



Elmley Dray  
School

## Safeguarding, Child and Vulnerable Adult Protection Policy

This policy is to be read in conjunction with the staff code of conduct.

***This is a core policy that forms part of the induction for all staff. It is a requirement that all members of staff have access to this policy and sign to say they have read and understood its contents.***

**This policy will be reviewed at least annually and/or following any updates to national and local guidance and procedures.**

### Key Contacts

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## The Flow Chart

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

Follow the school procedure

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



**Inform the Designated Safeguarding Lead**

Via: [safeguarding@elmleydraychool.co.uk](mailto:safeguarding@elmleydraychool.co.uk)



**If you are unhappy with the response**

**Staff:**

- Follow local escalation procedures
- Follow whistleblowing procedures

**learners, Parents and Carers and Parents:**

- Follow school complaints procedures (link or information on how to access)

At all stages, the learner's circumstances will be kept under review

The DSL/staff will request further support if required to ensure the **learner's safety** is **paramount**



**Record decision making and action taken in the learner protection file**

**Review** and **request further support** if necessary

**Why are you concerned?**

For example

- Something a learner has said – for example, an allegation of harm
- Learner's appearance – may include unexplained marks as well as dress
- Behaviour change
- Witnessed concerning behaviour

## What to do if you have a welfare concern in Elmley Dray School

### Monitor

Be clear about:

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



### Designated Safeguarding Lead

- Consider whether the learner or young person is at immediate risk of harm: are they safe to go home?
- Access the Kent Safeguarding Support Level Guidance document and procedures:  
<https://www.kscmp.org.uk/guidance/worried-about-a-learner>
- Refer to other agencies as appropriate, for example, Internal or community services, early help open access, LADO, Kent Adult Social Care, Police or make a Request for Support via Integrated Children's Services  
[Worried about a child - Kent Safeguarding learners Multi-Agency Partnership \(kscmp.org.uk\)](https://www.kscmp.org.uk/guidance/worried-about-a-learner)  
[https://www.medway.gov.uk/info/200170/learners\\_and\\_families/600/concerned\\_about\\_a\\_learner/2](https://www.medway.gov.uk/info/200170/learners_and_families/600/concerned_about_a_learner/2)  
  
[Report abuse - Kent County Council](#)  
  
[Kent and Medway SAB - Report Abuse](#)
- If unsure, consult with Area Education Safeguarding Advisor or Local Authority Social Worker at the Front Door: [www.kscmp.org.uk](http://www.kscmp.org.uk), or Kent Adult Social Care Flowchart: [Adult safeguarding - Kent County Council](#)

# 1. Child and Vulnerable Adult Focused Approach to Safeguarding

## 1.1 Introduction

- Elmley Dray School recognises our statutory responsibility to safeguard and promote the welfare of all learners (children and vulnerable adults). Safeguarding is everybody's responsibility and all those directly connected (staff, volunteers, governors - PAT), leaders, parents, families, learners are an important part of the wider safeguarding system for learners and have an essential role to play in making these communities safe and secure.
- Elmley Dray School believes that the best interests of learners always come first. All learners have a right to be heard and to have their wishes and feelings taken into account and all learners regardless of age, gender, ability, culture, race, language, religion or sexual identity or orientation, have equal rights to protection.
- Staff working with learners at Elmley Dray School will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a learner, staff will always act in the best interests of the learner and if any member of our community has a safeguarding concern about any child or adult, they should act and act immediately.
- Elmley Dray School recognises the importance of providing an ethos and environment within the organisation that will help learners to be safe and to feel safe. In our school learners are respected and are encouraged to talk openly. We will ensure learner's wishes and feelings are taken into account when determining what safeguarding action to take and what services to provide.
- Our core safeguarding principles are:
  - **Prevention:** positive, supportive, safe culture, curriculum and pastoral opportunities for learners, safer recruitment procedures.
  - **Protection:** following the agreed procedures, ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns.
  - **Support:** for all learners, parents and staff, and where appropriate specific interventions are required for those who may be at risk of harm.
  - **Collaborating with parents and other agencies:** to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.
- The procedures contained in this policy apply to all staff, including governors (PAT), temporary or third-party agency staff and volunteers, and are consistent with those outlined within [Keeping children safe in education \(2025\)](#), [Working Together to Safeguard children \(2023\)](#), [Safeguarding Vulnerable Groups Act 2006](#), [Social Care Institute for Excellence Guidance for Safe Day Care](#).
- Any references to the DSL should be taken to mean "the DSL (or Deputy DSL)".

## 1.2 Policy context

- This policy is based on the Department for Education's (DfE's) statutory guidance [Keeping children safe in education \(2025\)](#) and [Working Together to Safeguard children \(2023\)](#) We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is based on the following legislation:

- [Keeping children safe in education \(2025\)](#)
- [Working Together to Safeguard learners \(2023\)](#)
- Ofsted [Education inspection framework \(EIF\)](#)
- Framework for the Assessment of learners in Need and their Families 2000
- Kent and Medway Safeguarding learners Procedures
- [Safeguarding Vulnerable Groups Act 2006](#)
- [Care Act 2014](#)
- [Education \(Independent School Standards\) Regulations 2014](#)
- [Education Act 2002](#)
- [Education and Inspections Act 2006](#)
- [The Non-Maintained Special Schools \(England\) Regulations 2015](#)
- [The Education \(Independent School Standards\) Regulations 2014](#)
- [The School Staffing \(England\) Regulations 2009](#)
- [The Children Act 1989](#) (and [2004 amendment](#))
- [Non-Maintained Special Schools Regulations 2015](#)
- [Children and Families Act 2014](#)
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors (PAT) and Headteacher should carefully consider how they are supporting their learners with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting learners (where we can show it's proportionate). This includes making reasonable adjustments for disabled learners. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve learner outcomes. Some learners may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

- 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 learners
  - Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to learners
  - [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 [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 learners
  - This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#), however our setting does not provide early years education or care.
- Section 175 of the [Education Act 2002](#) requires school Director bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all learners who are learners at a school, or who are learners under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.

### 1.3 Definition of safeguarding

- In line with KCSIE 2025, safeguarding and promoting the welfare of learners is defined for the purposes of this policy as:
  - providing help and support to meet the needs of learners as soon as problems emerge
  - protecting learners from maltreatment whether that is within or outside the home, including online
  - preventing impairment of learners's mental and physical health or development
  - ensuring that learners grow up in circumstances consistent with the provision of safe and effective care
  - taking action to enable all learners to have the best outcomes
- **Child protection** is part of this definition and refers to activities undertaken to protect specific learners who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

- **Abuse** is a form of maltreatment of a learner, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.
- **Neglect** is a form of abuse and is the persistent failure to meet a learner's basic physical and/or psychological needs, likely to result in the serious impairment of the learner's health or development. Appendix 1 defines neglect in more detail.
- **Sharing of nudes and semi-nudes** (also known as sexting or youth-produced sexual imagery) is where learners share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.
- **Children** includes everyone under the age of 18. **Learners** refers to all children and vulnerable adults in our care.
- The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Childcare Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:
  - The local authority (LA)
  - Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
  - The chief officer of police for a police area in the LA area
- **Victim** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the learner involved feels most comfortable with.
- **Alleged perpetrator(s)** and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of learners) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

(Also see KCSIE 2025)

## 1.4 Related safeguarding policies

- This policy is one of a series in Elmley Dray School integrated safeguarding portfolio and should be read and actioned in conjunction with the policies as listed below:
  - Preventing extremism and radicalisation
  - Behaviour, including behaviour management and use of physical intervention
  - Staff Code of Conduct
  - Online Safety
  - Anti-bullying
  - GDPR, Data Protection and Confidentiality
  - Image Use
  - Relationship, Sex and Health Education (RSHE)

- Personal and Intimate Care
- Health and Safety
- Attendance
- Learning Outside the Classroom Policy
- First Aid and Administration of Medication Policy
- Managing Allegations Against Staff
- Acceptable Use of Technology
- Safer Recruitment
- Whistleblowing

## **1.5 Policy compliance, monitoring and review**

- Elmley Dray School will review this policy at least annually (as a minimum) and will update it as needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. The policy will also be revised following any national or local updates, significant local or national safeguarding events and/or learning, and/or any changes to our own procedures.
- All staff (including temporary staff and volunteers) will be provided with, and required to read, a copy of this policy and Part One and Annex B of KCSIE 2025 as appropriate which is available on the website of the organisation. Governors, SLT and safeguarding leads are expected to read KCSIE in its entirety.
- All staff (including temporary staff and volunteers) will undergo annual safeguarding training, including any updates throughout the year. New staff who miss said training at the start of the academic year will undergo training as part of their induction.
- Parents/carers can obtain a copy of the Safeguarding and Children and Vulnerable Adults Protection Policy on the organisation website and other related policies not available on the website on request.
- The policy forms part of our development plan and will be reviewed annually by the CIC Director, in collaboration with the Chair of Governors, who has responsibility for oversight of safeguarding and learner protection systems.
- The Chair of Governors and the Designated Safeguarding Lead will ensure regular reporting on safeguarding activity and systems to the Director and Governing Board (PAT).

## **1.6 Equality Statement**

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

We give special consideration to learners who:

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

## 2 Key Responsibilities

Safeguarding and learner protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors (PAT) in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing learners for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- o Behaviour policy
- o Pastoral support system
- o Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
  - ☐ Healthy and respectful relationships
  - ☐ Boundaries and consent
  - ☐ Stereotyping, prejudice and equality
  - ☐ Body confidence and self-esteem
  - ☐ How to recognise an abusive relationship (including coercive and controlling behaviour)
  - ☐ The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
  - ☐ What constitutes sexual harassment and sexual violence and why they're always unacceptable

### 2.1 The Governing Board (PAT) and Leadership

The **governing board (PAT)** will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and learner protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Headteacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a senior board level (or equivalent) lead (link PAT) to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- Ensure all staff undergo safeguarding and learner protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
  - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
  - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
- Make sure:
  - The DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
  - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
  - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
  - The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors).
  - That this policy reflects that learners with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities (regardless of whether or not the learners who attend these services/activities are learners on the school roll):
  - Seek assurance that the other body has appropriate safeguarding and learner protection policies/procedures in place, and inspect them if needed
  - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate

- o Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply
- The chair of directors will act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, where appropriate.
- All governors (PAT) will read Keeping Children Safe in Education in its entirety.
- This policy has information on how governors are supported to fulfil their role.

The **Headteacher** is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
  - o Are informed of our systems that support safeguarding, including this policy, as part of their induction
  - o Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their learner joins the school and via the school website
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each learner in the Early Years Foundation Stage (if applicable) is assigned a key person - not applicable in our setting.
- Overseeing the safe use of technology, mobile phones and cameras in the setting

## **2.2 Designated Safeguarding Lead (DSL)**

- The DSL is a member of the senior leadership team. Our DSL is Emily Hollis MBE, Headteacher. The DSL takes lead responsibility for learner protection and wider safeguarding in the school. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep learners safe online.
- During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. Out of school hours, the DSL can be contacted via email.
- When the DSL is absent, the Deputy DSLs will act as cover.
- The DSL will be given the time, funding, training, resources and support to:

- o Provide advice and support to other staff on learner welfare and learner protection matters
- o Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- o Contribute to the assessment of learners
- o Refer suspected cases, as appropriate, to the relevant body (local authority learners's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- o Have a good understanding of harmful sexual behaviour
- o Have a good understanding of the filtering and monitoring systems and processes in place at our school
- o Make sure that staff have appropriate Prevent training and induction
- The DSL will also:
  - o Liaise with local authority case managers and designated officers for learner protection concerns as appropriate
  - o Discuss the local response to sexual violence and sexual harassment with police and local authority learners's social care colleagues to prepare the school's policies
  - o Be confident that they know what local specialist support is available to support all learners involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
  - o Be aware that learners must have an 'appropriate adult' to support and help them in the case of a police investigation or search
  - o The full responsibilities of the DSL and Deputy DSLs are set out in their job description.

## 2.3 All staff

- Our staff play a particularly important role in safeguarding as they are in a position to identify concerns early, provide help for learners, promote learner's welfare and prevent concerns from escalating.
- Staff at Elmley Dray School recognise that learners may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as being abusive or harmful. This should not prevent staff from having professional curiosity and speaking to a DSL if they have any concerns about a learner.
- Staff at Elmley Dray School will determine how best to build trusted relationships with learners, young people and parents/carers which facilitate appropriate professional communication in line with existing and relevant policies.

All staff will:

- o Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually
- o Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance

- o Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask learners to do online (e.g. sites they need to visit or who they'll be interacting with online)
- o Provide a safe space for learners who are LGBTQ+ to speak out and share their concerns
- o Act in line with Teachers' Standards 2012 which state that teachers (including Proprietor Director and Headteacher) should safeguard learners' wellbeing and maintain public trust in the teaching profession as part of their professional duties.

All staff will be aware of:

- o Our systems that support safeguarding, including this learner protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and Deputy DSLs, the behaviour policy, online safety policy that includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring, and the safeguarding response to learners who go missing from education
- o The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- o The process for making referrals to local authority learners' social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- o What to do if they identify a safeguarding issue or a learner tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- o The signs of different types of abuse, neglect and exploitation, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as learner-on-learner abuse, grooming, learner sexual exploitation (CSE), learner criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- o New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- o The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- o The fact that learners can be at risk of harm inside and outside of their home, at school and online
- o The fact that learners who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other learners
- o That a learner and their family may be experiencing multiple needs at the same time

- What to look for to identify learners who need help or protection

## **2.4 Children and vulnerable adults**

- Children and vulnerable adults have a right to:
  - Feel safe, be listened to, and have their wishes and feelings taken into account.
  - Confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
  - Contribute to the development of Elmley Dray School safeguarding policies.
  - Receive help from a trusted adult.
  - Learn how to keep themselves safe, including online.

## **2.5 Parents and carers**

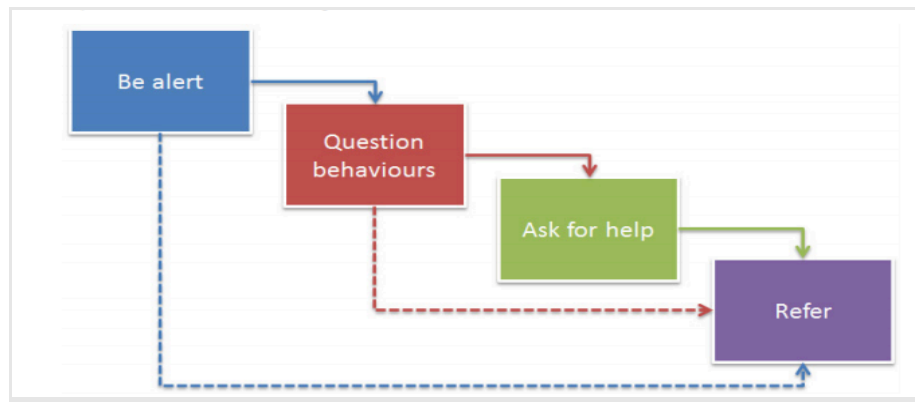
- Parents/carers have a responsibility to:
  - Understand and adhere to the relevant Elmley Dray School policies and procedures.
  - Talk to their learners about safeguarding issues and support Elmley Dray School in their safeguarding approaches.
  - Identify behaviours which could indicate that their learner is at risk of harm including online.
  - Seek help and support from Elmley Dray School or other agencies.

# **3 Recognising Abuse and Taking Action**

## **3.1 Recognising indicators of abuse and neglect**

- All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a learner who:
  - Is disabled
  - Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)
  - Is a young carer
  - Is bereaved
  - Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
  - Is frequently missing/goes missing from education, care or home
  - Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
  - Is at risk of being radicalised or exploited
  - Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online

- Is in a family circumstance presenting challenges for the learner, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage
- Is a privately fostered learner
- Has a parent or carer in custody or is affected by parental offending
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded
- Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue. Please also see Figure 1 for details of the process.
- Staff will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a learner, staff will always act in the best interests of the learner.
- All staff are made aware of the definitions and indicators of abuse and neglect as identified by WTSC 2023 and KCSIE 2025.
- Elmley Dray School recognise that when assessing whether a learner may be suffering actual or potential harm there are four categories of abuse (for more in-depth information, see appendix 1):
  - Physical abuse
  - Sexual abuse
  - Emotional abuse
  - Neglect
- By understanding the indicators of abuse and neglect, we can respond to problems as early as possible and provide the right support and services for the learner and their family.
- All members of staff are expected to be aware of and follow the below approach if they are concerned about a learner:



[‘What to do if you are worried a learner is being abused’ 2015](#)

- Elmley Dray School recognises that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of learner abuse and neglect can vary from learner to learner. learners develop and mature at different rates, so what appears to be worrying behaviour for a younger learner might be normal for an older learner. It is important to recognise that indicators of abuse and neglect do not automatically mean a learner is being abused; however all concerns should be taken seriously and will be explored by the DSL on a case-by-case basis.
- Elmley Dray School recognises abuse, neglect, and safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label alone. In many cases, multiple issues will overlap with one another, therefore staff will always be vigilant and always raise concerns with a DSL.
- Parental behaviours can indicate learner abuse or neglect, so staff will be alert to parent-learner interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.
- Learners may report abuse happening to themselves, their peers or their family members. All reports made by learners to staff will be taken seriously and will be responded to in line with this policy.
- Safeguarding incidents and/or behaviours can be associated with factors and risks outside Elmley Dray School. Learners can be at risk of abuse or exploitation in situations outside their families; extra-familial harms take a variety of different forms and learners can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.
- Elmley Dray School recognises that technology can be a significant component in many safeguarding and wellbeing issues; learners are at risk of abuse online from people they know (including other learners) and from people they do not know; in many cases, abuse will take place concurrently via online channels and in daily life.

- Elmley Dray School recognises that it works with learners who have additional or complex needs and may require access to intensive or specialist services to support them.
- Following a concern about a learner's safety or welfare, the searching and screening of learners and confiscation of any items, including any electronic devices, will be managed in line with the DfE '[Searching, screening and confiscation at school](#)' guidance.
- The DSL (or deputy) will be informed of any searching incidents where there were reasonable grounds to suspect a learner was in possession of a prohibited item. The DSL (or deputy) will then consider the circumstances of the learner who has been searched to assess the incident against any potential wider safeguarding concerns.
  - Staff will involve the DSL (or deputy) without delay if they believe that a search has revealed a safeguarding risk.

### **3.2 If a learner is suffering or likely to suffer harm, or in immediate danger**

- Make a referral to local authority social care and/or the police immediately if you believe a learner is suffering or likely to suffer from harm or is in immediate danger. Anyone can make a referral.
- Tell the DSL as soon as possible if you make a referral directly.
- Kent and Medway safeguarding procedures can be found here - [Safeguarding Procedures Manual](#)
- Referrals can be made via:
  - phone [03000 41 11 11](tel:03000411111) (child)/ [03000 41 61 61](tel:03000416161) (adult)
  - email [social.services@kent.gov.uk](mailto:social.services@kent.gov.uk)
  - [text relay](#) 18001 03000 41 11 11/18001 03000 41 61 61
  - Out of hours emergency [03000 41 91 91](tel:03000419191)
- The following link provides information for reporting learner abuse to your local council: <https://www.gov.uk/report-learner-abuse-to-local-council>

### **3.3 If a learner makes a disclosure to you and/or if you have concerns about a learner**

- If staff are made aware of a safeguarding and learner protection concern, they are expected to:
  - listen carefully to the learner, reflecting back the concern.
  - use the learner's language.
  - be non-judgmental.
  - avoid leading questions; only prompting the learner where necessary with open questions to clarify information where necessary. For example who, what, where, when or Tell, Explain, Describe (TED).

- not promise confidentiality as concerns will have to be shared further, for example, with the DSL and potentially Integrated learners's Services.
  - be clear about boundaries and how the report will be progressed.
  - record the concern using the facts as the learner presents them, in line with the organisations record keeping requirements.
  - inform the DSL (or deputy), as soon as practically possible.
- Bear in mind that the learner may:
    - not feel ready, or know how to tell someone that they are being abused, exploited or neglected
    - not recognise their experiences as harmful
    - feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a learner.

- If staff have any concerns about a learner's welfare, they are expected to act on them immediately. If staff are unsure if something is a safeguarding issue, they will speak to the DSL (or deputy).
- The DSL or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, a DSL is not available, this should not delay appropriate action being taken by staff. Staff should speak to a member of the senior leadership team, take advice from the Education Safeguarding Service or a consultation with a social worker from the Front Door (for contact information, see flowchart on page 4-5). In these circumstances, any action taken will be shared with a DSL as soon as is possible.
- All staff are made aware through regular training and in the induction process that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a learner is already known to other agencies. Staff will not assume a colleague, or another professional will act and share information that might be critical in keeping learners safe.
- Elmley Dray School will respond to safeguarding concerns in line with the Kent Safeguarding Children's Multi-Agency Partnership procedures (KSCMP)/Kent and Medway Safeguarding Adults Board (KMSAB).
  - The full KSCMP procedures and additional guidance relating to reporting concerns and specific safeguarding issues can be found on their website: [www.kscmp.org.uk](http://www.kscmp.org.uk)
  - KMSAB can be accessed here: [Kent & Medway SAB website](#)
- In Kent, Early Help and Preventative Services and Children's Social Work Services are part of Integrated Children's Services (ICS). Specific information and guidance to follow with regards to accessing support and/or making referrals in Kent can be found here: [www.kelsi.org.uk/support-for-learners-and-young-people/integrated-learnerrs-services](http://www.kelsi.org.uk/support-for-learners-and-young-people/integrated-learnerrs-services)

- Where it is identified a learner may benefit from Early Help support (as provided by ICS) , the DSL (or deputy) will generally lead as appropriate and make a request for support via the Front Door - [Front Door - KELSI](#).
- The DSL will keep all Early Help cases under constant review and consideration will be given to escalating concerns to the Front Door or seeking advice via [Kent Safeguarding learners Multi-Agency Partnership](#) and [Safeguarding contacts - KELSI](#)
- All staff are made aware of the process for making referrals to Integrated Children's Services and for statutory assessments under the learners Act 1989, especially section 17 (learners in need) and section 47 (a learner suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.
- Where a learner is suffering, or is likely to suffer from harm, or is in immediate danger (for example, under section 17 or 47 of the learners Act), a 'request for support' will be made immediately to Kent [Integrated Children's Services](#) (via the 'Front Door') and/or the police, in line with KSCMP procedures. If learners are from out of county, they will be referred to their council safeguarding team directly.
  - Elmley Dray School recognises that in situations where there are immediate learner protection concerns for a learner as identified in line with Support Level Guidance, it is NOT to investigate as a single agency, but to act in line with KSCMP guidance which may involve multi-agency decision making.
  - The DSL may seek advice or guidance from an Area Education Safeguarding Advisor – [Safeguarding contacts - KELSI](#)/ [Report abuse - Kent County Council](#) before deciding next steps.
  - They may also seek advice or guidance from a social worker at the Front Door service who are the first point of contact for [Integrated Children's Services](#) (ICS).
- In the event of a request for support to the Front Door being necessary, parents/carers will be informed and consent to this will be sought by the DSL in line with guidance provided by KSCMP and ICS. Parents/carers will be informed of this, unless there is a valid reason not to do so, for example, if to do so would put a learner at risk of harm or would undermine a criminal investigation.
- If, after a request for support or any other planned external intervention, a learner or young person's situation does not appear to be improving or concerns regarding receiving a decision or the decisions made, staff or the DSL will re-refer (if appropriate) and/or DSLs will follow the [Kent Safeguarding learners Multi-Agency Partnership Escalation Procedures](#), (or relevant local authority escalation procedures) to ensure their concerns have been addressed and, most importantly, that the learner or young person's situation improves.

### 3.4 Recording concerns

- All safeguarding concerns, discussions, decisions, and reasons for those decisions, will be recorded in writing on the organisations safeguarding system (MyConcern) and the

DSL will be alerted without delay. Our records will include a clear and comprehensive summary of any concerns, details of how concerns were followed up and resolved, and a note of any action taken, decisions reached and outcomes.

- Records will be completed as soon as possible after the incident/event, using the learners and young people's words and will be signed and dated by the member of staff. Safeguarding and learner protection records will record facts and not personal opinions. A body map will be completed if visible injuries have been observed.
- If there is an immediate safeguarding concern the member of staff will consult with a DSL before completing the online form as reporting urgent concerns takes priority.
- If members of staff are in any doubt about recording requirements, they will discuss their concerns with the DSL.
- Safeguarding and learner protection records will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and details regarding any action taken, decisions reached and the outcome.
- Learner protection records will be kept confidential and stored securely. Safeguarding and learner protection records will be kept for individual learners and young people and will be maintained separately from all other records relating to the learner in the organisation. Learner protection records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL.
- All safeguarding and learner protection records will be transferred in accordance with data protection legislation to the learner's subsequent school (as applicable), under confidential and separate cover as soon as possible; within 5 days for an in-year transfer or within the first 5 days of the start of a new term. Learner protection files will be transferred securely to the new DSL, separately to the learner's main file, and a confirmation of receipt will be obtained.
- In addition to the learner protection file, the DSL will also consider if it would be appropriate to share any information with the DSL at the new school or college in advance of a learner leaving, for example, information that would allow the new school or college to continue to provide support.
- Where Elmley Dray School receives learner protection files from another setting, the DSL will ensure key staff will be made aware of relevant information as required.
- Where a learner joins the school and no learner protection files are received, the DSL will proactively seek to confirm from the previous setting whether any learner protections exist for the learners and young people, and if so, if the files have been sent.

### **3.5 If you discover that FGM has taken place or a learner is at risk of FGM**

- Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".
- FGM is illegal in the UK and a form of learner abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.
- Possible indicators that a learner has already been subjected to FGM, and factors that suggest a learner may be at risk, are set out in appendix 3 of this policy.
- Any teacher who either:

- o Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- o Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

- Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve local authority social care as appropriate.
- Any other member of staff who discovers that an act of FGM appears to have been carried out on a learner under 18 must speak to the DSL and follow our local safeguarding procedures.
- The duty for teachers mentioned above does not apply in cases where a learner is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine learners.
- Any member of staff who suspects a learner is at risk of FGM or suspects that FGM has been carried out should speak to the DSL and follow our local safeguarding procedures - [Kent and Medway safeguarding children procedures and strategies - Kent Safeguarding learners Multi-Agency Partnership \(kscmp.org.uk\)](https://www.kscmp.org.uk/kent-and-medway-safeguarding-children-procedures-and-strategies)

### 3.6 If you have concerns about extremism

- If a learner is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.
- If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority learners's social care. Make a referral to local authority social care directly, if appropriate. Inform the DSL or deputy as soon as practically possible after the referral.
- Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or [Channel](#), the government's programme for identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority social care team.
- The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a learner. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.
- In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:
  - o Think someone is in immediate danger
  - o Think someone may be planning to travel to join an extremist group
  - o See or hear something that may be terrorist-related

### 3.7 If you have a concern about mental health

- Mental health problems can, in some cases, be an indicator that a learner has suffered or is at risk of suffering abuse, neglect or exploitation.
- Staff will be alert to behavioural signs that suggest a learner may be experiencing a mental health problem or be at risk of developing one.
- If you have a mental health concern about a learner that is also a safeguarding concern, take immediate action.
- If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.
- Refer to the Department for Education guidance on [mental health and behaviour in schools](#) for more information.

### 3.8 Allegations of abuse made against other learners

- We recognise that learners are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for learners.
- We also recognise the gendered nature of child-on-child (herein referred to as learner-on-learner) abuse. However, all learner-on-learner abuse is unacceptable and will be taken seriously.
- Most cases of learners hurting other learners will be dealt with under our school’s behaviour policy, but this learner protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:
  - o Is serious, and potentially a criminal offence
  - o Could put learners in the school at risk
  - o Is violent
  - o Involves learners being forced to use drugs or alcohol
  - o Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See appendix 3 for more information about learner-on-learner abuse.

#### Procedures for dealing with allegations of learner-on-learner abuse

- If a learner makes an allegation of abuse against another learner:
  - o You must record the allegation and tell the DSL, but do not investigate it
  - o The DSL will contact the local authority learners’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence

- o The DSL will put a risk assessment and support plan into place for all learners involved (including the victim(s), the learner(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- o The DSL will contact the learners and adolescent mental health services (CAMHS), if appropriate
- If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting learners and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

### **Creating a supportive environment in school and minimising the risk of learner-on-learner abuse**

- We recognise the importance of taking proactive action to minimise the risk of learner-on-learner abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- o Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- o Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female learners, and initiation or hazing type violence with respect to boys
- o Ensure our curriculum helps to educate learners about appropriate behaviour and consent
- o Ensure learners are able to easily and confidently report abuse using our reporting systems
- o Ensure staff reassure victims that they are being taken seriously
- o Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- o Support learners who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- o Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- o Ensure staff are trained to understand:
  - How to recognise the indicators and signs of learner-on-learner abuse, and know how to identify it and respond to reports

- That even if there are no reports of learner-on-learner abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
  - That if they have any concerns about a learner’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - learners can show signs or act in ways they hope adults will notice and react to
    - A friend may make a report
    - A member of staff may overhear a conversation
    - A learner’s behaviour might indicate that something is wrong
  - That if they have any concerns about a learner’s welfare, they should act on them
  - That certain learners may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
  - That a learner harming a peer could be a sign that the learner is being abused themselves, and that this would fall under the scope of this policy
  - The important role they have to play in preventing learner-on-learner abuse and responding where they believe a learner may be at risk from it
  - That they should speak to the DSL if they have any concerns
  - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side
- The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.
  - Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn’t (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:
    - Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority learners’s social care to determine this
    - There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

### **3.9 Sharing of nudes and semi-nudes (‘sexting’)**

- Elmley Dray School’s approach is based on [guidance from the UK Council for Internet Safety](#) for all staff and for [DSLs and senior leaders](#).

## **Your responsibilities when responding to an incident**

- If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos, including pseudo-images, which are computer-generated images that otherwise appear to be a photograph or video (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.
- You must **not**:
  - View, copy, print, share, store or save the imagery yourself, or ask a learner to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
  - Delete the imagery or ask the learner to delete it
  - Ask the learner(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
  - Share information about the incident with other members of staff, the learner(s) it involves or their, or other, parents and/or carers
  - Say or do anything to blame or shame any young people involved
- You should explain that you need to report the incident and reassure the learner(s) that they will receive support and help from the DSL.

## **Initial review meeting**

- Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:
  - Whether there is an immediate risk to learner(s)
  - If a referral needs to be made to the police and/or learners's social care
  - If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
  - What further information is required to decide on the best response
  - Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
  - Whether immediate action should be taken to delete or remove images or videos from devices or online services
  - Any relevant facts about the learners involved which would influence risk assessment
  - If there is a need to contact another school, college, setting or individual
  - Whether to contact parents or carers of the learners involved (in most cases parents/carers should be involved)

- The DSL will make an immediate referral to police and/or learners's social care if:
  - The incident involves an adult. Where an adult poses as a learner to groom or exploit a learner or young person, the incident may first present as a learner-on-learner incident. See appendix 3 for more information on assessing adult-involved incidents
  - There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)
  - What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
  - The imagery involves sexual acts and any learner in the images or videos is under 13
  - The DSL has reason to believe a learner is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)
- If none of the above apply then the DSL, in consultation with other members of staff as appropriate, may decide to respond to the incident without involving the police or learners's social care. The decision will be made and recorded in line with the procedures set out in this policy.

#### **Further review by the DSL**

- If at the initial review stage a decision has been made not to refer to police and/or learners's social care, the DSL will conduct a further review to establish the facts and assess the risks.
- They will hold interviews with the learners involved (if appropriate).
- If at any point in the process there is a concern that a learner has been harmed or is at risk of harm, a referral will be made to learners's social care and/or the police immediately.

#### **Informing parents/carers**

- The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the learner at risk of harm.

#### **Referring to the police**

- If it is necessary to refer an incident to the police, this will be done through dialling 101.

#### **Recording incidents**

- All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

#### **Curriculum coverage**

- Learners are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships and sex education and PSHE programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:
  - What it is
  - How it is most likely to be encountered
  - The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
  - Issues of legality
  - The risk of damage to people's feelings and reputation
  
- Learners also learn the strategies and skills needed to manage:
  - Specific requests or pressure to provide (or forward) such images
  - The receipt of such images
  
- This policy on the sharing of nudes and semi-nudes is also shared with learners so they are aware of the processes the school will follow in the event of an incident.
  
- Teaching follows best practice in delivering safe and effective education, including:
  - Putting safeguarding first
  - Approaching from the perspective of the learner
  - Promoting dialogue and understanding
  - Empowering and enabling learners and young people
  - Never frightening or scare-mongering
  - Challenging victim-blaming attitudes

### 3.10 Reporting systems for our learners

- Where there is a safeguarding concern, we will take the learner's wishes and feelings into account when determining what action to take and what services to provide.
- We recognise the importance of ensuring learners feel safe and comfortable to come forward and report any concerns and/or allegations.
- To achieve this, we will:
  - Put systems in place for learners to confidently report abuse
  - Ensure our reporting systems are well promoted, easily understood and easily accessible for learners
  - Make it clear to learners that their concerns will be taken seriously, and that they can safely express their views and give feedback
  - Inform learners of our reporting systems and processes, through our relationships and sex education, and PSHE curriculum, ensuring they are aware of who the safeguarding team are and where they can go for support
  - Provide reassurance following disclosures to ensure learners feel safe in submitting any concerns

### 3.11 Multi-agency working

- Elmley Dray School recognises the pivotal role we have to play in multi-agency safeguarding arrangements and is committed to its responsibility to work within the [KSCMP](#) multi-agency safeguarding arrangements as identified within 'Working Together to Safeguard Children' and [Kent & Medway SAB website](#)
- The leadership team, Directors and PAT together with the DSL for Elmley Dray School, will work to establish strong and co-operative local relationships with professionals in other agencies, including the safeguarding partners in line with local and national guidance.
- Elmley Dray School recognises the importance of multi-agency working and is committed to working alongside partner agencies to provide a coordinated response to promote learner's welfare and protect them from harm. This includes contributing to [KSCMP](#) processes as required, such as, participation in relevant safeguarding multi-agency plans and meetings, including Child/Vulnerable Adults Protection Conferences, Core Groups, Strategy Meetings, learner in Need meetings or other early help multi-agency meetings.

- Elmley Dray School will allow access for Kent Social Work Service and, where appropriate, from a placing local authority, to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.
- The Proprietor Director, Headteacher/DSL and Chair of Governors are aware of the requirement for learners to have an Appropriate Adult ([PACE Code C 2019](#)) where there is a need for detention, treatment and questioning by police officers and will respond to concerns in line with our school/college 'Searching, Screening and Confiscation' policy and/or behaviour policy, which is informed by the DfE '[Searching, screening and confiscation at school](#)' guidance.

### 3.12 Confidentiality and information sharing

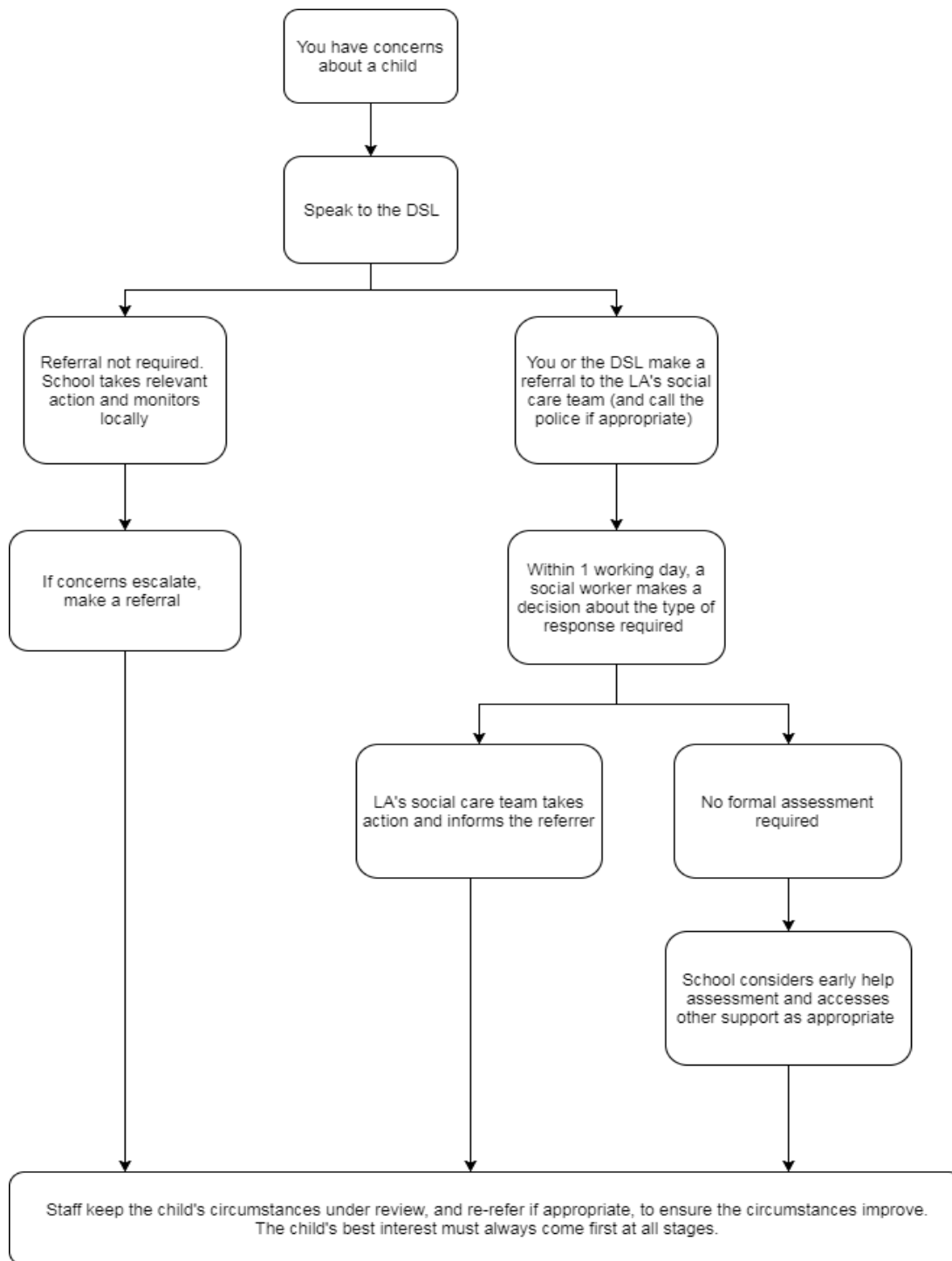
- Elmley Dray School recognises our duty and powers to hold, use and share relevant information with appropriate agencies in matters relating to learner protection at the earliest opportunity as per statutory guidance outlined within KCSIE.
- Elmley Dray School has an appropriately trained Data Protection Officer (DPO) as required by the UK General Data Protection Regulations (UK GDPR) to ensure that our organisation is compliant with all matters relating to confidentiality and information sharing requirements.
- Staff will have due regard to the relevant data protection principles, which allow them to share and withhold personal information. The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping learners safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of learners (KCSIE 2025). KCSIE 2025, the [Information Commissioner's Office](#) (ICO) and the DfE "[Information sharing advice for safeguarding practitioners](#)" (2018) guidance provides further details regarding information sharing principles and expectations.
- The DSL will disclose relevant safeguarding information about learners and young people with staff on a 'need to know' basis.
- All members of staff must be aware that whilst they have duties to keep information confidential, in line with our GDPR, Privacy and Confidentiality policy which is available on our website.
- All staff also have a professional responsibility to be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of learners; this may include sharing information with the DSL and with other agencies as appropriate.
- In regard to confidentiality and information sharing staff will only involve those who need to be involved, such as the DSL (or a deputy) and Kent Integrated Children's Services. All staff are aware they cannot promise a learner that they will not tell anyone about a report of any form of abuse, as this may not be in the best interests of the learner.

### 3.13 Complaints

- Elmley Dray School community should feel able to raise or report any concerns about learner safety or potential failures in the organisation's safeguarding regime. There is a complaints procedure available to parents, learners, members of staff and visitors who wish to report concerns or complaints. This can be found within the Compliments, Concerns and Complaints Policy and within the Whistleblowing Policy.
- Whilst we encourage members of our community to report concerns and complaints directly to us, we recognise this may not always be possible. learners, young people, and adults who have experienced abuse at school can contact the NSPCC 'Report Abuse in Education' helpline on 0800 136 663 or via email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)
- Staff can also access the NSPCC [Whistleblowing Advice Line](#) if they do not feel able to raise concerns regarding learner protection failures internally on 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).
- The leadership team at Elmley Dray School will take all concerns reported to the organisation seriously and all complaints will be considered and responded to in line with the relevant and appropriate process.
  - Anything that constitutes an allegation against a member of staff or volunteer will be dealt with in line with section 8 of this policy.

**Figure 1: procedure if you have concerns about a learner's welfare (as opposed to believing a learner is suffering or likely to suffer from harm, or in immediate danger)**

(Note – if the DSL is unavailable, this should not delay action) \*Reference to child also includes vulnerable adults for the purpose of this flowchart.



## 4 Supporting Learners Potentially at Greater Risk of Harm

- Whilst all learners should be protected, Elmley Dray School acknowledge that some groups of learners and young people with whom Elmley Dray School are potentially at greater risk of harm.

#### **4.1 Safeguarding Learners with Special Educational Needs or Disabilities (SEND)**

- Elmley Dray School works predominantly with families where there are learners with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges and barriers for recognising abuse and neglect.
- Elmley Dray School recognises that learners and young people with SEND may face additional communication barriers and experience difficulties in managing or reporting abuse or challenges. Learners with SEND will be supported to communicate and ensure that their voice is heard and acted upon.
- All members of staff are encouraged to appropriately explore potential indicators of abuse such as behaviour, mood changes or injuries and not to assume that they are related to the learners and young people's disability. Staff will be mindful that learners with SEND or certain medical conditions may be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Members of staff are encouraged to be aware that learners with SEND can be disproportionately impacted by safeguarding concerns, such as exploitation, peer group isolation or bullying including prejudice-based bullying.
- To address these additional challenges, Elmley Dray School will always consider implementing extra pastoral support and attention for learners and young people with SEND.
- The health, safety, independence, and welfare of learners is promoted, and their dignity and privacy are respected at Elmley Dray School. Arrangements for intimate and personal care are open and transparent and accompanied by robust recording systems which are agreed with the learners and young people, parents and carers.

#### **4.2 Children Missing from Education (CME)**

- Children missing from education, particularly persistently, can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse, and learner sexual and criminal exploitation - particularly county lines. A robust response to learners missing from education will support the identification of such abuse and may help prevent the risk of learners going missing in the future.
- Where possible, the school will hold more than one emergency contact number for each learner so we have additional options to make contact with a responsible adult if a learner missing education is also identified as being a welfare and/or safeguarding concern. Elmley Dray School will also hold information on contact for parents, carers and learners and young

people so that, if required, they can act on any vital warning sign to a range of safeguarding issues (see above point)

- Where Elmley Dray School have concerns that a child or young person is missing from education, we will respond in line with our statutory duties (DfE: [learners missing education](#)) and local policies.

#### **4.3 Elective Home Education (EHE)**

- Where a parent/carer expresses their intention to remove a learner from school with a view to educating at home, we will respond in line with [national Elective Home Education guidance](#) and local [Kent guidance](#). We will work together with parents/carers and other key professionals and organisations to ensure decisions are made in the best interest of the learner.

#### **4.4 Learners who need a social worker**

- The DSL will hold details of social workers working with learners in the school so that decisions can be made in the best interests of the learner's safety, welfare, and educational outcomes.
- Where learners have a social worker, this will inform school decisions about their safety and promote their welfare, for example, responding to unauthorised absence and provision of pastoral and/or academic support.

#### **4.5 Learners who are looked after and previously looked after learners and care leavers**

- Elmley Dray School recognises the common reason for learners becoming looked after is as a result of abuse and/or neglect and a previously looked after learner also potentially remains vulnerable.
- The school will appoint a '[designated teacher](#)' who will be a Senior SEND Teacher and DSL who works with local authorities, including the [Virtual School Kent \(including the virtual school head\)](#), to promote the educational achievement of registered learners who are looked after or who have been previously looked after.
- The designated teacher will work with the DSL to ensure appropriate staff have the information they need in relation to a learner's looked after legal status, contact arrangements with birth parents or those with parental responsibility, care arrangements and the levels of authority delegated to the carer by the authority looking after them.
- Where a learner is looked after, the DSL will hold details of the social worker and the name of the virtual school head in the authority that looks after the learner.
- Where the school believes a learner is being cared for as part of a private fostering arrangement (occurs when a learner under 16 or 18 if the learner is disabled is cared for and

lives with an adult who is not a relative for 28 days or more) there is a duty to recognise these arrangements and inform the Local Authority via the Front Door.

- Where a learner is leaving care, the DSL will hold details of the local authority Personal Advisor appointed to guide and support them and will liaise with them as necessary regarding any issues of concern.

#### **4.6 Learners who are Lesbian, Gay, Bi, Trans, Queer and non gender confirming (LGBTQ+)**

- The fact that a learner or a young person may be LGBTQ+ is not in itself an inherent risk factor for harm, however, Elmley Dray Schools recognises that learners who are LGBTQ+ or are perceived by other learners to be LGBTQ+ (whether they are or not) can be targeted by other learners or others within the wider community.
- Elmley Dray School recognises risks can be compounded where learners who are LGBTQ+ lack a trusted adult with whom they can be open. LGBTQ+ is included within our Relationships Education/ Relationship and Sex Education and Health Education curriculum and our staff will endeavour to reduce the additional barriers faced and provide a safe space for learners to speak out or share any concerns.

### **5 Online Safety**

- It is essential that learners are safeguarded from potentially harmful and inappropriate material or behaviours online. Elmley Dray School has an Online Safety Policy and has adopted a whole school approach to online safety which will empower, protect, and educate our learners and staff in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.
- Elmley Dray School ensures that online safety is considered as a running and interrelated theme when devising and implementing our policies and procedures, and when planning our curriculum, staff training, the role and responsibilities of the DSL and parental engagement.
- Elmley Dray School identifies that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
  - Content: being exposed to illegal, inappropriate or harmful content. For example misinformation, disinformation, conspiracy theories, pornography, fake news, racism, misogyny, self-harm, suicide, anti-semitism, radicalisation and extremism.
  - Contact: being subjected to harmful online interaction with other users. For example peer to peer pressure, commercial advertising and adults posing as learners or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
  - Conduct: personal online behaviour that increases the likelihood of, or causes, harm. For example, making, sending and receiving explicit images (including consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying.
  - Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

- Elmley Dray School recognises that technology, and the risks and harms related to it, evolve and change rapidly. The school will carry out an annual review of our approaches to online safety, supported by an annual risk assessment, which considers and reflects the current risks our learners face online.
- The Headteacher will be informed of any online safety concerns by the DSL, as appropriate. The named governor for safeguarding will report on online safety practice and incidents, including outcomes, on a regular basis to the wider PAT and director body.

Please also refer to our online safety policy.

## **5.1 Policies and procedures**

- The Headteacher/DSL has overall responsibility for online safety within the school but will liaise with other members of staff, for example Senior SEN Teachers as necessary.
- The DSL will respond to online safety concerns in line with this policy and other associated policies, including anti-bullying and behaviour policies.
- Elmley Dray School uses a wide range of technology. This includes computers, laptops, tablets and other digital devices, the internet, our learning platform, intranet and email systems.
  - All school owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.
- Elmley Dray School recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras and wearable technology. In accordance with KCSIE 2025 and the UK Safer Internet Centre guidance as to what “appropriate” filtering and monitoring might look like, Elmley Dray School has appropriate mobile, smart technology and image use statements in place, which are shared and understood by all members of the community. These statements form part of the annual review process and the welcome pack to the school.

## **5.2 Appropriate filtering and monitoring**

- Elmley Dray School will do all we reasonably can to limit learner exposure to online risks through school provided IT systems and will ensure that appropriate filtering and monitoring systems are in place.
  - If learners or staff discover unsuitable sites or material, they are required to alert the Headteacher immediately and so action can be taken to deal with the situation. The teacher must act immediately by turning off the ICT screen or indeed the classroom ICT until the situation is rectified.
  - Our leadership team and relevant staff have an awareness and understanding of the filtering and monitoring provisions in place, manage them effectively and know how to escalate concerns when identified.

- All users will be informed that use of our systems can be monitored, and that monitoring will be in line with data protection, human rights, and privacy legislation.
  - Filtering breaches or concerns identified through our monitoring approaches will be recorded and reported to the DSL who will respond as appropriate.
  - Any access to material believed to be illegal will be reported immediately to the relevant agencies, such as the Internet Watch Foundation and the police.
  - When implementing appropriate filtering and monitoring, Elmley Dray School will ensure that “over blocking” does not lead to unreasonable restrictions as to what learners can be taught with regards to online teaching and safeguarding.
- Whilst filtering and monitoring is an important part of our online safety responsibilities, it is only one part of school’s approach to online safety.
    - Learners will use appropriate search tools, apps and online resources as identified by staff, following an informed risk assessment.
    - Internet use will be supervised by staff as appropriate to learners' age and ability.
    - Learners will be directed to use age/ability appropriate online resources and tools by staff.

### **5.3 Information security and access management**

- Elmley Dray School is responsible for ensuring an appropriate level of security protection procedures are in place, in order to safeguard our systems as well as staff and learners.
- Elmley Dray School will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

### **5.4 Remote/Online learning**

Specific guidance for DSLs and SLT regarding remote learning is available at

- DfE: [Safeguarding and remote education during coronavirus \(COVID-19\)](#)
  - NSPCC: [Undertaking remote teaching safely](#)
  - The Education People: [Remote Learning Guidance for SLT](#)
- Elmley Dray School will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements and any local/national guidance.
  - All communication with Elmley Dray School learners, parents or carers will take place using organisational or school provided or approved communication channels.

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

- Staff and learners will engage with remote teaching and learning in line with existing behaviour principles as set out in our school behaviour policy and organisational code of conduct.

- Staff and learners will be encouraged to report issues experienced at home and concerns will be responded to in line with our learner protection and other relevant policies.
- When delivering remote learning, staff will follow our Remote Learning Acceptable Use Policy (AUP)

## 5.5 Artificial Intelligence (AI)

- Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, learners and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.
- Elmley Dray School recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard learners. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose learners to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.
- Elmley Dray School will treat any use of AI to access harmful content or bully learners in line with this policy, our AI policy and behaviour policy.
- Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school.

## 5.6 Staff training

- Elmley Dray School will ensure that all staff receive online safety training as part of induction and that ongoing online safety training and update for all staff will be integrated, aligned and considered as part of our overarching safeguarding approach.

## 5.7 Educating learners

- Elmley Dray School will ensure a comprehensive whole school curriculum response is in place, in line with the *UK Council for Internet Safety (UKCIS)* [‘Education for a Connected World Framework’](#) and *DfE* [‘Teaching online safety in school’](#) guidance, to enable all learners to learn about and manage online risks effectively as part of providing a broad and balanced curriculum.

## 5.8 Working with parents/carers

- Elmley Dray School will build a partnership approach to online safety and will support parents/carers to become aware and alert of the potential benefits and risks and to reinforce the importance of learners being safe online by providing information on any ongoing issues around online safety.
- Elmley Dray School will ensure parents and carers understand what systems are used to filter and monitor their learners’s online use at school, what their learners are being asked to

do online, including the sites they will be asked to access and who from the school (if anyone) their learner is going to be interacting with online.

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

## **6 Staff Engagement and Expectations**

### **6.1 Staff awareness, induction and training**

- All members of staff have been provided with a copy of part one of 'Keeping Children Safe in Education' 2025 which covers safeguarding information for staff.
  - Elmley Dray School leaders, including the DSL and PAT will read KCSIE 2025 in its entirety.
  - All members of staff will read part 1 and annex B.
  - All members of staff have signed to confirm that they have read and understood the national guidance shared with them. This information is held on personnel files for all staff and recorded on the SCR.
- All new staff and volunteers (including agency and third-party staff) receive safeguarding and learner protection training (including online safety), including information to ensure they are aware of the school internal safeguarding processes, as part of their induction. Staff are expected to complete KSCMP safeguarding and Home Office Prevent training, and to have a review of safeguarding training in the Autumn and Spring Term. This training is regularly updated and is in line with guidance. All staff also complete Prevent training.
- All governors and directors receive appropriate safeguarding including online safety training at induction. This training equips them with the knowledge to provide strategic challenge to test and assure that our safeguarding policies and procedures are effective and support the delivery of a robust whole school approach to safeguarding. This training is regularly updated.
- The DSL and deputy DSLs will undertake learner protection and safeguarding training at least every 2 years. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments). They, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.
- All staff members (including agency and third-party staff) will receive appropriate safeguarding training (including online safety) and this training will be updated at least twice annually through circulars, online CPD, INSET sessions or similar.

- Online safety training for staff will be integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning.
- In addition to specific safeguarding and learner protection training, all staff will receive regular safeguarding and learner protection updates, at least annually, to provide them with relevant skills and knowledge to safeguard learners effectively. This will initially be through email correspondence and weekly staff meetings.
- At least 1 person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures. Please refer to our safer recruitment policy for further information.
- Elmley Dray School recognises the expertise staff build by undertaking safeguarding training and from managing safeguarding concerns on a daily basis and staff are encouraged to contribute to and shape the organisations safeguarding arrangements and policies by being invited to review policies and procedures through training and reflection processes.
- The Headteacher/DSL will report to the Governors (PAT) and Director detailing safeguarding training undertaken by all staff and will maintain an up to date record of who has been trained.

## **6.2 Safer working practice**

- All members of staff are required to work within our clear guidelines on safer working practice as outlined in the organisational staff code of conduct.
- The DSL will ensure that all staff and volunteers (including agency and third-party staff) have read the organisation's safeguarding policy and are aware of the organisation's expectations regarding safe and professional practice via the staff code of conduct and Acceptable Use Policy (AUP).
- Staff will be made aware of the school behaviour management and physical intervention policies. Staff will manage behaviour effectively to ensure a good and safe educational environment and will have a clear understanding of the needs of all learners. Any physical interventions and/or use of reasonable force will be in line with our agreed policy and procedures, and national guidance.
- All staff will be made aware of the professional risks associated with the use of social media and electronic communication (such as email, mobile phones, texting, social networking). Staff will adhere to relevant organisations policies including staff code of conduct and Acceptable Use Policies (AUPs).

## **6.3 Supervision and support**

- The induction process will include familiarisation with safeguarding and learner protection responsibilities and procedures to be followed if members of staff have any concerns about a learner's safety or welfare.
- Elmley Dray School will provide appropriate supervision and support for all members of staff to ensure that:
  - All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of learners
  - All staff are supported by the DSL in their safeguarding role.
  - All members of staff have regular reviews of their own practice to ensure they improve.
- Any member of staff affected by issues arising from concerns for learners's welfare or safety can seek support from the DSL.
- The DSL will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union, the Education Support Partnership or other similar organisations directly.

## **7 Safer Recruitment and Allegations Against Staff**

### **7.1 Safer recruitment and safeguarding checks**

- Elmley Dray School are committed to ensuring that we develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our staff and in the school, learners.
  - Elmley Dray School will follow relevant guidance in Keeping Children Safe in Education 2025 (Part Three, 'Safer Recruitment') and from The Disclosure and Barring Service (DBS).
  - The proprietor/director, Chair of Governors and PAT, together with the leadership team are responsible for ensuring that the organisation follows safe recruitment processes as outlined within guidance.
  - The proprietor/director, Chair of Governors and PAT, together with the leadership team will ensure that at least one of the persons who conducts an interview has completed safer recruitment training.
- Elmley Dray School maintains an accurate Single Central Record (SCR) in line with statutory guidance.
- Elmley Dray School are committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools and the Care Act 2014.
- We advise all staff to disclose any reason that may affect their suitability to work with learners including convictions, cautions, court orders, reprimands, and warnings.

- Where Elmley Dray School places a learner with an alternative provision provider, the school will continue to be responsible for the safeguarding of that learner.
- Elmley Dray School will undertake appropriate checks to ensure the provider meets the needs of the learners and young people including written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment.
- Where Elmley Dray School organises work experience placements, we will follow the advice and guidance as identified in KCSIE 2025.

## **7.2 Allegations/concerns raised in relation to staff, including supply teachers, volunteers and contractors**

- Any concerns or allegations about staff will be recorded and dealt with appropriately in line with national (KCSIE 2025) and the local Kent allegations arrangements.
- Ensuring concerns are dealt with effectively will protect those working in or on behalf of the organisation from potential false allegations or misunderstandings.
- If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to learners, speak to the Headteacher as soon as possible. If the concerns/allegations are about the Headteacher, speak to the Chair of Governors.
- The Headteacher/Chair of Governors will then follow the procedures set out in this policy, if appropriate.
- Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the Headteacher, report it directly to the local authority designated officer (LADO).
- If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for learners, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.
- Where appropriate (early years), the school will inform Ofsted of the allegation and actions taken, within the necessary.
- Where the Headteacher/Chair of Governors is unsure how to respond, for example if the school is unsure if a concern meets the harm 'thresholds', advice will be sought via the Local Authority Designated Officer (LADO).
- In all cases where allegations are made against staff or low-level concerns are reported, once proceedings have been concluded, the Headteacher/Chair of Governors (and if they

have been involved, the LADO) will consider the facts and determine whether any lessons can be learned and if any improvements can be made.

### **7.2.1 Concerns that meet the ‘harm threshold’**

- School recognises that it is possible for any member of staff, including volunteers, governors, contractors, agency and third-party staff (including supply teachers) and visitors to behave in a way that indicates a person would pose a risk of harm if they continue to work in their present position, or in any capacity with learners in a school or college. This includes when someone has:
  - behaved in a way that has harmed a learner, or may have harmed a learner
  - possibly committed a criminal offence against or related to a learner
  - behaved towards a learner or learners in a way that indicates he or she may pose a risk of harm to learners
  - behaved or may have behaved in a way that indicates they may not be suitable to work with learners.
- Allegations against staff which meet this threshold will be responded to and managed in line with part four of KCSIE. Allegations that meet the harm threshold will be referred immediately to the Headteacher who will contact the LADO to agree further action to be taken in respect of the learner and staff member. In the event of allegations of abuse being made against the Headteacher, staff are advised to report to the Chair of Governors. In the event of allegations being made against the Chair of Governors, staff are advised that allegations should be reported to the LADO for guidance and instructions.

### **7.2.2 Concerns that do not meet the ‘harm threshold’**

- Elmley Dray School may also need to take action in response to ‘low-level’ concerns about staff. Additional information regarding low-level concerns is contained within our code of conduct– this includes what a low-level concern is, the importance of sharing them and the confidential procedure to follow when sharing them.
  - Elmley Dray School has an open and transparent culture in which all concerns about all adults working in or on behalf of the organisation are dealt with promptly and appropriately; this enables us to identify inappropriate, problematic or concerning behaviour early, minimise the risk of abuse and ensure that adults working in or on behalf of the organisation are clear about and act within appropriate professional boundaries, and in accordance with our ethos and values.
  - A ‘low-level’ concern does not mean that it is insignificant; a low-level concern is any concern that an adult working in or on behalf of the organisation may have acted in a way that is inconsistent with our code of conduct, including inappropriate conduct outside of work and does not meet the ‘harm threshold’ or is otherwise not serious enough to consider a referral to the LADO.
  - Low-level concerns may arise in several ways and from a number of sources. For example, suspicion, complaints, or allegations made by a learner, parent or other adult within or outside of the organisation, or as a result of vetting checks.

- It is crucial that all low-level concerns are shared responsibly, recorded and dealt with appropriately to protect staff from becoming the subject of potential false low-level concerns or misunderstandings.
- Low-level concerns can be shared confidentially by the Headteacher with the DSL and take a more collaborative decision making approach (at our school this is the same person)
  - Where low-level concerns are reported to the school, the Headteacher will be informed of all low-level concerns and is the ultimate decision maker in respect of the response to all low-level concerns.
  - The Headteacher will share concerns and liaise with the LADO enquiries officer via the LADO Enquiry Line.
  - Low-level concerns shared about supply staff and contractors will be shared with their employers so any potential patterns of inappropriate behaviour can be identified.
  - If the school is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, we will consult with the LADO.
- Low-level concerns will be recorded in writing and reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified.
  - Records will be kept confidential and will be held securely and retained and in compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) and other relevant policies and procedures (for example data retention policies).
  - Where a pattern is identified, the organisation will implement appropriate action, for example consulting with [the LADO enquiry line](#) and following our disciplinary procedures.

### 7.3 Safe Culture

- As part of our approach to safeguarding, the organisation has created and embedded a culture of openness, trust and transparency in which our values and expected behaviour as set out in our staff code of conduct are constantly lived, monitored and reinforced by all staff (including supply teachers, volunteers and contractors) and where all concerns are dealt with promptly and appropriately.
- Staff are encouraged and should feel confident to self-refer, if they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards. This includes where concerns may be felt to be deliberately invented or malicious; such allegations are extremely rare and as such all concerns should be reported and recorded.
- All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the organisations safeguarding regime. The Directors, Governance

(PAT) and Leadership team at Elmley Dray School will take all concerns or allegations received seriously.

- All members of staff are made aware of the organisation's Whistleblowing procedure. It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a learner at risk.
- Staff can access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding learner protection failures internally. Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).
- Elmley Dray School has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a learner, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person.
  - If these circumstances arise in relation to a member of staff at our organisation, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the [LADO](#).

## **8 Opportunities to Teach Safeguarding**

- Elmley Dray School will ensure that learners are taught about safeguarding, including online safety, as part of providing a broad and balanced curriculum. This will include covering relevant issues through Relationships and Sex Education and our PSHE and Life Skills Curriculum.
- We recognise that school plays an essential role in helping learners to understand and identify the parameters of what is appropriate learner and adult behaviour, what is 'safe,' to recognise when they and others close to them are not safe, and how to seek advice and support when they are concerned. Our curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that learners have a range of age appropriate contacts and strategies to ensure their own protection and that of others.
- Elmley Dray School recognises the crucial role we have to play in preventative education. Preventative education is most effective in the context of a whole-school approach which prepares learners for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. As many of our learners will have suffered some form of mental abuse in the past, we include in this learning our suicide awareness curriculum which is linked to the development of emotional resilience.
- Elmley Dray School has a clear set of values and standards, upheld and demonstrated throughout all aspects of school life which are underpinned by our behaviour policy and pastoral support system, as well as by a planned programme of evidence-based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum.

Our programme is fully inclusive and developed to be age and stage of development appropriate.

- Elmley Dray School recognises that a one size fits all approach will not be appropriate for all learners, and a more personalised or contextualised approach, tailored to the specific needs and vulnerabilities of individual learners and young people who attend our school.
- Our school systems support learners and young people to talk to any member of Elmley Dray Team of staff, as all will be trained to support the mental health and wellbeing of our vulnerable learners and young people. All learners and young people will be listened to and heard, and their concerns will always be taken seriously and acted upon as appropriate.

## **9 Physical Safety**

### **9.1 Use of ‘reasonable force’**

- There may be circumstances when it is appropriate for staff to use reasonable force in order to safeguard learners from harm. Further information regarding our approach and expectations can be found in our behaviour policy and is in line with the DfE [‘Use of reasonable force in schools’](#) guidance. Note this applies to the school/DfE child element of our service only.

### **9.2 The use of premises by other organisations**

- Where services or activities are provided separately by another body using the school facilities/premises, the Headteacher will seek written assurance that the organisation concerned has appropriate policies and procedures in place regarding safeguarding learners and learner protection, and that relevant safeguarding checks have been made in respect of staff and volunteers. If this assurance is not achieved, an application to use premises will be refused.
- Safeguarding requirements will be included in any transfer of control agreement (such as a lease or hire agreement), as a condition of use and occupation of the premises. Failure to comply with this will lead to termination of the agreement.

### **9.3 Site security**

- All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light.
- Appropriate checks will be undertaken in respect of visitors and volunteers coming into School premises as outlined within national guidance. Visitors will be expected to sign in and out via the office visitors log and to display a visitor’s badge whilst on site.
- Staff and visitors will be expected to adhere to any safety arrangements implemented.
- Any individual who is not known or identifiable on site should be challenged for clarification and reassurance.

- The school will not accept the behaviour of any individual (parent or other) that threatens school security or leads others (learner or adult) to feel unsafe. Such behaviour will be treated as a serious concern and could result in a decision to refuse access for that individual to the school site in the future.

## 10. Local Contacts and Support

- All members of staff are made aware of local support available.

If a learner or young person may be at risk of imminent harm, call the Integrated Front Door on 03000 411 111 (outside office hours - 03000 419 191)/ 03000 41 61 61 or the Police on 999

### Contacting the Education Safeguarding Service

- [Safeguarding contacts - KELSI](#)

#### Online Safety in the Education Safeguarding Service

- o 03301 651500 - [onlinesafety@theeducationpeople.org](mailto:onlinesafety@theeducationpeople.org) (non-urgent issues only)

#### LADO Service

- o Telephone: 03000 410888
- o Email: [kentlearnerslado@kent.gov.uk](mailto:kentlearnerslado@kent.gov.uk)
- o Professional referrals to be made on the learners's services portal  
<https://webapps.kent.gov.uk/KCC.learnerssPortal.Web.Sites.Public/Default.aspx>

#### Integrated learners's Services/ learners's Social Work Services

- o Front Door: 03000 411111
- o Out of Hours Number: 03000 419191

#### Kent Police

- o 101 or 999 if there is an immediate risk of harm

#### Kent Safeguarding learners Multi-Agency Partnership (KSCMP)

- o [kscmp@kent.gov.uk](mailto:kscmp@kent.gov.uk)
- o [www.kscmp.org.uk](http://www.kscmp.org.uk)
- o 03000 421126

#### Kent and Medway Safeguarding Adults Board (KMSAB)

- o [Kent and Medway SAB - Report Abuse](#)

#### Adult Safeguarding

- o Adult Social Care via 03000 41 61 61 (text relay 18001 03000 41 61 61) or email [social.services@kent.gov.uk](mailto:social.services@kent.gov.uk)

## Version control - Approval and review

Version No.	Approved By	Approval Date	Main Change	Review Period
1	Hayley Furnell	August 2024	Initial policy approved	Annually
2	Hayley Furnell	August 2025	Annual review, KCSIE 2025 updates, change to DDSL	Annually
2.1	Hayley Furnell	December 2025	Updated to include additional DDSL	Annually



Hayley Furnell, Director,  
on behalf of Elmley Dray School

Dated: December 2025  
Next review: August 2026

## Appendix 1: Categories of Abuse

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

**Abuse:** a form of maltreatment of a learner. Somebody may abuse or neglect a learner by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another learner or learners. It should be noted that abuse can be carried out both on and offline and be perpetrated by men, women, and learners.

**Sexual abuse:** involves forcing or enticing a learner or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the learner 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 learners in looking at, or in the production of, sexual images, watching sexual activities, encouraging learners to behave in sexually inappropriate ways, or grooming a learner 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 learners.

### Signs that MAY INDICATE Sexual Abuse

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

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

### Signs that MAY INDICATE physical abuse

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft area of the face such as the cheeks

- Fingertip bruising to the front or back of torso
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns
- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot
- Aggressive behaviour or severe temper outbursts.
- Injuries need to be accounted for. Inadequate, inconsistent, or excessively plausible explanations or a delay in seeking treatment should signal concern.

**Emotional abuse:** the persistent emotional maltreatment of a learner such as to cause severe and adverse effects on the learner's emotional development. It may involve conveying to a learner 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 learner 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 learners. These may include interactions that are beyond a learner's developmental capability as well as overprotection and limitation of exploration and learning or preventing the learner participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing learners frequently to feel frightened or in danger, or the exploitation or corruption of learners. Some level of emotional abuse is involved in all types of maltreatment of a learner, although it may occur alone.

#### **Signs that MAY INDICATE emotional abuse**

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

**Neglect:** the persistent failure to meet a learner's basic physical and/or psychological needs, likely to result in the serious impairment of the learner's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a learner 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 learner 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 learner's basic emotional needs.

#### **Signs that MAY INDICATE neglect.**

- Constant hunger
- Poor personal hygiene
- Constant tiredness

- Inadequate clothing
- Frequent lateness or non-attendance
- Untreated medical problems
- Poor relationship with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight
- Low self esteem

## Appendix 2: Support Organisations

### NSPCC 'Report Abuse in Education' Helpline

- [0800 136 663](tel:0800136663) or [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

### National Organisations

- NSPCC: [www.nspcc.org.uk](http://www.nspcc.org.uk)
- Barnardo's: [www.barnardos.org.uk](http://www.barnardos.org.uk)
- Action for learners: [www.actionforlearners.org.uk](http://www.actionforlearners.org.uk)
- learners's Society: [www.learnersssociety.org.uk](http://www.learnersssociety.org.uk)
- Centre of Expertise on learner Sexual Abuse: [www.csacentre.org.uk](http://www.csacentre.org.uk)

### Support for Staff

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

### Support for learners

- learnerLine: [www.learnerline.org.uk](http://www.learnerline.org.uk)
- Papyrus: [www.papyrus-uk.org](http://www.papyrus-uk.org)
- The Mix: [www.themix.org.uk](http://www.themix.org.uk)
- Shout: [www.giveusashout.org](http://www.giveusashout.org)
- Fearless: [www.fearless.org](http://www.fearless.org)
- Victim Support: [www.victimsupport.org.uk](http://www.victimsupport.org.uk)

### Support for Adults

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

### Support for Learning Disabilities

- Respond: [www.respond.org.uk](http://www.respond.org.uk)
- Mencap: [www.mencap.org.uk](http://www.mencap.org.uk)
- Council for Disabled learners: <https://councilfordisabledlearners.org.uk>

### Contextual Safeguarding Network

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

### Kent Resilience Hub

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

## **Substance Misuse**

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

## **Domestic Abuse**

- Domestic abuse services: [www.domesticabuseservices.org.uk](http://www.domesticabuseservices.org.uk)
- Refuge: [www.refuge.org.uk](http://www.refuge.org.uk)
- Women's Aid: [www.womensaid.org.uk](http://www.womensaid.org.uk)
- Men's Advice Line: [www.mensadviceline.org.uk](http://www.mensadviceline.org.uk)
- Mankind: [www.mankindcounselling.org.uk](http://www.mankindcounselling.org.uk)
- National Domestic Abuse Helpline: [www.nationaldahelpline.org.uk](http://www.nationaldahelpline.org.uk)
- Respect Phonenumber: <https://respectphonenumber.org.uk>

## **Criminal and Sexual Exploitation**

- National Crime Agency: [www.nationalcrimeagency.gov.uk/who-we-are](http://www.nationalcrimeagency.gov.uk/who-we-are)
- It's not okay: [www.itsnotokay.co.uk](http://www.itsnotokay.co.uk)
- NWG Network: [www.nwgnetwork.org](http://www.nwgnetwork.org)
- County Lines Toolkit for Professionals: [www.learnerssociety.org.uk/information/professionals/resources/county-lines-toolkit](http://www.learnerssociety.org.uk/information/professionals/resources/county-lines-toolkit)

## **Honour Based Abuse**

- Karma Nirvana: <https://karmanirvana.org.uk>
- Forced Marriage Unit: [www.gov.uk/guidance/forced-marriage](http://www.gov.uk/guidance/forced-marriage)
- FGM Factsheet: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/496415/6\\_1639\\_HO\\_SP\\_FGM\\_mandatory\\_reporting\\_Fact\\_sheet\\_Web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf)
- Mandatory reporting of female genital mutilation: procedural information: [www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information](http://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information)
- The right to choose - government guidance on forced marriage: [www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage](http://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage)

## **Learner-on-learner abuse, including bullying, sexual violence and harassment**

- Rape Crisis: <https://rapecrisis.org.uk>
- Brook: [www.brook.org.uk](http://www.brook.org.uk)
- Disrespect Nobody: [www.disrespectnobody.co.uk](http://www.disrespectnobody.co.uk)
- Upskirting – know your rights: [www.gov.uk/government/news/upskirting-know-your-rights](http://www.gov.uk/government/news/upskirting-know-your-rights)
- Lucy Faithfull Foundation: [www.lucyfaithfull.org.uk](http://www.lucyfaithfull.org.uk)
- Stop it Now! [www.stopitnow.org.uk](http://www.stopitnow.org.uk)
- Parents Protect: [www.parentsprotect.co.uk](http://www.parentsprotect.co.uk)
- Anti-Bullying Alliance: [www.anti-bullyingalliance.org.uk](http://www.anti-bullyingalliance.org.uk)
- Diana Award: [www.antibullyingpro.com/](http://www.antibullyingpro.com/)
- Bullying UK: [www.bullying.co.uk](http://www.bullying.co.uk)
- Kidscape: [www.kidscape.org.uk](http://www.kidscape.org.uk)

## Online Safety

- NCA-CEOP: [www.ceop.police.uk](http://www.ceop.police.uk) and [www.thinkuknow.co.uk](http://www.thinkuknow.co.uk)
- Internet Watch Foundation (IWF): [www.iwf.org.uk](http://www.iwf.org.uk)
- learnernet: [www.learnernet.com](http://www.learnernet.com)
- UK Safer Internet Centre: [www.saferinternet.org.uk](http://www.saferinternet.org.uk)
- Report Harmful Content: <https://reportharmfulcontent.com>
- Marie Collins Foundation: [www.mariecollinsfoundation.org.uk](http://www.mariecollinsfoundation.org.uk)
- Internet Matters: [www.internetmatters.org](http://www.internetmatters.org)
- NSPCC: [www.nspcc.org.uk/online-safety](http://www.nspcc.org.uk/online-safety)
- Get Safe Online: [www.getsafeonline.org](http://www.getsafeonline.org)
- Parents Protect: [www.parentsprotect.co.uk](http://www.parentsprotect.co.uk)
- Cyber Choices:  
<https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices>
- National Cyber Security Centre (NCSC): [www.ncsc.gov.uk](http://www.ncsc.gov.uk)

## Mental Health

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

## Radicalisation and hate

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

## Learners with Family Members in Prison

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

## Appendix 3: Specific Safeguarding Issues

### Assessing adult-involved nude and semi-nude sharing incidents

This section is based on annex A of the UK Council of Internet Safety's [advice for education settings](#).

All adult-involved nude and semi-nude image sharing incidents are learner sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as learner-on-learner nude/semi-nude sharing, it may be difficult to initially assess adult involvement.

There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.

#### Sexually motivated incidents

In this type of incident, an adult offender obtains nude and semi-nudes directly from a learner or young person using online platforms.

To make initial contact, the offender may present as themselves or use a false identity on the platform, sometimes posing as a learner or young person to encourage a response and build trust. The offender often grooms the learner or young person on social media, in chatrooms or on gaming platforms, and may then move the conversation to a private messaging app or an end-to-end encrypted (E2EE) environment where a request for a nude or semi-nude is made. To encourage the learner or young person to create and share nude or semi-nude, the offender may share pornography or learner sexual abuse material (images of other young people), including AI-generated material.

Once a learner or young person shares a nude or semi-nude, an offender may blackmail the learner or young person into sending more images by threatening to release them online and/or send them to friends and family.

Potential signs of adult-involved grooming and coercion can include the learner or young person being:

- Contacted by an online account that they do not know but appears to be another learner or young person
- Quickly engaged in sexually explicit communications, which may include the offender sharing unsolicited images
- Moved from a public to a private/E2EE platform
- Coerced/pressured into doing sexual things, including creating nudes and semi-nudes
- Offered something of value such as money or gaming credits
- Threatened or blackmailed into carrying out further sexual activity. This may follow the learner or young person initially sharing the image or the offender sharing a digitally manipulated image of the learner or young person to extort 'real' images

#### Financially motivated incidents

Financially motivated sexual extortion (often known as 'sextortion') is an adult-involved incident in which an adult offender (or offenders) threatens to release nudes or semi-nudes of a learner or young person unless they pay money or do something else to benefit them.

Unlike other adult-involved incidents, financially motivated sexual extortion is usually carried out by offenders working in sophisticated organised crime groups (OCGs) overseas and are only motivated by profit. Adults are usually targeted by these groups too.

Offenders will often use a false identity, sometimes posing as a learner or young person, or hack another young person's account to make initial contact. To financially blackmail the learner or young person, they may:

- Groom or coerce the learner or young person into sending nudes or semi-nudes and financially blackmail them
- Use images that have been stolen from the learner or young person taken through hacking their account
- Use digitally manipulated images, including AI-generated images, of the learner or young person

The offender may demand payment or the use of the victim's bank account for the purposes of money laundering.

Potential signs of adult-involved financially motivated sexual extortion can include the learner or young person being:

- Contacted by an online account that they do not know but appears to be another learner or young person. They may be contacted by a hacked account of a learner or young person
- Quickly engaged in sexually explicit communications which may include the offender sharing an image first
- Moved from a public to a private/E2EE platform
- Pressured into taking nudes or semi-nudes
- Told they have been hacked and they have access to their images, personal information and contacts
- Blackmailed into sending money or sharing bank account details after sharing an image or the offender sharing hacked or digitally manipulated images of the learner or young person

### **learners who are absent from education**

A learner being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or learner criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a learner may be absent or become missing from education, but some learners are particularly at risk. These include learners who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care

- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with learners who are absent from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a learner leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a learner's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a learner is suffering from harm or neglect, we will follow local learner protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority learners's social care team, and the police, if the learner is suffering or likely to suffer from harm, or in immediate danger.

### **learner criminal exploitation**

learner criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a learner into criminal activity. It may involve an exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and learners or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a learner:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's learners's social care team and the police, if appropriate.

## **Child sexual exploitation**

Child sexual exploitation (CSE) is a form of learner sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a learner into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and learners or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Learners or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a learner:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's learners's social care team and the police, if appropriate.

## **Learner-on-learner abuse**

Learner-on-learner abuse is when learners abuse other learners. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are no reports, that doesn't mean that this kind of abuse isn't happening.

Learner-on-learner abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between learners (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)

- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone 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 sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where learners abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about learner-on-learner abuse, or a learner makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

When considering instances of harmful sexual behaviour between learners, we will consider their ages and stages of development. We recognise that learners displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

## **Domestic abuse**

Learners can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a learner may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between learners) and learner/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on learners of all forms of domestic abuse, including where they see, hear or experience its effects.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. learners who witness domestic abuse are also victims.

Older learners may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on learners and affect their health, wellbeing, development and ability to learn.

If police are called to an incident of domestic abuse and any learners in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the learner or learners arrive at school the following day. This is the procedure where police forces are part of [Operation Encompass](#)

The DSL will provide support according to the learner's needs and update records about their circumstances.

## **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a learner's welfare.

The DSL (and deputy DSLs) will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a learner has been harmed or is at risk of harm, the DSL will also make a referral to local authority social care.

## **So-called 'honour-based' abuse (including FGM and forced marriage)**

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a learner being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

## **FGM**

The DSL will make sure that staff have access to appropriate training to equip them to be alert to learners affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a learner is at risk of FGM.

Indicators that FGM has already occurred include:

- A learner confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/learner already being known to social services in relation to other safeguarding issues
- A girl:
  - Having difficulty walking, sitting or standing, or looking uncomfortable
  - Finding it hard to sit still for long periods of time (where this was not a problem previously)

- Spending longer than normal in the bathroom or toilet due to difficulties urinating
  - Having frequent urinary, menstrual or stomach problems
  - Avoiding physical exercise or missing PE
  - Being repeatedly absent from school, or absent for a prolonged period
  - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
  - Being reluctant to undergo any medical examinations
  - Asking for help, but not being explicit about the problem
  - Talking about pain or discomfort between her legs
- Potential signs that a learner may be at risk of FGM include:
- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
  - FGM being known to be practised in the girl's community or country of origin
  - A parent or family member expressing concern that FGM may be carried out
  - A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
  - A girl:
    - Having a mother, older sibling or cousin who has undergone FGM
    - Having limited level of integration within UK society
    - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
    - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
    - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
    - Talking about FGM in conversation – for example, a girl may tell other learners about it (although it is important to take into account the context of the discussion)
    - Being unexpectedly absent from school
    - Having sections missing from her 'red book' (learner health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

### **Forced marriage**

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

It is also illegal to cause a learner under the age of 18 to marry, even if violence, threats or coercion are not involved.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

If a member of staff suspects that a learner is being forced into marriage, they will speak to the learner about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the learner about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fmfu@fco.gov.uk](mailto:fmfu@fco.gov.uk)
- Refer the learner to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

### **Preventing radicalisation**

- **Radicalisation** refers to the process of a person legitimising support for, or use of, terrorist violence
- **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:
  - Negate or destroy the fundamental rights and freedoms of others; or
  - Undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
  - Intentionally create a permissive environment for others to achieve the results outlined in either of the above points
- **Terrorism** is an action that:
  - Endangers or causes serious violence to a person/people;
  - Causes serious damage to property; or
  - Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause. Schools have a duty to prevent learners from becoming involved with or supporting terrorism. The DSL, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies. They'll make sure that staff have access to appropriate training to equip them to identify learners at risk.

We will assess the risk of learners in our school from becoming involved with or supporting terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our learners to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to radicalisation into terrorism. Radicalisation can occur quickly or over a long period. Staff will be alert to changes in learners' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a learner is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

learners who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a learner, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including behaviour, curriculum, and online safety policies.

### **Sexual violence and sexual harassment between learners in schools**

Sexual violence and sexual harassment can occur:

- Between 2 learners of any age and sex
- Through a group of learners sexually assaulting or sexually harassing a single learner or group of learners
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

learners who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on learner-on-learner abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a learner has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, learners with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) learners are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a learner makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

### **Serious violence**

Indicators which may signal that a learner is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups

- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the learner has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced learner maltreatment
- Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a learner being involved in, or at risk of, serious violence, they will report this to the DSL.

### **Checking the identity and suitability of visitors**

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise learners or staff.

### **Non-collection of learners**

If a learner is not collected at the end of the session/day, we would contact parents/carers and taxi service (if applicable). The DSL or a Deputy DSL would remain on site with at least one other member of staff until the parents/carers could collect the learner.

### **Missing learners**

Our procedures are designed to ensure that a missing learner is found and returned to effective supervision as soon as possible. If a learner goes missing, please refer to our missing learner policy.