



SINCE 604 AD

KING'S SCHOOL

ROCHESTER

SAFEGUARDING & CHILD PROTECTION POLICY

Whole School Policy, including EYFS & Boarding

This policy was adopted on:	01.09.26
Policy last reviewed on:	26.08.26
Policy last reviewed by Governors:	27.08.26
Person/Body reviewing:	DSL / Governors (Patricia Stewart)
Date of next review (except in the case of relevant legislation):	01.09.27

Designated Safeguarding Lead (DSL) Whole School & EYFS: Mrs Laura George

Deputy Designated Safeguarding Leads (DDSLs):

Senior School: Owen Smith (Vice Principal Senior), Sarah Miles (Assistant Vice Principal), Lauren Costelloe (Head of Upper School)

Junior School: Mrs Kellie Crozer (Vice Principal Junior), Mrs Lindsay Green (Class Teacher), Mrs Stacy Jeavons (Class Teacher), Mrs Nicola Heddershaw (Head of Year Middle School)

Boarding: Mr Callum Carroll (Boys and Girls Boarding House)

Safeguarding Nominated Governor: Mrs Patricia Stewart

This policy will be reviewed annually by the Governing Body, unless an incident or new legislation or guidance suggests the need for an earlier update.

This policy has been authorised by the Board of Governors, is addressed to all members of staff and volunteers, is available to parents on request and is published on the School website. It applies wherever staff or volunteers are working with pupils even where this is away from the School, for example at an activity centre or on an educational visit.

Based upon the Medway Model Policy

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Name	Title	Telephone	Email contact
Mrs Laura George	Whole School Designated Safeguarding Lead & Assistant Vice Principal Junior	01634 888577	lgeorge@kings-rochester.co.uk
Mr Owen Smith	Deputy Designated Safeguard Lead & Vice Principal Senior	01634 888555	osmith@kings-rochester.co.uk
Mrs Sarah Miles	Deputy Designated Safeguard Lead & Assistant Vice Principal Senior	01634 888555	smiles@kings-rochester.co.uk
Miss Lauren Costelloe	Deputy Designated Safeguard Lead & Head of Upper School	01634 888555	lcostelloe@kings-rochester.co.uk
Mrs Kellie Crozer	Deputy Designated Safeguarding Lead & Vice Principal Junior	01634 888560	kcrozer@kings-rochester.co.uk
Mrs Nicola Heddershaw	Deputy Designated Safeguarding Lead, Head of Middle School and Head of Junior Mathematics	01634 888566	nheddershaw@kings-rochester.co.uk
Mrs Lindsay Green	Deputy Designated Safeguarding Lead & Class Teacher Junior School	01634 888566	lgreen@kings-rochester.co.uk
Mrs Stacy Jeavons	Deputy Designated Safeguarding Lead & Class Teacher Junior School	01634 888566	sjeavons@kings-rochester.co.uk
Mr Simon Fisher	Principal	01634 888551	principal@kings-rochester.co.uk
Mr Callum Carroll	Deputy Designated Safeguard Lead and Boarding	01634 888544	ccarroll@kings-rochester.co.uk
Mrs Patricia Stewart	Child Protection & Safeguarding Link Governor	01634 888555	pstewart@kings-rochester.co.uk
Mr John Maas	Chair of Governors	01634 888555	jcondon@kings-rochester.co.uk
Mrs Julie Green	Independent Listener	07525 176658	
	Medway LADO	01634 331 065	
Medway Safeguarding Children Partnership (MSCP) CADS (Children's Advice and Duty Service)	https://www.medway.gov.uk/info/200170/children-and-families/600/concerned-about-a-child/2	01634 334466 Or out of hours: 03000 419191 Consultation: 9:30-12:30 01634 33 1662	Use the portal NOT phone number if the concern is high but the child is not at imminent risk.
Kent Safeguarding Children Partnership (KSCP)	https://www.kscomp.org.uk/guidance/worried-about-a-child	03000 411111 Or out of hours: 03000 419191	
Early Help		Medway: 01634 338746 Kent: 03000 419222	Medway: chsupport@medway.gov.uk Kent: earlyhelp@kent.gov.uk
NSPCC		08008 800 5000 (M-F 8am-8pm)	help@nspcc.org.uk
Childline		0800 1111	
Counter extremism/ Prevent Duty	Advice line for staff/ Governors 0800 011 3764	101 or 999 in an emergency	Counter-extremism@education.gsi.gov.uk
Child Exploitation & Online Protection Centre		101 for advice or 999 in an emergency	https://www.ceop.police.uk/safety-centre/
Reporting FGM	Police	101 or 999	
UK Safer Internet Centre		0344 800 2382	helpline@saferinternet.org.uk
Police (ask to speak to Combined Safeguarding Team)		101 for advice or 999	

Section 1: INTRODUCTION

King's Rochester is committed to safeguarding and promoting the welfare of children and young people and will always consider the best interests of the child. Children, young people and parents have a right to expect the School to provide a safe and secure environment. Children have a right to be protected from maltreatment, inside or outside the home, including online. Safeguarding practice at King's Rochester is underpinned by a child centred approach within a whole family context. This ensures that decisions reflect the lived experience, wishes, and needs of the child alongside their family circumstances and wider context, in line with Working Together to Safeguard Children 2026. Everyone deserves respect and to be valued in an atmosphere of openness and support, where staff and pupils feel able to raise concerns and know that they will be listened to. We are committed to providing help and support to meet the needs of children as soon as problems emerge. We recognise that unconscious bias may impact our perceptions and expectations of children, particularly those from minority communities, and that this may influence the safeguarding actions we take. We actively work to create an environment where assumptions and bias, relating to race, ethnicity, sex, disability, and sexuality, can be safely identified and challenged by any member of staff. We seek to educate and challenge all members of the school community to address equality of access and opportunity for all children, by highlighting inequalities and increasing awareness. The staff at King's are alert to the signs of abuse and neglect, and follow procedures set out in this policy, to ensure that all within our community receive effective and appropriate support, protection and justice.

This policy has been developed in accordance with the principles established by the Children Act 1989 and 2004; the Education (Independent School Standards) (England) Regulations 2019, and in line with the following government publications.

- Working Together to Safeguard Children
- Statutory Guidance for School and Colleges "Keeping Children Safe in Education"
- EYFS statutory framework for group and school-based providers
- "Social Work Assessment of Children in Need"
- "What to do if You are Worried a Child is Being Abused"
- Disqualification Under Childcare Act 2006 (updated 2018)
- Prevent Duty Guidance for England and Wales
- Prevent Duty: Departmental Advice for Schools and Childcare Providers

- Multi-agency statutory guidance on FGM
- Sharing nudes and semi-nudes: advice for education settings working with children and young people
<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nude-s-advice-for-education-settings>
- Children missing in education
<https://www.gov.uk/government/publications/children-missing-education>
- Working together to improve school attendance
- Child sexual exploitation: definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation
- Children's Wellbeing and Schools Act
- Preventing and tackling bullying
- Medway Safeguarding Children Partnership (MSCP) Safeguarding Children Procedures
- Kent Safeguarding Children Partnership
- Relationships, Sex and Health Education (RSHE) statutory guidance, DfE July 2025 (to be implemented September 2026)
<https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education>
- This policy incorporates the requirements of Keeping Children Safe in Education 2026, including the strengthened expectations regarding Family Help, child on child abuse including harassment and violence, Violence Against Women and Girls, modern slavery, trainee teachers, information sharing and safeguarding risks linked to artificial intelligence.

The School recognises that Violence Against Women and Girls (VAWG) includes behaviours such as sexual harassment, sexual violence, coercive control, stalking, domestic abuse, image based abuse and misogynistic attitudes or behaviours. Staff understand that these behaviours exist on a continuum and will always be treated as safeguarding concerns where children are affected.

Modern slavery, including child trafficking, forced labour, criminal exploitation and domestic servitude, is recognised as a safeguarding concern. Staff are trained to recognise indicators and report concerns immediately to the DSL.

This School takes seriously its responsibility under section 175 of the Education Act 2002 to safeguard and promote the welfare of children. The School is also committed to working together with other agencies to ensure adequate arrangements are in place within our School to identify, assess, and support those children who are suffering harm.

RELATIONSHIPS, SEX AND HEALTH EDUCATION (RSHE) IMPLEMENTATION

The School is implementing the updated RSHE statutory guidance published by the DfE in July 2025, with full implementation required by September 2026. Our RSHE curriculum is designed to be age-appropriate across our 2-18 age range and includes:

Early Years Foundation Stage (2-5 years):

- Basic understanding of families and relationships
- Personal safety and body awareness
- Emotional wellbeing and self-care

Primary Years (5-11 years):

- Relationships Education covering families, friendships, and communities
- Health Education including mental wellbeing, physical health, and safety
- Age-appropriate understanding of personal boundaries

Secondary Years (11-18 years):

- Comprehensive Relationships and Sex Education
- Advanced health education including mental health awareness
- Preparation for adult life and decision-making

The School ensures parental engagement in RSHE provision while maintaining statutory requirements. Parents are informed about RSHE content and can discuss concerns with the School, though the right to withdraw applies only to specific sex education components for pupils under 15, and pupils aged 15+ can opt back into sessions.

All RSHE teaching staff receive appropriate training, and the curriculum is regularly reviewed to ensure compliance with statutory guidance and school values.

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domestic abuse, image based abuse and misogynistic attitudes or behaviours. Staff understand that these behaviours exist on a continuum and will always be treated as safeguarding concerns where children are affected.

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Future updates to this policy will reflect forthcoming government guidance for supporting gender-questioning children, which will be implemented once finalised and signposted in KCSIE.

We recognise that safeguarding and promoting the welfare of children is everyone's responsibility, including temporary or agency staff¹, students on placement, volunteers and governors. All have a full and active role to play, as part of the wider safeguarding system for children, in protecting our pupils from harm. The child is at the centre of all we do and child welfare is our paramount concern. Feedback from staff regarding deficiencies or weaknesses in procedures will be attended to at once. We work with parents to ensure they understand the school's legal responsibility to safeguard and ensure the welfare of all children, including the need for referral to other agencies in some situations.

King's Rochester consists of one School comprising two Schools; a Junior School (2 to 13 years) which includes Early Years pupils (in Nursery & Reception classes), and a Senior School (13 to 18 years), collectively referred to in this policy as 'the School' unless otherwise stated. In addition, a boarders' community of young people aged 11 years+ are resident in school and living away from home. The School seeks to afford them the particular care and protection their status requires.

This policy applies to all children attending King's Rochester from 2 to 18 years of age, including children within the Early Years Foundation Stage.

Designated Safeguarding Lead: Mrs Laura George
Deputy Designated Safeguarding Lead with responsibility for the Early Years Foundation Stage (EYFS): Mrs Kellie Crozer

The School also educates the Rochester Cathedral Choristers. Both organisations have an agreed protocol for the joint safeguarding of the Choristers ((7) Procedure for the joint safeguarding of the Choristers) which should be referred to in all

¹ Wherever the word "staff" is used, it covers ALL staff on site, including ancillary supply and self employed staff, contractors, volunteers working with children etc, and governors

safeguarding matters and a copy of this policy can be found on the School's Google Drive. Weekly meetings are held with the School and Cathedral to discuss the welfare and safeguarding arrangements of the Choristers. In addition to this, the DSL and Cathedral Safeguarding Officer meet termly.

Of course, any safeguarding concerns about choristers can be referred to either School or Cathedral or directly to the Local Children's Services (NB: referrals are made to the safeguarding service where the child LIVES, therefore, this is likely to be Kent or Medway).

King's Rochester Sports Centre

Any staff or pupils of King's Rochester who are at the Sports Centre must still follow the School's Safeguarding and Child Protection Policy and Procedures as laid out in this Policy. Members of the public are asked to report any safeguarding concerns to the Manager of the Sports Centre who has a full and relevant qualification. Both organisations have agreed a document, 'Procedures for the safeguarding of King's Rochester staff and pupils at King's Rochester Sports Centre.' KRSC staff follow this document and not the School's policy. Meetings are held at least termly with the School DSL and Sports Centre DSL and the procedures reviewed annually.

Section 2: AIMS

All staff are committed to providing a caring, positive, safe and stimulating environment that promotes the social, physical, mental and moral development of the individual child.

The School will always act in the best interest of the child.

The aims of this policy are:

- To provide all staff, including the Designated Safeguarding Lead (hereafter referred to only as DSL) and Deputy Designated Safeguarding Leads (hereafter referred to only as DDSLs), the Principal, volunteers and Governors with the necessary information to enable them to meet their statutory responsibilities to promote and safeguard the wellbeing of children protecting them from maltreatment, inside or outside the home, including online. ;
- To ensure consistent good practice across the School providing help and support to meet the needs of children as soon as problems emerge; and
- To demonstrate the School's commitment with regard to safeguarding children.

The 'good practice' outcomes of this policy within the School are:

- To support the child's development in ways that will foster security, confidence, resilience and independence;
- To provide an environment in which *all* children and young people (including pupils who are, or are perceived to be LGBTQ+ or gender questioning and children with SEND) feel safe, secure, confident, valued and respected, and in which they know how to approach adults if they are in difficulties and that they will be effectively listened to by everyone and taken seriously;
- To provide specific 'listening' opportunities via Form Time with form tutors, wellbeing coordinator sessions, circle time and 'listening sessions' and provide children with the language and skills needed to keep themselves safe and get themselves heard;
- To maintain an attitude of 'it could happen here' with regard to child protection;
- To maintain a culture of sharing even small pieces of information that may build into a bigger picture surrounding a child or family;
- To raise the awareness of all teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse, whether by an adult or another pupil;

- To provide a systematic means of monitoring all children for signs of change in behaviours/demeanour and especially those known, or thought to be at risk of harm;
- To ensure we, the School, do not unlawfully discriminate against pupils because of their protected characteristics and consider how we are supporting pupils with protected characteristics;
- To understand the distinction between universal services, community based Early Help, targeted Family Help and statutory children's social care intervention, ensuring children receive the right support at the earliest opportunity;
- To ensure we, the School, contribute to assessments of need and support packages for children, including Early Help Intervention;
- To be aware that children may not feel ready or know how to tell someone they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful but that this should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns;
- To determine how best to build a trusted and safe relationship with children to facilitate communication
- To emphasise the need for good levels of communication between all members of staff;
- To develop and promote effective working relationships with other agencies, especially the Police and Social Care and foster a multi-agency approach to safeguarding; and
- To ensure that all staff working within our School, who have substantial access to children, have been checked as to their suitability, including verification of their identity, qualifications, a satisfactory DBS check and where necessary a barred-list check (according to guidance)², online searches will be carried out for shortlisted candidates as part of the school's due diligence (shortlisted candidates will be made aware these checks may be carried out) , and that a single central record is kept for audit purposes.
- To monitor attendance
- To ensure early identification of need through proactive engagement with Early Help and parents, recognising that early intervention prevents escalation to statutory safeguarding intervention.

Section 3: SAFE SCHOOL, SAFE STAFF: MANAGEMENT OF SAFEGUARDING

² Guidance regarding DBS checks recently updated by the Protection of Freedoms Act 2012 and statutory guidance on "Keeping Children Safe in Education"

Governing Body

It is the Governing Body's overall responsibility to ensure compliance with child protection statutory requirements.

The Governing Body takes seriously its responsibility to uphold the aims of the charity and its duty of care in promoting the welfare of children, ensuring their security and protecting them from harm. The reporting of safeguarding practice at the School enables the Governing Body to ensure compliance with current legislation and to identify areas for improvement. They actively challenge and hold leaders to account for safeguarding practice, including Early Help identification, multi agency engagement, and information sharing, using evidence such as audits, case studies, and safeguarding data;. The Governing Body recognises that close liaison with the local authorities is also vital in order that appropriate support and training can be given.

All members of the Governing Body understand and fulfil their responsibilities and will ensure that:

- they undertake the School's required Safeguarding Training (at least annually) and are equipped with sufficient knowledge to fulfil their function;
- there is an effective and statutorily compliant Safeguarding and Child Protection Policy and Procedures in place and a staff Code of Conduct, both provided to all staff on induction;
- the School's safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures;
- appropriate action is taken, in a timely manner, to safeguard and promote children's welfare;
- the School contributes to inter-agency working in line with statutory duty, through effective implementation of the Safeguarding and Child Protection Policy and Procedures and good cooperation with local agencies;
- the School operates safer recruitment procedures that include the requirement for at least one member of a recruitment panel to have undertaken safer recruitment training and for appropriate checks to be made in line with national guidance (KCSIE);
- the School has statutorily compliant policies and procedures for dealing with allegations of abuse against members of staff, including allegations made against the DSL or Principal, (see Part 4, KCSIE 2025 and Appendix 8 'Allegations against Staff: Procedure' of this document);
- a senior leader is the DSL with lead responsibility for child protection within the School, and that they have the appropriate authority, time, funding, training, resources and support to fulfil the role and responsibilities;

- the DSL and DDSs undertake training, and training updates, at least every 2 years in line with statutory guidance and that the role is written into their job description;
- all other staff have received effective safeguarding training delivered by an outside agency at least every 3 years and receive, at least annual updates to provide them with relevant skills and knowledge to safeguard children effectively in line with national and Local Safeguarding Children Partnership guidance;
- where necessary, an appropriately trained and informed teacher is appointed to promote the educational achievement of any child who is ‘looked after’;
- where necessary, an appropriately trained and informed teacher is appointed to promote the educational achievement of any child who is ‘privately fostered’;
- appropriate safeguarding responses are in place to deal with pupils who go missing from the School during the school day (see School’s Missing Child policy);
- ensure the School complies with the now statutory *Working Together to Improve School Attendance* (May 2024) [guidance](https://www.gov.uk/government/publications/working-together-to-improve-school-attendance), including working with children’s social care where persistent or severe absence is linked to safeguarding risk;
<https://www.gov.uk/government/publications/working-together-to-improve-school-attendance>
- appropriate safeguarding responses are in place for children who repeatedly do not attend school, frequently go missing/ miss education, experience multiple suspensions, are at risk from being permanently excluded and safeguarding concerns need to be raised ([Children Missing in Education/ Children who are absent from education](#));
- any weaknesses in Child Protection arrangements are remedied immediately;
- ensure that any serious incident that has resulted, or could result, in a significant loss of funds or a significant risk to the School’s property, work, pupils (beneficiaries) or reputation is reported to the Charity Commission immediately, including any suspicions, allegations or incidents of abuse or mistreatment of vulnerable beneficiaries. In particular, if:
 - there has been an incident where the pupils have been or are being abused or mistreated while under the care of the School or by someone connected with the School such as a Governor, member of staff or volunteer;
 - there has been an incident where someone has been abused or mistreated and this is connected with the activities of the School;

- allegations have been made that such an incident may have happened, regardless of when the alleged abuse or mistreatment took place there are grounds to suspect that such an incident may have occurred.

See more at: <https://www.gov.uk/complain-about-charity>

- Safeguarding and Child Protection policies and procedures are reviewed annually by the nominated Safeguarding Governor and then the full Governing Body. Those with safeguarding experience may contribute to writing the policy and procedures (ie: DSL/DDSLs).

The nominated Safeguarding and Child Protection Link Governor is Mrs Patricia Stewart. Her responsibilities include to:

- have oversight of child protection matters including policy and procedures;
- support and challenge the school to ensure appropriate systems and procedures are in place;
- ensure that the School actively contributes to multi agency safeguarding arrangements as a key partner, including providing information, participating in reviews, and supporting local safeguarding processes;
- ensure there is a robust system for recording, storing and reviewing child welfare concerns;
- take account of how safe pupils feel when in school;
- review this policy and school procedures annually; and
- discuss the annual safeguarding audit with the DSL prior to its presentation for the full Governing Body.

All Staff

All members of School staff and volunteers (which includes, the Principal, all Governors, teaching and support staff):

- are provided with child protection information, use of mobile devices policy, behaviour policy, low level concerns policy, staff code of conduct, whistleblowing policy and employment manual at induction, included in their arrival pack. They will be provided with both online (before they commence employment) and face to face training and the School's Safeguarding Policy so that they are aware of the School's DSL and DDSLs as well as the School's systems, policies and procedures for reporting concerns;
- have signed an agreement that they have read and understood Keeping Children Safe in Education September 2025 (Part One) and Annex B (teaching, boarding & medical centre staff) or just Annex A (non-teaching staff);

- are provided with a small card summarising key points and offering reminder prompts for following procedures in School;
- have child protection awareness training, updated by the DSL annually or another approved provider every 3 years, to maintain their understanding of the signs and indicators of abuse;
- are trained in, and receive regular updates in, Early Help online safety, reporting concerns, and annual updates in the School's safeguarding procedures in line with current legislation;
- must maintain professional curiosity at all times and not accept explanations at face value, particularly when working with vulnerable children, including those who are non verbal, pre verbal, or where concerns relate to unborn children.
- are aware of their own responsibility in reporting concerns or disclosures to the DSL (or DDSL), but also, if there is risk of immediate harm to a child, directly to the appropriate Children's Advice and Duty Service;
- know how to respond to a pupil who discloses abuse through delivery of the whole School training (see Appendix 6 'Guidance for Staff on Receiving a Disclosure' and Appendix 7 'Managing a Concern');
- are aware of the definitions, signs and symptoms of physical, sexual, emotional abuse and neglect so that they are able to identify children who may be in need of extra help or who are suffering, or likely to suffer, significant harm and in such circumstances take appropriate action (see Appendix 3 'What is Abuse?' and Appendix 4 'Recognising Signs of Abuse');
- are aware of wider, changing, specific safeguarding concerns including (but not exclusively) mental health, CCE, CSE, honour based abuse including Female Genital Mutilation (FGM), radicalisation, online safety, child on child abuse, and children engaging in risk taking behaviour (see Appendix 5 'Specific Safeguarding Concerns');
- will ensure the suitability of adults working with children on school sites at all times;
- ensure that child protection concerns or allegations against adults working in the School, including the DSL, are referred to the Principal who will then contact the LADO³ for advice. Any member of staff who has harmed a child or who may pose a risk of harm to a child will be notified to the Disclosure and Barring Service (DBS)⁴. This is for consideration for barring, following resignation, dismissal, or when we cease to use their service as a result of a substantiated allegation or if they resign during an investigation and there is a concern they may pose a risk of harm to children; and

³ LADO Local Authority Designated Officer for allegations against staff

⁴ Contact the LADO for guidance in any case. Failure to notify DBS service in appropriate circumstances is a criminal offence.

- consider how pupils may be taught about safeguarding, including online safety, through teaching and learning opportunities. This is part of providing a broad and balanced curriculum and pastoral care covering relevant issues through Relationship Education or Relationship and Sex Education and PSHEE.

KCSIE defines safeguarding and promoting the welfare of children as protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. Children includes everyone under the age of 18. The School's safeguarding responsibilities also extend to unborn children where staff become aware of concerns, in line with Working Together to Safeguard Children. In such cases, concerns should be reported to the DSL in the usual way for consideration of a pre-birth referral to Children's Services.

Safeguarding is not just about protecting children from deliberate harm, neglect and failure to act. It includes a wide range of issues relating to pupil's welfare, mental and physical health and safety.

We are aware that safeguarding and child protection are fundamental to the welfare of all children in our care. This Policy, therefore, should be read in conjunction with other policies which are designed to promote the safeguarding of children.

The following policies are therefore relevant to the School's safeguarding practices:

- Staff Code of Conduct;
- Staff Acceptable Use and Mobile Devices Policy;
- Whistleblowing Policy;
- Safer Recruitment Policy;
- Behaviour Policy;
- Anti-bullying Policy;
- Online Safety Policy;
- Supervision and Missing Child Policy;
- Complaints Policy;
- Low Level Concerns Policy;
- Health and Safety Policy;
- Data Protection Policy; and
- Search and Confiscation Policy.

These are all available in the School Policies and Procedures folder on Google Drive.

Also relevant are Government documents:

KCSIE (2025):

KCSIE (2025) Part 1 only:

Working Together to Safeguard Children :

What to do if You are Worried a Child is being Abused :

<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused>

Boarding Community at King's Rochester

Statutory guidance 'Keeping Children Safe in Education' (2026), notes that children can be particularly vulnerable in residential settings, and that within a boarding community in any school such as King's Rochester, staff need to be alert to pupil relationships and the potential for child on child abuse. Boarding staff or those involved in teaching/ supporting boarding pupils are expected to be vigilant with regard to this potential and report any concerns in line with local safeguarding procedures. The Boarding Housemaster and Housemistress are trained as a DDSL for continuity of care for boarders outside of 'normal' school hours.

There are additional requirements for boarding schools set out in National Minimum Standards and regulations:

This includes any concern that a female boarding pupil may be about to be or has been exposed to female genital mutilation (FGM).

In addition, current safe practice guidance for safeguarding children when staying with host families either in the UK or abroad is carefully followed, when necessary.

The school acknowledges the need to provide alternative accommodation if a member of the boarding staff is suspended in circumstances of a safeguarding & child protection nature.

When possible, if abuse is suspected by one or more pupils against another pupil including the legal threshold, the School acknowledges the need to refer such abuse to an external safeguarding agency (see Allegations against Pupils).

This School accepts the principles of the 'BSA Commitment to Care Charter' (Boarding Schools Association, February 2022)

<https://www.boarding.org.uk/wp-content/uploads/2025/01/95060-BSA-Commitment-to-care-charter.pdf> and the importance of the care, wellbeing and safeguarding of boarding pupils.

Charter Commitments:

- BSA schools are committed to the highest duty of care and safeguarding
- Everyone in a BSA school will raise any abuse concerns immediately
- BSA schools will follow all statutory safeguarding guidance and laws and report abuse to the relevant authority
- BSA schools will support any present pupils affected by abuse and those who report concerns, and offer support to past pupils
- BSA will support member schools which responsibly follow the Charter

Section 3A: MISINFORMATION, DISINFORMATION AND CONSPIRACY THEORIES

The School recognises that misinformation, disinformation (including fake news) and conspiracy theories can pose safeguarding risks to children. Exposure to false or harmful information can impact children's mental health, worldview, and decision-making, potentially leading to radicalisation, self-harm, or other harmful behaviours.

All staff should be alert to signs that a child may be exposed to or influenced by harmful misinformation, including:

- Sudden changes in behaviour or beliefs that appear extreme or concerning
- Repeated sharing of unverified or demonstrably false information
- Social isolation or withdrawal following engagement with online content
- Expression of conspiracy theories or extremist viewpoints
- Reluctance to accept evidence-based information from trusted sources

Staff concerns about a child's exposure to harmful misinformation should be reported to the DSL using CPOMS. The School will work with families and external agencies as appropriate to support children who may be affected.

The School's PSHEE and digital literacy curriculum includes age-appropriate education about identifying reliable sources, fact-checking, and understanding how misinformation spreads online.

Section 3B: BOARDING COMMUNITY SAFEGUARDING REQUIREMENTS

NATIONAL MINIMUM STANDARDS COMPLIANCE

King's Rochester fully complies with the National Minimum Standards for

Boarding Schools (updated September 2022). This includes:

24/7 Safeguarding Arrangements:

- A designated member of boarding staff trained to DSL level is available at all times during boarding hours
- Clear procedures for emergency safeguarding referrals outside normal school hours
- Regular welfare checks and pastoral support systems
- Secure communication systems for reporting concerns

Out-of-Term Safeguarding:

- Comprehensive risk assessments for pupils remaining on site during holidays
- Alternative accommodation arrangements if boarding staff face safeguarding allegations
- Clear procedures for pupils who cannot return home during school breaks
- Liaison with local authorities regarding vulnerable boarders during holidays

Boarding-Specific Risks:

- Recognition that boarders may be particularly vulnerable due to distance from family
- Enhanced procedures for international pupils and those with complex family situations
- Cultural sensitivity training for all boarding staff
- Regular review of boarding safeguarding arrangements with external agencies

The School maintains detailed records of all boarding welfare concerns and ensures appropriate information sharing with relevant authorities where pupils live away from the local area.

Section 4: DSL and DDSLs

- The DSL, Mrs Laura George, is a member of the Senior Management Team and will take lead responsibility for all safeguarding and child protection matters arising at the School and will work in accordance with KCSIE.
- The DSL and her Deputies (DDSL) will support all other staff in dealing with any child protection concerns that arise.
- The DSL is given the time, funding, training and resources, status and authority within the School in order to carry out these duties.
- The name and contact details of the DSL are set out in the Contacts list at the beginning of this document and again in Appendix 1 ('Key Contact

Information’). The main duties of the DSL (and the deputies) are set out clearly in Appendix 2 (‘The Role of the DSL/DDSLs’), details of the role have been added to the DSL’s job description.

- The Deputies (DDSLs) are also teachers and academic staff. Their names and contact details are set out in the Contacts list at the beginning of this document and again in Appendix 1 (‘Key Contact Information’), details of the role have been added to their job descriptions.
- The DDSLs have undertaken the same compulsory training as the DSL, delivered through the Medway Safeguarding Team, or by an approved external training provider, and will undertake other training as required, at least every 2 years. They have also all undertaken Prevent Awareness training and FGM training.
- In the absence of the DSL, one of the trained Deputy Designated Safeguarding Leads will assume full responsibility for safeguarding. Appropriate cover arrangements ensure that safeguarding leadership is available whenever the School is open or pupils are attending school activities, including educational visits and boarding provision. A shared, monitored safeguarding mailbox is maintained so that concerns raised outside of CPOMS, or when the DSL is unavailable, are still received, monitored and acted upon without delay by a member of the DSL team.
- **The DSL, Mrs Laura George, works four days per week during term time (non-working day: Friday).** On this day, lead responsibility for safeguarding transfers in full to the DDSL rostered for that day, who has been trained to the same standard as the DSL and has full authority to make safeguarding decisions without waiting for the DSL to become available.
- Because King’s Rochester is a large campus site, mobile reception and contactability cannot be guaranteed at all times. Staff must never delay raising a concern while waiting for the DSL to personally answer her phone. If the DSL cannot be reached promptly, staff should go directly to the on-duty DDSL, or, where a child is at immediate risk, contact the police on 999. The DSL’s direct number is an additional escalation route for the DSL/DDSL team, not the sole or primary safeguarding line.
- **Nursery provision (age 2+) operates 50 weeks of the year**, including school holiday periods when the DSL, whose role follows the academic year, is not working. During these out-of-term weeks, lead safeguarding responsibility for the Nursery passes to the Nursery Manager, contactable on the number held in Appendix 1 for the Junior School Office. If that DDSL is also unavailable, cover passes to the next DDSL on a published holiday on-call rota, confirmed before each holiday period. The DSL remains contactable

where possible as a further escalation point during holidays, but Nursery safeguarding arrangements do not depend on her being reachable, a trained DSL/DDSL is always the named lead on duty.

- The DSL and DDSLs are committed to working with local Safeguarding Partners and other agencies in line with Working Together to Safeguard Children.
- At weekends and overnight during term time, the boarding housemaster/ housemistress will be responsible for advice amongst the boarding staff teams and emergency referrals associated with the boarders. All such advice/action must be recorded appropriately and passed to the DSL as early as possible following an incident. The boarding Housemaster/ Housemistress have completed the same training as the DSL and the DDSLs.

Throughout this policy, reference to the DSL includes the DDSLs where the DSL is unavailable.

Section 5: TRAINING

All staff have a legal duty to protect children from abuse and support them, always acting in the best interest of the child. It is therefore essential that everyone in School:

- is aware of the procedures within this Policy and follows them;
- knows how to implement the procedures in this Policy;
- understands how to record concerns and disclosures and keep sufficient records; and
- reports any matter of concern immediately in accordance with this Policy.

STAFF TRAINING REQUIREMENTS - CLARIFIED SCHEDULE

All staff training follows this clear schedule:

DSL and DDSLs:

- Formal DSL training every 2 years minimum
- Annual refresher training and updates
- Prevent awareness training (refreshed every 3 years)
- FGM awareness training
- Regular updates from Local Safeguarding Children Partnership

All Teaching and Support Staff:

- Comprehensive safeguarding training every 3 years delivered by external provider
- Annual safeguarding updates delivered by DSL or approved provider
- Induction training before starting work with children
- Regular briefings on emerging safeguarding issues

Governors:

- Annual safeguarding training
- Regular updates on legislative changes

The School ensures that guidance and training covers current legislation and emerging risks, with additional training provided when new concerns are identified. This will ensure that all staff have the necessary knowledge and skills to carry out their role, and will include (though not exclusively):

- a copy of the School's current Safeguarding and Child Protection Policy;
- a copy of Part 1 of KCSIE & Annex B and, where appropriate, Annex A;
- a requirement to sign to confirm that they have read and understood all of the above documents and an opportunity to ask questions beforehand if necessary;
- an understanding of the types of abuse and possible indicators (see Appendix 3 - 'What is Abuse' and Appendix 4 'Recognising Signs of Abuse');
- knowledge of how to respond to concerns about a child or a disclosure from a child (see Appendix 6 'Guidance for Staff on Receiving a Disclosure' and Appendix 7 'Procedures for Managing Concerns');
- knowledge of how to manage a report of child-on-child sexual violence and sexual harassment (see child on child Abuse section);
- Training also includes recognising harmful sexual behaviours (HSB), the importance of professional curiosity, and understanding contextual safeguarding, recognising the influence of peer groups, online environments and the community on risk;
- what to do in the case of concerns about a member of staff, including supply staff (see 'Allegations against staff' and Appendix 8 for the School's 'Allegations Against Staff: Procedure' based on Part 4 KCSIE);
- guidance, advice and support on assessing the risk of children being drawn into terrorism and who may be at risk of radicalisation;
- an overview of the local Early Help procedures and an understanding of their role in it; and

- an overview of current specific safeguarding concerns (see Appendix 5 - ‘Specific Safeguarding Concerns’).

A record of all staff training in Child Protection and Safeguarding are kept.

Induction

All staff are provided with induction training. This will involve staff being provided with (though not exclusively):

- a copy of this Policy, KCSIE Part 1 & Annex B and Annex A, where relevant;
- an overview of the role of the DSL/DDSLs and their contact details;
- relevant Safeguarding and Child Protection training including, awareness of local Early Help procedures and the process for making referrals alongside understanding what to do if they are concerned about a child or a child makes a disclosure;
- a copy of the School’s handbook;
- the staff Code of Conduct and;
- a copy of the Whole School Digital Services Policy and the Mobile Device Policy;
- a signpost to the Whistleblowing Policy contained within the Employment Manual;
- a copy of the low-level concerns policy
- a copy of the Behaviour Policy; and
- the School’s safeguarding response to children who go missing from education and those who go missing during the school day.

The DSL/DDSL

The DSL/DDSLs undertake training to ensure that they have the knowledge and skills required to carry out their role. This includes Prevent awareness training and is updated at least every two years. In addition to this, they will have safeguarding refresher training at least every 2 years to keep up to date with current thinking and legislation. The DSL receives regular updates from the Local Safeguarding Children Partnership. DSL and DDSL training now includes scenario-based rehearsal of Section 47 decision making and the Call First, Detail Later escalation protocol.

Section 6: SUPPORTING CHILDREN - PROCEDURES

- If a member of staff has a concern about a child, they should always consult the DSL or relevant DDSL. Options will then include:
 - Managing any support for the child internally via pastoral systems;

- An early help assessment; or
- Referral to Children's Services as the child might be in need, is in need, or suffering or likely to suffer harm.

Alternative Provision (AP) Safeguarding

Where pupils are placed in Alternative Provision (AP), the School will ensure that the provider meets the same safeguarding expectations required of our own setting.

Safeguarding expectations include:

- Written confirmation from AP providers that all adults working with children
- have undergone the necessary child protection and recruitment checks (including DBS and barred list checks).
- Knowing the exact location of the child during school hours.
- Conducting a half-termly review of the placement for attendance, progress, suitability, and safeguarding risk.
- Immediate withdrawal of the pupil from AP where safeguarding concerns are identified.

Principles:

- An 'it could happen here' attitude will be maintained at all times.
- Staff must act in the best interest of the child and not assume that others will take action.
- The child's wishes and feelings must be taken into account wherever possible.
- Safeguarding and promoting welfare of children is everyone's responsibility.
- Reporting systems will remain well promoted, easily understood, and accessible so concerns can be raised and treated seriously.

Early Help

Early Help (also referred to as Family Help within Working Together to Safeguard Children) is the provision of help and support as soon as emerging difficulties are identified at any point in a child's life.

The School is committed to the early identification of need and will proactively identify children and families who may benefit from Early Help. The School will not only make referrals but will actively contribute to Early Help assessments and plans, working in partnership with other agencies and remaining involved in supporting outcomes for the child and family.

The School recognises its role as a key partner within multi agency safeguarding arrangements and will contribute to local safeguarding processes, including sharing relevant information, participating in safeguarding reviews, and supporting multi agency decision making.

The School understands that providing early help is more effective in promoting the welfare of children than reacting later. Staff are aware that they are in a position to identify concerns early, provide help for children and prevent concerns from escalating.

The School's safeguarding training includes guidance about the local Early Help process and the part that staff play in it in identifying those children who may benefit. Any child may benefit from early help, yet staff should be particularly alert to potential need for help for a child who:

- is disabled and has specific additional needs;
- has educational needs (whether or not they have a statutory Education Health and Care plan);
- is a young carer;
- has a mental health need;
- identifies as LGBTQ+ or is perceived to be such by peers is questioning their gender identity or expression.

The School is aware that pupils who are LGBTQ+ or gender-questioning may be at increased risk of harm, bullying or isolation. Staff will treat all such pupils with respect, follow school protocols, and work closely with families and external agencies to safeguard wellbeing, pending formal DfE guidance expected during 2025.

- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is at risk of modern slavery, trafficking or exploitation;
- is at risk of being radicalised or exploited;
- is misusing drugs and alcohol;
- is in family circumstances presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues or domestic abuse;
- is using drugs or alcohol themselves;
- has returned home to their family from care;

- is a privately fostered child
- is frequently missing/goes missing from education, home or care
- has experienced multiple suspensions, is at risk of being permanently excluded from school
- has a parent or carer in custody or is affected by parental offending

Staff should refer to the DSL for a possible Early Help Assessment (EHA) when:

- age appropriate progress is not being made and the causes are unclear or development progress is being met;
- the support of more than one additional agency is needed to meet the child or young person's needs; and
- child/ren do not meet MSCP safeguarding threshold yet concerns are emerging e.g. attendance, behavioural, social or physical wellbeing academic progress.

Staff must not delay sharing information due to uncertainty regarding data protection. The Data Protection Act 2018 and UK GDPR support the lawful sharing of information for safeguarding purposes, and concerns must always be passed to the DSL without delay.

The DSL will consider appropriate action in accordance with the Local Safeguarding Children Partnership threshold criteria, possibly initiating a consultation with them and then if early help is appropriate, the DSL will liaise or support the staff member in liaising with other agencies and setting up an inter-agency assessments as appropriate. If Early Help and/or other support is appropriate, the case will be kept under constant review and consideration given to a referral to children's social care if the child's situation doesn't appear to be improving.

Staff should understand the distinction between universal services, community based Early Help, targeted Family Help and statutory children's social care intervention. The School will work collaboratively with children, families and partner agencies to ensure children receive the right help at the earliest opportunity.

Multi-Agency Working

Schools have a pivotal role to play in multi-agency safeguarding arrangements. It is essential that the School contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children.

New safeguarding partners and child death review partner arrangements are now in place. Locally, the Kent and Medway Safeguarding Partnership Boards have made arrangements to work together with appropriate relevant agencies to safeguard and

promote the welfare of local children, including identifying and responding to their needs. It is especially important that the School understands its role as part of the safeguarding partnership arrangements.

The School recognises the National Multi-Agency Practice Standards for Child Protection set out in Working Together to Safeguard Children 2026. Staff are supported to meet these standards, which include an unrelenting focus on protecting children from all forms of significant harm inside and outside the home, timely and effective information sharing, and practice that is led or overseen by skilled, experienced practitioners. The School fosters a learning culture in which staff stay up to date with emerging best practice and apply this in their decision-making.

Procedures for Concerns about a Pupil's Welfare

It is the duty of all staff to report a concern or disclosure to the DSL/DDSL as soon as possible, using CPOMS, the schools management system. However small the concern, it should be reported in order to build a picture, if necessary, of the child and their welfare.

If a member of staff has a concern about a pupil they will need to decide what action to take:

- firstly, 'Add incident' on CPOMS and notify the DSL and DDSL in the appropriate part of the School. Staff should not assume a colleague or another professional will take action and sharing information might be critical in keeping a child safe.;
- the DSL/DDSL will consider the appropriate action – this may include a referral or other options such as a referral to specialist services or Early Help services and this will be made in accordance with the referral threshold set by the Local Safeguarding Children Partnership;
- if it is decided that a referral is not required, a team will be set up – with a key contact – to monitor, support and review the situation. Consideration will particularly be given to subsequently making a referral if the pupil's situation does not seem to be improving.

Children in Need

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their

welfare. Children in need may be assessed under section 17 of the Children Act 1989. Staff should be mindful of any pupils they consider to be children in need and report to the DSL/ relevant DDSL.

If a child is in immediate danger, or risk of harm... ie: Children suffering or likely to suffer harm

If a child is feared to be in immediate danger or is at risk of harm a referral should be made to children's social care and/or the police immediately. **Anyone can make a referral.**

NB: Referrals are made to the safeguarding service where the child LIVES, therefore, this is likely to be Kent or Medway.

Local authorities have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare.

When referrals are made by members of staff other than the DSL, the DSL MUST be informed, as soon as possible, that a referral has been made.

Immediate Response When Section 47 Threshold is Met (Call First, Detail Later Protocol)

When the DSL or DDSL determines the Section 47 threshold is met and the child is suffering or is likely to suffer significant harm, the following protocol replaces all detailed written procedures.

Call First, Detail Later Mandate: The DSL or DDSL must immediately contact the Local Authority Children's Advice and Duty Service (CADS) or the Police. Delaying the call to gather full details or complete the written referral form is strictly prohibited.

Mandatory Initial Call Information: Only essential details are required to trigger agency response. This includes the child's name, date of birth, address, and the immediate nature of the risk.

Recording After the Call: The full written referral must be completed immediately after contact with the duty officer or social worker, not before.

We recognise that a child who is abused or witnesses violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth. We recognise that the School may provide the only stability in the lives of children who have been abused or who are at risk of harm and will always seek to support every child.

The School will support all children by:

- encouraging self-esteem and self-assertiveness, through the curriculum as well as our relationships, and not condoning aggression or bullying;
- promoting a caring, safe and positive environment within the School;
- liaising and working together with all other support services and those agencies involved in the safeguarding of children and the support of mental health;
- notifying Children's Services as soon as there is a significant concern;
- providing continuing support to a child about whom there have been concerns and who leaves the School, by ensuring that appropriate information is copied under confidential cover to the child's new setting and ensuring the School records (including medical records if appropriate) are forwarded as a matter of priority;
- listening to a child's wishes and feelings.

Children who may be particularly vulnerable

Many factors can contribute to an increased risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse happens.

To ensure that all our children receive full and adequate protection, we give special consideration and attention to any children in our care who are:

- disabled or have special educational needs;
- living in an identified domestic abuse situation;
- affected by known parental substance misuse;
- asylum seekers;
- living away from home, such as our boarders;
- vulnerable to being bullied, or engaging in bullying;
- living in temporary accommodation;
- living transient lifestyles;
- living in kinship care arrangements;
- who are bereaved or experiencing significant loss;
- living in chaotic, neglectful and unsupportive home situations;
- vulnerable to discrimination and maltreatment on the grounds of a protected characteristic including race, ethnicity, religion or sexuality;
- involved directly or indirectly in prostitution or child trafficking;
- non-native English speakers i.e. English is not their first language;

- ‘Looked After’ Children (LACs) or children in care. This includes those who are subject to a care order or temporarily classed as looked after on a planned basis for short breaks or respite care.
- privately fostered children

The DSL and designated staff will work with the Virtual School Head (VSH, named officer within Medway Council’s (or Kent County Council’s, depending on the child’s placing authority) Virtual School team.) to promote educational outcomes for looked-after children and children with a social worker, including those in **kinship care**. This reflects the expanded VSH duties introduced in 2024 and reinforced in KCSIE 2025.

Children Potentially at Greater Risk of Harm

Children who need a social worker – children in need and those with a child protection plan – may be potentially at greater risk of harm.

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect or complex family circumstances. A child’s experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

The DSL will be informed that a child has a social worker and use this information so that decisions can be made in the best interests of the child’s safety, welfare and educational outcomes.

Where children need a social worker, this will inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Children requiring mental health support are also considered potentially at a greater risk of harm.

The School has an important role to play in supporting the mental health and wellbeing of pupils. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

The School has systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems. There is a range of advice to help Schools identify children in need of extra mental health support, this includes working with external agencies.

Children with Special Educational Needs and Disabilities

Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. These additional barriers can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
 - being more prone to peer group isolation than other children;
 - the potential for children with SEND being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
 - communication barriers and difficulties in overcoming these barriers.
- NB. The DSL has a bank of resources to support safeguarding conversations with children with language and / or communication difficulties.*

Additional pastoral support is offered to these children in order to address these challenges.

ADDITIONAL SEND SAFEGUARDING MEASURES

The School recognises that children with SEND face additional safeguarding challenges and implements enhanced protective measures:

Communication Support:

- DSL and Learning Support DDSL maintains resources for communicating with children who have speech, language, or communication difficulties
- Staff trained in alternative communication methods including visual aids and assistive technology
- Regular review of communication strategies for individual pupils

Enhanced Vulnerability Recognition:

- Understanding that SEND pupils may be disproportionately affected by bullying without showing obvious signs
- Recognition that behaviour changes may be attributed to disability rather than abuse concerns

- Increased vigilance for peer-on-peer abuse targeting SEND pupils
- Awareness of online vulnerabilities specific to SEND pupils

Additional Support Measures:

- Individual safeguarding plans for pupils with complex SEND needs
- Regular liaison with external SEND professionals regarding safeguarding concerns
- Enhanced transition planning to maintain safeguarding continuity

Safeguarding practice must take into account the needs of non verbal and pre verbal children, and those unable to articulate their experiences. Staff should consider behavioural indicators, presentation, and interaction patterns, and maintain professional curiosity when assessing risk.

Disclosures

If a pupil makes a direct allegation or disclosure, all staff should know how to:

- **Recognise** the signs of abuse (see Appendix 3 ‘What is Abuse’ and Appendix 4 ‘Recognising Signs of Abuse’;
- **Refer** straight to the DSL/DDSL (see Appendix 7 ‘Procedures for Managing Concerns’;
- **Record** accurate notes as soon as possible including all necessary information; and
- **Respond** so that the pupil is reassured and feels listened to and supported (refer to Appendix 6 for ‘Guidance for Staff on Receiving a Disclosure’ in these circumstances).

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside of these environments. Staff should be aware that safeguarding concerns may include extra-familial harm, where risks to children occur outside the family home, including within peer groups, online environments, or the wider community.

All staff, but especially the DSL/DDSLs should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

Allegations against pupils: Child on Child Abuse

The behaviour and conduct of pupils towards each other will, in most instances, be covered by the School’s Behaviour and Anti-bullying Policies. However, it is

recognised that some behaviour by pupils towards each other may raise safeguarding concerns. All staff recognise that children are capable of abusing their peers. All staff understand that abuse is abuse, and it will not be tolerated or passed off as ‘banter’, ‘just having a laugh’ or ‘part of growing up.’

These behaviours may include, but are not limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- allegations against Pupils: Child on Child Abuse Including Harassment and Violence;
- sexual violence, such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment which may be stand-alone or part of a broader pattern of abuse;
 - For further information on Sexual Violence and Harassment please see Part 5 KCSIE (2025) and also refer to Annex B.
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- upskirting, which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- Consensual and non-consensual sharing of self-generated intimate images and/or videos, including those generated using AI (e.g. deepfakes).
 - For further information see <https://www.gov.uk/government/publications/sharing-nude-s-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-how-to-respond-to-an-incident-overview>
- initiation/hazing type violence and rituals.

The School takes steps to minimise the risk of child on child abuse: The School has robust behaviour and anti-bullying procedures in place. The pupils are taught, at all stages of the School, about acceptable behaviour and how to keep themselves safe. Appropriate action is taken to identify and protect pupils who may be of increased risk due to home circumstances, SEND, LGBTQ+, emotional vulnerability or those within our boarding community and away from home.

Abusive behaviour by pupils will be taken seriously. The School recognises the gendered nature of child on child abuse but is clear that abuse is abuse, and it will never be tolerated. This behaviour will not be dismissed as being normal between young people or passed off as ‘banter’ or simply ‘part of growing up’.

All allegations against pupils will be reported in accordance with this Policy, as for any other type of abuse:

- inform the DSL/DDSL immediately using CPOMS;
- two members of staff manage reports of sexual violence and harassment ;
- if sexual violence or harassment is alleged, the DSL will consider informing the Police as well as the local Children’s Services;
- the School will take advice from Children’s Services and the Police, as appropriate, on when and how to inform the pupil about the allegation and how investigations of such allegations should be conducted;
- pupils against whom an allegation has been made, may be suspended from School during the investigation and the School’s Behaviour Policy sanctions and the Exclusion, Removal and Review Policy may apply;
- the School will carry out risk assessments and take all appropriate action to ensure the safety and welfare of all pupils including the pupil or pupils accused of abuse – this will include a consideration of contextual safeguarding if possible, ie: what is occurring in the pupils’ wider lives;
- the School will ensure that all pupils are supported throughout the situation, including being appropriately supported if interviewed by Police or Social Care professionals;
- in the case of pupils whose parents are abroad, the pupil’s elected guardian will be informed and requested to support the pupil, including accommodating them if they are suspended from School during the investigation; and

- both the victim(s) and perpetrator(s) will be considered ‘at risk’ and each party will be fully supported by the School and outside agencies as necessary.

The School recognises that even if there are no reported cases of child on child abuse, such abuse may still be taking place and is simply not being reported. The School adopts the *DfE Harmful Sexual Behaviour (HSB) Framework* as a reference point for identifying, categorising and responding to problematic, inappropriate, or abusive sexual behaviours. The DSL and DDSLs review incidents of sexualised behaviour logged on CPOMS to identify patterns or repeat concerns, and to ensure support, education and proportionate responses are in place. Any patterns will be discussed at DSL team meetings and escalated where appropriate. The School references the DfE Harmful Sexual Behaviour Framework when reviewing incidents. The DSL monitors all reports of sexualised behaviour for **patterns, escalation, or repeat concerns**, and logs actions taken. Concerns are reviewed regularly by the safeguarding team.

FGM (Female Genital Mutilation)

Whilst all staff should speak to the DSL/DDSL with regard to any concerns about FGM, there is a specific **legal duty on teachers**. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** report this to the Police immediately. (See [Appendix 5](#) ‘Specific Safeguarding Concerns’ and Appendix 1 ‘Key Contact Information’ for details).

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

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it

should be noted exploitation as well as being physical can be facilitated and/or take place online. More information include definitions and indicators are included in Annex B (KCSIE 2025).

Serious Violence

All staff should be aware of indicators which may signal that children are at risk from or involved in serious crime. These may include:

- increased absence from school;
- a change in friendships or relationships with older individuals or groups;
- a significant decline in performance;
- signs of self-harm or a significant change in wellbeing;
- signs of assault or unexplained injuries; and
- unexplained gifts or new possessions.

All concerns should be noted and discussed with the DSL as soon as possible.

Mental Health

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

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem, however, staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, by alerting the DSL or DDSL. Where a member of staff believes a child is in immediate danger as a result of a mental health crisis (for example, an active risk of suicide or serious self-harm), staff must call 999 or take the child to A&E immediately, and inform the DSL or DDSL as soon as possible afterwards. Where the concern is urgent but not immediately life-threatening, staff should call 111 for advice while still alerting the DSL or DDSL without delay. This does not replace the duty to alert the DSL/DDSL, both actions should happen, with the emergency response taking priority.

Further guidance and advice can be found in [Appendix 5](#).

MENTAL HEALTH AND SAFEGUARDING INTEGRATION

The School recognises the crucial link between mental health and safeguarding, implementing integrated support systems:

Identification and Response:

- All staff trained to recognise early signs of mental health difficulties
- Clear referral pathways to internal counselling services and external CAMHS
- Trauma-informed approaches for pupils who have experienced abuse or neglect.

Support Systems:

- Dedicated wellbeing coordinators in both Junior and Senior Schools
- Regular liaison with families regarding mental health concerns
- Individual support plans for pupils with ongoing mental health needs

Staff Wellbeing:

- Recognition that staff mental health impacts their ability to safeguard pupils
- Access to employee assistance programmes and occupational health services
- Clear procedures for supporting staff involved in serious safeguarding incidents

Prevention of harm

We recognise that the School plays a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection.

The School community will therefore:

- ensure that the child's wishes are taken into account, where appropriate, when determining what action to take regarding a safeguarding concern to give primacy to the child's best interest;
- work to establish and maintain an ethos where children feel secure and are encouraged to talk, are always listened to and are always taken seriously;
- ensure all staff can recognise the signs of abuse (see [Appendix 3](#) 'What is Abuse' and [Appendix 4](#) 'Recognising Signs of Abuse');
- ensure all staff are aware of wider, specific safeguarding concerns (see [Appendix 5](#) 'Specific Safeguarding Concerns');

- include regular consultation with children e.g. through safety questionnaires/ plans, participation in anti-bullying week, asking children to report whether they have had happy/sad lunchtimes/breaktimes;
- ensure that all children know there is an adult in the School who they can approach if they are worried or in difficulty;
- include, across the curriculum including PSHEE, Relationships and Sex Education, opportunities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help. The School's PSHEE and RSHE guidelines are set out in the Whole School PSHEE and RSHE Policy. In particular, where appropriate, this will include child sexual exploitation, domestic violence, female genital mutilation, forced marriage, substance misuse, knives and gang activity, radicalisation and extremism, online safety (including imagery), relationships (including sexual relationships), risks associated with, water, fire, roads and railways. Also focused work to prepare for transition to each new section of the School and personal safety/independent travel when appropriate; and
- ensure school staff members should follow formal procedures for dealing with children who go missing from education, particularly on repeat occasions, or children who are absent from education, to help identify the risk of abuse and neglect including sexual abuse or exploitation (see 'Specific Safeguarding Concerns' - [Appendix 5](#) for more details on Children Missing Education, CCE and CSE).

The School recognises that misogyny, sexist attitudes and gender based harassment may contribute to abusive behaviour and will address these through education, behaviour management and safeguarding procedures where appropriate.

As we increasingly work online, it is essential that our children are safeguarded from potentially harmful and inappropriate online material. As such, the Governing Body along with the School's senior leaders, ensure that appropriate filters and monitoring systems are in place to keep them safe when accessing the internet at School and support them when learning from home. (There is a separate policy for online safety.)

Our School's filtering and monitoring solution centres around our Smoothwall Firewall device. It is helpful to think that our filtering system is like a playground fence, it is a barrier to prevent the pupils from wandering. The monitoring is looking at the behaviour of the children, like a teacher on playground duty.

The smoothwall firewall device is plugged into the school network and all inbound/outbound internet traffic is routed through it for analysis. The device is

accessed via an intranet web portal. The login details are kept by the Director of Digital Services (DDS) and the IT helpdesk team as a back up. The devices' filtering rules and keywords are updated every 24 hours from the smoothwall servers.

In accordance with KCSIE 2025 and the DfE's "*Plan Technology for Your School*" guidance, the School regularly reviews and assesses its filtering and monitoring systems for effectiveness, proportionality, and risk management. These checks are logged, discussed at Governor safeguarding meetings, and updated as needed.

The School's use of any generative AI tools will comply with the DfE's "Generative AI: Product Safety Expectations". Staff will only use AI tools that meet school safety expectations, with monitoring to prevent risk exposure for pupils.

Filtering and monitoring alerts are sent via email to the DSL and a DDSL (also the DDS) if/ when they occur. This is to ensure the job is not carried out in isolation. The DSL/ DDSL then updates CPOMS with the pupil and site that has been blocked and alerts the DDSL in that part of the School. The DDSL then follows this up by speaking with the pupil, and if appropriate the parent. The Head of IT in each department is also notified so that trends and patterns can be identified and responded to.

The DSL, Director of Digital Strategy and DDSLs meet termly, testing the system using the website [testfiltering.com](https://www.testfiltering.com). These checks will be logged and reported to the Governors. They will not be carried out in isolation. Governors receive regular assurance reports regarding the effectiveness, proportionality and review of filtering and monitoring systems.

In line with KCSIE 2025, the School uses the DfE's *Plan Technology for Your School and College* tool to assess the effectiveness of its filtering and monitoring systems and ensure they are proportionate and risk-appropriate.

This policy incorporates the DfE's Generative AI guidance for education settings: <https://www.gov.uk/government/publications/generative-artificial-intelligence-in-education>

The School will ensure staff are aware of, and comply with, the expectations set out in this guidance.

GENERATIVE AI SAFETY PROTOCOLS

In line with the DfE's "Generative AI: Product Safety Expectations" guidance, the School maintains strict protocols for any use of AI tools:

- Only approved AI tools that meet the School's safety standards may be used
- All AI interactions involving pupils are supervised and monitored
- Staff receive training on AI safety risks including deep fakes, inappropriate content generation, and privacy concerns
- Pupils are educated about AI risks as part of the digital literacy curriculum
- The School regularly reviews and updates its approved AI tools list
- Any concerns about AI-generated content or interactions are reported immediately to the DSL

The School prohibits the use of AI tools to generate inappropriate content, create deep fake images, or compromise pupil privacy and safety.

At King's we ensure that all staff receive training on the expectations, applicable roles and responsibilities in relation to our filtering and monitoring systems and processes.

The School also follows the DfE's *Generative AI: Product Safety Expectations* to ensure that any AI tools used in school meet safety and monitoring requirements.

<https://www.gov.uk/government/publications/generative-ai-in-education>

CYBER SECURITY

In line with KCSIE 2026, the School recognises cyber security as a core safeguarding matter, not solely an IT concern. Safeguarding records, child protection files and other sensitive pupil data held on School systems are treated as high-risk assets: a cyber-attack or data breach involving this information poses an immediate risk to pupil safety and wellbeing, not only a data protection risk.

The School will:

- ensure safeguarding and child protection data (including CPOMS records) are held on systems with appropriate access controls, encryption and multi-factor authentication;
- restrict access to safeguarding records to those staff with a legitimate need to know, as set out elsewhere in this Policy;
- ensure the Director of Digital Strategy maintains and regularly tests backup and incident response arrangements covering safeguarding data specifically;
- treat any suspected or actual cyber incident affecting safeguarding records as a safeguarding incident, to be reported to the DSL and Director of Digital Services simultaneously, in addition to being managed under the School's IT security and data breach procedures; and

- review cyber security arrangements for safeguarding systems as part of the termly filtering and monitoring review with the DSL, Director of Digital Strategy and DDSLs.

Allegations against staff (including supply staff and volunteers)

The School has procedures for dealing with allegations against staff – academic staff, support staff, supply staff, the DSL, the Principal, Governors, volunteers and any other staff that work with children – which show the School’s need to protect children from abuse and the need to protect staff and volunteers from false or unfounded allegations. These procedures are set out in Appendix 8 ‘Allegations against Staff: Procedure’ and are in line with Part 4, KCSIE.

We understand that a pupil may make an allegation against a member of staff. If such an allegation is made, or information is received which suggests that a person’s conduct may have harmed or present a risk of harm to children, the member of staff receiving the allegation or aware of the information, will immediately inform the Principal.

The Principal will consult the Local Authority Designated Officer (LADO).

If the allegation made to a member of staff concerns the Principal, the person receiving the allegation will immediately inform the Chair of Governors who may consult with the DSL but will definitely contact the LADO and HR services, without notifying the Principal first.

Guidance, through the Code of Conduct, is given to all staff to ensure that their behaviour and actions do not place pupils or themselves at risk of harm, or allegations of harm to a pupil.

Whistle-blowing and Low-Level Concerns

We recognise that pupils cannot be expected to raise concerns in an environment where staff fail to do so.

All staff should, therefore, be aware of their duty to raise concerns, where they exist, about the management of child protection which may include the attitude or actions of colleagues. Staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the School’s safeguarding regime, and know that they will be taken seriously. If it becomes necessary to consult outside the School, they should speak in the first instance, to the LADO and subsequently to other agencies, following the Whistleblowing Policy.

A low-level concern is any concern that an adult has acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.
- Doesn't meet the threshold of harm or is not considered serious enough for the school or college to refer to the local authority.

A Low-Level Concerns Policy is in place to ensure there is a culture of openness and trust. A copy of this policy can be found on the Google drive.

This contributes to a culture of openness, trust, and professional accountability. Staff are regularly reminded of how to report concerns and that doing so is in the best interest of pupils and colleagues.

These concerns are reported to the Principal, via a google form.

If a member of staff feels unable to raise an issue with their employer or feel that genuine concerns are not being addressed, staff can use the NSPCC whistleblowing helpline/ Staff 0800 028 0285 (M-F 8am-8pm) or email help@nspcc.org.uk.

Where the School has made a referral to Children's Services and believes that appropriate action has not been taken, the DSL should escalate this concern. This can be done by contacting the relevant safeguarding partnership directly, Medway Safeguarding Children Partnership (01634 334466) or Kent Safeguarding Children Partnership (03000 411111), or by raising the matter through the local dispute resolution process as set out in Working Together to Safeguard Children.

Use of Mobile Devices

In line with KCSIE 2026 and DfE guidance, the School operates as a mobile phone-free environment by default. Parts of the School's Policy on the use of mobile phones and personal devices is found in the School's staff handbook and sets out guidance for staff.

- mobile phones/tablets/laptops should only be visible if there is a legitimate reason for them to be used in the support of teaching and/or in the case of an emergency.
- at all other times, personal mobile technology devices should be kept out of sight and switched off or switched to silent;
- All staff working in the Early Years Foundation Stage (EYFS) must use school-issued laptops and devices when accessing, storing, or

transmitting any child-related information or school systems. Personal devices are not permitted for professional use within EYFS to ensure compliance with data protection requirements and safeguarding protocols. Personal devices should be kept in the school or Nursery office or in a locked cupboard. School devices are provided for use in the EYFS;

- personal calls or messages should not be viewed or responded to whilst a staff member is on duty, and especially not when a staff member is in the presence of children;
- photographs taken on mobile devices and used within class lessons/ school activities depicting pupils of the school taking part in school activities must be uploaded to the school email system or drives as soon as possible, and never stored in the memory of a personal phone or tablet for more time than is necessary; and
- wherever possible, School devices should be used instead of personal devices.
- all members of staff have access to appropriate training on the expectations

And for pupils – again, please see full policy.

- It is not necessary for any Junior School pupil (Years N - 3) to have personal mobile devices in School.
- In the Junior School Year 4- 13) , pupils hand in their mobile phone (if they have one) at the start of the school day. Junior School will not be allowed to wear smart watches.
- in the Senior School mobile phones, although allowed to be carried by the pupils, should not be used without permission from members of staff (unless in an emergency).
- In the Junior (in the case of their school device) and Senior School, pupils who wish to use their device at school can only do so upon agreement of the School's Acceptable Use Policy and should only use the internet via the School network. Pupils must not attempt to bypass the School network and filtering policies. The use of the network is monitored carefully and any breaches of its use, and/or concerns raised regarding content being searched will result in the DSL/DDSL speaking with the pupil, contacting home, and possibly taking it to child services/police if there are concerns raised. All child-on-child safeguarding incidents, including low-level concerns and online abuse,

are logged on CPOMS and reviewed by the DSL team. Patterns are monitored termly and actions recorded. Support is offered to both the child harmed and the child responsible.

The School complies with GDPR regulations and acknowledges that certain uses of images are necessary for the ordinary running of the School. Parent permission for those under 12, and pupil permission for those over 12, is sought regarding how images may be taken, stored and used by the School.

The use of restrictive interventions, including reasonable force and seclusion

There are circumstances when it is appropriate for staff in schools to use reasonable force to safeguard children. The term ‘reasonable force’ covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, using positive handling techniques, to more extreme circumstances such as breaking up a fight or where a young person needs to be handled to prevent violence or injury. ‘Reasonable’ in these circumstances means ‘using no more force than is needed’. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil’s path, or active physical contact such as leading a pupil by the arm out of the classroom. The decision on whether or not to use reasonable force to control or restrain a child is down to the professional judgement of the staff concerned and should always depend on individual circumstances. All incidents of positive handling are recorded and parents are informed if this has been needed.

The Use of Touch to Teach Individual Music Lessons.

There are circumstances when it is appropriate for staff in schools to use ‘pedagogical touch’ when teaching a child, a musical instrument, or to sing. In these instances, the following guidance is followed:

- only carry out work that has been previously agreed and is taking place with the knowledge of King’s School
- make sure that the child has clear access to the door and that you are not placed in between the door and the child
- avoid touching the child where possible, unless for pedagogical purposes, in which case the context should be explained to the child before initiating contact (e.g. I am going to lift your elbow up to improve your hand position). Remember NSPCC: is it Necessary, Safe, Permitted, Clear, Contextual?
- if it is necessary to touch the child’s abdomen (for example, to demonstrate use of breath), do so when there is more than one pupil in the room (i.e. at the change-over time between lessons). Ideally, ask the pupil to use their own hand on their abdomen

to feel the relevant set of muscles working, or another pupil if they are comfortable with this.

- if a child is not comfortable with being touched (either by telling you or by their actions) do not touch the child again and report any concerns to the DSL team
- never prevent the child from leaving the room; if they do leave, ensure that they are safe, either yourself, or by contacting another member of staff who can ensure the safety of the child
- avoid confrontational behaviour or arguments with a child; it is always better to 'back down' and continue the discussion with other professionals and/or parents present
- NB. all of our teaching rooms have windows or a door that has glass, allowing other students and professionals to see in without disturbing you

Confidentiality, Record Keeping and Sharing of Information

We recognise that all matters relating to child protection are confidential and that it is essential to keep accurate records.

Staff must record **ALL** concerns and disclosures using CPOMS, as soon as possible, and alert the DSL. Only the Principal, Heads of each part of the School, DSL/DDSLs and the Child Protection administrator will have sight of these records.

The Principal or DSL/DDSLs will disclose any information about a child to other members of staff on a need-to-know basis only.⁵

The School recognises that information sharing is vital in identifying and tackling all forms of abuse and neglect. As part of meeting a child's needs, it is recognised that the School should be proactive in sharing information with local agencies to help identify, assess and respond to risks or concerns about the safety and welfare of children. The School understands its responsibility to co-operate with the Police and Children's Social Care to ensure that relevant information is shared for the purposes of child protection investigations under section 47 of the Children Act 1989. The School further understands that the Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep information secure but that these do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information will not be allowed to stand in the way of the need to safeguard and promote the welfare and prevent the safety of children.

⁵ Guidance about sharing information, can be found in the DfE booklet 'Information sharing: advice for practitioners providing safeguarding services'.

Appropriate staff will have due regard to the relevant data protection principles which allow them to share (and withhold) personal information, as provided in the Data Protection Act 2018 and the GDPR. This includes:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as ‘special category personal data’;
- understanding that ‘safeguarding of children and individuals at risk’ is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk; and
- for schools, not providing pupils’ personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, they must withhold providing the data in compliance with schools’ obligations under the Data Protection Act 2018 and the GDPR. Where in doubt the School will seek independent legal advice.

All staff must be aware that they cannot promise a child to keep secrets that might compromise the child’s safety or wellbeing.

Records must include the rationale for safeguarding decisions, including occasions where referrals were considered but not made.

When a child has given notice to leave the School, the DSL will consider whether it would be appropriate to share information with the new school in advance, in order for them to put support in place for when the child arrives. The safeguarding file will be sent securely to the new School, separately to their school pupil file.

Working with Parents/Carers

The School is committed to working in partnership with parents/carers to safeguard and promote the welfare of child/ren and to support them to understand our statutory responsibilities in this area.

The School is committed to working with parents positively, openly and honestly. Parents will be treated with respect, dignity and courtesy. Parents' rights to privacy and confidentiality will be respected and sensitive information will not be shared unless permission is granted or it is necessary to do so in order to safeguard a child/ren.

The School will seek to share with parents any concerns about their child unless to do so may place a child at increased risk of harm. A lack of parental engagement or agreement regarding the concerns the School has about a child will not prevent the DSL making a referral to Children's Social Care and a Multi-Agency Risk Assessment Conference (MARAC) in those circumstances where it is appropriate to do so.

The School will always undertake to share the intention to refer a child to Social Care with parents/carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation. If in doubt, the DSL will consult with the Children's Advice and Duty Team at the Children's Social Care Services, on this point.

Health & Safety

The School has a duty to ensure the safety of children whilst on the school site and hence a responsibility for making the site secure.

All staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light. All staff have an ID card worn on a lanyard clearly identifying themselves as school staff. We operate within a whole-community ethos and welcome comments from pupils, parents and others about areas that may need improvement as well as what we are doing well.

Appropriate checks will be undertaken in respect of visitors and volunteers coming into school as outlined within guidance. Visitors will be expected to sign in and out via the office visitors' log, in whichever part of the School that they begin their visit, and to display a visitor's badge whilst on school site. All visitors will be advised of the School's basic safeguarding procedure and the identity of the DSL and DDSLs in school. Any individual who is not known or identifiable, by either a visitor's badge or a staff lanyard, should be challenged for clarification and reassurance. Schools have a responsibility for identifying approved adults who are collecting children from school.

Single-Sex Facilities

In line with KCSIE 2026, the School provides separate toilet facilities for boys and girls from age 8, and pupils should not use toilets designated for the opposite biological sex. Pupils aged 11 and over should not undress in front of pupils of the opposite biological sex, and overnight accommodation on school trips and in boarding houses will remain single-sex in their areas. Where a pupil does not wish to use the toilet, changing room, shower or dormitory allocated for their biological sex, the School will consider whether an alternative facility can be provided without compromising the provision of single-sex facilities or the safety, comfort, privacy or dignity of that pupil or of other pupils. A clear record will be kept of any such arrangements.

Single-Sex Sport

In line with KCSIE 2026, the School recognises that pupils may be separated according to biological sex in sport and physical activity where the physical strength, stamina or physique of the average girl would place her at a disadvantage in competition with the average boy, or vice versa. Where a sport or activity needs to be delivered in single-sex groups on safety grounds because of these physical differences, this will be applied without exception, regardless of a pupil's gender identity. Staff organising sport and PE should raise any queries about specific activities with the DSL.

Where extended school activities are provided by and managed by the School, our own Child Protection and Safeguarding Policy and procedures apply. Where other organisations provide services or activities on our site, the member of the School's staff responsible for arranging the services or activities will check that the service or activity providers have appropriate procedures in place, including relevant risk assessments and safer recruitment procedures. This will form part of the terms and conditions of the hire. It is made clear that failure to comply with this would lead to a termination of the agreement. To be clear, if the school receives an allegation relating to an incident that happened when an individual or organisation was on school premises, King's will follow the safeguarding policies and procedures, including informing the LADO as they would with any safeguarding allegation.

Where visiting speakers are invited into school, a Google search of the individual will be carried out and, if appropriate, references from other schools sought. The content of a talk is vetted and a risk assessment completed. Visiting speakers are supervised at all times when onsite.

When our children attend off-site activities, including those abroad on School trips, we will check that effective child protection arrangements are in place. All staff are

bound by the School's 'Educational Visits' Policy when arranging and organising off-site trips.

The School will not accept the behaviour of any parent or individual that threatens the School security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in the decision to refuse access onto the school site for that individual, and the non-continuation of a child's education at King's Rochester, in line with our standard terms and conditions.

Our Health & Safety policy reflects the consideration we give to the protection of our children both physically within the school environment and, for example, in relation to Internet use and, as already mentioned above, when away from the school and undertaking school trips and visits.

Section 7: SUPPORTING STAFF

Through the existing School system of coaching, mentoring and staff consultation arrangements we will ensure that staff have routine opportunities to reflect on the well-being of their pupils, their own relationships inside and outside of School and to consider if there are any safeguarding concerns or suspicions.⁶ In line with Working Together to Safeguard Children 2026, the School is committed to supporting reflective practice across all staff who work with children, not only those in EYFS. This may take the form of individual reflective conversations, group case discussions, or multi-agency supervision opportunities, and is intended to strengthen analysis and decision-making in safeguarding matters.

All staff and volunteers who require supervision when working with or supervising children will be monitored as set out in KCSIE 2025 by staff who are appropriately briefed about supervision responsibilities.

We recognise that staff working in the School, who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting. We will support such staff by providing regular sessions to talk through their anxieties with a named colleague and to seek further support as appropriate, and decisions made in these meetings will be recorded⁷.

Staff working with children in the EYFS, have an arranged supervision meeting each half term.

⁶ The MSCB recommends that all staff in contact with children have opportunities for 'reflective' discussions about children in their care as safeguarding concerns are more readily identified.

⁷ MSCB Policy "A Framework for Safeguarding Practice Reflection"

Safer Recruitment

ENHANCED SAFER RECRUITMENT PROCEDURES

King's Rochester implements enhanced safer recruitment procedures in line with KCSIE 2025 requirements:

Pre-Employment Checks:

- Identity verification using photographic ID and proof of address
- Qualification verification through direct contact with issuing bodies
- Comprehensive employment history with explanations for any gaps
- Two professional references, including from most recent employer working with children
- Enhanced DBS check and Barred List check where applicable, including for volunteers previously exempt on the basis of supervision, in line with KCSIE 2026 changes to regulated activity
- Online searches as part of due diligence for shortlisted candidates (candidates are informed)
- Overseas criminal record checks where applicable
- Prohibition from teaching check for teaching positions
- Section 128 check for management positions

Interview Process:

- At least one member of every recruitment panel has completed safer recruitment training
- Face-to-face/online interviews exploring candidates' suitability to work with children
- Scenario-based questions relating to safeguarding situations
- Verification of identity through original documents

Post-Appointment:

- Comprehensive induction including safeguarding training before unsupervised access to pupils
- Probationary period with enhanced supervision and support
- Regular review meetings during first year of employment

The School maintains a Single Central Record of all pre-employment checks, regularly audited by the DSL and governing body (specifically the safeguarding governor).

During the recruitment process an online search may be carried out as part of due diligence on shortlisted candidates, candidates will be informed of this. For those working with EYFS children and those working with children between 5-8 years old,

outside of normal school hours, a disqualification from working with children declaration is also completed.

Section 8: MONITORING AND EVALUATION

The School's Child Protection and Safeguarding Policy and procedures will be monitored and evaluated by:

- the DSL reporting, when necessary, to the Senior Management (which meets weekly);
- the DSL/DDSLs at bi-weekly meetings and half-termly working lunch meetings;
- discussions with staff in staff meetings;
- pupil surveys and questionnaires;
- scrutiny of range of risk assessments;
- the Safeguarding Governor and full Governing Body visits to the School;
- Scrutiny of Governing Body (GB) minutes – standing item on every committee's agenda;
- logs of bullying/racist/behaviour incidents for SMT and GB to monitor;
- review of parental concerns and parent questionnaires; and
- review of outside school activities – e.g. breakfast and after-school clubs.

Any safeguarding incidents at the School will be followed by a review of these procedures by the DSL and the Principal, and a report made to the Safeguarding Link Governor. When an incident involves a member of staff and has been referred to the LADO, the LADO will be asked to assist in this review to determine whether any improvements can be made to the School's procedures. Any deficiencies or weaknesses in arrangements will be remedied immediately.

The full Governing Body undertakes an annual review of this Policy and the School's procedures. The DSL, in conjunction with the Safeguarding Governor, prepares a full report for them each year that addresses training and referral information, amongst other things.

In line with Working Together to Safeguard Children 2026, the School recognises that as a relevant agency within local multi-agency safeguarding arrangements, safeguarding audits and compliance information may be requested by the Lead Safeguarding Partners (Medway or Kent). The DSL will ensure that such requests are responded to promptly and that audit outcomes are shared with the Governing Body and local safeguarding partners as required.

Appendix 1: KEY CONTACT INFORMATION

Name	Title	Telephone	Email contact
Mrs Laura George	Whole School Designated Safeguarding Lead & Assistant Vice Principal Junior	01634 888577	lgeorge@kings-rochester.co.uk
Mr Owen Smith	Deputy Designated Safeguard Lead & Vice Principal Senior	01634 888555	osmith@kings-rochester.co.uk
Mrs Sarah Miles	Deputy Designated Safeguard Lead & Assistant Vice Principal Senior	01634 888555	smiles@kings-rochester.co.uk
Miss Lauren Costelloe	Deputy Designated Safeguard Lead & Head of Upper School	01634 888555	lcostelloe@kings-rochester.co.uk
Mrs Kellie Crozer	Deputy Designated Safeguarding Lead & Vice Principal Junior	01634 888560	kcrozer@kings-rochester.co.uk
Mrs Nicola Heddershaw	Deputy Designated Safeguarding Lead, Head of Middle School and Head of Junior Mathematics	01634 888566	nheddershaw@kings-rochester.co.uk
Mrs Lindsay Green	Deputy Designated Safeguarding Lead & Class Teacher Junior School	01634 888566	lgreen@kings-rochester.co.uk
Mrs Stacy Jeavons	Deputy Designated Safeguarding Lead & Class Teacher Junior School	01634 888566	sjeavons@kings-rochester.co.uk
Mr Simon Fisher	Principal	01634 888551	principal@kings-rochester.co.uk
Mr Callum Carroll	Deputy Designated Safeguard Lead and Boarding	01634 888544	ccarroll@kings-rochester.co.uk
Mrs Patricia Stewart	Child Protection & Safeguarding Link Governor	01634 888555	pstewart@kings-rochester.co.uk
Mr John Maas	Chair of Governors	01634 888555	jcondon@kings-rochester.co.uk
Mrs Julie Green	Independent Listener	07525 176658	
	Medway LADO	01634 331 065	
Medway Safeguarding Children Partnership (MSCP) CADS (Children's Advice and Duty Service)	https://www.medway.gov.uk/info/200170/children-and-families/600/concerned-about-a-child/2	01634 334466 Or out of hours: 03000 419191 Consultation: 9:30-12:30 01634 33 1662	Use the portal NOT phone number if the concern is high but the child is not at imminent risk.
Kent Safeguarding Children Partnership (KSCP)	https://www.kscmp.org.uk/guidance/worried-about-a-child	03000 411111 Or out of hours: 03000 419191	
Early Help		Medway: 01634 338746 Kent: 03000 419222	Medway: chsupport@medway.gov.uk Kent: earlyhelp@kent.gov.uk
NSPCC		08008 800 5000 (M-F 8am-8pm)	help@nspcc.org.uk
Childline		0800 1111	
Counter extremism/ Prevent Duty	Advice line for staff/ Governors 0800 011 3764	101 or 999 in an emergency	Counter-extremism@education.gsi.gov.uk
Child Exploitation & Online Protection Centre		101 for advice or 999 in an emergency	https://www.ceop.police.uk/safety-centre/

Reporting FGM	Police	101 or 999	
UK Safer Internet Centre		0344 800 2382	helpline@saferinternet.org.uk
Police (ask to speak to Combined Safeguarding Team)		101 for advice or 999	

Any concerns of a safeguarding nature should be reported as soon as possible, ideally using CPOMS. Further advice can be sought from the DSL about reporting mechanisms and read within this policy. Key contacts for King's Rochester are provided on this page of this policy and in Appendix 1. However, it should be noted that a concern can be registered directly with the Local Safeguarding Children Partnership without the need to liaise with the DSL, and in an emergency or if a crime is believed to have been committed, direct contact with the Police can be made by telephoning 999.

EMERGENCY SAFEGUARDING CONTACTS

In addition to the DSL team, the following emergency contacts are available 24/7 during term time:

Boarding Emergency Contact: Available through main school number 01634 888577

Out-of-Hours Senior Management: Contact via main switchboard for emergency access

Local Authority Emergency Duty Team:

- Kent: 03000 41 61 61 (out of hours)

- Medway: 01634 334466 (out of hours)

All staff have access to emergency contact cards with key numbers for immediate safeguarding concerns.

Appendix 2: THE ROLE OF THE DSL/DDSLs

The DSL is:

Mrs Laura George, Assistant Vice Principal, Junior School and a member of the Senior Management Team, who takes lead responsibility for all safeguarding and child protection matters arising at the School.

Direct Contact: 01634 888577

CP & Safeguarding Secretary (Mrs Virginia Howard): 01634 888551

The DDSLs are:

In the Junior School	Mrs Lindsay Green	contact: 01634 888566
	Mrs Kellie Crozer	contact: 01634 888560
	Mrs Nicola Heddershaw	contact: 01634 888566
	Mrs Stacy Jeavons	contact: 01634 888566
In the Senior School:	Mr Owen Smith	contact: 01634 888555
	Mrs Sarah Miles	contact: 01634 888539
	Miss Lauren Costelloe	contact: 01634 888562
	Mr Callum Carroll	contact: 01634 888544

The DDSLs will carry out the role of the DSL when the DSL is unavailable.

Nursery holiday-period cover: during weeks the Nursery is open outside school term time, the nursery manager (a trained DSL) holds lead safeguarding responsibility, with cover passing down the on-call rota if unavailable. See Section 4 for full detail.

DSL (and DDSLs) broad areas of responsibility, as listed in Annex C, KCSIE (2025):

Managing referrals

- **The DSL is expected to:**
 - refer cases of suspected abuse to the appropriate local authority Children's Advice and Duty Service as required;
 - support staff who make referrals to the appropriate local authority Children's Advice and Duty Service;
 - refer cases to the Channel programme where there is a radicalisation concern as required;
 - support staff who make referrals to the Channel programme;

- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the Police as required.

Work with others

- **The DSL is expected to:**
 - liaise with the Principal to inform him or her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
 - as required, liaise with the Principal or assigned ‘case manager’ (as referred to in KCSIE, Part Four) and the LADO (Local Authority Designated Officer(s)) at the local authority for child protection concerns in cases which concern a staff member;
 - liaise with staff, especially pastoral support staff, school nurses, IT Technicians and SENCO on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
 - act as a source of support, advice and expertise for all staff.

Training

The DSL (and DDSLs) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years.

They should all undertake Prevent awareness training.

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

- understand the assessment process for providing Early Help and statutory intervention, including local criteria for action and the local authority Children’s Advice and Duty Service referral arrangements;
- have a working knowledge of how local authorities conduct a ‘Child Protection Case Conference’ and a ‘Child Protection Review Conference’

and be able to attend and contribute to these effectively when required to do so;

- can ensure each member of staff has access to, and understands, the School's Child Protection and Safeguarding Policy and procedures, especially new and part time staff;
- can keep members of staff abreast of current procedures through half-termly quizzes and/or case-study discussions;
- are alert to the specific needs of children in need, those with special educational needs and young carers when appropriate;
- understand relevant data protection legislation and regulations especially the Data Protection Act 2018 and the General Data Protection Regulation; Duty under Children and Wellbeing Act 2026
- understand the importance of information sharing, written within the school, with the Cathedral and with the three safeguarding partners, other agencies, organisations and practitioners;
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the School with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school;
- can recognise the additional risks that children with SEN , disabilities (SEND) and LGBTQ+ face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them.

Raising Awareness

The DSL should:

- ensure the School's Safeguarding & Child Protection Policy is known, understood and used appropriately;

- ensure the School's Safeguarding & Child Protection Policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with nominated link Governor regarding this;
- ensure the Safeguarding & Child Protection Policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the School in this;
- link with the local Safeguarding Children Partnerships to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements;
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff.
- ensure that the School and the staff know who the children with CP issues or social workers are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; and
- support teaching staff to identify the challenges that children with CP issues and/or social workers might face and the additional academic support and adjustments that they could make to best support these children.

Child Protection Files

When children leave the School, the DSL will ensure that their child protection file is transferred to the new school as soon as possible (within 5 working days). This will be transferred separately from the main pupil file, ensuring secure transit, and a confirmation of receipt be obtained. Receiving schools should ensure key staff such as DSLs and SENCOs, or the named person with oversight for SEND, are aware as required.

In addition to the child protection file, the DSL will also consider if it would be appropriate to share any information with the new school in advance of a child leaving. For example, information that would allow the new school to continue supporting victims of abuse and have that support in place for when the child arrives.

Miscellaneous

The DSL and any DDSLs who are involved in recruitment, and at least one member of the Governing Body, will also complete Safer Recruitment Training. At least one

member of staff who is safer recruitment trained will sit on each interview panel for any role in the School.

The name of the designated members of staff for child protection, the Designated Safeguarding Lead and Deputies (DSL & DDSLs), will be clearly advertised in the School. The School makes clear its role in referring and monitoring cases of suspected abuse.

All new members of staff will be given a copy of our Child Protection and Safeguarding Policy, with the DSL/DDSLs' names clearly displayed, as part of their induction into the School and receive training.

Parents/carers are made aware of this policy and their entitlement to have a copy of it via the school website.

Appendix 3: WHAT IS ABUSE?

Identifying Abuse

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

Abuse is a form of maltreatment of a child. Somebody may abuse, neglect or exploit a child by inflicting harm, or by failing to act to prevent harm. Harm can include children witnessing the ill treatment of others and that is particularly relevant when children see, hear or experience domestic abuse and its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or another child or children (KCSIE).

The School recognises that domestic abuse may also include abuse by children towards parents or carers. Staff will consider this as a safeguarding concern requiring assessment and support.

The School operates Operation Encompass in line with statutory requirements under the Victims and Prisoners Act 2024. This ensures that where a child has been present at or affected by a domestic abuse incident, the School is notified by police, enabling appropriate and timely support to be provided. The DSL is responsible for receiving and acting upon these notifications, these will be added to CPOMS to ensure the right members of the DSL team can support.

There are four main categories of abuse and neglect: **physical abuse, emotional abuse, sexual abuse** and **neglect**.

The most up to date definitions and possible indicators and signs of abuse are found below. Staff should also refer to Part 1 of KCSIE and 'What to do if you are worried a child is being abused'.

Children from all types of background may be abused physically, emotionally, sexually or through neglect. It is not always easy to recognise or accept that abuse is happening.

Physical Abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates

the symptoms of, or deliberately induces, illness in a child.

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

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

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

Appendix 4: RECOGNISING SIGNS OF ABUSE

As part of training, staff are provided with the following guidance for recognising the signs of abuse:

Physical Abuse

Determining whether an injury is accidental or non-accidental is a skilled job. It requires a full assessment of the injury, explanation, history and circumstances. This is not the role of a teacher.

There are, however, a number of injuries which should be regarded with concern and may indicate a non-accidental cause. Some may need medical assessment and treatment, occasionally urgently. Injuries need to be accounted for.

Inadequate, inconsistent, or excessively plausible explanations, or a delay in seeking treatment for the child, should signal concern.

Some of the following signs may be particular indicators of physical abuse:

Physical indicators:

- finger mark bruising on cheeks or any other area of the body where bruises are unlikely to appear in everyday play;
- presence of injuries that are in several stages of healing suggesting that a child has experienced repeated maltreatment over time;
- injuries to the soles of the feet;
- bald patches on a child's head;
- bite marks;
- injuries that form a shape or pattern;
- scald marks and burning, including cigarette marks;
- black eyes;
- marks that might indicate a child has been restrained or strangled;
- broken bones; and
- any injuries that are inconsistent with the explanation given.

Behavioural indicators:

- flinching when touched;
- inability to recall how injuries occurred;
- avoiding getting changed for sporting or other activity;
- reluctance to go home;

- wearing trousers and shirts or blouses with long sleeves even on hot sunny days, although remember to consider this in the light of the individual child (e.g. some children are dressed ‘modestly for religious and/or cultural reasons);
- excessively eager to please;
- very aggressive or withdrawn;
- attempts to run away;
- sad, frequently cries;
- drug and/or alcohol misuse; and
- any behaviour that is not consistent with a child’s stage of development.

Emotional Abuse

Some of the following signs may be particular indicators of emotional abuse:

Physical indicators:

- self-harm marks;
- erratic weight or growth patterns;
- delayed development, either physically or emotionally; and
- erratic behaviour.

Behavioural indicators:

- difficulty in forming relationships;
- inappropriate attention-seeking;
- withdrawn;
- unexplained underachievement at school;
- self-harming;
- bed-wetting; and
- disturbed sleep.

Sexual Abuse

Some of the following signs may be particular indicators of sexual abuse:

Physical indicators:

- stomach pains;
- genital soreness, bleeding or discharge;
- recurring genital-urinary infections;
- underage pregnancy;
- discomfort in walking or sitting; and
- sexually transmitted infections.

Behavioural indicators:

- a change in behaviour;
- not wanting to undress;
- sexual knowledge, language and behaviours beyond their age;
- eating disorders;
- fear or avoidance of being with a person or a group of people;
- withdrawn;
- self-harming;
- unexplained amounts of money;
- disturbed sleep;
- sexualised drawings;
- change in handwriting; and
- the types of questions asked (do they suggest sexual knowledge that a child should not have).

Neglect

Some of the following signs may be particular indicators of neglect:

Physical indicators:

- poor personal hygiene/unwashed clothing;
- inadequate clothing (not having warm clothes in winter);
- lack of muscle tone (bones appearing to stick out);
- lack of energy due to inadequate food intake and/or poor nutrition;
- untreated skin or hair problems (rashes, sores, flea bites, head lice);
- unattended medical or dental problems;
- consistent hunger/big appetite -can't seem to eat enough; and
- very thin or swollen stomach.

Behavioural indicators:

- difficulty in making friends;
- missing or irregularly attending school or nursery;
- anti-social behaviour;
- withdrawn;
- steals food or begs it from others;
- developmental delay (weight, language, social skills);
- demands constant attention and affection; and
- alcohol or substance misuse.

Faltering growth (failure to thrive)

In addition to the general signs of neglect physical and behavioural indicators of faltering growth include:

- child has not attained significant developmental milestones;
- low body-fat ratio;
- dehydration;
- normal growth which is interrupted by a period of failing to gain weight or even losing weight;
- child appears listless or undemanding; and
- does not show interest in surroundings and is unresponsive to stimulation.

Appendix 5: SPECIAL SAFEGUARDING ISSUES

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviour linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as producing sexual imagery) put children in danger.

KCSIE , Annex B, acknowledges the following specific safeguarding issues:

- children and the court system
- children missing from education (see below);
- children with family members in prison;
- child criminal exploitation (CCE) (see below);
- child sexual exploitation (CSE) (see below);
- county lines (see below);
- domestic abuse (see below);
- homelessness;
- so called honour-base abuse including:
 - female genital mutilation (see below);
 - forced marriage (see below);
- preventing radicalisation (see below);
- child on child abuse
- Modern slavery including trafficking, labour exploitation, domestic servitude and criminal exploitation.
- sexual violence and sexual harassment between children (see below); and
- upskirting (see below).

Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside the School. All staff, but especially the DSL/DDSLs should consider whether children are at risk of abuse or exploitation in situations outside their families, family home or the school environment. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitations, criminal exploitation and serious youth violence. This is known as contextual safeguarding, which simply means assessments of children should consider whether

wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

Children Missing Education (CME) and persistently absent children

'Children absent from education' refers to all children of compulsory school age who are not on a school roll or being educated otherwise (e.g. privately or in alternative provision), who have been out of any educational provision for a substantial period of time or who are absent from education on repeat occasions .

All staff should be aware that children missing, particularly repeatedly, or unexplainable and/ or persistent can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse, neglect and exploitation, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Any concerns of this nature should be reported to the DSL as soon as possible. It is recognised that when a child is not in School, they may be susceptible to, or exposed to, other risks.

The School will inform the local authority of any pupil who is going to be added or deleted from the School's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) School Attendance (Pupil Registration) (England) Regulations 2024 (SI 2024/208), made on 27 February 2024 and coming into force on 19 August 2024 .

As a result of daily registration, schools are particularly well placed to notice when a child has gone missing or are absent, including during the school day and monitor trends in attendance.

The School will inform the local authority if a pupil fails to attend School regularly or has been absent without the School's permission for a continuous period of 10 sessions (5 school days) or at such intervals as determined by the local authority or the Secretary of State.

For children missing during the school day, the School will ensure that, where reasonably possible, each pupil will have more than one emergency contact number.

If a member of staff becomes aware that a child may have run away or gone missing, the following procedure should be put into action (in accordance with the School's Missing Child Policy):

- Staff will maintain safety and the well-being of other children;
- A roll-call will be taken;
- A member of the Senior Management Team, and one other member of staff, will search the immediate vicinity;
- If those involved in the search all agree that the child is missing, the Police will be contacted via dialling 999 (this will be done within 20 minutes for EYFS, Nursery and Year 1 - 3 of Junior School, 30 minutes for Years 4 - 8 of Junior School Pupils and 1 hour for Senior School Pupils);
- The Attendance Officer in Satis House should be notified - 01634 888553;
- The Junior School Office in Chadlington House should be notified on 01634 888566;
- The Head of the relevant part of the School will contact the parents of the missing child, (this will be done within 20 minutes for EYFS, Nursery and Year 1 - 3 of Junior School, 30 minutes for Years 4 - 8 of Junior School Pupils and 1 hour for Senior School Pupils);
- Once the Police arrive, all relevant information about the child will be given and they will then take over the search.
- If off site, the Group Leader will remain to liaise with the Police and to comfort the child when found. They will also maintain regular contact with the School. The remaining staff and children will return to School.

Missing boarders outside of the school day:

- Check the child does not have any additional activities such as matches, drama, music etc, and check the sign in/out book;
- If the child's whereabouts is unknown the Housemistress/ master must be informed by the duty tutor;
- Question other children from the house;
- Phone the child's mobile;
- Initiate a search in the boarding house and grounds, the high street and local area;
- Contact and check with friends from outside of boarding;
- Contact all other boarding house staff to check that there has not been additional communication received informing us of an absence;
- Contact the other boarding house to check their house and surrounding area;
- Inform the Senior Deputy Head and/or the Principal;
- As soon as the child is confirmed as missing then phone parents and guardians to check if they have any information;

- Contact the police.

Guidelines of questions to be asked:

- When was he/she last seen?
- Who was he/she with?
- Where might he/she have gone?
- Is this child 'vulnerable' in any particular way?
- What emotional state did he/she appear to be in?
- Has anything upset him/her recently?
- Did he/she speak to anyone about leaving?
- Who are his/her main friends at School?
- Does he/she have a mobile phone and what is the number?
- Does he/she have a special friend?
- Is there any reason to believe he/she might have been abducted? (e.g. family custody dispute; very wealthy/prominent parents.)
- Have there ever been concerns of this nature before?

If off site, the Group Leader will remain to liaise with the Police and to comfort the child when found. They will also maintain regular contact with the School. The remaining staff and children will return to School.

When the situation has been concluded, the Head of the relevant part of the School will make a written record of the incident, the action taken, and any reasons given by the pupil for being missing.

However, where a risk of harm is suspected, the DSL would consider a discussion with parents, if appropriate, reporting the child missing to the Police and contacting the local Children's Advice and Duty Service.

Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

Child Sexual Exploitation (CSE)

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology.

CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

The above CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends; and
- children who suffer from sexually transmitted infections or become pregnant.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and if this is noted or suspected, a referral to the DSL should be made at once.

Domestic Abuse

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

King's is an Operation Encompass School. This is a national police and education early intervention safeguarding partnership to support children who witness and experience Domestic Abuse. Where the school is unsure of how to respond to a notification, advice may be sought from the First Response, or the Operation Encompass helpline which is available 8:00am – 13:00pm, Monday – Friday on 0204 513 9990

So-called 'Honour-Based' Abuse, including FGM and Forced Marriage

So-called ‘honour-based’ abuse (HBA) encompasses incidents or crimes which have been committed in the belief that they protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of so-called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the DSL. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Female Genital Mutilation (FGM)

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

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Find these on the FGM Factsheet [here](#). Victims of FGM are likely to come from a community that is known to practise FGM.

All staff are aware that they have a mandatory, legal duty (under Section 5B of the Female Genital Mutilation Act 2003) to **personally report** to the Police cases where they discover that an act of FGM appears to have been carried out on a girl under 18. All members of staff should report concerns to the DSL and involve the local Children’s Advice and Duty Service, as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, local safeguarding procedures should be followed.⁸

At King’s Rochester, the DSL/DDSL’s complete the free online home office training around FGM.

⁸ Please refer to “Mandatory Reporting of Female Genital Mutilation – procedural information” Annex A: FGM Mandatory Reporting Process Map for ‘known’ cases and the current process

Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one 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. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools can play an important role in safeguarding children from forced marriage.

Since February 2023 it has been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if no violence, threats or other forms or coercion are used. As with the existing forced marriage law this applies to non-binding, unofficial 'marriages' as well as legal marriages (p 155 KCSIE 2023). Staff at King's will report to the DSL if they have any reason to believe that a child may be at risk or being taken out of the country for the purposes of a forced marriage.

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 75-80 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at The right to choose: government guidance on forced marriage - GOV.UK (www.gov.uk) School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fm@fcdo.gov.uk.

Preventing Radicalisation under The Counter-Terrorism and Security Act 2015

The School has a legal duty to have due regard to the need to prevent people from being drawn into terrorism.

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of the School's safeguarding approach.

Hence, every member of staff at King's Rochester recognises that safeguarding children exposed to radicalisation and extremism is no different to safeguarding against any other vulnerability and should be approached in the same way as

protecting children from other risks. There is a King's School Prevent risk assessment in place.

KCSIE states that:

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

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 **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.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL/DDSLs making a Prevent referral.

The Prevent Duty

All schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015, in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent Duty. The Prevent Duty is seen as part of the School's wider safeguarding obligations.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the School may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

Every member of academic staff, all senior staff and governors have completed an e-learning training package developed by the Police or, more recently, TES Develop on Prevent which includes guidance on how to identify people who may be vulnerable to being drawn into terrorism, and how to refer them into the Channel process.⁹ This awareness and training is in accordance with current statutory guidance.¹⁰

The DSL (and DDSLs) have additional online training on the Prevent Duty and is in accordance with current statutory guidance.¹¹ The DSL will ensure that any new information around Prevent is disseminated with staff and review how the School protects children online.

The School ensures that we use time within the school year to allow pupils to explore controversial issues in a safe environment. All staff want to increase children's resilience and make them aware of how they influence and participate in decision making. We promote pupils' spiritual, moral, social and cultural development and within this, fundamental British Values.¹² The School's guidelines for SMSC and FBV education are set out in the Whole School SMSC and FBV Policy.

The School also invites speakers into school. It is expected that anyone who books such a speaker ensures the content of the talk is vetted and suitable for its audience in advance. A risk assessment is completed and a Google search of the individual undertaken. If appropriate, references from other schools where they have spoken before may be sought. The visitor is supervised at all times on the school site.

⁹ Awareness Training (channel programme) can be found at www.preventforschools.org

¹⁰ The Prevent duty: Departmental Advice for schools and childcare providers

¹¹ The Prevent duty: Departmental Advice for schools and childcare providers

¹² The Prevent duty: Departmental Advice for schools and childcare providers

Sexual Violence and Sexual Harassment between Children

Sexual violence and sexual harassment can occur between two or more children of **any** age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children 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. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. The school will respond to allegations seriously and all victims will be offered appropriate support. Staff are aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBTIQ+ children are at greater risk.

The School is aware of the importance of:

- making it clear to pupils that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and
- challenging behaviours (which are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia. Dismissing or tolerating such behaviours risks normalising them.

Sexual Violence

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003¹¹¹ as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

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

Sexual Harassment

References to sexual harassment mean 'unwanted conduct of a sexual nature' that can occur online and offline. In the context of child on child sexual harassment, it is likely to: violate a child's dignity; and/or make them feel intimidated, degraded or humiliated; and/or create a hostile, offensive or sexualised environment.

Sexual Harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothing and appearance and calling someone sexualised names;
- sexual 'jokes' or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature; and
- online harassment. This may be standalone or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - non-consensual sharing of sexual images and videos;
 - sexualised online bullying;
 - unwanted sexual comments and messages, including, on social media;
 - sexual exploitation; coercion and threats; and
 - upskirting.

The Government advice 'Sexual violence and sexual harassment between children in schools and colleges' provides further detailed advice. Part 5 of KCSIE is about managing reports of child on child sexual violence and sexual harassment which will inform the School's response to such cases. There is a brief summary also in Annex B.

LGBTIQA+ young people might be particularly vulnerable to harassment. For a greater understanding of the school experience encountered by LGBTIQA+ children, see this [Safer Schools Contextual Safeguarding Factsheet](#).

Upskirting

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12th April 2019. ‘Upskirting’ is where someone takes a picture under a person’s clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

It is a criminal offence. Anyone of any gender, can be a victim.

Online Risks (see Annex D)

The use of technology has become a significant component of many safeguarding concerns. Harmful behaviours such as child sexual exploitation, radicalisation, and sexual predation are frequently enabled or exacerbated by online platforms.

The breadth of issues within online safety can now be categorised into **four key areas of risk**, known as the “**4 Cs**”:

- **Content** – being exposed to **illegal, inappropriate or harmful material**, such as pornography, hate speech, **misinformation, disinformation, and conspiracy theories**, including material that is racist, radicalising, or otherwise harmful.
- **Contact** – being subjected to **harmful interaction with others online**, including grooming, exploitation, peer pressure, harassment, and impersonation (e.g. adults posing as children).
- **Conduct** – children’s own **online behaviour**, which may increase risk or cause harm to others. This includes sharing explicit images, cyberbullying, or aggressive online conduct.
- **Commerce** – risks such as **online gambling, scams, financial exploitation**, or exposure to advertising and marketing which may exploit children’s vulnerabilities.

Children may be vulnerable in one or more of these areas, and staff should be aware of the signs and know how to respond. The school's online safety curriculum, monitoring systems, and filtering provisions are designed to address all four areas, and regular reviews are conducted in line with DfE guidance.

Sharing nudes and semi-nude images

This means the taking and sending or posting of self-generated intimate images and/or videos, usually through mobile phone picture messages or webcams over the internet, including those generated or manipulated using AI (e.g. deepfakes).

The School will treat all incidents of sharing nudes and semi-nude images as a safeguarding matter and procedure should be followed as laid out in this Policy.

Members of staff should not view sexual imagery, or copy, print or share the images *under any circumstances*. Staff should however, be prepared to describe the content of images as reported to them. Ideally the device should be confiscated, turned off and locked away securely until it is required.

External agencies may not always need to be involved, but the School will always seek advice as to the deletions of images and action to be taken. If the images have been shared online, the School will consider contacting relevant web hosts/service providers or contacting the Internet Watch Foundation or Childline.

A pupil should be advised to block a sender if they are receiving unwanted images. The UK Council for Child Internet Safety's advice note 'Sexting in schools and colleges: responding to incidents and safeguarding young people' contains details of support agencies and provides further information for schools on how to respond to incidents of sexting.

AI-Generated Child Sexual Abuse Material and Financially Motivated Sexual Extortion (FMSE)

Staff should be aware that AI tools can be used to generate or manipulate sexual images of children, including "deepfakes" and nudification of real photographs. This is treated with the same seriousness as other child sexual abuse material, regardless of whether the image is wholly computer-generated, and must be reported to the DSL immediately using CPOMS.

Staff should also be aware of financially motivated sexual extortion (FMSE), where a child is coerced, typically online, into sharing a sexual image and then blackmailed

for money or further images. Pupils experiencing this should be reassured they are victims, not offenders, and supported to report it without fear of punishment.

Further guidance is available from the National Crime Agency's CEOP Education programme:

- Understanding and responding to AI-generated child sexual abuse material: <https://www.ceop.police.uk>
- Financially motivated sexual extortion (FMSE) guidance for education settings: <https://www.ceop.police.uk>

Further advice can be found:

<https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-how-to-respond-to-an-incident-overview>

Appendix 6: Guidance for Staff on Receiving a Disclosure

Although hard to hear, it is a privilege to receive a disclosure from a pupil since it acknowledges that they trust you enough to confide in you.

When receiving a disclosure, 'Good Practice' is as follows:

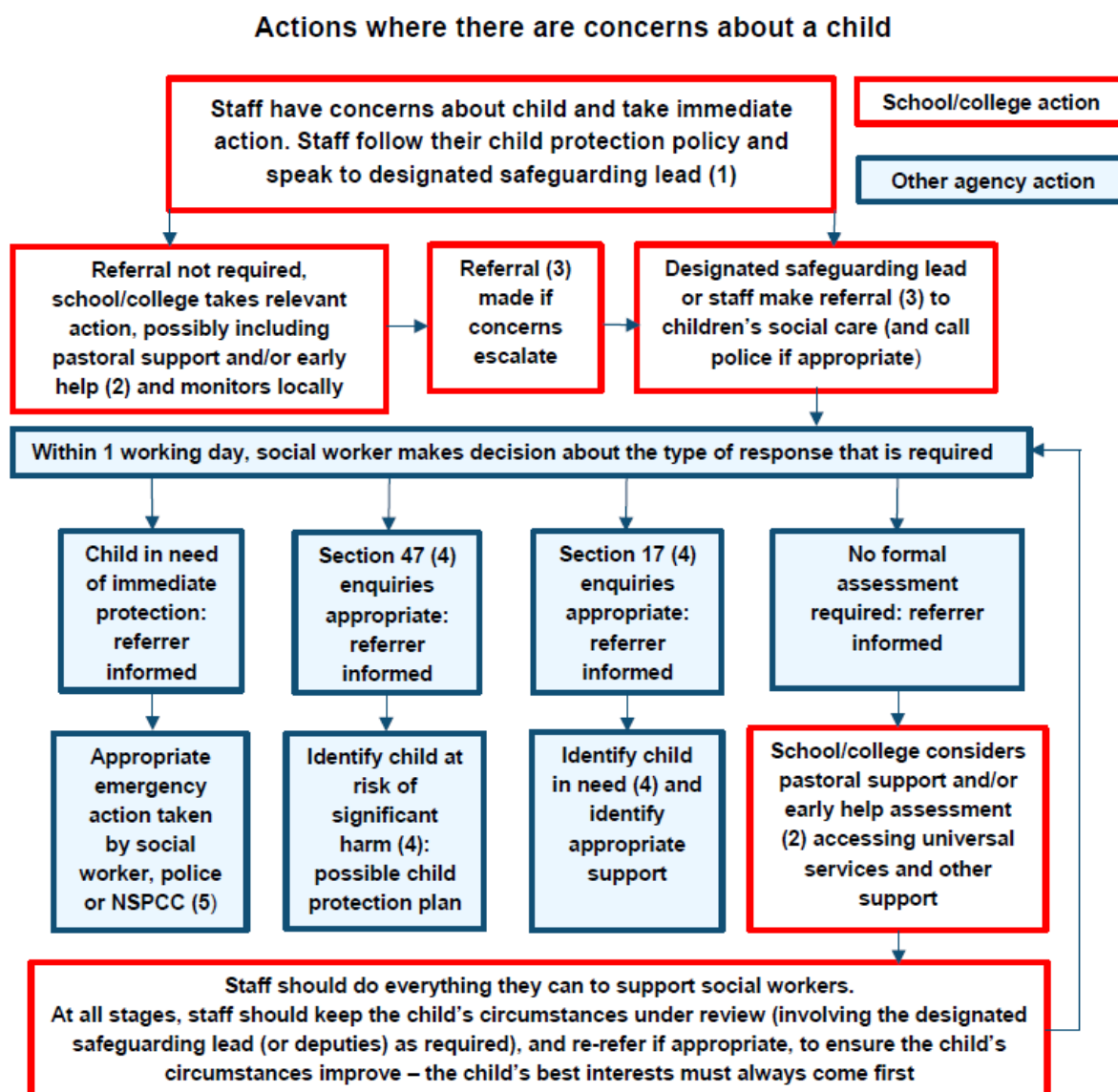
- Listen – be welcoming and allow them to speak without interruption – this may be very hard for them;
- Use TED – Ask the child to Tell, Explain or Describe an event/incident further – ask questions for clarification only;
- Stay Calm & Reassure – offer understanding with no judgement – “it’s not your fault”;
- Affirm – “it was right for you to tell me”, “you have been very brave”; “you will be taken seriously”
- NEVER promise confidentiality. Rather “I must pass this on to someone who can help”;
- Follow up – tell them you will support them as much as you can as they have chosen you to trust;
- DO NOT INVESTIGATE;
- Record – using CPOMS complete as much information as you can.
- Report assign the CPOMS incident to the DSL/DDSL
- Seek support for yourself.

If the DSL is unavailable or you believe the child to be in immediate harm, you must make a referral. This can be done by telephone (recommended) or by reference to the Medway or Kent local Safeguarding Children Partnership websites.

You will need the child’s name, date of birth and address. You will also need the parents’ phone numbers too (and addresses if different to the child).

Be prepared before you ring and remember that the appropriate local safeguarding service is based on where the child lives (therefore, either Kent or Medway for the vast majority of our pupils).

Appendix 7: PROCEDURES FOR MANAGING CONCERNS



1 In cases which also involve a concern or an allegation of abuse against a staff member, see KCSIE 2025, Part Four.

2 Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of Working Together to Safeguard Children provides detailed guidance on the early help process.

3 Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of Working Together to Safeguard Children.

4 Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of Working Together to Safeguard Children.

5 This could include applying for an Emergency Protection Order (EPO).

Appendix 8: **ALLEGATIONS AGAINST STAFF: PROCEDURE**

Allegations against staff including teachers and other staff including supply teachers and volunteers, and including the DSL, should be reported to the Principal. If they concern the Principal, they should be reported to the Chair of Governors.

It is expected that all staff and Governors involved in the management of allegations of abuse made against a member of staff, supply staff or volunteer or former member of staff or volunteer will comply at all times with DfE statutory guidance contained within the document: Keeping Children Safe in Education (KCSIE). The following guidance is drawn directly from the Part 4, KCSIE .

School staff, because of their daily contact with children in a variety of situations including the wider caring role, are particularly vulnerable to accusations of abuse. Their relationships with pupils may lead to allegations being made against them by pupils or adults with parental responsibilities. In any such case, these procedures need to be applied with common sense and judgement; a quick response and resolution is a priority.

The School's procedures

The School's procedures for dealing with allegations made against anyone working in the School, including supply teachers and volunteers, will be used where the member of staff or volunteer is alleged to have:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm if they work regularly or closely with children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (either within or outside of School).

Any allegations not meeting these criteria can now be dealt with as “low level” concerns, as identified in KCSIE, Part Four. See separate policy.

This procedure relates to members of staff, supply staff and volunteers who are currently working in the School regardless of whether the School is where the abuse is alleged to have taken place. Allegations against former members of staff or volunteers who are no longer working at the School will be referred to the Police. Historic allegations of abuse should also be referred to the Police.

Specific Allegations against Supply Staff

In some circumstances the School will have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency or business (referred to in this section as ‘the agency’).

Whilst the School is not the employer of supply teachers, allegations will be dealt with properly. In no circumstances will the School decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome. The School will also discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

The School will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor will they have all the relevant information required by the LADO as part of the referral process.

Supply teachers, whilst not employed by the School, are under the supervision, direction and control of the School whilst on the premises. They should be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School during the investigation.

Allegation Outcomes

If an allegation is made against **any** member of staff, the School’s priority will be to achieve a quick resolution of that allegation in a fair and consistent way that provides effective protection for any child involved and at the same time supports the person who is the subject of the allegation. All such allegations must be dealt with as a priority without delay.

The following definitions are to be used when determining the outcome of allegation investigations:

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation

- **Unsubstantiated:** there is insufficient evidence to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

The procedures to be followed in all such cases are outlined in Part 4 of KCSIE

Reporting an allegation against staff or volunteers

All allegations, complaints, concerns or suspicions against staff, including supply staff or volunteers, should be reported to the Principal.

All allegations about the Principal should be reported to the Chairman of Governors without the Principal being informed.

All allegations, complaints, concerns or suspicions about the Chairman of Governors should be reported to the LADO without the Chairman of Governors being informed. The LADO may choose to appoint a 'case manager'.

The Principal will inform the LADO based on the established statutory criteria for such a referral. The Principal will also decide whether to inform the DSL, or, if the DSL is the subject of the allegation, the DDSLs. The LADO will be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria and the LADO may consult the Police and Children's Services as appropriate.

No investigation will be undertaken into allegations without prior consultation with the LADO so as not to jeopardise statutory investigations. Borderline cases will be discussed informally with the LADO, as stated above, without naming the school or individual until the LADO has advised whether a referral is required. Any allegations not meeting the criteria will be dealt with in accordance with Local Safeguarding Children Partnership's procedures and the School's Disciplinary Procedures. All such cases will be handled within the School without delay.

All discussions with the LADO will be recorded in writing.

In a strategy discussion or the initial evaluation of the case, the Principal should share all relevant information they have about the person who is the subject of the allegation, and about the alleged victim(s).

The initial sharing of information and evaluation by the appropriate agencies may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern; in which case this decision and a justification for it should be recorded by both the Principal and the LADO, and agreement reached on what information should be put in writing to the individual concerned and by whom. The Principal should then consider, with the LADO, what action should follow both in respect of the individual and those who made the initial allegation.

Disclosure of information

The Principal will inform the accused person as soon as possible after consulting the LADO and will provide as much information as possible at that time.

The Parents or carers of the child[ren] involved will be informed of the allegation as soon as possible if they do not already know of it. They will also be kept informed of the progress of the case and the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed, but the parents or carers of the child may be told the outcome in confidence.

Where the LADO advises that a strategy discussion is needed, or Police or Local Children's Services need to be involved, the Principal will not speak to the accused person or the parents or carers until those agencies have consulted and have agreed what information can be disclosed.

The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed and, where necessary, parents and carers will be made aware of the prohibition on reporting or publishing allegations about teachers. If parents or carers express a wish to apply to the court to have reporting restrictions removed, they will be told to seek legal advice.

The Principal should take advice from the LADO, Police and local Children's Services to agree the following:

- who needs to know and, importantly, exactly what information can be shared;
- how to manage speculation, leaks and gossip;

- what, if any information can be reasonably given to the wider community to reduce speculation; and
- how to manage press interest if and when it should arise.

Where the Police are involved, wherever possible the Principal will ask the Police to obtain consent from the individuals involved to share their statements and evidence for use in the employer disciplinary process. This should be done as their investigation proceeds and will enable the Police to share relevant information without delay at the conclusion of their investigation or any court case.

Action to be taken against the accused

The School has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. Individuals will be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless external agencies object to this. The individual concerned will be advised to contact their trade union representative, if they have one, or a colleague for support. He/she will also be given access to welfare counselling and medical advice, if appropriate.

The Principal will appoint a named representative to keep the member of staff informed of the progress of the case and to consider what other support might be appropriate. If the member of staff is suspended he/she will also be kept up to date with current work-related issues.

Where an investigation by the Police or Local Authority is unnecessary, the LADO will discuss the steps to be taken with the Principal. The appropriate action will depend on the nature and circumstances of the allegation and will range from taking no further action to dismissal or a decision not to use the person's services in the future.

It may be necessary to undertake a further enquiries to determine the appropriate action. If so, the LADO will discuss with the Principal how and by whom the investigation will be undertaken.

Suspension

Suspension will not be an automatic response to an allegation and will only be considered in a case where:

- there is cause to suspect a child or other children at the School is or are at risk of significant harm; or
- the allegation is so serious that it might be grounds for dismissal.

All options to suspension will be considered before taking that step. Consideration will be given to whether the result that would be achieved by suspension could be obtained by alternative arrangements, for example, redeployment either within or outside of the School or providing an assistant when the individual has contact with children. The School will give due weight to the views of the LADO when making a decision about suspension.

A member of staff will only be suspended if there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification will be recorded and the member of staff notified of those reasons in writing within one working day. Appropriate support will be provided for the suspended individual and contact details provided. Social contact with colleagues and friends should not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

Criminal proceedings

The School will consult with the LADO following the conclusion of a criminal investigation or prosecution as to whether any further action, including disciplinary action, is appropriate and if so, how to proceed. The options will depend on the circumstances of the case, including the result of the police investigation or trial and the standards of proof applicable.

Return to work

If it is decided that the person who has been suspended should return to work, the School will consider how best to facilitate this, for example, arranging a phased return and / or the provision of a mentor to provide assistance and support in the short term. The School will also consider how to manage the contact with the child[ren] who made the allegation.

DBS and TRA Referrals and Ceasing to employ staff

There is a legal requirement on the school as an employer to make a referral to the DBS where they think that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child.

If the School ceases to use the services of a member of staff or volunteer because they are unsuitable to work with children, a settlement/compromise agreement will not be used and a referral to the Disclosure and Barring Service will be made as soon as possible if the criteria are met – see above – as per the guidance published by the DBS.

If the accused person resigns or ceases to provide his / her services, this will not prevent child protection allegations being followed up in accordance with this policy and the statutory guidance. A referral to the Disclosure and Barring Service (DBS) will be made as soon as possible, if the criteria are met – see above – as per the guidance published by the DBS.

Staff should be aware that the DBS has statutory authority to bar a person from working in regulated activity with children and/or vulnerable adults in the UK.

Guidance for making referrals can be found on the DBS website <https://www.gov.uk/government/organisations/disclosure-and-barring-service>.

Failure to report to the DBS constitutes an offence and the School may be removed from the DfE register of independent schools.

Where a teacher is dismissed (or would have been dismissed had he/she not resigned) for misconduct, separate consideration will be given as to whether a referral to The Teaching Regulation Agency (TRA) should be made, as per the flow chart that appears in the guidance published by the TRA. If in doubt, a referral will be made.

Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the Governors without delay.

Charity Commission report

Safeguarding issues may also be reportable to the Charity Commission under their serious incident reporting guidance, that is, if any one or more of the following things occur:

- there has been an incident where the pupils (beneficiaries) of the School have been or are being abused or mistreated while under the care of someone connected with the School such as a trustee, member of staff or volunteer;
- there has been an incident where someone has been abused or mistreated and this is connected with the activities of the School;

- allegations have been made that such an incident may have happened, regardless of when the alleged abuse or mistreatment took place;
- the School has grounds to suspect that such an incident may have occurred; or
- it is the responsibility of the Governing Body to make this report and notify the School's insurers as appropriate.

Timescales

All allegations must be dealt with as a priority so as to avoid any delay. Where it is clear immediately that the allegation is unsubstantiated or malicious, the case should be resolved within one week. It is expected that most cases of allegations of abuse against staff will be resolved within one month with exceptional cases being completed within 12 months. If the nature of the allegation does not require formal disciplinary action, the Principal should institute appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, as far as possible it should be held within 15 working days.

Unsubstantiated, false or malicious allegations

Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Principal will consider whether to take disciplinary action in accordance with the School's Discipline policies and the Expulsion, Removal and Review Policy.

The School may apply appropriate sanctions to pupils who are found to have made malicious allegations. This could include temporary or permanent exclusions or referral to the Police if a criminal offence may have been committed.

Where a parent has made a deliberately invented or malicious allegation the Principal will consider whether to require that parent to withdraw their child or children from the school on the basis that they have treated the School or a member of staff unreasonably.

Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the School reserves the right to contact the Police to determine whether any action might be appropriate.

Record keeping and references

Details of all allegations found to be malicious will be removed from personnel records.

A clear and comprehensive summary of any allegations made against a member of staff, and all details leading to and including a resolution, and a note of any actions taken and decisions reached will be kept on the confidential personnel file and will be retained until the accused has reached normal retirement age or for a period of 10 years if that is longer.

However, where an issue or concern relating to a member of staff and the safeguarding of children has been identified, records of any concerns, suspicions or investigations will be kept for 75 years. Such records will provide clarification in cases where future DBS checks reveal information from the Police about an allegation that did not result in a criminal conviction and will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time. The School will provide information regarding a substantiated allegation for the purposes of future references and DBS disclosures in accordance with the School's safer recruitment procedures. In cases where allegations are found to be malicious or unsubstantiated, reference will not be made in employer references.

Review and Learning Lessons

At the conclusion of a case in which an allegation is substantiated, the LADO should review the circumstances of the case with the Principal to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future. This should include issues arising from the decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified.

Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The LADO and Principal should consider how future investigations of a similar nature could be carried out without suspending the individual.

Low Level Concerns

KCSIE states that:

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harms threshold.

A low-level concern is any concern - no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

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

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

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door;
- using inappropriate sexualised, intimidating or offensive language

See Low Level Concerns Policy for further information.