



Thinking Schools Academy Trust  
***“Transforming Life Chances”***

Safeguarding and Child Protection  
 Policy

Holcombe Grammar School - Medway

<b>This Policy was Adopted on</b>	<b>September 2024</b>
<b>This Policy will be reviewed by</b>	<b>September 2025</b>
<b>Head Teacher/Principal</b>	<b>Mr Lee Preston</b>
<b>Designated Safeguarding Lead</b>	<b>Miss Sue Gould</b>
<b>Deputy Safeguarding Lead/s</b>	<b>Mr Andy Anderson Mrs Aimee Banks Mr Michael Fielding Mrs Stacey Sommerville Mr David Hayes Mrs Lorraine Bridges Miss Kerry Boxall Mr Chris Potter</b>
<b>Safeguarding Nominated Regional Governor</b>	<b>Joanne Allen James Sheppard</b>
<b>Trust Safeguarding Lead</b>	<b>Mrs Lee Lucas</b>
<b>Regional Safeguarding Lead</b>	<b>Mrs Ann Pullen</b>

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## Policy statement and principals

### Child protection statement

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse, neglect and exploitation, following our procedures to ensure that children receive effective support, protection and justice. The procedures contained in this policy apply to all staff, volunteers and governors and are consistent with those of the Local Authority Safeguarding Children Partnership ( LA SCP). [MSCP](#)

The Trust Board of Directors and the Regional Governing Bodies takes seriously its responsibility under section 175 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within our Academy to identify, assess, and support those children who are suffering harm.

We recognise that all adults, including temporary staff, volunteers and governors, have a full and active part to play in protecting our pupils from harm, and that the child's welfare is our paramount concern. Our approach is child-centered, considering at all times what is in the **best interests** of the child. We are committed to safeguarding the welfare of all pupils which is our highest priority and this includes developing and maintaining a 'culture of vigilance' to ensure that signs and symptoms of abuse, neglect and exploitation, are picked up, thus the opportunity for those wishing to cause harm to children is drastically reduced. Children's wishes and feelings will be taken into account when determining what action to take and what services to provide and this will be recorded within the child's safeguarding file. All staff believe that our Academy should provide a caring, positive, calm, safe and stimulating environment that promotes the social, physical and moral development of the individual child.

As part of the Thinking Schools Academy Trust, there is also a Head of Safeguarding, who has received DSL training and is able to provide support, advice and guidance as well as training, for all Academy staff, as well as a Regional Safeguarding Lead for the South East, South and South West.

The Academy will:

- Ensure this policy is available on the Academy website.
- Place an electronic copy of the policy in the staff area of the Academy computer system/VLE
- Make available paper copies on request
- Raise safeguarding awareness through the school newsletter, assemblies, TSAT fortnightly safeguarding bulletin for staff and weekly bulletin for DSL, staff meetings and other communications

- Contribute to multi agency working in line with statutory guidance Working Together to Safeguard Children - [WTTSC](#)
- Ensure support is offered to parents/carers where English is a second language to help them understand the content of the policy.
- Ensure the safety and wellbeing of children and young people is paramount when adults, young people or children are using the internet, social media or mobile devices whilst providing staff and volunteers with the overarching principles that guide our approach to online safety. Ensure that, as an organisation, we operate in line with our values and within the law in terms of how we use online devices.
- Make it clear that there is a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable, and it will not be tolerated. Dismissing or tolerating such behaviours risks normalising them.
- Ensure all personal data relating to the safeguarding of students, parents/carer and staff is processed and shared in line with the Trust Privacy Notice, Data Protection Policy & Information Security Policy. [TSAT Data Protection Policy](#)
- Ensure **All** staff are aware of systems within the Academy which support safeguarding, This will include the:
  - child protection policy (which includes with child-on-child abuse)
  - behaviour policy (which should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying)
  - staff behaviour policy/code of conduct which amongst other things, includes low-level concerns, allegations against staff and whistleblowing
  - safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods and
  - role of the designated safeguarding lead (including the identity of the DSL and any deputies).

The policy is provided to all staff (including temporary staff and volunteers) at induction alongside our Staff Code of Conduct. In addition, Proprietors, Governors, Senior Management Team, all staff and volunteers are provided with the statutory guidance '[Keeping Children Safe in Education](#)', DfE (2024) and are required to read Part one if they work directly with children and Annex B. For those staff who do not work directly with children (Central TSAT staff who are not based within the school setting) are required to read Annex A (a condensed version of Part One).

### **Policy principles**

- The welfare of the child is paramount
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm including online, ensuring their approach is child-centred.
- All staff are an important part of the wider safeguarding system for children [Working Together to Safeguard Children](#)
- Pupils and staff involved in child protection issues will receive appropriate support. The Academies responsibility to safeguard and promote the welfare of children is of paramount importance
- To provide an environment in which children and young people feel safe, secure, valued and respected, feel confident, and know how to approach adults if they are in difficulties, and that they will be effectively listened to.
- Policy will be reviewed at least annually unless an incident or new legislation or guidance suggests the need for an interim review.

### **Policy aims**

- To raise the awareness of all staff of the need to safeguard children, including online, and provide all staff with the necessary information to identify and report possible cases of abuse,

neglect and exploitation, allowing them to meet their child protection responsibilities.

- To ensure consistent good practice emphasising the need for good levels of communication between all members of staff as well as a structured procedure which all members of the Academy will follow in cases of suspected abuse.
- To demonstrate the Academies commitment with regard to child protection to pupils, parents and other partners.
- To provide an environment in which children and young people feel safe, secure, valued and respected, feel confident and able to approach adults if they need help knowing they will be listened too.
- The voice of the child is evident in case files and informs schools policy developments.

## Safeguarding legislation and guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education](#) (2024) and [Working Together to Safeguard Children](#) (2023) and should be read alongside this policy.

We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners. [MSCP](#)

- This policy is also based on the following legislation:  
*Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils*
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#) which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#) which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children
- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage

This policy should also be read alongside the following TSAT and school policies:

- [Mobile Device Policy](#)

- [Behaviour Policy](#)
- [Staff Code of Conduct](#)
- [Safer Recruitment](#)
- [Subject Access Request Policy](#)
- [Management of Safeguarding Allegations Policy](#)
- [Whistle Blowing Policy](#)
- [Complaints Policy](#)
- [ICT Acceptable Use Policy](#)
- [Attendance Policy](#)
- [Data Protection Policy](#)

## Definitions and Terminology

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing impairment of children’s mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- promoting the upbringing of children with their birth parents, or otherwise their family network 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 in line with the outcomes set out in the Children’s Social Care National Framework.

This definition is in line with [Working together to safeguard children 2023](#)

**Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

**Children** includes everyone under the age of 18.

**Staff** refers to all those working for or on behalf of the Academy#, full time or part time, temporary or permanent, in either a paid or voluntary capacity.

**(D)DSL** refers to the designated (deputy) safeguarding lead at the school.

**Parent** refers to birth parents and other adults who are in a parenting role, for example stepparents, foster carers and adoptive parents.

**KCSIE** refers to the DFE statutory document Keeping Children Safe in Education.

**LA SCP** refers to the Local Authority Safeguarding Children Partnership

## Equality statement

Schools and colleges have obligations under the Equality Act 2010 (the Equality Act). Schools **must** not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief,

gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions
- Are young carers (pg 22)
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation (pg 30)
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after ( page 20)
- Are missing from education (pg 33)
- Whose parent/carer has expressed an intention to remove them from school to be home educated (pg 33)

Legal duties under the Equality Act 2010 must be complied with, including putting special provision in place to support dialogue with children who may not be able to convey their wishes and feelings as they may want to. This might include, for example, those who have communication difficulties, unaccompanied children, refugees, those children who are victims of modern slavery and/or trafficking and those who do not speak English or for whom English is not their first language.

Guidance to help schools understand how the Equality Act affects them and how to fulfil their duties under the act can be found at [Equality Act 2010: advice for schools - GOV.UK \(www.gov.uk\)](http://www.gov.uk/government/guidance/equality-act-2010-advice-for-schools), it may also be useful for colleges. For further information Equality Act guidance [Equality Act guidance | Equality and Human Rights Commission \(equalityhumanrights.com\)](http://www.equalityhumanrights.com/equality-act-guidance)

## **Human Rights Act 83.**

The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them.

Under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. The specific convention rights applying to schools and colleges are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination, and
- Protocol 1, Article 2: protects the right to education.



Being subjected to harassment, violence and or abuse, neglect and exploitation, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. Further information (including on absolute and qualified rights) can be found at [equality human rights](#)

## Roles and responsibilities

### The Board of Directors and Regional Governing Bodies

Governing bodies and proprietors have a strategic leadership responsibility for the Academy's safeguarding arrangements and must ensure that they comply with their duties under legislation. They ensure a whole school approach to safeguarding with all systems, processes and policies operating with the best interests of the child at their heart is in place and can be evidenced. The wishes and feelings of the child when there is a safeguarding concern, should be taken into account when determining what action to take and what services to provide. Systems are in place to allow children to express their views and give feedback.

All members of the Board of Directors and the Regional Governing Bodies understand and fulfil their responsibilities, namely to ensure that:

- The Governance Body ensures the school is compliant with section 175 of the Education Act 2002. The Governance body returns their 175/157 report to **Medway Council**. Any areas of concern in safeguarding are identified and action plan/risk assessment is developed annually.
- All governors and trustees receive appropriate safeguarding and child protection (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) training at induction which will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. This training will be regularly updated.
- There is a Child Protection policy (within the Safeguarding Policy) together with a staff behaviour (code of conduct) policy.
- The behaviour policy is in place and includes measures to prevent bullying including cyber bullying.
- All staff are given the relevant sections of the guidance to read "Keeping Children Safe in Education September 2024".
- The Academy operates safer recruitment procedures by ensuring that there is at least one person on every recruitment panel that has completed Safer Recruitment training as well as identified members of TSAT Governors who have undertaken training in Safer Recruitment.
- The Academy has procedures for dealing with allegations of abuse against staff and volunteers and will make a referral to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have had they not resigned.
- Where the services of a teacher because of serious misconduct have resulted in dismissal or even if they leave first (including agency staff) consideration will be given on whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).
- DSL and deputy DSL undergo refresher training at least every 2 years as well as multiagency training and any other relevant training required. All other staff have Safeguarding training updated on a regular basis including Online Safety training and includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring

- All staff and volunteers are provided with child protection awareness information and Online Safety at induction including the name of the DSL so that they know who to go to if they have a concern.'
- 'Mechanisms' are in place to assist staff to 'understand and discharge their role and responsibilities' as set out in Part one of KCSIE
- All members of staff, volunteers, and Governors know how to respond to a pupil who discloses abuse, neglect and exploitation, through delivery of whole school training.
- All parents/carers are made aware of the responsibilities of staff members with regard to child protection procedures through publication of the Trust Child Protection and Safeguarding Policy, available on the Academy website.
- Where reasonably possible, the Academy will hold more than one emergency contact number for each pupil.
- The DSL works together with the Attendance Improvement Coordinator to ensure appropriate responses and working with relevant outside agencies are in place for children who go missing from education particularly on repeat occasions.
- Academy lettings policy will seek to ensure the suitability of adults working with children on Academy sites at any time.
- Community users organising activities for children are aware of the Academy Child protection guidelines and procedures.
- It considers how children may be taught about safeguarding. This may be part of a broad and balanced curriculum covering relevant issues through personal social health and economic education (PSHE) and/or for maintained schools through sex and relationship education (RSE) including online safety.
- All that can reasonably be done to limit children's exposure to the above risks from the school's or college's IT system. As part of this process, governing bodies and proprietors should ensure their school or college has appropriate filters and monitoring systems in place and regularly review their effectiveness and understanding of the filtering and monitoring systems and processes in place
- Safeguarding training, including online safety training, is refreshed regularly, integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning
- That enhanced DBS checks are in place for Chairs of Regional Governing Bodies. The Chair of the Directors is counter signed by the Secretary of State.
- The name of the DSL and deputy DSL's for Safeguarding and Child Protection will be clearly advertised in the Academy, with a statement explaining the Academies role and monitoring cases of suspected abuse, neglect and exploitation.
- The Designated Looked After Child Teacher is a qualified teacher and undertakes appropriate training to ensure the education and welfare of Looked After Children and previously Looked After Children is prioritised.
- The Academy will comply with the requirements of the Counter Terrorism and Security Act to have due regard for the need to prevent people being drawn into terrorism and will act in accordance with its "Prevent" duty. This will include promoting British Values and building resilience to radicalisation, all staff completing Prevent training in order they can identify the signs of children being radicalised, working together with social care and Police Prevent Engagement Officer and referring as appropriate, the young person to the Channel Panel under the Prevent strategy. [The Prevent Duty](#)
- Governing bodies and proprietors are aware of their obligations under the Human Rights Act 1998 21, the Equality Act 2010 22, (including the Public Sector Equality Duty 23), and their local multi-agency safeguarding arrangements

The Governance Body/Head Teacher is accountable for ensuring the effectiveness of this policy and school compliance. The Governance/Director has a named champion within Safeguarding; this is To be confirmed (Governance Safeguarding Lead)

## The Designated Safeguarding Lead (DSL) For Children and Families

- Has the status and authority within the Academy to carry out the duties of the post, including committing resources and supporting and directing other staff.
- Is part of the Senior Leadership team and is directly line managed by the Head Teacher/Principal.
- Is the Online Safety Lead and lead for monitoring and filtering.
- Is appropriately trained, with regular updates and compliant with statutory refreshers.
- Acts as a source of support and expertise to the school community.
- Has a working knowledge of **MSCP** procedures.
- Keeps detailed electronic records of all concerns using **Safeguard**, ensuring that the voice of the child is clearly heard, acted on and recorded within the safeguarding file. Access to such records is strictly controlled. The recording and storing of information is kept in line with [the-data-protection-act](#) [TSAT Data Protection Policy](#)
- Refers cases of suspected abuse, neglect and exploitation, to children's social care or police as appropriate
- DSLs (and their deputies) will need to familiarise themselves with their local threshold document which includes the process for the local early help assessment and the type and level of early help services to be provided, in this document.
- Ensures that when a pupil leaves the school, their child protection file is passed to the new school (separately from the main pupil file and ensuring secure transit) and confirmation of receipt is obtained through use of the Trust Safeguarding File Transfer Form/Safeguard Software system. In addition, the DSL may consider it appropriate to share information with the new school in advance of the pupil leaving in order to help safeguard and promote the pupil's welfare.
- Coordinates, attends and/or contributes to child protection conferences and plans.
- Develops effective links with relevant statutory and voluntary agencies including the **MSCP**
- Liaises with the TSAT Head of Safeguarding to ensure that the child protection policy and procedures are reviewed and updated annually.
- Makes the child protection policy available publicly, on the school's website or by other means.
- Works closely with the designated Looked After Child teacher ensuring they have the contact details of the child's social worker and virtual head teacher.
- Through liaison with the Attendance Improvement Coordinator, will ensure that the Social Worker, of any pupil with a child protection plan who is absent without explanation, is informed the same day.
- Share details with the Attendance Improvement Coordinator of pupil's youth offending team so that their worker is informed of any unexplained absences
- Promotes educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and is therefore best placed to identify the impact that these issues might be having on children's attendance, engagement and achievement at school.
- Ensures completion of termly report for the Regional Governing Body and the annual Local Safeguarding Children's Partnership Sec 175/157 audit if required.
- Develop a culture of listening to children and taking account of their wishes and feelings.
- Designated Safeguarding Lead will share risks and resilience of pupil/student proportionately with staff members/volunteers on a "need to know and in the child's best interest" and this is recorded and monitored to ensure risks/progress of pupil/student is understood. The Designated Safeguarding Lead will clearly state reasons for sharing this information and that this is carried out in strict confidentiality, we follow [safeguarding-practitioners-information-sharing-advice](#)
- Liaise with the safeguarding partners and work with other agencies in line with [working-](#)

[together-to-safeguard-children](#).

- [npcc.When to call Police](#) will help DSL's understand when they should consider calling the Police and what to expect when they do.
- Work alongside the Head Teacher in respect of low-level concerns and allegations against staff and record all incidents to allow for any patterns of behaviour to be recognised.

**Annex C in KCSIE 2024** provides a comprehensive guide to the role of the DSL

## **The deputy designated safeguarding lead(s)**

Is/are trained to the same level as the DSL and, in the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of pupils. In the event of the long-term absence of the DSL, the deputy will assume all of the functions above. Deputy DSL's may support with some aspects of safeguarding as directed by the DSL.

## **The role of staff**

All staff have a responsibility to provide a safe environment in which children can learn. The Teachers Standards sets out expectations that all teachers manage behaviour effectively to ensure a good and safe educational environment, and requires teachers to have a clear understanding of the needs of all pupils, including those with mental health needs. Any staff member who has a concern about a child's welfare should report this using the referral process on the Safeguard Software system. Staff should be prepared to identify children who may benefit from Early Help. School staff are particularly important as they are in a position to identify concerns early, promoting children's welfare and preventing concerns from escalating. The Teachers Standards 2012 states that they should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties

All staff will reassure children and young people that they are being taken seriously and that they will be supported and kept safe. No child or young person should ever be given the impression that they are creating a problem by reporting abuse, neglect, exploitation, sexual violence or sexual harassment. Nor should they ever be made to feel ashamed for making a report.

## **Staff training**

It is important that all staff receive training to enable them to recognise the possible signs of abuse, neglect and exploitation and to know what to do if they have a concern. All members of staff are trained in and receive regular updates on safeguarding children and young people including e-safety, online abuse, Child Sexual Exploitation, FGM, Domestic Abuse to name but a few, as well as how and who to report concerns.

New staff and governors will receive a briefing during their induction, which includes the Academies child protection policy and staff behaviour policy, reporting and recording arrangements, and details for the DSL. All staff, including the DSL, Headteacher (unless the Headteacher is the DSL) and governors will receive training that is regularly updated. All staff will also receive a wide range of comprehensive safeguarding and child protection updates, including Online safety, via email, weekly bulletins, website access and staff meetings throughout the year.

Staff understand the difference between a 'concern' and 'immediate danger or at risk of harm' ensuring appropriate action is taken through whole school safeguard training and fortnightly safeguarding bulletins. All members of staff, volunteers and governors know how to respond to a pupil who discloses abuse through delivery of whole school safeguard training.

## Supporting Children

Safeguarding is not just about protecting children from deliberate harm. It also includes such things as student safety, bullying, racist abuse and harassment, educational visits, intimate care, Children Missing Education and internet safety etc. The witnessing of abuse, neglect and exploitation, can have a damaging effect on those who are party to it, as well as the child subjected to the actual abuse, neglect and exploitation and in itself will have a significant impact on the health and emotional well-being of the child. All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experience as harmful. They may feel embarrassed, humiliated or may be being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from being professionally curious and sharing with the DSL. Staff should think about how best to build trusted relationships with children and young people which facilitate communication

Abuse, neglect and exploitation can take place in any family, institution or community setting, by telephone or on the internet. Abuse can often be difficult to recognise as children may behave differently or seem unhappy for many reasons, as they move through the stages of childhood or their family circumstances change. However, it is important to know the indicators of abuse, neglect and exploitation and to be alert to the need to consult further.

We recognise that all adults at this Academy have a full and active part to play in protecting and safeguarding the children in our care, and that the pupil's welfare is our paramount concern.

We aim to provide an environment in which pupils feel safe, secure, valued and respected; and where they feel confident and know how to approach responsible adults if they are in difficulties.

The Department for Education has produced advice [What to do if you're worried a child is being abused: advice for practitioners](#) This contains advice to help practitioners identify child abuse and neglect and take appropriate action in response.

### **Good practice includes:**

- treating all pupils with respect
- setting a good example by conducting ourselves appropriately
- involving pupils in decisions that affect them
- encouraging positive, respectful, calm and safe behaviour among pupils
- being a good listener
- being alert to changes in pupils' behaviour and to signs of abuse, neglect and exploitation
- recognising that challenging behaviour may be an indicator of abuse, neglect and exploitation
- reading and understanding the school's child protection policy, staff behaviour policy and guidance documents on wider safeguarding issues
- being aware that the personal and family circumstances and lifestyles of some pupils lead to an increased risk of abuse, neglect and exploitation
- referring all concerns about a pupil's safety and welfare to the DSL, or, if necessary, directly to police or children's social care

## Police and Criminal Evidence Act (1984) – Code C

The Designated Safeguarding Lead (and deputy) are aware of the requirement for children to have an appropriate adult when in contact with Police officers who suspect them of an offence.

PACE states that anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child for the purposes of this Code and any other Code.

PACE also states that If at any time an officer has any reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an appropriate adult at any point.

The Designated Safeguarding (or deputy) will communicate any vulnerabilities known by the school to any police officer who wishes to speak to a pupil about an offence they may suspect. This communication will be recorded [**state the name of your recording system**].

If having been informed of the vulnerabilities, the designated safeguarding lead (or deputy) does not feel that the officer is acting in accordance with PACE, they should ask to speak with a supervisor or contact 101 to escalate their concerns.

A Police Officer must not caution a juvenile or a vulnerable person unless the appropriate adult is present. If a child or a vulnerable person is cautioned in the absence of the appropriate adult, the caution must be repeated in the appropriate adult's presence.

#### **The appropriate adult' means, in the case of a child:**

1. the parent, guardian or, if the juvenile is in the care of a local authority or voluntary organisation, a person representing that authority or organisation.
2. a social worker of a local authority
3. failing these, some other responsible adult aged 18 or over who is not:
  - a) a police officer;
  - b) employed by the police;
  - c) under the direction or control of the chief officer of a police force; or
  - d) a person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions,

Further information can be found in the Statutory guidance - [PACE Code C 2019](#).

## **Child protection procedures**

### **Recognising abuse, neglect and exploitation**

To ensure that our pupils are protected from harm, we need to understand what types of behaviour constitute abuse and neglect. Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone. Abuse may be committed by adult men or women and by other children and young people. Keeping Children Safe in Education refers to four categories of abuse. (These are set out on page 23)

### **Indicators of abuse, neglect and exploitation**

Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons, it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated safeguarding lead.

**It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.**

A child who is being abused, neglected or exploited may:

- have bruises, bleeding, burns, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless with regard to their own or other's safety
- self-harm
- frequently miss school, arrive late or leave the school for part of the day
- show signs of not wanting to go home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority
- become disinterested in their school work
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age
- acquire gifts such as money or a mobile phone from new 'friends'.

Individual indicators will rarely in isolation, provide conclusive evidence of abuse, neglect and exploitation. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed.

## **Prevention**

We recognise that the Academy plays a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection. School staff are particularly important as they are in a position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating.

The Academy community will therefore:

- Work to establish and maintain an ethos where children feel secure and are encouraged to talk and are always listened to.
- Include regular consultation with children e.g., through safety questionnaires, participation in anti-bullying week, asking children to report whether they have had happy/sad lunchtime.
- Ensure that all children know there is an adult in the school whom they can approach if they are worried or in difficulty.
- Include safeguarding across the curriculum, including PSHE/RSHE opportunities, which equip children with the skills they need to, stay safe from harm and to know to whom they should turn for help. In particular, this will include anti-bullying work, e-safety, road safety, pedestrian and cycle training. Also focussed work in Year 6 to prepare for transition to secondary school and more personal safety/independent travel.
- Ensure all staff are aware of Academy guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks

## Taking action

**Any child, in any family in any school could become a victim of abuse. Staff should always maintain an attitude of “it could happen here”.** Key points for staff to remember for taking action are:

- in an emergency take the action necessary to help the child, if necessary, call 999
- report your concern as soon as possible to the DSL. The timing of such referrals should reflect the level of perceived risk of harm, not longer than **within one working day** of identification or disclosure of harm or risk of harm.
- do not start your own investigation
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family
- complete a record of concern on Safeguard
- seek support for yourself if you are distressed.

## If you are concerned about a pupil’s welfare

There will be occasions when staff may suspect that a pupil may be at risk. The pupil’s behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical signs may have been noticed. In these circumstances, staff will try to give the pupil the opportunity to talk and ask if they are OK or if they can help in any way.

## If a pupil discloses to you

It takes a lot of courage for a child to disclose that they are being abused, neglected or exploited. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive. If a pupil talks to a member of staff about any risks to their safety or wellbeing, the staff member will, at the appropriate time, let the pupil know that in order to help them they must pass the information on to the DSL.

Staff will:

- allow them to speak freely
- remain calm and do not overreact
- give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’
- not be afraid of silences
- **not promise to keep secrets** –find an appropriate early opportunity to explain that it is likely that the information will need to be shared with others. *NB: If the child is Fraser competent (i.e.)* Professionals working with children need to consider how to balance children’s rights, wishes and sharing information with their responsibility to keep children safe from harm. Underage sexual activity should always be seen as a possible indicator of child sexual exploitation. Sexual activity with a child under 13 is a criminal offence and should always result in a child protection referral.
- **Only ask questions for clarification purposes** –at all times avoid asking questions that suggest a particular answer (leading questions): Use **Who What When Where and How or Tell Explain Describe (TED)**
- not automatically offer any physical touch as comfort
- avoid admonishing the child for not disclosing earlier. Saying things such as ‘I do wish you had told me about this when it started’. This may be interpreted by the child to mean that they have done something wrong
- tell the pupil what will happen next
- report verbally to the DSL even if the child has promised to do it by themselves
- complete the **record of concern form** via Safeguard and send to the DSL without delay (within the working day or earlier dependant on the level of harm and risk)
- seek support if they/yourself feel distressed.



## Working together with parents

The school is committed to working in partnership with parents/carers to safeguard and promote the welfare of child/ren and to support them to understand our statutory responsibilities in this area. We are committed to working with parents positively, openly and honestly. We ensure that all parents are treated with respect, dignity and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission or it is necessary to do so in order to safeguard a child from harm.

We will seek to share with parents any concerns we may have about their child unless to do so may place a child at increased risk of harm. A lack of parental engagement or agreement regarding the concerns the school has about a child will not prevent the Designated Safeguarding Lead making a referral to Children's Social Care and Multi – Agency Risk Assessment Conference (MARAC) and any other Local Authority referral routes in those circumstances where it is appropriate to do so.

Our focus is the safety and wellbeing of the pupil. Therefore, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are contacted.

In order to keep children safe and provide appropriate care for them, the school requires parents to provide accurate and up to date information regarding:

- Full names and contact details of all adults with whom the child normally lives;
- To hold two emergency contact numbers;
- Full names and contact details of all persons with parental responsibility (if different from above);
- Emergency contact details (if different from above);
- Full details of any other adult authorised by the parent to collect the child from school (if different from the above);
- Any legal or criminal changes which effects parental responsibility e.g. Bail condition, contact orders, non-molestation orders, court orders etc

Holcombe Grammar School will offer guidance and support to parents via newsletters, on request via phone, email or in person reinforcing the importance of children being safe online

## Early Help

Early help is a system of support which aims to support children and families as soon as problems emerge. Some early help support is described as 'targeted early help' and is provided to children and families who are identified by practitioners to have multiple or complex needs requiring a specialist and/or multi-agency response but where statutory intervention is not needed. Without intervention, a family may break down or a child may be put a risk of neglect, emotional, physical or sexual harm. This also includes the risk of extremism. The Academies have no pre-prescribed criteria for supporting children and families. Each case is assessed according to needs and a bespoke programme put in place for that child and/or family.

Early help plans should have focused outcomes for children and families, and should be actively planned with them. We see how early help can transform a child in school, not just what they are able to achieve academically, but how their personal, social and emotional development can thrive with the right support. We are committed to early help because it is the right thing to do for our children to give them the best start in life.

## Record Keeping

All concern's, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. Each child will have a separate child protection file when there are concerns for that child.

Records will include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached and the outcome

***Following completion of a record of concern, staff will be provided with feedback of action taken by the DSL. Staff have a duty to challenge this action with the DSL if they disagree and retain a duty to refer to social care themselves if they believe this to be the correct course of action.***

## Confidentiality and sharing information

Information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation and in promoting children's welfare, including their educational outcomes. Schools have clear powers to share, hold and use information for these purposes. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the pupil and staff involved but also to ensure that information being released into the public domain does not compromise evidence. Staff are expected to treat information they receive about children and young people in a discreet and confidential manner. Confidential information should never be used casually in conversation or shared with any person other than a need-to-know basis. The use of PMR (walkie talkies) radios will not be used as a method of communication when discussing personal or sensitive safeguarding information.

Following a number of cases where senior leaders in a school had failed to act upon concerns raised by staff, ***Keeping Children Safe in Education*** emphasises that **any** member of staff can contact children's social care if they are concerned about a child. (Contact details can be found on pg 18)

Child protection information will be stored and handled in line with the Data Protection Act 2018. Information sharing is guided by the following principles. The information is:

- necessary and proportionate
- relevant
- adequate
- accurate
- timely
- secure

Information sharing decisions will be recorded, whether or not the decision is taken to share.

Child protection information will be stored separately from the pupil's school file and the school file will be 'tagged' to indicate that separate information is held.

The DSL will normally obtain consent from the pupil and/or parents to share sensitive information with outside agencies. However, where there is good reason to do so, the DSL may share information *without* consent, and will record the reason for not obtaining consent.

Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the Head teacher

The Data Protection Act does not prevent school staff from sharing information with relevant

agencies, where that information may help to protect a child. The Trust Subject Access policy is available to parents and pupils via the website or on request. [Data Protection toolkit for schools](#)  
TSAT [Data Protection Policy](#)

## Referral to children's social care

The DSL will make a referral to children's social care if it is believed that a pupil is suffering or is at risk of suffering significant harm. The pupil (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child. Any member of staff may make a direct referral to children's social care if they genuinely believe independent action is necessary to protect a child. The below hyper link directs you to your local children's social care contact number; [Report-child-abuse-to-local-council](#)

## Reporting directly to child protection agencies

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care, police or the NSPCC if:

- the situation is an emergency and the designated safeguarding lead, their deputy, the Head teacher and the chair of governors are all unavailable
- they are convinced that a direct report is the only way to ensure the pupil's safety
- for any other reason they make a judgement that direct referral is in the best interests of the child.

## Supporting Staff

All Academy staff should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.

Through the existing Academy system of performance management, mentoring and staff consultation arrangements, we will ensure that staff have routine opportunities to reflect on the well-being of their students and to consider if there are any safeguarding concerns or suspicions. We recognise that staff working in the Academy, who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.

We will support such staff by providing regular sessions to talk through their anxieties with the DSL and to seek further support as appropriate, through the Head of Safeguarding for the Trust/Regional Safeguarding Lead. Decisions made in these meetings will be recorded.

## Children who may be particularly vulnerable

Some children may have an increased risk of abuse, neglect and exploitation. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur. To ensure that all of our pupils receive equal protection, we will give special consideration to children who are:

- disabled or has certain health conditions and has specific additional needs
- has special educational needs whether they have an Education Health and Care Plan or not
- have a mental health need
- young carers
- affected by parental substance misuse, domestic violence or parental mental health needs
- asylum seekers

- living away from home possibly in private fostering
- persistently absent from education
- showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- vulnerable to being bullied, or engaging in bullying
- living in temporary accommodation
- affected by parental offending or has a family member in prison
- live transient lifestyles or living in chaotic and unsupportive home situations
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- at risk of modern slavery, trafficking sexual or criminal exploitation
- do not have English as a first language
- at risk of honour-based abuse such as female genital mutilation (FGM) or forced marriage
- at risk of being drawn into extremism/radicalised or exploited
- frequently missing/goes missing from care/home

This list provides examples of additionally vulnerable groups and is not exhaustive. Special consideration includes the provision of safeguarding information and resources in community languages and accessible formats for children with communication needs.

We recognise that a child who is abused or witnesses' violence may feel helpless and humiliated, may blame itself and find it difficult to develop and maintain a sense of self-worth.

We recognise that the Academy may provide the only stability in the lives of children who have been abused or who are at risk of harm.

## **Children who associate as LGBTQ+**

The fact that a child or a young person may be LGBTQ+ is not in itself an inherent risk factor for harm. However, children who are LGBTQ+ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Risks can be compounded where children who are LGBTQ+ lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.

LGBTQ+ inclusion is part of the statutory Relationships Education, [Relationships and sex education \(RSE\) and health education](#) and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse.

## **Mental Health and Self Harm**

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. If staff have mental health concerns about a child, they must inform the DSL without delay.

Self-harm is defined by the National Institute of Clinical Excellence Guidelines (2004) as an "expression of personal distress, usually made in private, by an individual who hurts him or herself". Essentially, self-harm is any behaviour where the intent is to cause harm to oneself.

Where appropriate, the pupil should be encouraged to call their parents to talk about what has happened. The DSL should also talk to the parent/carer. In the event that a pupil is reluctant to contact their parents, staff must take responsibility and alert parents that their child may be at risk of harming themselves in the future.

It is recommended that the Academy provide parents with both community and web-based resources for understanding and effectively addressing self-injury. Advice on seeking support through the GP should also be provided. Referrals for counselling and Mental Health support may be offered. When people talk about “self-harm,” they are usually referring to behaviors like cutting, but cutting is not the only way people self-harm. Ways of self-harming can include:

- cutting yourself
- poisoning yourself
- over-eating or under-eating
- biting yourself
- picking or scratching at your skin
- burning your skin
- inserting objects into your body
- hitting yourself or walls
- overdosing
- exercising excessively
- pulling your hair
- getting into fights where you know you will get hurt.

All cases of self-harm will be treated with sensitivity, with acknowledgement of the pupil’s feelings and the circumstances surrounding that of the individual and their intentions.

[mental health & behaviour in schools guidance](#)

## **Looked After Children and previously Looked After Children**

Many looked after children have suffered disrupted learning and may have missed extended periods of school. The gaps in their learning – and in many cases the emotional impact of their experiences – are likely to have become significant barriers to their progress.

A previously looked-after child is one who is no longer looked after because s/he is the subject of an adoption, special guardianship or child arrangement order which includes arrangements relating to with whom the child is to live, or when the child is to live with any person, or has been adopted from ‘state care’ outside England and Wales.

**Section 20** of the **2008 Act** places the following duties on governing bodies:

- to designate a member of staff (the designated teacher) as having the responsibility to promote the educational achievement of looked-after children, including those aged between 16 and 18 who are registered pupils at the school;
- to ensure that the designated teacher undertakes appropriate training (section 20(2); and
- the governing body and the designated teacher must have regard to this guidance and any other relevant guidance issued by the Secretary of State. Section 20(3) of the 2008 Act gives the Secretary of State powers to make regulations setting out the qualifications and experience which the designated teacher should have.

**The role of the designated teacher within the school:** The designated teacher should have lead responsibility for helping school staff understand the things, which affect how, looked after children learn and achieve. It is a legal requirement that they are a fully qualified teacher.

The designated teacher should:

- be a qualified teacher
- promote a culture of high expectations and aspirations for how looked after children learn;
- make sure the young person has a voice in setting learning targets;
- be a source of advice for staff about differentiated teaching strategies appropriate for individual children and in making full use of Assessment for Learning;

- make sure that Looked After Children are prioritised in one-to-one tuition arrangements and that carers understand the importance of supporting learning at home;
- have lead responsibility for the development and implementation of the child's Personal Education Plan (PEP) within the school and rigorously tracking their attainment progress.
- review whether the school's policies are sensitive to their needs, e.g., in accessing out of school hours learning, respecting the children's wishes and feelings about their care status or generally meeting their needs as identified in their personal education plans (PEPs)
- ensure whether any looked-after and previously looked-after children are identified as gifted and talented and how those needs are being met;
- be aware of whether any looked-after or previously looked-after children face additional safeguarding challenges of which the school's designated safeguarding lead should be aware;
- review whether any looked-after and previously looked-after children have special educational needs (SEN) and whether those needs are being identified and met at the appropriate level;
- review whether any looked-after and previously looked-after children have mental health needs and whether those needs are being identified and met;
- whether the school's behaviour management policy is sufficiently flexible to respond to looked-after and previously looked-after children's challenging behaviour in the most effective way for those children
- work with Virtual School Heads to promote the education of looked-after and previously looked-after children, discussing how funding can be best used to support the progress of looked after children in the school and meet the needs identified in the child's personal education plan.
- ensure that particular account is taken of the child's needs when joining the school and of the importance of promoting an ethos of high expectations about what s/he can achieve;
- arrange transitions to the next phase of a child's education so they are supported effectively to avoid children losing ground – e.g., moving schools from primary to secondary school or because of a change in placement or exclusion;
- remind parents and guardians of previously looked-after children when enrolling at the school, that they need to inform the school if their child is eligible to attract PP+

Where they are used effectively, PEPs improve the educational experience of the child by helping everyone gain that clear and shared understanding about the teaching and learning provision necessary to meet the child's education needs and how that will be provided. For this reason, **the school and local authority (through strong links between the designated teacher and the local authority virtual school head) have a shared responsibility for making the PEP a living and useful document.** Local Authorities are appointing a virtual school head who is a senior local authority manager with lead responsibility in the authority for improving the educational achievement of looked after children by tracking and monitoring their progress as if they were in a single school.

As part of the arrangements for monitoring the effectiveness of the role, governing bodies should as a minimum, receive an annual report from the designated teacher. The report should enable the governing body to make overall judgements about the designated teacher role in the context of wider school planning.

[looked-afterandpreviouslylooked-afterchildren](#) [Promoting education](#)

## Care Leavers

The Local Authority have on-going responsibilities to young people who cease to be looked after and become care leavers aged 16 or 17. A Personal Advisor should be appointed to develop a pathway plan with the young person describing how the care leaver will be supported to participate in

education. The DSL therefore must ensure they have the details of the LA Personal Advisor and liaise with them as necessary.

## **Pupils with SEND**

Children with disabilities and SEN have an increased vulnerability to abusive situations and can face additional safeguarding challenges. These challenges can include assumptions that indicators of possible abuse, neglect and exploitation such as behaviour, mood or injury relate to the child's disability or medical condition and therefore there is no further exploration; because they may need intimate care and may have cognitive impairments that prevent an understanding of appropriate adult behaviour. A lack of effective communication skills to share concerns and a reliance on adults can also be important factors. Safeguarding children and young people with SEND requires understanding, foresight and reflection. Keeping children safe from harm in school relies on all staff being able to recognise the raised risk factors, identify young people with the greatest levels of risk and create focused action plans that sufficiently respond to their needs. Keeping open dialogue between staff and raising the importance of safeguarding across the Academies is essential.

There are identifiable groups of children who are at greater risk of harm. Understanding the risk factors behind child abuse enables us to target those children and families at greatest risk and ensure that monitoring processes are particularly robust for those pupils. An effective partnership between the SENCO, designated safeguarding officers and pastoral staff, should identify children and siblings with the highest risks on intake to the school and over subsequent terms. By linking the information on the school's SEND register; those with poor attendance, children who are looked-after or previously looked after, children with multiple exclusions and those who score highly on other risk factors, resources can be effectively focused.

The term "disabled" covers a wide range of impairments that have a different impact on the child, their needs and their experience of disabling barriers. Any one child's experience of their impairment will be unique to them. However, some issues will be common to the experience of children across a number of impairment groups including children with moderate, severe and profound and multiple learning disabilities; children with specific learning difficulties; children with physical or visual impairments; deaf children; children with an autistic spectrum condition; children with physical or mental health needs; children with speech, language and communication needs; and children with behavioural, emotional and social development needs.

[Code of practice 0-25](#) [Supporting pupils at school with medical conditions](#) See also TSAT supporting pupils at school with medical conditions policy [TSAT Medical Policy](#)

The Special Educational Needs and Disabilities Information and Support Services (SENDIASS). SENDIASS offer information, advice and support for parents and carers of children and young people with SEND. All local authorities have such a service: [Find your local IAS service mencap](#) - Represents people with learning disabilities, with specific advice and information for people who work with children and young people

## **Four categories of abuse**

In most cases multiple issues will overlap with one another for further guidance:

[Medway Safeguarding Children Partnership \(medwayscp.org.uk\)](http://medwayscp.org.uk)

### **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 (this used to be called Munchausen's Syndrome by Proxy, but is now more usually referred to as fabricated or induced illness).

### **Emotional abuse**

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children 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.

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

### **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 as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

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

### **Domestic Abuse**

The Government defines domestic abuse as "Any incident of threatening behaviour, violence or abuse (psychological, physical, sexual, financial or emotional) between adults who are or have been intimate partners or family members regardless of gender or sexuality aged 16 or over". The abuse can encompass but is not limited to; physical, sexual, financial and emotional.

Children may suffer both directly and indirectly if they live in households where there is domestic violence. Domestic abuse is likely to have a damaging effect on the health, development and welfare of children. Domestic Abuse can also occur within their own intimate relationships. The Domestic Abuse Act 2021 introduces the first ever statutory definition and recognises the impact of DA on children, as victims in their own right, if they see, hear or experience the effects of abuse.



To help protect and safeguard children within schools, the Police in Medway and Kent, will be sharing brief summaries of Police reports with the Academy following a domestic abuse incident. We hope this information will ensure we are best placed to help and support our children and families.

**Operation Encompass** aims to ensure that schools have timely information about all Police attended incidents of domestic abuse. This notification allows schools to offer support and if appropriate intervention to safeguard the wellbeing of children affected by DA. [Operation Encompass](#)

If you need help and support to deal with domestic abuse there is a very good website giving information on all local resources at: [nhs.livewell/abuse](https://nhs.uk/livewell/abuse) [Domestic abuse](#)

## Contextual Safeguarding

All staff, but especially the designated safeguarding lead (or deputy) should be considering the context within which any incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Contextual Safeguarding helps focus on the fact that young people experience harm beyond their families and recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships

## Managing Allegations against other pupils (child on child abuse)

At Holcombe Grammar School we recognise that even if there are no reported cases of child on child abuse, such abuse may still be taking place and is simply not being reported. We also recognise that girls are more likely to be harmed and boys that cause harm, but all child-on-child abuse is unacceptable and will be taken seriously. To enable our children to report abuse confidently, we have the following systems in place

- Report It! – This is located on the school website and allows discrete reporting of any incidents or concerns.
- Student Services Department has a dedicated email address for students to contact, if they are not able or confident to approach in person: [studentservices@holcombegrammar.org.uk](mailto:studentservices@holcombegrammar.org.uk)
- The Senior Leadership Team, Heads of Year and Form Tutors are very accessible to students and parents with 'Who's Who' posters displayed widely across the school so students can identify who they can speak with.
- Signs of abuse are discussed with students through the personal development curriculum to aid them in noticing abuse of themselves or others and understand systems of support and reporting available to them.

Depending on the nature of the reported abuse, there will be a range of support available including but not limited to

- Place to Talk
- Elsa Programme
- One to one mentoring
- Restorative Justice sessions
- Parental involvement
- Signposting or referral to outside agencies

All staff must be aware that children can abuse other children. This is most likely to include, but may not be limited to:

- Bullying (including cyber bullying)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm
- Sexual violence such as rape, assault by penetration and sexual assault

- Sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which maybe stand alone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves or to engage in sexual activity with a third party
- Up skirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or harm
- Sharing of nude or semi-nude images (also known as youth produced sexual imagery)
- Initiation/hazing type violence and rituals such as abuse or humiliation used as a way of initiating a person into a group. This may include an online element.
- Abuse in intimate personal relationships
- Intra Familial harm (DSL will need to consider any necessary support for siblings following incidents)

To be considered part of this process, at least one of the following will probably be involved:

- The allegation is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil
- is of a serious nature, possibly including a criminal offence
- raises risk factors for other pupils in the school
- indicates that other pupils may have been affected by this student
- indicates that young people outside the school may be affected by this student

In areas where gangs are prevalent, older students may attempt to recruit younger pupils using any or all of the above methods. Young people suffering from sexual exploitation themselves may be forced to recruit other young people under threat of violence. [Gang and youth violence](#)

Child on Child abuse can happen both inside and outside of school and online and will be taken seriously. All staff understand the importance of challenging inappropriate behaviours that are actually abusive in nature. Staff will not downplay certain behaviours, for example, dismissing sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys will be boys”; this can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Same-sex relationships Lesbian, Gay, Bisexual and Trans (LGBT) young people experience relationship abuse at similar rates as heterosexual young people and, for some, it can be an increased risk factor. LGBT young people can face additional barriers to identifying abuse and seeking help. They may be concerned about revealing their sexual orientation; fearful of homophobic reactions from family, friends and professionals and unaware of specialist support services.

Lessons and assemblies can be used as a way to help children understand, in an age-appropriate way, what abuse is and encourage them to tell a trusted adult if someone is behaving in a way that makes them feel uncomfortable. Outside organisations will come in to the Academy to deliver assemblies. The Academy will create a whole school ethos that makes it clear to children that if they have a problem, however big or small they can talk to a member of staff. Ways to do this can include:

- displaying posters signposting children to services that might be able to help them if they are worried, such as ChildLine.
- using 'Worry boxes' - which are either placed inside the classroom or around the building. If a child is feeling unsure about approaching an adult this can be a good way for them to share their worries.
- class activities may be a time where concerns are shared.

Staff will be provided with regularly updated and appropriate safeguarding training that enables them to understand how to identify child-on-child abuse early to prevent it from escalating. This will be through Whole school safeguard training, fortnightly staff bulletins, staff briefings, item on staff meeting agendas for example.

### **Responding:**

When an allegation is made by a pupil, against another student, members of staff should consider whether the complaint raises a safeguarding concern. Every child who has experienced abuse should receive tailored support to meet their needs.

- Listen carefully to the child and reassure them that you are taking them seriously.
- Record the incident, noting all the relevant facts as fully as possible. Write down the language used by the child. This will help you record precisely what happened and understand how the child has been affected.
- Consider what support the child may need in the short-term, for example making sure they won't come into contact with the child who has displayed abusive behaviour.
- Using Safeguard complete a record of concern to notify your DSL

Child on child abuse which raises safeguarding concerns will be recorded, and actioned appropriately. This may involve interventions and referrals to outside agencies and professionals.

It is essential that **all** of those who have been harmed are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school or college should not be downplayed and should be treated equally seriously. A pupil who has been harmed should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should they ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

## **Child on child sexual violence and sexual harassment**

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment can also occur within intimate personal relationships between peers. It is never acceptable and will not be tolerated. All staff will maintain an attitude that '**it could happen here**' [Relationship abuse](#);

When responding to reports of sexual violence or harassment, decisions will be made on a case-by-case basis, with the **DSL** taking the leading role, using their professional judgment and alongside other agencies such as social care and the Police. Harmful sexual behaviours in young children may be (and often are) a symptom of either their own abuse or exposure to abusive practices and or materials. It is therefore important to explore safeguarding concerns for the perpetrator ensuring any action required is taken to safeguard that child as well.

Anyone who has been harmed will be reassured and the report will be taken seriously. It is important to note children may not find it easy to tell staff verbally. They may show signs or act in ways they hope an adult will notice and react to. They should not be made to feel ashamed for making a report or their experience minimised, ensuring they feel supported and are dealt with respectfully.

Where the report includes an online element, a key consideration is for staff not to view or forward illegal images of a child.

Where the report is of sexual violence, the DSL will make an immediate risk and needs assessment considering:

- the person who the subject, especially their protection and support
- the alleged person who has caused harm
- all the other children (and if appropriate, adult students and staff) at the Academy, especially any actions that are appropriate to protect them.

The risk assessment will be recorded and kept under review.

There are four likely scenarios to consider when managing any report of sexual violence and/or sexual harassment. Consideration to whether there are wider cultural issues within the school that has enabled the inappropriate behaviour to occur will be given, and action taken such as extra teaching time, staff training for example.

1. **Manage internally:** some cases such as a one-off incident for example may not require early help or referrals to statutory services. It may be the incident can be handled internally by providing pastoral support and the Academy's behaviour policy.
2. **Early Help:** assessment may indicate that the children involved do not need a referral to statutory services but may benefit from Early Help.
3. **Referral to Social Care:** Where a statutory referral is appropriate, the DSL and Academy will work alongside the lead social worker. It will be important that the DSL works closely with social care and any other agencies required to ensure any actions the Academy takes do not jeopardise a statutory investigation.
4. **Reporting to the Police:** Any report to the Police will generally be in parallel with a referral to children's social care. Where a report of rape, assault by penetration or sexual assault is made, the starting point is that this should be passed on to the Police. Even if the person who has caused harm is under the age of ten, the starting principle of reporting to the Police remains. Police and the Academy will consult and agree what information can be shared with the parents/carers as well as the best way to protect the person who has been harmed and their anonymity. At this stage the Academy, unless there are compelling reasons not to do so, will generally inform parents/carers. Any disciplinary measures against the person who has caused harm must not jeopardise the Police investigation and therefore it is important that the DSL work closely with the police.

There is further guidance available at [Sexual violence and harassment between children in schools](#) as well as KCSIE 2024 part 5 Child on child sexual violence and sexual harassment containing various links providing support.

## Harmful sexual behaviour

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour" (HSB). The term has been widely adopted in child protection and is used in this advice. **HSB can occur online and/or face-to-face and can also occur simultaneously between the two.** HSB should be considered in a child protection context.

When considering HSB, both ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. Confidential specialist support and advice on HSB is available from the specialist sexual violence sector and sources are listed in KCSiE 2024 Annex B.

It is effective safeguarding practice for the designated safeguarding lead (and their deputies) to have a good understanding of HSB. This will aid in planning preventative education, implementing preventative measures, drafting and implementing an effective child protection policy and incorporating the approach to sexual violence and sexual harassment into the whole school approach to safeguarding.

HSB can, in some cases, progress on a continuum. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support.

## What is Consent

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

- a child under the age of 13 can never consent to any sexual activity
- the age of consent is 16
- sexual intercourse without consent is rape.

Further information about consent can be found here: [What is sexual consent?](#)

## Sharing of nude and semi-nude images

[Creating and sharing sexual photos and videos of under-18s is illegal.](#) In the latest advice for schools and colleges (UKCIS, 2020), sexting is no longer terminology that is used instead this is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated.

This does **not** include the sharing of sexual photos and videos of under 18 year olds with or by adults. This is a form of child sexual abuse and must be referred to the Police.

If staff become aware of an incident involving sharing of nude and semi-nude images, it must be reported to the DSL immediately;

**Never** view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – **this is illegal.**

If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.

**Do not** delete the imagery or ask the young person to delete it.

**Do not** ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).

**Do not** share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.

**Do not** say or do anything to blame or shame any young people involved.

**Do** explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive- but children still need to know that it is illegal- whilst non-consensual is illegal and abusive.

[Further information is available here - Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)

## **Upskirting**

Typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm. It is now a criminal offence.

## **Sexual exploitation of children (CSE)**

Sexual exploitation involves an individual or group of adults taking advantage of the vulnerability/imbalance of power of an individual or groups of children or young people, to coerce, manipulate or deceive a child or young person into taking part in sexual activity, in exchange for something the child who is being harmed needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. Those being harmed can be boys or girls and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. Children and young people are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.

Sexual abuse may involve physical contact, or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothes. It may also include non-contact activities such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in a sexually inappropriate way or grooming a child in preparation to abuse including via the internet.

CSE can affect any child who has been coerced into engaging in sexual activities and includes 16- and 17-year-olds who can legally consent to have sex.

The Academy includes the risks of sexual exploitation in the PSHE and RSE/HE curriculum. A common feature of sexual exploitation is that the child often does not recognise the coercive nature of the relationship and does not see themselves as victims. The child may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse. All staff are made aware of the indicators of sexual exploitation and all concerns are reported immediately to the DSL.

Further information is available here: [Child sexual exploitation Relationships Education, Relationships and Sex Education/Health Education guidance Teaching about relationships, sex and health - GOV.UK \(www.gov.uk\)](#)

## **Child Criminal Exploitation (CCE)**

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the child who is



being harmed needs or wants, and/or (b) for the financial or other advantage of the perpetrator and/or (c) through violence or threats of violence. The child being harmed may have been criminally exploited even if the activity appears consensual.

All staff will be aware of indicators, which may signal that pupils are at risk from or involved with serious violent crime. Increased absence from school, changes in friendships, relationships with older pupils, decline in performance, self-harm, injuries, significant changes in wellbeing, unexplained gifts and new possessions could all indicate involvement or association with criminal networks or gangs. It can also occur through the use of technology Home Office's [gangs-and-youth-violence](#) and [criminal exploitation of children and county-lines](#)

It is important to note that the experiences of girls who are criminally exploited can be very different to that of boys and the indicators may not be the same. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

### **Serious Violence**

Indicators of risk may include; increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm, signs or assault or unexplained injuries (not an exhaustive list).

Children who are frequently absent from school, permanently excluded or male, have experienced child maltreatment or may have been involved in offending behaviour may have increased risk of the likelihood of involvement in serious violence

### **County Lines**

County lines is the term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas (within the UK) using dedicated mobile phone lines or other form of 'deal line'. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging' where drugs are concealed internally to avoid detection.

A number of indicators for CSE and CCE may be applicable to where children are involved in county lines. Missing episodes from both home and school is one way of identifying potential involvement in county lines, owe a debt bond to their exploiters, have their bank accounts used to facilitate drug dealing. Further information on the signs of a young person's involvement in county lines is available in guidance published by the [Home Office](#) [Child missing from home or care; Drugs County Lines Toolkit For Professionals](#)

### **Trafficking of children**

Children can be trafficked into the country from abroad or children resident in the UK can become victims of trafficking too and be moved within a town or between locations for the purposes of exploitation. Exploitation includes children being used for **sex work, domestic work, restaurant/sweatshop, drug dealing, shoplifting and benefit fraud**. Often children and young people do not know that they have been trafficked. They may not want to tell their story for fear of not being believed, not knowing they are victims of crimes or fear of getting into trouble. They may still be under the control of their traffickers/exploiters. Even though a child may have been trafficked for a purpose other than sexual exploitation, they become highly vulnerable to physical and sexual abuse once they have been trafficked. Sexual exploitation of children is most likely to occur in informal locations, such as private flats. The use of trafficking for exploitative labour is often hidden and can be difficult to identify without the support of local communities. Risk indicators can include children who have unexplained moves, have not been enrolled into school or attended a GP practice, are being cared for by adult/s who are not their parents, are not in possession of their own travel documents, children who go missing from home or care, or unaccompanied asylum-seeking children. Further information can be found here [Trafficking and modern day slavery](#)

## So called Honour-Based Abused (including forced marriage)

'Honour-based' violence (HBA) encompasses crimes, which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBA are abuse.

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse. In England and Wales, the practice is a criminal offence under the Anti-Social Behaviour, Crime and Policing Act 2014.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses. Children may be married at a very young age and well below the age of consent in England. School staff receive training and should be particularly alert to suspicions or concerns raised by a pupil about being taken abroad and not be allowed to return to England. [The right to choose government guidance on forced marriage](#) [forced-marriage-resource-pack](#)

**In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.**

## FGM

FGM is the collective name given to a range of procedures involving the partial or total removal of external female genitalia for non-medical reasons. In England the practice is a criminal offence under the Female Genital Mutilation Act 2003. The practice can cause intense pain, distress, and long-term health consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so school staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by female pupil about going on a long holiday during the summer vacation period.

Mandatory reporting came into force in October 2015. Where a teacher discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there will be a statutory duty upon that individual to report it to the police. Further information can be found in Section 5B of the Female Genital Mutilation Act 2003 [Female genital mutilation](#)

## Ritualistic Abuse linked to spirit possession

Some faiths believe that spirits and demons can possess people (including children). The use of any physical or psychological violence to get rid of the possessing spirit is abusive and should always be reported. Successful prosecution will result in a criminal conviction of those using this form of abuse even if the intention is to help the child. Further information is available here [Faith abuse](#)

## Radicalisation and Extremism

The government defines extremism as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

Some children are vulnerable to being radicalised: adopting beliefs and engaging in activities, which are harmful, criminal or dangerous. Islamic extremism is the most widely publicised form and schools should remain alert to the risk of radicalisation into white supremacy extremism.



School staff receive training to help to identify signs of extremism and there is a risk assessment completed to identify any areas of concern. Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and the school follows the DfE advice Promoting fundamental British Values as part of SMCS (spiritual, moral, social and cultural education) in Schools (2014). All staff complete the online Government Prevent training.

The Prevent programme is a key part of the Government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism. Schools and governing bodies have a critical part to play. The Department of Education guidance 'Keeping Children Safe in Education', refers to the risks of radicalisation and the guidance contains links to the Channel process. Channel is a key element of the Prevent strategy. It is a multi-agency approach to protect people from radicalisation. It is about safeguarding children and adults from being drawn into terrorist related activity. It is not an entry to the criminal justice system but a needs-based support and intervention programme. All staff complete the Prevent online training.

Here are examples of indicators that *may* suggest vulnerability to violent extremism:

- **Expressed opinions** – such as support for violence and terrorism or the values of extremist organisations
- **Material** – possession of extremist literature; attempts to access extremist websites and associated password protected chat rooms; possession of material regarding weapons, explosives or military training
- **Behaviour and behavioural changes** – such as withdrawal from family and peers; hostility towards former associates and family; association with prescribed organisations and those that hold extremist views
- **Personal history** – Claims or evidence of involvement in organisations voicing violent extremist ideology or attendance at military/terrorist training

A practitioner from any agency working with the child, young person or adult could be the person to recognise that there has been a change in the individual's behaviour that may suggest they are vulnerable to violent extremism.

Staff and visitors to the school must refer all concerns about children and young people who show signs of vulnerability or radicalisation to the Designated Safeguarding Lead. Designated Safeguarding Lead will refer cases to the [Channel programme](#) where there is a radicalisation concern as required; also support staff that make referrals to the Channel programme; completing appropriate risk assessments. [The Prevent Duty](#)

Medway, North and West Kent  
Sally Green  
[sally.green2@kent.gov.uk](mailto:sally.green2@kent.gov.uk)  
03000 413439

South and East Kent  
Jill Allen  
[jill.allen@kent.gov.uk](mailto:jill.allen@kent.gov.uk)  
03000 413565

## Visiting Speakers

The Prevent Duty sets out an expectation of clear protocols for ensuring that any visiting speakers are suitable and appropriately supervised. This includes a formal procedure for inviting speakers which involves approval by the Headteacher/Principal, appropriate checks on the suitability of the person, documented agreement that they understand they must abide by the Academies equality commitments including no statements that might cause offence to others or undermine tolerance of faiths or beliefs and no extremist material. Academy staff will know the content of the presentation before the event. Staff will bring any presentation that proves to be unsuitable will be brought to an early end by staff. Any presentation to raise funds will be with written permission by the Headteacher/Principal only. Normal visitor to the Academy procedures will be followed.

## Online Safety:

## Child Exploitation and E-Safety

Children and young people can be exploited and suffer bullying through their use of modern technology such as the internet, mobile phones and social networking sites. In order to minimise the risks to students and young people, the Academy will ensure that it has appropriate measures in place such as security monitoring and filtering as well as an 'acceptable use policy' linked to the e-Safety policy. The Academy will ensure that staff are aware of how to avoid compromising 'the position of trust' either in or out of the school and are aware of the dangers associated with the internet and other mobile technology. The Academy e-Safety policy will clearly state that mobile phone or electronic communications with a student at the school is **not** acceptable other than for approved school business e.g., coursework, mentoring. Where it is suspected that a student is at risk from internet abuse or cyber bullying concerns will be reported to the DSL and any appropriate agency.

All Staff should be aware that technology is a significant component in many safeguarding and well-being issues. Children are at risk online as well as in day-to-day life. In many cases, abuse, neglect and exploitation will take place concurrently via online channels and in daily life. Staff and Governors will undertake Online Safety training. The breadth of issues classified within online safety is considerable but can be categorised into three areas of risk:

- **Content** being exposed to illegal, inappropriate or harmful content; e.g.: pornography, racist, radical and extremist, self-harm, suicide
- **Contact** being subjected to harmful online interaction with other users; e.g.: peer to peer pressure, grooming, commercial advertising
- **Conduct** personal online behaviour that is likely to increase or causes harm; e.g.: making, sending and receiving explicit images, sharing others explicit images and online bullying
- **Commerce** risks such as online gambling, inappropriate advertising, phishing and or financial scams. Risks can be reported to the Anti-Phishing Working Group <https://apwg.org/>

Online safety will be considered and reflected in the planning of curriculum, any teacher training, the role of the DSL and any parental engagement.

The Thinking Schools Academy Trust will review on an annual basis the approach to online safety ensuring that any risk assessments undertaken reflect the risks children may face.

The following resources, plus many more listed in KCSIE 2024 Annex B, may also help schools and colleges understand and teach about safeguarding:

DfE advice for schools: [Teaching online safety in schools - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/teaching-online-safety-in-schools)

UK Council for Internet Safety (UKCIS) guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people)

The UKCIS [External Visitors](#) guidance will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors

National Crime Agency's CEOP education programme: [CEOP Education \(thinkuknow.co.uk\)](https://www.thinkuknow.co.uk/ceop-education)

Public Health England: [Every Mind Matters](#)

[Harmful online challenges and online hoaxes](#) this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support.

## Monitoring & Filtering

The Board of Directors and Regional Governing Bodies shall be doing all that they reasonably can to limit children's exposure to the above risks from the school's IT system. They ensure that there are appropriate filtering and monitoring systems in place and will review their effectiveness on a regular basis. This will be through IT internal reviews, use of external audit tool such as 360Safe (SGFL) and a monitoring and filtering working party consisting of members of the Trust IT and Safeguarding Team. The use the SWGFL tool to check the filtering provider is signed up to relevant lists (CSA content, Sexual Content, Terrorist content, Your Internet Connection Blocks Child Abuse & Terrorist Content)

will support in ensuring compliance.

To support schools and colleges to meet this duty, the Department for Education has published filtering and monitoring standards which set out that schools and colleges should:

- identify and assign roles and responsibilities to manage filtering and monitoring systems.
- review filtering and monitoring provision at least annually.
- block harmful and inappropriate content without unreasonably impacting teaching and learning.
- have effective monitoring strategies in place that meet their safeguarding needs

Please also see The Thinking Schools Academy Trust following policies;

[ict acceptable use policy.](#)

[ict-monitoring-policy](#)

[information-security-policy.](#)

## Photos and Videos

Staff must be clear about the purpose and what will happen to the photos when the lesson/activity is concluded. Ensure that a senior member of staff is aware and for what purpose. Avoid making images in one-to-one situations. **DO NOT** take, display or distribute images of children unless you have consent to do so, preferably in writing.

It is recommended that

- If a photo is used avoid naming the pupil
- If the pupil is named avoid using their photo
- Academies should establish whether the images will be retained for further use
- Images should be securely stored and used only by those authorised to do so

Under no circumstance should adults in school access inappropriate images. Accessing child pornography or indecent images of children on the internet, and making, storing or disseminating such material is illegal and if proven will invariably lead to the individual being barred from work with children and young people

## Intimate Care

All children have a right to safety, privacy and dignity when contact of an intimate nature is required (for example assisting with toileting or removing wet/soiled clothing). A care plan should be drawn up and agreed with parents for all children who require intimate care on a regular basis. Children should be encouraged to act as independently as possible and to undertake as much of their own personal care as is practicable. When assistance is required, staff should ensure that another appropriate adult is in the vicinity and is aware of the task to be undertaken.

## Children missing from education

***“Basic to safeguarding children is to ensure their attendance at school.”***

All children, regardless of their circumstances, are entitled to a full-time education, which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area.

All staff should be aware that children being absent from school or college, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so called ‘honour’-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to

help prevent the risks of a child going missing in future. It is important that staff are aware of their school's or college's unauthorised absence procedures and children missing education procedures.

The Attendance Improvement Coordinator and DSL work closely together alongside the LA Attendance team and any other relevant professionals.

[Children missing education;](#)

## **Elective Home Education**

In September 2016 the Education (Pupil Registration) (England) Regulations 2006 were amended so that schools must inform their LA of all deletions from their admission register when a child is taken off roll. All TSAT Academies comply to this requirement. Where a parent/carer expresses a wish/intention to remove their child from school with a view to educating at home, we will work together with any relevant agencies/key professionals to coordinate a meeting with parents/carers where possible. This will ideally be before a final decision has been made to ensure parents/carers have considered what is in the best interests of each child.

## **Bullying**

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause anxiety and distress. All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through our tackling-bullying procedures. Further advice/information is also available here [Bullying including cyberbullying;](#)

## **Racist Incidents**

Our policy on racist incidents is set out separately, and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. All Academies keep a record of racist incidents. [Hate](#)

## **Work Experience (Secondary Academies)**

The school has detailed procedures to safeguard pupils undertaking work experience, including arrangements for checking people who provide placements and supervise pupils on work experience, which are in accordance with the guidance in KCSIE.

## **Children staying with host families**

The school may make arrangements for pupils to stay with a host family during a foreign exchange trip or sports tour. Some overseas pupils may reside with host families during school terms and we will work with the local authority to check that such arrangements are safe and suitable. In such circumstances, the school follows the guidance in KCSIE to ensure that hosting arrangements are as safe as possible and all relevant and appropriate checks are completed.

## **Private fostering arrangements**

A private fostering arrangement occurs when someone other than a parent or a close relative care for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16, or aged under 18 if the child is disabled. By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. Should Academy Staff become aware of a Private Fostering arrangement they will inform the DSL who will consult with the family and if appropriate will inform Social Care. [Private fostering](#)

**It is a statutory duty for the school to inform the Local Authority when it is made aware of a child or young person being subject to private fostering arrangements.**

## **Physical Intervention/Use of Reasonable Force**

There are circumstances when it may be appropriate for staff to use reasonable force to safeguard pupils. This covers a range of actions used by staff that involves a degree of physical contact to control or restrain children. 'Reasonable' in these circumstances means 'using no more force than is needed' Key staff have been trained in Positive Handling and will only exercise this duty when all de-escalation or distraction strategies have failed and as a last resort or in an emergency situation to prevent serious harm. Use of reasonable force will be recorded on the TSAT Positive Handling incident form and parents and carers will be notified as soon as it is reasonable to do so. Some identified pupils may have a Positive Handling Plan in place, which has been completed by staff, parents/carers and pupil, all having contributed to ensure the appropriateness of the interventions stated in the plan. We understand that physical intervention of a nature, which causes injury or distress to a child, may be considered under child protection or disciplinary procedures. We recognise that touch is appropriate in the context of working with children, and all staff have been given Positive Handling guidance to ensure they are clear about their professional boundary.

[DfE Use of Reasonable Force](#)

## **Abuse of position of trust**

All Academy staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach.

Staff understand that under the Sexual Offences Act 2003 it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a pupil under 18 may be a criminal offence.

**The Staff Behaviour Policy/Code of Conduct states our expectations of staff. It is signed by all staff.**

## **Staff/Pupil online relationships**

The school provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with pupils. Staff found to be in breach of these rules may be subject to disciplinary action or child protection investigation. The ICT Acceptable Use policy and Mobile Devices are available on the website.

## **Allegations against staff, including supply teachers, volunteers and contractors**

All Academy staff should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.

When an allegation is made against a member of staff, our set procedures must be followed. The Headteacher on all such occasions where the threshold for LADO has been met will discuss the content of the allegation with the Local Authority Designated Officer (LADO). [Please click here for the TSAT managing allegations policy](#)

## **Low level concerns**

As part of our whole school approach to safeguarding, Holcombe Grammar School, promotes an open and transparent culture in which all concerns about adults working in or on behalf of the Academy are dealt with promptly and appropriately. The term 'low level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold as set out in KCSIE Paragraph 362. A low level concern is any concern – no matter how small and even if no

more than causing a sense of unease or a 'nagging doubt' that an adult working in or on behalf of the Academy may have acted in a way that:

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

Low level concerns should be reported to the Head Teacher/Principal. In the case of supply agency or a contractor the concern will also be shared with their employer so that any potential patterns of inappropriate behaviour can be identified. All concerns will be recorded in writing as well as any action taken.

Further information on the low-level concerns can be found with the TSAT Staff code of conduct

The full procedures for dealing with allegations against staff can be found in KCSIE and in the school's Managing Allegations against Staff policy and procedures. Guidance about conduct and safe practice, including safe use of mobile phones by staff and volunteers, will be given at induction and are in the Staff Code of Conduct Policy.

All staff should be aware of their duty to raise concerns about the attitude and actions of colleagues. The vast majority of adults who work with children in education settings act professionally and seek to provide a safe and supportive environment, which secures the wellbeing and very best outcomes for children and young people in their care. Much relies on pupil and staff interactions where tensions and misunderstandings can occur. Allegations may be genuine, malicious or misplaced. They may arise from differing perceptions of the same event, but when they occur, they are inevitably distressing and difficult for all concerned.

We understand that a pupil may make an allegation against a member of staff. If such an allegation is made, or information is received which suggests that a person may be unsuitable to work with children, the member of staff receiving the allegation or aware of the information, will immediately inform the Headteacher/Principal. If the allegation made to a member of staff concerns the Headteacher/Principal, the person receiving the allegation will immediately inform the Deputy CEO, who will contact the LADO where threshold to do so has been met, without notifying the Headteacher/Principal first.

If an allegation is made about a member of the Proprietor Body, the person receiving the allegation will immediately inform the Deputy CEO, who will contact the LADO where threshold to do so has been met.

In some circumstances, the Academy may have to consider an allegation against an individual not directly employed by the Academy. In these circumstances, we will ensure that the allegation is dealt with properly. The employer of that person will be informed as will the LADO where threshold to do so has been met. Allegations concerning staff who no longer work at the Academy or historical allegations will be reported to the Police and LADO as applicable.

Where the services of a teacher because of serious misconduct have resulted in dismissal or even if they leave first (including agency staff) consideration will be given on whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

## **Whistle blowing if you have concerns about a colleague**

Staff who are concerned about the conduct of a colleague towards a pupil are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount. The Thinking Schools Academy Trust whistleblowing code enables staff to raise concerns or allegations, initially in confidence and for a sensitive enquiry to take place

and is available on the website.

All concerns of poor practice or possible child abuse by colleagues should be reported to the Headteacher/Principal. Complaints about the Headteacher/Principal should be reported to the Deputy CEO.

The NSPCC whistle-blowing helpline number 0800 028 0285. 8:00 AM to 8:00 PM, Monday to Friday <https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/>

General guidance on whistleblowing can be found via <https://www.gov.uk/whistleblowing>

## **Safer recruitment**

Our Academy complies with the requirements of Keeping Children Safe in Education ([DfE 2024](#)) Part 3 and the **L**ASCP by carrying out safer recruitment checks for all new employees. The Academy follows the Thinking Schools Academy Trust Staff Recruitment and DBS policy and procedures, which can be found at [www.tsatrust.org.uk](http://www.tsatrust.org.uk)

At least one member of each recruitment panel will have attended safer recruitment training and at least two people will carry out the shortlisting exercise which will include notifying candidates that online searches will be carried out.

All new employees (involved in early year's settings and/or before or after school care for children under eight) are made aware of the 2018 Childcare Disqualification Regulations and their obligations to disclose relevant information to the school. This is captured through the New Starter pack.

The Academy obtains written confirmation from supply agencies or third-party organisations that agency staff or other individuals who may work in the Academy have been appropriately checked.

Trainee teachers will be checked either by the school or by the training provider, from whom written confirmation will be obtained.

The Academy maintains a single central record of recruitment checks undertaken and is audited on a regular basis by the Headteacher/Principal, Chair of the RGB and TSAT Safeguarding Team.

## **Volunteers**

Volunteers, including governors, will undergo checks commensurate with their work in the school, their contact with pupils and the supervision provided to them. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised.

## **Contractors**

The school checks the identity of all contractors working on site and requests DBS with barred list checks where required by statutory guidance. Contractors who have not undergone checks will not be allowed to work unsupervised during the school's day.

## **Site security**

School has developed a system in-line with guidance below to ensure that [regulated and non-regulated activities](#) and staff supervision is understood across the school. The identification of volunteers, students, visitors can be clearly identified by our visitor system.

Visitors to the school, including contractors, are asked to sign in and are given a badge, which confirms they have permission to be on site. Parents who are simply delivering or collecting their children do not need to sign in. Any individual who is not known or identifiable should be challenged

for clarification and reassurance. Academies have a responsibility for identifying approved adults who are collecting children from school.

All visitors are expected to observe the school's safeguarding and health and safety regulations. The Headteacher will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site. The Academy will not accept the behaviour of any parent or individual that threatens the Academy security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in the decision to refuse access onto the Academy site for that individual. See the Trust Parent/Career Conduct Policy.

All staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light. We operate within a whole-community ethos and welcome comments from pupils/students, parents and others about areas that may need improvement as well as what we are doing well. Our lettings policy will seek to ensure the suitability of adults working with children on Academy sites at any time. Community users organising activities for children are aware of the Academy child protection guidelines and procedures provided as part of the letting's arrangement.

## **Extended school and off-site arrangements**

All extended and off-site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. Where extended school activities are provided by and managed by the Academy, our own child protection policy and procedures apply. If other organisations provide services or activities on our site on behalf of our Academy, we will check that they have appropriate procedures in place, including safer recruitment procedures. When our pupils attend off-site activities, including day and residential visits and work-related activities, we will check that effective child protection arrangements are in place.

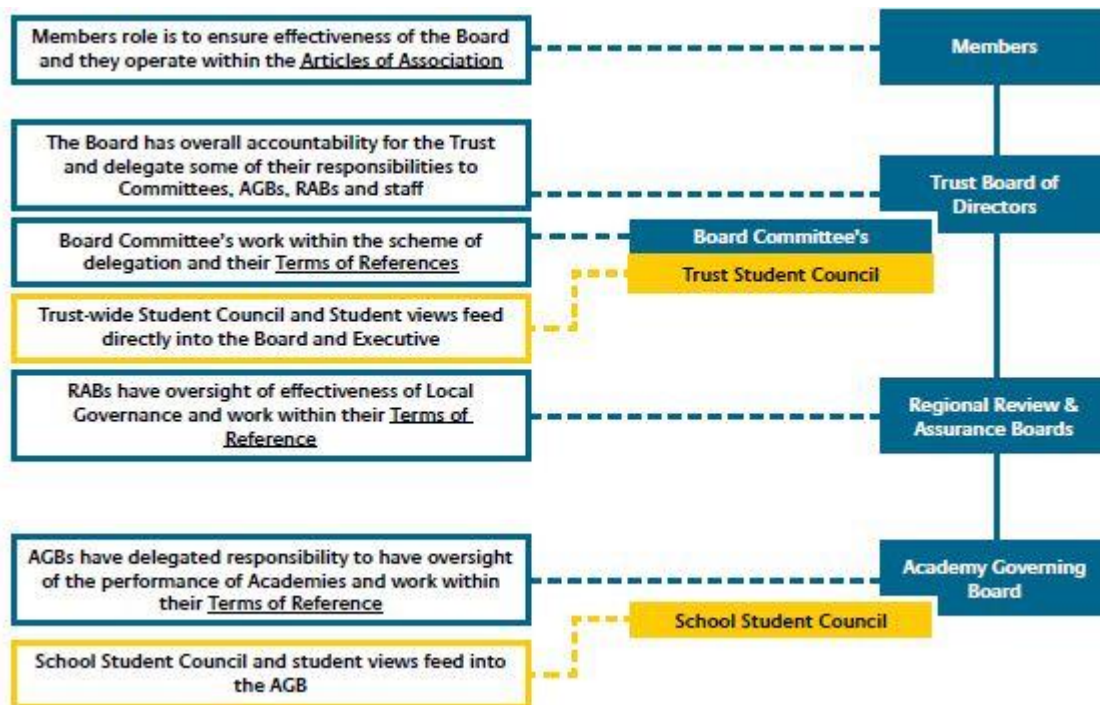
## **Use of School premises for non-school activities (Lettings)**

Any lettings arrangements that include services to children, the Governing Body/Proprietor will seek written assurances regarding appropriate safeguarding and child protection policies and procedures in place. Any failure to comply would lead to termination of the agreement. Terms and conditions are written into agreements to ensure the requirements for the safety and wellbeing of all children are adhered to.

Holcombe Grammar School may receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, Holcombe Grammar School will follow the safeguarding policy and procedures, including informing the LADO.



# Governance Structure



In addition to the Governance Structure, there is the position of Head of Safeguarding Mrs Lee Lucas as well as a Regional Safeguarding Lead, Mrs Ann Pullen

## Safeguarding Team at Holcombe Grammar School

Holcombe Grammar School Safeguarding Team	
Role	Name
Designated Safeguarding Lead for Children and Families.	<b>Sue Gould</b> <a href="mailto:susan.gould@holcombegrammar.tsat.uk">susan.gould@holcombegrammar.tsat.uk</a> <a href="mailto:safeguarding@holcombegrammar.org.uk">safeguarding@holcombegrammar.org.uk</a>
Deputy Designated Officer/s	<b>Mr Andy Anderson</b> <b>Mrs Aimee Banks</b> <b>Mr Michael Fielding</b> <b>Mrs Stacey Sommerville</b> <b>Mr David Hayes</b> <b>Mrs Lorraine Bridges</b> <b>Miss Kerry Boxall</b> <b>Mr Chris Potter</b>
Academy Governing Board Linked Governor for Child Protection and Safeguarding	<b>Jo Allen</b> <b>James Sheppard</b>

### **Thinking Schools Academy Trust**

Lee Lucas, Head of Safeguarding  
Telephone: 01634 336535 07970 741 979  
Email: [l.lucas@tsatrust.org.uk](mailto:l.lucas@tsatrust.org.uk)

Ann Pullen, Regional Safeguarding Lead  
Telephone: 01634 336535 07545645817  
Email: [a.pullen@tsatrust.org.uk](mailto:a.pullen@tsatrust.org.uk)

### **Local Authority details**

Medway LADO 01634 331065  
Children's Social Care 01634 334466  
Emergency Out of Hours 03000 41 91 91  
<https://www.medwayscp.org.uk/mscb/>

## What To Do Flow Map

