



Child Protection and Safeguarding Policy

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

Date of last review:	February 2025
Review Frequency:	At least annually

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

Status and Review Cycle	Statutory / At least annually
Policy reviewed and amended	February 2025
Next review date	September 2025
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Key Contacts

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Designated Safeguarding Lead ("DSL") and Deputy Designed Safeguarding Lead ("DDSL")	<p>DSL (including for EYFS Pupils) Helen Cook TEL: 01732 763572 EMAIL: helen.cook@theprep.org.uk</p> <p>Deputy DSL Julie White TEL: 01732 763572 EMAIL: julie.white@theprep.org.uk</p> <p>Deputy DSL Laura Young TEL: 01732 763572 EMAIL: laura.young@theprep.org.uk</p> <p>Deputy DSL Caroline Mansfield TEL: 01732 763572 EMAIL: caroline.mansfield@theprep.org.uk</p> <p>Deputy DSL Louisa Rowland TEL: 01732 763572 EMAIL: louisa.rowland@theprep.org.uk</p> <p>Deputy DSL: Kevin Evers TEL: 01732 763572 EMAIL: kevin.evers@theprep.org.uk</p>
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Local Support and Contact Details

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

- **Kent Integrated Children's Services/ Children's Social Work Services**
 - [Kent Integrated Children's Services Portal](#) – select 'urgent' if there is an immediate risk/concern
 - Front Door Service: 03000 411111
 - Out of Hours Number: 03000 419191
- **Local Early Help and Preventative Services and Family Hubs**
 - [Early Help and Preventative Services - KELS](#)
 - [Early Help contacts - KELS](#)
 - [Kent Family Hubs - Kent County Council](#)
- **Kent Police**
 - 101 or 999 if there is an immediate risk of harm
- **Kent Safeguarding Children Multi-Agency Partnership (KSCMP)**
 - www.kscmp.org.uk
 - 03000 421126 or kscmp@kent.gov.uk
- **Adult Safeguarding**
 - Adult Social Care via 03000 41 61 61 (text relay 18001 03000 41 61 61) or email social.services@kent.gov.uk
- **Kent LADO Education Safeguarding Advisory Service (LESAS) – Support for Kent Children's Workforce**
 - [Local Authority Designated Officer \(LADO\) - Kent Safeguarding Children Multi-Agency Partnership](#)
 - To speak to the LADO regarding an allegation against a member of staff, complete a referral on the [Kent Integrated Children's Services Portal](#).
 - To raise a LADO, strategic education safeguarding or online safety enquiry, commission a review or enquiry about bespoke training or other safeguarding products, please use the [LESAS enquiry form](#).

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What to do if you have a welfare concern about a pupil at Sevenoaks Prep

Why are you concerned?

For example:

- Something a child has said, for example, an allegation of harm
- Child's appearance; may include unexplained marks/bruises as well as dress
- Behaviour change(s)
- Witnessed concerning behaviour
- Information is given to you by another person

Act immediately, record your concerns on CPOMS & communicate with the DSL. Do not discuss the concern with anyone.

Follow the Sevenoaks Prep procedure (Record all details on CPOMS and alert DSL)
If the child has made a disclosure

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

Inform the Designated Safeguarding Lead (Helen Cook, helen.cook@theprep.org.uk)

If the DSL is unavailable, inform the DDSLs (Laura Young, Louisa Rowland, Julie White, Kevin Evers or Caroline Mansfield)

THE DSL WILL:

- If a child is at risk of immediate harm and/or is unsafe to go home, make an urgent Request for Support to the Front Door Service via the portal or call the Police on 999.
- If no immediate risk of harm, provide internal support and/or refer to other agencies in line with Kent Safeguarding Support Level Guidance and KSCMP procedures, as appropriate. For example, signposting to community services and/or early help open access, a non-urgent call to the Police via 101, reporting allegations against staff to the County LADO Service, or make a Request for Support via the Front Door Service Portal.
- Where the school/college is unsure, advice can be sought from a Local Authority Social Worker at the Front Door Service via **03000 411 111**
- Where support is required out of working hours, contact the Out of Hours Service via **03000 41 91 91**.

If you are unhappy with the response:

DSLs/Staff:

- Follow the Sevenoaks Prep's whistleblowing procedures (policy found on website)
- Follow Kent safeguarding partnership escalation procedures.

Parents:

- Follow Sevenoaks Prep's complaints procedures (policy found on website)

Record decision making and action taken on CPOMS

Monitor

Be clear about:

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

Review and request further support if necessary.

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

Child Focused Approach to Safeguarding

Introduction

This policy applies to all members of staff and volunteers, is available to parents on request and is published on the school's website. It applies whenever staff or volunteers are working with pupils, including when activities take place off site. When the word 'staff' is used, it applies to all categories of staff including supply staff, third party employees, self-employed staff, contractors, governors, volunteers, students and those on work experience.

- Sevenoaks Prep recognises its statutory responsibility to safeguard and promote the welfare of all children. Safeguarding and promoting the welfare of children is **everybody's** responsibility and everyone has a role to play. All members of our community (staff, volunteers, governors, leaders, parents/carers, wider family networks and pupils) have an important role in safeguarding children and all have an essential role to play in making our community safe and secure.
- Sevenoaks Prep believes that the best interests of children always come first. All children (defined in law and in this policy as those up to the age of 18) have a right to be heard and to have their wishes and feelings taken into account and all children regardless of age, sex (gender), ability, culture, race, language, religion or sexual identity or orientation have equal rights to protection.
- Staff working with children at Sevenoaks Prep will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child and if any member of our community has a safeguarding concern about any child or adult they should act and act immediately.
- This policy applies where there are any child protection concerns regarding children who attend the school but may also apply to other children connected to the School (e.g. siblings, or younger members of staff (under 18s) or children on student/work placements).
- Sevenoaks Prep recognises the importance of providing an ethos and environment within school that will help children to be safe and to feel safe. In our school, children are respected and are encouraged to talk openly. We will ensure children's wishes and feelings are taken into account as far as possible when determining what safeguarding action to take and what services to provide although they will not necessarily determine the school's action, and decisions will be based in what is considered to be in the child's best interests.
- Sevenoaks Prep recognises the importance of adopting a trauma-informed approach to safeguarding; we understand there is a need to consider the root cause of children's behaviour and consider any underlying trauma.
- Our core safeguarding principles are:
 - **Prevention:** positive, supportive, safe culture, curriculum and pastoral opportunities for children, safer recruitment procedures.

- **Protection:** following the agreed procedures, ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns.
- **Support:** adopt a child-centred approach and provide support for all pupils, parents/carers and staff, and - where appropriate - implement specific interventions for those who may be at risk of harm.
- **Collaboration:** with both parents where possible and other agencies to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.

Legal Framework

This policy pays due regard to the following statutory guidance and other government guidance. It also complies with the procedures of Kent SCMP.

1. Keeping Children Safe in Education (KCSIE) (2024)
2. Working Together to Safeguard Children (WT) (2018 updated 2023)
3. Statutory Framework for the Early Years Foundation Stage (EYFS) (2024)
4. [Kent and Medway Safeguarding Children Procedures](#)
5. The Education (Independent School Standards) Regulations (2014)
6. HM Gov advice 'What to do if you're worried a child is being abused' (March 2015)
7. Working Together to Improve School Attendance (2024)
8. DfE advice 'Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (May 2024)
9. Safer Recruitment Consortium 'Guidance for safe working practice for those working with children and young people in education settings' (February 2022)
10. DfE guidance 'Teaching online safety in school' (January 2023)
11. Mental health and behaviour in schools: departmental advice (November 2018)
12. DfE Statutory Guidance "Relationships Education, Relationships and Sex Education (RSE) and Health Education" (2019 updated 2021)
13. DfE Searching Screening and Confiscation Advice for schools
14. UKCIS Education Group: Sharing nudes and semi-nudes: advice for education settings working with children and young people (March 2024)
15. Designated teacher for looked after children (February 2018)
16. DfE statutory guidance 'Children missing education' (August 2024)
17. DfE's Searching Screening and Confiscation Advice
18. Prevent Duty Guidance for England and Wales (2023 updated 2024)
19. The use of social media for on-line radicalisation (July 2015)
20. Equality Act 2010: advice for schools_(updated 2018)
21. Promoting the education of children with a social worker: Virtual School Head role extension (March 2024)
22. Police and Criminal Evidence Act (PACE) Code C 2019

All references to KCSIE within this policy refer to KCSIE (2024)

- Sevenoaks Prep will follow local or national guidance in response to any emergencies. We will amend this policy and our procedures as necessary but regardless of the action required, our safeguarding principles will always remain the same with the welfare of the child being paramount.

Definition of Safeguarding

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

Staff must be familiar with the signs of neglect, physical, emotional and sexual abuse and have an understanding of other specific safeguarding issues which may impact children. Detailed information can be found in Appendix 1 and Appendix 2 of this policy and in Part 1 of KCSIE and Annex B.

Related policies

- This policy is one of a series in the school integrated safeguarding portfolio and should be read and actioned in conjunction with the policies as listed below:
 - Anti-bullying
 - Attendance
 - Behaviour, including behaviour management and use of reasonable force
 - Complaints
 - Data protection and information sharing
 - Emergency procedures, such as evacuations and lockdowns
 - Health and safety, including plans for school reopening
 - First aid and accidents, including medication and managing illness, allergies, health and safety, and infection
 - Mobile phones and Devices
 - Online safety
 - Personal and intimate care
 - Relationship, Sex and Health Education (RSHE)
 - Risk assessments, such as school trips, use of technology, school re-opening
 - Safer recruitment
 - Staff code of conduct, including Acceptable Use of Technology Policies (AUP)

- Whistleblowing

Policy compliance, monitoring and review

- Sevenoaks Prep will review this policy at least annually (as a minimum) - and will update it as needed - so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. The policy will also be revised following any national or local updates, significant local or national safeguarding events and/or learning and/or any changes to our own procedures.
- All staff (including temporary staff and volunteers) will be provided with a copy of this policy and Part One and Annex B of KCSIE as appropriate. A copy of these documents can be found on the school intranet.
- Parents/carers can obtain a copy of the school Child Protection Policy and other related policies on request. Additionally, our policies can be viewed via the school website: (<https://www.theprep.org.uk/about-us/policies/>).
- The policy forms part of our school development plan and will be reviewed annually by the governing body who has responsibility for oversight of safeguarding and child protection systems.
- The Designated Safeguarding Lead (DSL) and headteacher will ensure regular reporting on safeguarding activity and systems to the governing body. The governing body will not receive details of individual pupil situations or identifying features of families as part of their oversight responsibility.

Key Responsibilities

Governors

The governing body has a statutory responsibility for safeguarding arrangements and to ensure that policies, procedures and training is effective and complies with the law at all times.

The governing body ensures that:

- it facilitates a whole school approach to safeguarding which involves everyone. They will ensure that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development so that all systems, processes, and policies operate with the best interests of the child at their heart.
- it is aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, and the local multi-agency safeguarding arrangements set out by the Kent Safeguarding Children Multi-Agency Partnership ([KSCMP](#)).
- there are policies and procedures in place so appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- there is a nominated governor for safeguarding, who takes leadership responsibility at Board level for all safeguarding matters. The nominated governor will support the DSL and have oversight to

ensure that the School has an effective policy which interlinks with other related policies, that locally agreed procedures are in place and being followed and that the policies are reviewed at least annually and when required.

- an appropriate senior member of staff from the school's leadership team, is appointed to the role of designated safeguarding lead and that the DSL is supported in their role and is provided with sufficient time so they can provide appropriate support to staff and children regarding any safeguarding and welfare concerns.
- the school holds at least two emergency contact numbers for each child.
- safer recruitment procedures are followed in accordance with Part 3 of KCSIE and recorded in the school's Single Central Record (SCR).
- online safety is integrated into the school's overarching approach to safeguarding
- the school's IT systems have appropriate monitoring and filtering systems installed, to block harmful and inappropriate content without unduly restricting access for educational purposes, and to review the effectiveness at least annually
- the leadership team and relevant staff have an awareness and understanding of the online safety provisions in place, manage them effectively and know how to escalate concerns when identified.
- the school has policies and procedures in place relating to the use of cameras and technology within the EYFS.
- it reviews the Child Protection and Safeguarding Policy at least annually, including the effectiveness of procedures and their implementation.

Head

The head is responsible for ensuring:

- an overarching culture of safeguarding is promoted so the welfare of children is embedded within all the school's processes and procedures operating with the best interests of the child at their heart.
- that the school's policies and procedures follow statutory guidance.
- that KCSIE Part 1 (including Annex B) and the school's Child Protection and Safeguarding Policy are understood and implemented effectively by all staff.
- sufficient time, training and resources are allocated to enable the DSL and Deputies to carry out their roles effectively.
- that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively in accordance with the school's Whistleblowing procedures.
- pupils are taught about keeping safe, including online
- systems are in place, which are easily understood and easily accessible for pupils to report concerns, including abuse.
- any reports regarding concerns or allegations related to the conduct of adults (this includes behaviour outside of school that might indicate an individual is unsuitable to work with children), including low level concerns are dealt with appropriately
- liaising with the Local Authority Designated Officer (LADO) regarding concerns about adults
- training on safer recruitment is undertaken at regular intervals and ensure that safer recruitment procedures are followed in accordance with Part 3 of KCSIE and recorded in the school's Single Central Record (SCR).

- the monitoring of this policy in liaison with the DSL and Governing Body and to remedy any deficiencies immediately.

Designated Safeguarding Lead (DSL)

- The School has appointed a member of the senior leadership team (Helen Cook - Acting Deputy Head and Head of Pre-Prep) as the Designated Safeguarding Lead (DSL).
- The school has also appointed Deputy DSLs who have delegated responsibilities and act in the DSLs absence:
 - Louisa Rowland, Head of Early Years
 - Julie While (Teacher, Attendance Officer, Well-Being Co-Ordinator)
 - Caroline Mansfield (Prep SEND Co-Ordinator)
 - Laura Young (Class Teacher, Maths Co-Ordinator & ECT Mentor)
 - Kevin Evers (IT Teacher, Form Tutor)

Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.

The DSL has responsibility for:

- promoting a culture of safeguarding so the welfare and best interests of children are embedded within all the school's processes and procedures
- the day-to-day oversight of safeguarding and child protection systems (including online safety and understanding the filtering and monitoring systems and processes in place) in school.
- advising staff on the response to any safeguarding concerns.
- acting as the central contact point for all staff, parents, pupils and external agencies to discuss any safeguarding concerns.
- maintaining a confidential recording system for all safeguarding and child protection concerns including action taken. This includes keeping records for those cases where there is no need to make a referral to any other service
- co-ordinating safeguarding action for individual children.
- when supporting children with a social worker or looked after children, the DSL will have the details of the child's social worker and the name of the virtual school head in the authority that looks after the child, with the DSL liaising closely with the designated teacher.
- liaising with other agencies and professionals in line with KCSIE and WTSC.
- ensuring that locally established procedures as put in place by the three safeguarding partners as part of the [Kent Safeguarding Children Multi-Agency Partnership](#) (KSCMP) procedures, including referrals, are followed, as necessary.
- understanding child protection processes, including Section 17 (child in need) and Section 47 (child suffering, or likely to suffer, significant harm) assessments under the Children's Act (1989) and 'Early Help' processes

- representing, or ensure the School is appropriately represented at multi-agency safeguarding meetings (including child protection conferences).
- managing and monitoring the School's role in any multi-agency plan for a child.
- being available during term time (during school hours) for staff in the School to discuss any safeguarding concerns.
- ensuring adequate and appropriate DSL cover arrangements in response to any closures and any out of hours and/or out of term activities.
- taking lead responsibility for online safety, including understanding the filtering and monitoring systems and processes in place.
- helping promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff.
- ensuring all new staff receive induction training in safeguarding and understand their responsibilities
- maintaining a regular training programme for all members of the school's staff, in line with KCSIE and advice from Kent SCMP
- liaising with the headteacher to inform them of any safeguarding issues, especially ongoing enquiries under section 17 and section 47 of the Children Act 1989 and police investigations. This includes being aware of the requirement for children to have an Appropriate Adult ([PACE Code C 2019](#)).
- ensuring that when pupils leave the school any child protection information is copied for the new school within 5 days and transferred securely and separately from the main file
- ensuring that a record of any safeguarding information is obtained from any previous school or nursery for a new pupil joining the school
- monitoring pupil attendance and patterns of attendance
- ensuring the Child Protection and Safeguarding Policy is reviewed annually in conjunction with the Head and the Governors, such review to include its effectiveness in practice

Members of staff

- Staff all play a particularly important role in safeguarding as they are in a position to observe changes in a child's behaviour or appearance, identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating.
- All members of staff have a responsibility to:
 - provide a safe environment in which children can learn
 - adhere to the school's Staff Code of Conduct and other school policies
 - be aware of the indicators of abuse, neglect and exploitation, including child-on-child abuse so that they can identify cases of children who may need help or protection
 - know what to do if they have concerns about a child or if a child tells them that they are being abused, neglected, or exploited and understand the impact this can have upon a child
 - be able to identify and act upon indicators that children are, or at risk of developing mental health issues

- be prepared to identify children who may benefit from early help and understand the early help process and their role in it
- understand the School's safeguarding policies and systems
- undertake regular and appropriate training which is regularly updated
- be aware of the local process of making referrals to children's social care and statutory assessment under the Children Act 1989, including Early Help
- know how to maintain an appropriate level of confidentiality
- reassure children who report concerns that they are being taken seriously and that they will be supported and kept safe
- to be aware that that even if there are no reports of child-on-child abuse, or any other form of abuse, it does not mean it is not happening, it may just not be being reported.
- to educate pupils understand how to keep themselves safe and manage risk
- to be alert to absenteeism of any pupils and inform the DSL of any concerns.
- to be alert to wider environmental factors that are a threat to a child's safety and/or welfare (Contextual Safeguarding)
- to report to the Head any concerns about the conduct of adults, including low level concerns (this includes behaviour outside school that might indicate an individual is unsuitable to work with children)
- act in line with Teachers' Standards 2012 which state that teachers (including headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties
- Staff must recognise that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences as being abusive or harmful. This should not prevent staff from having professional curiosity and speaking to a DSL if they have any concerns about a child.
- Staff must determine how best to build trusted relationships with children, young people and parents/carers which facilitate appropriate professional communication in line with existing and relevant policies (e.g. our Staff Code of Conduct).

Children and young people

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

Parents and carers

- Parents/carers have a responsibility to:
 - Understand and adhere to the Sevenoaks Prep policies and procedures.
 - Talk to their children about safeguarding issues and support the School in their safeguarding approaches.
 - Identify behaviours which could indicate that their child is at risk of harm, including online.

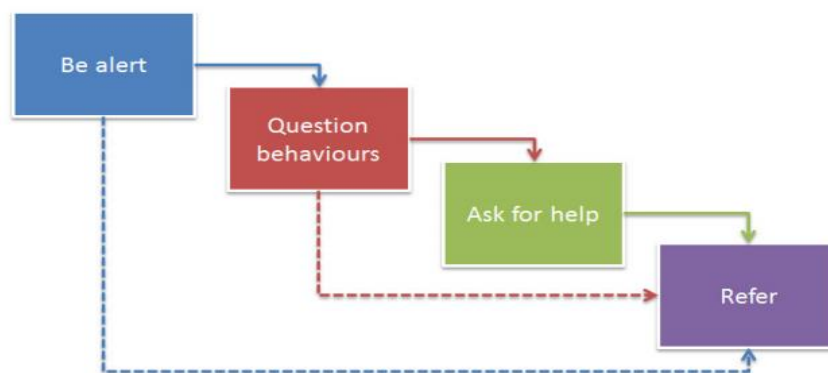
- Seek help and support from the School or other agencies.

Procedures for when there are concerns about a child

Recognising indicators of abuse, neglect and other safeguarding issues

(Also see [appendix 1](#) and [appendix 2](#))

- Staff must maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff must always act in the best interests of the child.
- All staff are made aware of the definitions and indicators of abuse, neglect and exploitation as defined in 'Keeping Children Safe in Education'. The thresholds for support are outlined locally within the [Kent Support Levels Guidance](#).
- Sevenoaks Prep recognises that when assessing whether a child may be suffering actual or potential harm there are four categories of abuse (for more in-depth information, see appendix 1):
 - Physical abuse
 - Sexual abuse
 - Emotional abuse
 - Neglect (including affluent neglect)
- By understanding the indicators of abuse, neglect and other safeguarding issues, the school can respond to problems as early as possible and provide the right support and services for the child and their family.
- All members of staff are expected to be aware of and follow the below approach if they are concerned about a child:



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

Staff must be aware that

- children may report abuse, neglect or exploitation happening to themselves, their peers or their family members.
- concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness
- indicators of child abuse, neglect and exploitation can vary from child to child.

- children develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child
- parental behaviors can also indicate abuse, neglect or exploitation - so staff must be alert to a parent/carer's interaction with a pupil or issues such as parental alcohol misuse, domestic abuse or mental health
- children can be at risk of abuse, neglect or exploitation in outside their families; extra-familial harms include sexual exploitation, criminal exploitation, sexual exploitation and abuse, serious youth violence and county lines.
- indicators of abuse, neglect and exploitation do not automatically mean a child is being harmed.
- technology can be a significant component; children are at risk of abuse or exploitation online from people they know (including other children) and from people they do not know; abuse may take place concurrently via online channels and in daily life.
- some children have additional or complex needs and may require access to intensive or specialist services to support them.

Staff must also be aware that

- children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful
- may feel embarrassed, humiliated, or could be being threatened
- it is more common for concerns to arise about a child of prep school age through staff observations and general conversation rather than a direct disclosure
- there may also be a change in a pupil's art or written work which may show signs of confusion or distress.
- younger pupils may talk about, or demonstrate behaviour, through their play which gives rise to concerns

Abuse, neglect, exploitation and other safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label alone. In many cases, multiple issues will overlap with one another. In many safeguarding cases it is not one major incident which triggers a referral, but a series of seemingly minor events.

Staff must always be vigilant and report all concerns, however minor they may appear, to the DSL.

Responding to Child Protection Concerns

Procedures if staff have a concern about a pupil

- If a member of staff is concerned about a pupil the matter should be referred to the DSL, or a Deputy DSL in the DSL's absence, without delay.
- Staff may speak directly to the DSL first to discuss their concerns about a pupil or may enter their concern straight on to CPOMS (the school's management system for safeguarding) for attention by the DSL. In either case, reporting a concern must not be delayed and must be reported as soon as possible and always on the same working day. (also see later section on recording concerns)
- In all instances, a written record must be made by the member of staff on CPOMS, which all staff have access to.
- Any member of staff who cannot access CPOMS for any reason must always contact the DSL directly, and without delay.

Procedures for staff if a pupil discloses information directly

The member of staff must:

- **Listen carefully** and keep an open mind. Staff should not take a decision as to whether or not abuse has taken place. Note taking may cause the child to stop talking so it is preferable to focus solely on the child, paying particular attention to the language used so it may be recorded accurately after the conversation is finished.
- **Reassure** the pupil, if they have made a disclosure, that he/she is right to tell and is not to blame. A pupil must never be given the impression that they are creating a problem by reporting abuse. Nor should a pupil ever be made to feel ashamed for making a report.
- **Do not promise confidentiality.** Explain that you must make sure that the pupil is safe, and you will need to ask other adults to help you to do this.
- **Do not cross question the pupil.** You must not ask leading questions, that is, a question which suggests its own answer. Let the pupil tell you what he or she wants to and no more. The pupil may be interviewed by a specialist later and too much questioning may prejudice later investigations or cause the child to become anxious and retract his/her information.
- **Be prepared to follow up** with the pupil, but only in conjunction with advice from the DSL.
- **Be aware that** younger pupils may disclose issues of a safeguarding nature in general conversation rather than as a specific disclosure to a member of staff.
- **Do not attempt any examination** or remove a pupil's clothes to look further at an injury. Under no circumstances should photographs be taken of a pupil's injury. It may be possible to observe the pupil during the normal school routine, for example in a physical education (PE) class. If a pupil wants to show you his or her injuries, make sure that a colleague is with you as a witness. Try to arrange for one of you to be the same sex as the pupil
- **Do not attempt to investigate** matters further; your role is to listen, record and report your concerns to the DSL.
- When the pupil has finished talking, make sure that he/she feels secure and, if appropriate, explain what you are going to do next.

If a concern or disclosure involves technology or online images staff must follow the specific advice in the online safety policy.

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

Action by the DSL on receipt of a concern about a child

- On receipt of the safeguarding report, the DSL must record the decisions made and action taken. Action will depend on the nature of the concern. It may include one or more of the following:
 - a. monitoring the pupil in school
 - b. a discussion with parents
 - c. early help intervention from the school and/or another agency
 - d. advice and/or referral to Children's Services
 - e. advice and/or referral to the LADO
 - f. report to the police
- The DSL is also aware of the requirement, in specific circumstances, for children to have an Appropriate Adult. Further information can be found in the Statutory guidance – Police and Criminal Evidence Act (PACE) Code C 2019
- Any new concern or information about a pupil who has active or previous involvement with Children's Services must be passed to the pupil's allocated social worker without delay.
- The member(s) of staff making the report will be informed by the DSL of the action taken, although additional information will only be shared with members of staff on a need-to-know basis.
- If the pupil's situation does not appear to be improving, the staff member with concerns should request the DSL to re-consider the action taken.

In Kent, Early Help and Preventative Services and Children's Social Work Services are part of [Integrated Children's Services](#) (ICS) and are accessed via the 'Front Door Service' / [Kent Children's Services Portal](#).

Referrals to Children's Services

Referrals about an individual pupil must be made to the Local Authority in which the pupil resides. Almost all pupils reside in Kent [If this is not the case please amend] therefore the DSL follows the Levels of Need thresholds from Kent SCMP when decisions are made about making referrals. Available here:

<https://www.kscmp.org.uk/guidance/kent-support-levels-guidance>

There are 4 levels.

1. Universal Support:

The child has their needs met within universal provision.

2. Additional Support:

Children and families with additional needs who require extra help to improve outcomes (often referred to as Early Help)

3. Intensive Support:

Intensive support can be offered to children and families where they have complex or multiple needs requiring local authority services to work together with universal services

4. Specialist Support:

Children who are considered to have been harmed or are likely to suffer significant harm as a result of abuse or neglect.

Early Help

- a) Early help means providing support as soon as a problem emerges at any point in a child's life.
- b) Any pupil may benefit from early help, but KCSIE recommends that all staff should be particularly alert to the potential need for early help for a pupil who:
 - is disabled or has certain health conditions and has specific additional needs
 - has special educational needs (whether or not they have a statutory education, health and care plan)
 - has a mental health need
 - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
 - is a young carer
 - is frequently missing/goes missing from education, care or home
 - is misusing alcohol and other drugs themselves
 - is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
 - has returned home to their family from care
 - has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
 - is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
 - is at risk of being radicalised or exploited
 - has a parent or carer in custody, or is affected by parental offending
 - is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
 - is a privately fostered child.

If early help support is appropriate, the DSL (or a deputy) will lead on exploring internal resources available and liaising with other universal or additional services available via local agencies. Additional support systems in school may form part of early help strategies, e.g., additional pastoral support, school mentors, support from a counsellor and will feed into Local Authority early help measures as required. Evidence is kept of all early help interventions.

Where Intensive Support Early Help (provided by ICS, outlined in the [KSCMP support levels guidance](#)) is considered to be appropriate, the DSL (or deputy) will make a 'request for support' via the [Kent Children's Services Portal](#).

Staff, including the DSL, may be required to work with other agencies and professionals in an early help assessment.

The DSL will keep all Early Help cases under constant review and consideration will be given to escalating concerns and/or seeking advice from the Front Door Service if the situation does not appear to be improving or is getting worse.

Chapter 3 of Working Together to Safeguard Children (Department for Education) provides detailed guidance on the early help process.

Threshold Levels 3 and 4

Where a child is suffering, or is likely to suffer from harm, or is in immediate danger (e.g. under section 17 or 47 of the Children Act) intensive or specialist support is required and a 'request for support' will be made immediately to Kent [Integrated Children's Services](#) (via the [portal](#)) and/or the police, in line with the [Kent Support Level Guidance and KSCMP procedures](#).

- Sevenoaks Prep recognises that in situations where there are immediate child protection concerns for a child as identified in line with Support Level Guidance, it's role is NOT to investigate but to act in line with KSCMP guidance which may involve multi-agency decision making.
- The DSL will seek advice or guidance from a social worker via the Front Door Service before deciding next steps.

It is the school's policy that the DSL (or a deputy DSL in the absence of the DSL), has the responsibility for making all referrals; however, anybody can make a referral and in exceptional circumstances staff may raise concerns directly with Children's Services. If, at any point, there is a risk of immediate serious harm to a pupil a referral should be made to Children's Services or the police on 999 immediately. If staff make a referral directly they should inform the DSL as soon as possible that they have done so.

- If a member of staff raises a concern about a child with the DSL and the child's situation does not appear to be improving they must re-refer the matter to the DSL and record this on CPOMS.
- If, after a request for support or any other planned external intervention, by the DSL to an external agency a child's situation does not appear to be improving, or concerns regarding receiving a decision or the decisions made, the DSL will re-refer the pupil and will follow the [Kent Escalation and Professional Challenge Policy](#) to ensure their concerns have been addressed and, most importantly, that the child's situation improves.
- DSLs and staff will be mindful of the need for the school to ensure any activity or support implemented to support children and/or families is recorded. Support provided by the school where families are struggling will be overseen and reviewed by the DSL on a regular basis to ensure activity does not obscure potential safeguarding concerns from the wider professional network.

Communication with Parents

- All parents are aware from the school's publication of this policy on the website that the school has a safeguarding policy and is required to follow statutory guidance in respect of reporting to Children's Services any case of suspected abuse.

- From this policy and from notices in the school buildings, parents are made aware of the identities of the DSL and Deputy DSLs with whom they may discuss concerns.
- The school works closely with parents and outside agencies to help support pupils and their families; however, it will always prioritise the duty of care to the pupil and will refer concerns if it considers a pupil is/may be at risk of harm or has suffered harm.
- The DSL will normally request a meeting with the parents of the pupil about whom there are concerns to discuss the matter, explaining the reasons for the school's concerns and the course of action the school intends to take.
- Referrals to Children's Services or the LADO (or initial advice from either service) do not require prior parental consent. The DSL must act in the best interests of the pupil, even if this results in making a referral against the parents' wishes.
- If the DSL believes that notifying parents might in any way exacerbate the problem, increase the risk to the pupil or if there are any other extenuating circumstances, initial advice will be sought from Children's Services prior to notifying the parents. This may result in an immediate referral to Children's Services without parents being notified.
- If a decision is made that concerns will not be discussed with the child's parents or carers prior to referral to Children's Services, this will be recorded in the child's safeguarding records with a full explanation of the reason for this decision.
- If there is an allegation which involves a member of staff, parents will only be informed after the school has consulted with the LADO and has obtained the LADO's consent.
- If a parent has any safeguarding concerns, he/she should contact the school's DSL as soon as possible.

Recording concerns

- All safeguarding concerns, discussions, decisions, and reasons for those decisions, must be recorded in writing on the school's safeguarding incident/concern system: CPOMS and passed without delay to the DSL.
- CPOMS can be accessed via this webpage address: <https://theprep.cpoms.net/session/new>
- If staff are unable to access CPOMS for any reason, a concern form can be located on the School's Intranet, following 'Staff Room' – 'Safeguarding' – 'The Green Form'. This should then be emailed to helen.cook@theprep.org.uk
- All peri staff are asked to email helen.cook@theprep.org.uk
- Staff should also ensure that the DSL or a DDSL is informed that a submission on CPOMS or via email has been made.
- Records must be completed as soon as possible after the concern arises.
- The record should use names, not initials, for all references to people.
- Any conversations directly with a pupil or overheard, must be recorded using the words used by the pupil and must include the date, time and place of the conversation,
- Record the matter as soon as possible after speaking to the pupil and before the conversation is discussed with anyone else.
- The record should be specific. Document the actual behaviour and language used by a pupil rather than more vague terms such as inappropriate language/behaviour.
- Child protection records must record facts and not personal opinions. A body map must be completed if visible injuries to a child have been observed.
- Notes made of such disclosures or concerns could become part of a statutory assessment by Children's Services and/or part of a criminal investigation so must be completed accurately.
- If handwritten notes have been made, these should be scanned and attached to the concern on CPOMS.
- If more than one member of staff is present when a pupil discloses information or behaves in a manner which gives rise to concerns, each member of staff must make a separate safeguarding report on CPOMS.
- If there is an immediate safeguarding concern the member of staff must consult with a DSL before completing the form as reporting urgent concerns takes priority.
- If members of staff are in any doubt about recording requirements they must discuss their concerns with the DSL.
- The DSL ensures that child protection records include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and details regarding any action taken, decisions reached and the outcome.
- Child protection records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL.
- All child protection records must be securely transferred to the DSL of the child's subsequent school, within 5 days for an in-year transfer or within the first 5 days of the start of a new term. They must be transferred separately to the child's main file, and a confirmation of receipt obtained.
- In addition to the child protection file, the DSL will also consider if it would be appropriate to share any information with the DSL at the new school or college in advance of a child leaving (e.g. information that would allow the new school or college to continue to provide support).

- Where the school receives child protection files from another setting, the DSL will ensure key staff such as the Special Educational Needs Co-Ordinators (SENCOs)/ and Assistant Heads of Key Stage will be made aware of relevant information as required.
- Where a pupil joins the school and no child protection files are received, the DSL will proactively seek to confirm from the previous setting whether any child protections exist for the pupil and, if so, if the files have been sent.

Preserving evidence (including on electronic devices)

- All evidence (which could include a pupil's work, scribbled notes, iPads, mobile phones containing text messages, computers) must be preserved.
- If evidence is found on an electronic device, the device involved should be confiscated and set to flight mode or, if this is not possible, it should be turned off.
- Staff must not view images, look for further images, copy or print any images or forward images by email or any other electronic means. This is particularly important if images involving 'nudes' or 'semi-nudes' are found, as to do so is a criminal offence.
- If the imagery has already been viewed by accident (e.g. if a pupil has shown it to a member of staff before he/she could ask them not to), this must be reported to the DSL immediately.
- Do not delete the imagery or ask the pupil to delete it.
- Do not ask the pupil(s) involved in the incident to disclose information regarding the imagery.
- Do not share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any pupil(s) involved.
- Do explain that you need to report it and reassure them that they will receive support and help.
- Report the matter to the DSL immediately

Links to useful documents: [DfE Searching Screening and Confiscation Advice for schools](#)

Mental health

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

Early intervention to identify issues and provide effective support is crucial. The school's role in supporting and promoting mental health and wellbeing can be summarised as:

- **Prevention:** the creation of a safe, calm school environment where mental health problems are less likely, improving the mental health and wellbeing of the whole school population, and equipping pupils to be resilient so that they can manage the normal stresses of life effectively. This includes teaching pupils about mental wellbeing through the curriculum and reinforcing this teaching through school activities.
- **Identification:** recognising emerging issues as early and accurately as possible
- **Early support:** helping pupils to access early support and intervention
- **Access to specialist support:** working effectively with external agencies to provide swift access or referrals to specialist support and treatment.

Adverse Childhood Experiences (ACEs) and other events may also have an impact on pupils. These include:

- loss or separation – resulting from death, parental separation, divorce, hospitalisation
- loss of friendships (especially in adolescence)
- family conflict or breakdown that may result in the child having to live elsewhere, being taken into care or adopted, deployment of parents in armed forces families
- life changes – such as the birth of a sibling, moving house or changing schools or during transition from primary to secondary school
- traumatic experiences such as abuse, neglect, domestic violence, bullying, violence, accidents or injuries
- other traumatic incidents such as a natural disasters or terrorist attacks

Where children experience a range of emotional and behavioural problems that are outside the normal range for their age, they might be described as experiencing mental health problems or disorders.

Mental health professionals have classified these as:

- **emotional disorders** - phobias, anxiety states and depression
- **conduct disorders** - stealing, defiance, fire-setting, aggression and anti-social behaviour
- **hyperkinetic disorders** - disturbance of activity and attention
- **developmental disorders** - delay in acquiring certain skills such as speech, social ability or bladder control, primarily affecting children with autism and those with pervasive developmental disorders
- **attachment disorders** - children who are markedly distressed or socially impaired because of an extremely abnormal pattern of attachment to parents or major care givers
- **Trauma disorders**, such as post-traumatic stress disorder, because of traumatic experiences or persistent periods of abuse and neglect
- other mental health problems including eating disorders, habit disorders, somatic disorders; and psychotic disorders such as schizophrenia and manic-depressive disorder

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

If a member of staff suspects that a pupil is having mental health difficulties they must:

1. complete a Strengths and Difficulties (SDQ) analysis - available from our Mental Health Co-ordinators
2. once the SDQ is completed, a member of the mental health team will be in touch to discuss the next steps
3. alert the key stage leader
4. the mental health and wellbeing team will alert the DSL

Once the SDQ or similar has been carried out, the wellbeing team will determine the best support system to put in place for the child. Staff, parents and the child will be informed of the next steps and support given as a priority.

The School has a number of staff trained Mental Health First Aiders who can support children and staff in the first instance. In addition to this the School has Mental Health and Well-Being Co-ordinators, some of whom will also be DDSLs to align thinking and allow for multi-disciplinary discussions. The mental health and well-being co-ordinators manage support of the pupils, in conjunction with the School's safeguarding team as well as keeping members of SLT informed where necessary and appropriate.

The school has 6 staff trained as Mental Health First Aiders, 5 Drawing and Talking practitioners, 1 ELSA practitioner and a freelance private counsellor who runs onsite sessions. Parents and children have clear signposting to access these services within school and are often contacted directly by the school with support if the school has identified a mental health need in the child/family.

More information can be found in the [DfE 'Mental Health and Behaviour in Schools'](#) guidance

Supporting Children Potentially at Greater Risk of Harm

- Whilst **all** children must be protected, the school acknowledge that some groups of children are potentially at greater risk of harm. This can include the following groups.

Safeguarding children with Special Educational Needs or Disabilities (SEND)

- Children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges and barriers for recognising abuse, neglect or exploitation.
- Children with SEND may face additional communication barriers and experience difficulties in managing or reporting abuse or challenges. Children with SEND will be supported to communicate and ensure that their voice is heard and acted upon.
- All members of staff are encouraged to appropriately explore potential indicators of abuse, neglect and exploitation such as behaviour, mood changes or injuries and not to assume that they are related to the child's disability. Staff must be mindful that children with SEND, or certain medical conditions may be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Members of staff are encouraged to be aware that children with SEND can be disproportionately impacted by safeguarding concerns, such as exploitation, peer group isolation or bullying including prejudice-based bullying.
- To address these additional challenges, the school always considers implementing extra pastoral support and attention for children with SEND. The DSL works closely with the Pre-Prep SEND Co-Ordinator (Years N-Y2, Keely Mott) or the Prep SEND Co-Ordinator (Years 3-8, Caroline Mansfield) to plan support as required.
- The school has a robust Intimate Care Policy which ensures that the health, safety, independence, and welfare of children is promoted, and their dignity and privacy are respected.

Arrangements for intimate and personal care are open and transparent and accompanied by robust recording systems. Further information can be found in the Intimate Care Statement and Nappy Changing procedure document.

Confidentiality and information sharing

Sevenoaks Prep recognises its duty and powers to hold, use and share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity.

HM Government guidance Information Sharing (2024) must always be consulted if there is any doubt about consent or sharing information.

The most important consideration should be whether sharing information is necessary to safeguard and protect a pupil. ***Data protection legislation and guidance must not be allowed to stand in the way of sharing information to safeguard pupils.***

Information shared should be:

- **Necessary and proportionate** - Any information shared must be proportionate to the need and level of risk.
 - **Relevant** - Only information that is relevant to the purposes should be shared with those who need it.
 - **Adequate** - Information should be adequate for its purpose. Information should be of the right quality to ensure that it can be understood and relied upon.
 - **Accurate** - Information should be accurate and up to date and should clearly distinguish between fact and opinion. If the information is historical then this should be explained.
 - **Timely** - Information should be shared in a timely fashion to reduce the risk of harm.
 - **Secure** - Wherever possible, information should be shared in an appropriate, secure way.
 - **Record** - Information sharing decisions should be recorded whether or not the decision is taken to share.
-
- The headteacher and DSL will disclose relevant safeguarding information about a pupil with staff on a 'need to know' basis.
 - Staff must not discuss safeguarding matters with other staff or with any parents unless they have permission from the DSL to do so.
 - All members of staff must be aware that whilst they have duties to keep information confidential - in line with the school's confidentiality policy - they also have a professional responsibility to be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children which includes reporting information to the DSL and sharing information with other agencies as appropriate.

Safeguarding Training

Staff induction and training

- a) The DSL is responsible for ensuring that all new members of staff working in school, and any volunteers, receive induction and training on their responsibilities for safeguarding and child protection and on the procedures for recording and referring any concerns. This training takes place prior to the new member of staff starting work with the children.
- b) All newly recruited staff are provided with the following information and given in-house training on safeguarding issues as part of their induction. This includes:
 - Keeping Children Safe in Education, Part 1 and Annex B
 - Sevenoaks Safeguarding Policy
 - Staff Code of Conduct
 - E-safety Policy, including an understanding of filtering and monitoring;
 - Whistleblowing Policy
 - Behaviour Policy
 - Anti-bullying Policy
 - Prevent training
 - Procedures on managing children who go missing from education
 - How to report concerns through CPOMS
- c) The school takes a risk-based approach to the level of information provided when training other temporary staff, staff running clubs, contractors and volunteers. As a minimum, they are provided with the school's safeguarding and child protection policy, the staff code of conduct and a copy of Part 1 of KCSIE including Annex B.

Ongoing Training

Staff

- All staff are required to read, at least annually, the Child Protection and Safeguarding Policy (i.e. this policy) and the Staff Code of Conduct and must confirm that they have done so.
- All staff are required to read and understand, at least annually, the current guidance for staff in Part 1 and Annex B of KCSIE and confirm that they have done so.
- Every member of staff receives comprehensive training in safeguarding (including on-line safety) at least every three years, in line with advice from Kent SCMP. Refresher training is provided annually at the start of the academic year and on specific issues through the year as required.
- All staff complete annual e-Safety and Prevent training
- All staff are trained in how to listen, respond to and report any disclosures including those which involve child on child sexual violence or sexual harassment.

DSL Training

The DSL and Deputy DSLs undergo training at a minimum every two years, which includes training in inter-agency working in line with Annex C of KCSIE. They have updates, at least annually, on specific issues as required.

The DSL and DDSs are required to read KCSIE in its entirety.

Training for Governors

- All governors receive safeguarding induction training.
- Governors are required to read KCSIE in its entirety.
- The governor responsible for safeguarding and the Chair of Governors have received specific safeguarding training appropriate to their role. They undertake refresher training every two years, as a minimum.
- This training aims to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole-school approach to safeguarding.
- All governors complete annual refresher training in safeguarding, including e-Safety and Prevent training
- The Governors are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 and the local multi-agency safeguarding arrangements.

Records of staff training

- All members of staff sign to confirm that they have read and understood the national guidance shared with them.
- Records of training are kept by the DSL within the Safeguarding area of the school's intranet (accessed only by the safeguarding team)

The DSL and headteacher provide an annual report to the governing body detailing safeguarding training undertaken by all staff

- Sevenoaks Prep recognises the expertise staff build by undertaking safeguarding training and from managing safeguarding concerns on a daily basis, and staff are encouraged to contribute to and shape the School's safeguarding arrangements and child protection policies. This can be done in a variety of ways, with some examples including input from knowledgeable and experienced staff, inviting input at staff meetings etc.

Staff Code of Conduct

- The school ensures robust processes are in place which promote continuous vigilance, maintain an environment that deters, and challenges inappropriate behaviour.
- The Staff Code of Conduct gives comprehensive, clear guidance on the expected behaviour of all adults in the school. Staff should always maintain appropriate professional boundaries, avoid behaviour which could be misinterpreted by pupils or others and report any conduct by an adult which raises concern. Failure to follow the Staff Code of Conduct is likely to result in disciplinary action being taken. The Staff Code of Conduct can be found on the school's website and on the school's intranet.
- The DSL ensures that all staff (including contractors) and volunteers are aware of school expectations regarding safe and professional practice via the Staff Code of Conduct and Acceptable Use Policy (AUP).
- Staff are also made aware of the School's behaviour management and physical intervention policies. Staff must manage behaviour effectively to ensure a good and safe educational environment and must have a clear understanding of the needs of all children. Any physical interventions and/or use of reasonable force must be in line with our agreed policy and procedures, and national guidance.
- All staff are made aware of the professional risks associated with the use of social media and electronic communication (such as email, mobile phones, texting, social networking).
- Staff must adhere to relevant school policies including the Staff Code of Conduct, Mobile and Smart Technology Policy, Acceptable Use Policies (AUPs), and Social Media Policy.

Supervision and support

- The school ensures that members of staff who are working within the foundation stage are provided with appropriate supervision in accordance with the statutory requirements of Early Years Foundation Stage (EYFS).
- The school provides appropriate supervision and support for all members of staff to ensure that:
 - All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children
 - All staff are supported by the DSL in their safeguarding role.
 - All members of staff have regular reviews of their own practice to ensure they improve over time.
- Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL.

- The DSL will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union, the Education Support Partnership or other similar organisations directly.

Safer Recruitment

Sevenoaks Prep ensures that all steps are taken to recruit staff and volunteers who are suitable to work with pupils and staff.

- The school follows statutory guidance for the safer recruitment and employment of staff who work with children as set out in Part Three of KCSIE and *Disqualification under the Childcare Act 2006* (September 2018)
 - The governing body and leadership team are responsible for ensuring that the School follows safe recruitment processes as outlined within guidance.
- Staff involved in recruitment receive appropriate training in safer recruitment and this is updated no less than every five years.
 - The governing body ensures that at least one of the persons on any interview panel has completed safer recruitment training.
- The School maintains an accurate Single Central Record (SCR) in line with statutory guidance.
- Staff are required to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, reprimands, and warnings.
- Where the school places a pupil with an alternative provision provider, the school continues to be responsible for the safeguarding of that pupil and will need to be satisfied that the provider can meet the needs of the pupil.
 - The school will obtain written confirmation from any alternative provision providers, including providers for residential visits that appropriate safeguarding checks have been carried out on all individuals working at the establishment, i.e. those checks that the school would otherwise perform in respect of its own staff.

Allegations against staff, including supply teachers, volunteers and contractors

As part of its overall safeguarding ethos, the school ensures that it promotes an open and transparent culture in which staff feel confident to report all concerns about adults working in the school (including self-employed staff, supply teachers, volunteers and contractors).

All members of staff must follow the Staff Code of Conduct and conduct themselves in a professional manner, both to ensure the safety of pupils and to reduce the risk of any allegation of improper behaviour.

If any allegation of abuse or suspected abuse is made against a member of staff or volunteer, the school will follow the guidance in Part four of KCSIE and the [local Kent allegations arrangements](#). In depth information can be found within our 'Managing Allegations against Staff' policy. This can be found on the school's intranet or can be obtained from the School's bursar.

Concerns that meet the 'harm threshold'

The school recognises that it is possible for any member of staff, including volunteers, governors, contractors, agency and third-party staff (including supply teachers) and visitors to behave in a way that indicates a person poses a risk of harm if they continue to work in their present position, or in any capacity with children in a school. Allegations that might indicate that a person is unsuitable to work with children are where a person has:

- 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 may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Reporting an allegation or concern

- Staff must never think that abuse by an adult is not possible in this school, or immediately disbelieve an accusation against someone who is known well and trusted.
- A member of staff receiving an allegation of abuse by another member of staff, or with concerns about another member of staff, should report this immediately to the Head, unless the Head is the one against whom the allegation is made.
- An allegation against the Head should be reported to the Chair of Governors, without notifying the Head first.
- In the Head's absence, an allegation against a member of staff must be reported to the Chair of Governors.

- In any instance where there may be a conflict of interest about reporting an allegation or concern to the Head or to the Chair of Governors, the Local Authority Designated Officer (LADO) should be contacted directly and without hesitation.
- Concerns may be reported verbally, directly to the relevant senior member of staff, or by email. Any staff who make a report verbally in the first instance will also be required to make a written record of the information they have disclosed.

Procedures following an allegation & Informing the Local Authority Designated Officer (LADO)

- a) If the allegation constitutes a possible serious criminal offence, or in the case of serious harm, or if a pupil is in immediate danger, a referral to Children's Services and/or the police will be made immediately.
- b) An allegation of abuse by an adult will always result in a senior person from the school (as detailed above) contacting the LADO of Kent SCMP who will advise on the next steps to be taken.
- c) If the headteacher is unsure if a concern meets the harm 'thresholds', advice will always be sought via the [Local Authority Designated Officer](#) (LADO).
- d) Under no circumstances will the school conduct an investigation without first informing the LADO and seeking advice about the course of action to be taken. Borderline cases will also be discussed and, following discussions, the LADO will advise what further steps should be taken.
- e) There are two aspects to consider when an allegation is made:
 - Look after the welfare of the child - the DSL is responsible for ensuring that the child is not at risk and for referring cases of suspected abuse to Children's Social Care as described earlier.
 - Investigate and support the person subject to the allegation - the case manager (usually the head, unless the head is the subject of the allegation) should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.
- f) The school's aim will be to achieve a quick resolution of the 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.
- g) The Head will obtain written details of the allegation, signed and dated, from the person who received the allegation or the person who is making the allegation. If a pupil has made an allegation, a written note of what the pupil has said will be made by the member of staff to whom the pupil made the allegation.
- h) The Head will also record any basic information to establish the facts, including dates, times, locations and names of potential witnesses and any CCTV footage.
- i) Any allegation against staff, including those considered borderline, must be reported and discussed with the LADO without delay, and within one working day.
- j) An initial assessment of any allegation referred will be made by the LADO and the Head. They will judge whether there is a need for immediate action, whether the allegation is demonstrably false or whether there has been inappropriate behaviour or poor practice that can be dealt with through the school's usual staff disciplinary procedures.
- k) Where the initial discussion leads to no further action, the case manager and the LADO should:
 - record the decision and justification for it; and
 - agree on what information should be put in writing to the individual concerned and by whom

- l) Where further enquiries are required the LADO and case manager will discuss how and by whom the investigation will be undertaken. In straightforward cases, the investigation will normally be undertaken by the Head. If the nature or complexity of the allegation requires it, the allegation may require an independent investigator.
- m) In the case of a referral and investigation, the Head must ensure, before contacting any interested parties, that there is no objection by the investigating agencies.
- n) Where there are no objections from the investigating agencies, the Head will:
 - inform the person making the allegation and explain the likely course of action
 - ensure the parents of the pupil(s) who is the alleged victim have been informed about the allegation and the likely course of action
 - inform the member of staff against whom the allegation is made and explain the likely course of action
 - keep a written record of the above.
- o) The Head, in consultation with the LADO, will make the decision whether or not to suspend the teacher involved.
- p) If an allegation is made, every effort will be made to maintain confidentiality and guard against unwanted publicity while the allegation is being investigated. The Education Act (2011) prevents the 'publication' of material by any person that may lead to the identification of a teacher who is the subject of an allegation. Parents and carers will also be made aware of the prohibition on reporting or publishing allegations about teachers.
- q) The Head will take advice from the LADO, the Safeguarding Governor and other agencies to agree:
 - Who needs to know and exactly what information can/cannot be shared
 - How to manage speculation and gossip
 - What, if any, information can be given to the wider community to reduce speculation
 - If necessary, how to manage the press.
- r) The school has a duty of care towards its employees and will ensure that effective support is provided for anyone facing an allegation. The individual concerned will be advised to contact their trade union representative, if they have one, or a colleague for support.
- s) The following definitions will 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 either 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.
- t) Allegations that are found to have been malicious will be removed from personnel records and any that are not substantiated, are unfounded or are malicious will not be referred to in employer references.
- u) Records concerning allegations of abuse must be preserved until the accused has reached normal pension age or for 10 years from the date of the allegation if longer.

Allegations relating to supply teachers/employees of third party

The school's procedures for managing allegations against staff above also apply to staff not directly employed by the school, for example, supply teachers provided by an employment agency or business ('the agency'). The school will usually take the lead, but agencies/ third party employers will be notified and should cooperate in any enquiries from the LADO, police and/or Children's Services.

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 LADO to determine a suitable outcome. The school will discuss with the agency whether it is appropriate to suspend the supply teacher while an investigation is carried out but this decision rests with the Head and the LADO.

Referral to the Disclosure & Barring Service (DBS) and Teaching Regulation Agency (TRA)

If the school ceases to use the services of any person (whether employed, contracted, a volunteer or a student) because that person was considered unsuitable to work with children, a prompt and detailed report will be made to the DBS.

For teaching staff, the school also has a legal responsibility to report the matter to the Teaching Regulation Agency (TRA) which may result in a prohibition order being issued by the Secretary of State for Education, as required by sections 141D and 141E of the Education Act 2002.

A report to the TRA may also be made for additional reasons 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'. Advice about whether an allegation against a teacher is sufficiently serious to refer to the TRA can be found in [Teacher misconduct: the prohibition of teachers](#) (October 2015 updated 2022). Further guidance is published on the [TRA website](#).

Concerns that do not meet the 'harm threshold' - Low Level Concerns

- 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 may have acted in a way that is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work, and does not appear to meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.
- A member of staff may have doubts about the behaviour of another adult towards a pupil, or another child, or concerns about how their own behaviour might be interpreted. Examples of such behaviour could include, but are not limited to:
 - a. being over friendly with children
 - b. having favourites
 - c. taking photographs of children on their mobile phone/other device
 - d. engaging with a child on a 1:1 basis in a secluded area or behind a closed door
 - e. using inappropriate sexualised, intimidating or offensive language,
 - f. Email, messaging, use of social media sites or other communication between adults and pupils outside agreed protocols
 - g. Any incident where he/she feels that his/her actions or behaviour towards a pupil or that of another adult, may have been misinterpreted or may have given rise to a risk or misinterpretation

- Low-level concerns may arise in several ways and from a number of sources (e.g. suspicion, complaints, or allegations made by a child, parent or other adult within or outside of the organisation, or as a result of vetting checks).
- Low-level concerns must be reported to the DSL (Deputy Head) or Headteacher.
- In cases where the DSL is informed, the DSL will inform the Headteacher and Chair of Governors
- The headteacher is the ultimate decision maker in respect of the response to all low-level concerns and will share concerns and liaise with [the LADO](#) enquiries officer, if appropriate. If there is any doubt as to whether the information which has been shared about a member of staff is a low-level concern or meets the harm threshold, [the LADO must always be consulted](#).
- Where a pattern is identified, the school will implement appropriate action, for example consulting with [the LADO](#) and following the school's own disciplinary/HR procedures.
- Staff are also encouraged, and to feel confident if the need arises, for them to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.
- When a low-level concern has been raised by a third party, the Head will collect as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved and to any witnesses. The name of the person making the report will be noted and requests to remain anonymous will be respected as far as reasonably possible.
- The school will also consider if any wider issues in the school enabled the behaviour to occur or contributed to it, and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence.
- All low-level concerns will be recorded in writing. The record will include:
 - details of the concern;
 - the context in which it arose;
 - evidence collected by the Head where the concern has been raised via a third party;
 - the decision categorising the type of behaviour;
 - action taken;
 - the rationale for decisions and action taken;
 - the name of the individual sharing the concerns (respecting any wish to remain anonymous as far as possible)
- Records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)
- Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harm threshold, in which case it will be referred to the LADO.

- The purpose of low level reporting is to protect both pupils and the staff working with them, and allows a system for a simple record to be kept in case events are later referred to or any patterns emerge.
- Low level concerns relating to supply staff and staff employed by a third party will be reported to the agency/employer in order that any patterns of behaviour may be identified.
- A staff member who reports a low-level concern, or a more serious allegation, in good faith will suffer no detriment as a result and will benefit from the protection set out in the school's Whistleblowing Policy.
- In all cases where allegations are made against staff or low-level concerns are reported, once proceedings have been concluded, the headteacher (and if they have been involved, [the LADO](#)) will consider the facts and determine whether any lessons can be learned and if any improvements in school procedures are required.
- In the situation that the School receives an allegation relating to an incident that happened when an individual or organisation was using our premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities), the school will follow the above procedures, including informing the LADO.

Non-recent allegations

- Abuse can be reported no matter how long ago it happened.
- Where an adult makes an allegation to the school that they were abused as a child, the individual will be advised to report the allegation to the police.
- Non-recent allegations made by a child, will be reported to the LADO in line with KENT SCMP procedures for dealing with non-recent allegations. The LADO will coordinate with Children's Services and the police.

Children, young people, and adults who have experienced abuse in education can also contact the NSPCC 'Report Abuse in Education' helpline on 0800 136 663 or via email: help@nspcc.org.uk

Safe Culture and Whistleblowing

- As part of its approach to safeguarding, the School has created and embedded a culture of openness, trust and transparency in which its values and expected behaviour as set out in the Staff Code of Conduct are constantly lived, monitored and reinforced by all staff (including supply teachers, volunteers and contractors) and where all concerns are dealt with promptly and appropriately.
- All staff and volunteers should feel able to raise any concerns about poor or unsafe practice and potential failures in the School's safeguarding regime. The leadership team takes all concerns or allegations received seriously.

- All members of staff are made aware of the School's Whistleblowing procedure. A copy of this can be found on the School's intranet.
- All staff are made aware of their duty to raise any concerns about school procedures, which may include the attitude or actions of colleagues. All members of the school community have a duty to protect children and should they have concerns they must make these known to the Head.
- Failure to report concerns about the conduct of a colleague that could place a child at risk could result in disciplinary procedures.
- Staff can access the NSPCC whistleblowing helpline if they do not feel able to raise concerns about the school's practice, including child protection issues internally. Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.

Complaints

The School has a Complaints Policy available to parents, which is available on request or on the School's website.

Opportunities to Teach Safeguarding

The school ensures that children are taught about safeguarding, including online safety, as part of providing a broad and balanced curriculum. This includes covering relevant issues through Relationships Education (Pre-Prep and Prep) and Relationships and Sex Education and Health Education (Prep).

- It is recognised that the School plays an essential role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour, e.g. what is 'safe,' to recognise when they and others close to them are not safe, and how to seek advice and support when they are concerned. The curriculum also provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that pupils have a range of age-appropriate strategies to ensure their own protection and that of others.
- . Preventative education is most effective in the context of a whole-school approach which prepares pupils for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment.
- The school has a clear set of values and standards, upheld, and demonstrated throughout all aspects of school life which are underpinned by the Behaviour Policy and pastoral support system, as well as by a planned programme of evidenced based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. The programme is fully inclusive and developed to be age and stage of development appropriate.
- Sevenoaks Prep recognise that a one size fits all approach will not be appropriate for all children, and a more personalised or contextualised approach, tailored to the specific needs and vulnerabilities of

individual children might be needed (e.g. children who are victims of abuse, neglect or exploitation, and children with SEND).

Safety

Use of 'reasonable force'

- There may be circumstances when it is appropriate for staff to use reasonable force in order to safeguard children from harm. Further information regarding our approach and expectations can be found in the school's Behaviour Policy and is in line with the DfE ['Use of reasonable force in schools'](#) guidance.

The use of school premises by other organisations

- Where school facilities or premises are rented/hired out to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) it is ensured that appropriate arrangements are in place to keep children safe.
 - Where those services or activities are provided under the direct supervision or management of school staff, existing arrangements for child protection - including this policy - will apply.
 - Where services or activities are provided separately by another body using the school facilities/premises, the headteacher and governing body will seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place for the provider to liaise with the School on these matters where appropriate. If this assurance is not achieved, an application to use premises will be refused.
- Safeguarding requirements will be included in any transfer of control agreement (such as a lease or hire agreement), as a condition of use and occupation of the premises. Failure to comply with this will lead to termination of the agreement.

Site security

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

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

Appendix 1: Categories and Indicators of Abuse

All staff should be aware that abuse, neglect, exploitation and other 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.

KCSIE defines abuse as

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

Paragraph 24 KCSIE (2024)

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

Signs that MAY INDICATE Sexual Abuse

- sudden changes in behaviour and performance
- displays of affection which are sexual and age inappropriate
- self-harm, self-mutilation or attempts at suicide
- alluding to secrets which they cannot reveal
- tendency to cling or need constant reassurance
- regression to younger behaviour, for example thumb sucking, playing with discarded toys, acting like a baby
- distrust of familiar adults, for example, anxiety of being left with relatives, a childminder or lodger
- unexplained gifts or money
- depression and withdrawal
- fear of undressing, for example for PE
- secrecy relating to use of technology
- sexually transmitted disease or pregnancy
- fire setting

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

Signs that MAY INDICATE physical abuse

- bruises and abrasions around the face
- damage or injury around the mouth
- bi-lateral injuries, such as two bruised eyes
- bruising to soft area of the face such as the cheeks
- fingertip bruising to the front or back of torso
- bite marks
- burns or scalds (unusual patterns and spread of injuries)
- deep contact burns, such as cigarette burns
- injuries suggesting beatings (strap marks, welts)
- covering arms and legs even when hot
- inappropriate/harmful medication usage
- aggressive behaviour or severe temper outbursts.
- injuries that cannot be accounted for. Inadequate, inconsistent, or excessively plausible explanations for an injury, or a delay in seeking treatment should signal concern

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 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 cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Signs that MAY INDICATE emotional abuse

- over reaction to mistakes
- lack of self-confidence/esteem
- sudden speech disorders
- self-harming
- eating Disorders
- extremes of passivity and/or aggression
- compulsive stealing
- drug, alcohol, solvent abuse
- fear of parents being contacted
- unwillingness or inability to play
- secrecy relating to use of technology
- excessive need for approval, attention, and affection

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 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.

Signs that MAY INDICATE neglect.

- constant hunger
- poor personal hygiene
- constant tiredness
- inadequate clothing
- frequent lateness or non-attendance
- untreated medical problems
- poor relationship with peers
- compulsive stealing and scavenging
- rocking, hair twisting and thumb sucking
- running away
- loss of weight or being constantly underweight
- low self esteem

Affluent neglect

Staff should also be aware of the impact of affluent neglect, which refers to the neglect experienced by children in more wealthy families. This can be difficult to identify, as the type of neglect experienced by children in these circumstances is often emotional.

Parents may work very long hours or be absent for extended periods, leaving children in the care of paid carers. This can create an emotional disconnect and leave children feeling isolated and lonely, with their emotional needs unfulfilled by their parents. Affluent parents may also subject their children to a high amount of pressure to succeed academically, or in other pursuits such as sport or music, which can lead to psychological and emotional problems.

Absent parents may also have little knowledge of what their children are doing. This can lead to increased risks with children who may spend long periods online or at an older age have the financial means to facilitate drug abuse and the independence to engage in harmful sexual activity.

Appendix 2: Specific Safeguarding Issues

- There are a range of specific safeguarding issues and situations that can put children at greater risk of harm. Annex B of KCSIE contains important additional information about the following specific safeguarding issues and detailed guidance on a number of issues is also listed at the front of this policy.
- If staff are ever unsure how to respond they must speak with the DSL or a deputy without delay.

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children 5–11year olds and 12–17-year-olds available on the gov.uk website.

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The school may refer some parents and carers to this service where appropriate.

Children who are Lesbian, Gay, Bisexual, or Gender Questioning/Trans (LGBGQT)

When supporting a trans or gender questioning child, the school will consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. (see Anti-Bullying Policy and section ?? below on Child-on- child abuse)

Children who go missing from education and attendance (also see Attendance Policy)

- Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines.
- All pupils are recorded on the school's admission register and their attendance is recorded in the daily attendance register. Staff must report repeated absence or any concerns about attendance to the DSL.
- All unexplained absences will be followed up in accordance with the Attendance Policy.

- The local authority is informed of any child whose name is added to or deleted from the admission register at a non-standard transition point, i.e. joining the school other than in Reception in September or leaving at any time other than the end of the summer term of Year 8 in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended).
- If a pupil leaves the school then, whether there are any concerns about that pupil or not, the school will seek to obtain, for inclusion in the return the name of the future school, the expected date of the child's first day there, and, if applicable, the family's new home address and the date on which the family will be moving to it. If there are concerns about a pupil, and a parent refuses to supply the information, this may result in a report to Children's Services.
- The school will inform the local authority of any pupil who fails to attend school regularly or who has been absent without the school's permission for a continuous period of ten days or more.
- If a pupil who has current involvement with Children's Services is absent from the school the normal procedure of a first day call to the home will be followed. The pupil's social worker must be informed of all absences promptly, and immediately.
- When a pupil moves to another school, the DSL must inform the receiving school without delay that child protection records exist or not. Within 5 days the original records must be passed on either by hand or sent securely. Duplicate records must be retained. Duplicate records should be kept securely until the pupil reaches the age of 25 years.
- The school holds contact details for both parents (unless a parent is deceased, or a parent has no parental responsibility for the child) and two emergency contact numbers.
- Where the School has concerns that a child has unexplainable and/or persistent absences from education and/or is missing from education, we will respond in line with our statutory duties (DfE: [Children missing education](#)) and local policies. Local support is available via the Kent [PRU, Inclusion and Attendance Service \(PIAS\)](#).

Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual activity 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.

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. Victims can be exploited even when the sexual activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

The school is aware that often a child is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. However, staff must act on their concerns as they would for any other type of abuse. Children also rarely self-report CSE so staff must be particularly vigilant to potential indicators of risk.

There are three main types of child sexual exploitation:

- **Inappropriate relationships:**
Usually involves just one abuser who has inappropriate power – physical, emotional or financial – or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.
- **Boyfriend:** Abuser grooms victim by striking up a normal relationship with them, giving them gifts and meeting in cafés or shopping centres. A seemingly consensual sexual relationship develops but later turns abusive. Victims are required to attend parties and sleep with multiple men and threatened with violence if they try to seek help.
- **Organised exploitation and trafficking:** Victims are trafficked through criminal networks – often between towns and cities – and forced or coerced into sex with multiple men. They may also be used to recruit new victims. This serious organised activity can involve the buying and selling of young people.

Any concerns that a child is being or is at risk of being sexually exploited should be passed immediately to the DSL. If a child is in immediate danger the police should be called on 999.

Child Criminal Exploitation (CCE) including gangs and County Lines

CCE is also a form of abuse and involves taking advantage of an imbalance in power to coerce, manipulate or deceive a child into criminal activity.

Criminal exploitation of children is a typical feature of county lines criminal activity where children and young people are recruited to transport drugs. Key identifying features of involvement in county lines are when children are missing.

Staff should be aware of the key indicators of children being sexually or criminally exploited which can include:

- going missing for periods of time or regularly coming home late;
- regularly missing school or education or not taking part in education;
- appearing with unexplained gifts or new possessions;
- associating with other young people involved in exploitation;
- having older boyfriends or girlfriends;
- suffering from sexually transmitted infections;
- mood swings or changes in emotional wellbeing;
- drug and alcohol misuse;
- displaying inappropriate sexualised behaviour.

Serious violence

- All staff are aware of the indicators which may signal children are at risk from or are involved with serious violent crime. These may include unexplained gifts or new possessions, increased absence from

school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of CCE.

- Any concerns regarding serious violence will be reported and responded to in line with other child protection concerns by speaking with a DSL or deputy. The initial response to child victims is important and staff will take any allegations seriously and work in ways that support children and keep them safe.

Domestic abuse

Exposure to domestic abuse and/or violence can have serious, long lasting emotional and psychological impact on children.

The school recognises that:

- domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents
 - domestic abuse can include, but is not limited to, psychological (including coercive control), physical, sexual, economic, or emotional abuse
 - children can be victims of domestic abuse if they see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse)
 - anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background, and domestic abuse can take place inside or outside of the home
 - domestic abuse can take place within different types of relationships, including ex-partners and family members
 - there is always a potential for domestic abuse to take place when parents/families separate, or for existing domestic abuse to persist or escalate post separation
 - domestic abuse can have a detrimental and long-term impact on children's health, well-being, development, and ability to learn
 - domestic abuse concerns will not be looked at in isolation and our response will be considered as part of a holistic approach which takes into account children's lived experiences
 - it is important not to use victim blaming language and to adopt a trauma informed approach when responding to concerns relating to domestic abuse
- If staff are concerned that a child may be at risk of seeing, hearing, or experiencing the effects of any form of domestic abuse, or in their own intimate relationships, immediate action should be taken by speaking to the DSL or a deputy.

Operation Encompass

Sevenoaks Prep is an [Operation Encompass School](#). This means it works in partnership with Kent Police to provide support to children experiencing the effects of domestic abuse.

An Operation Encompass notification is sent to the school when the police are called to an incident of domestic abuse and there are children in the household; the police are expected to inform schools before the child(ren) arrive the following day.

- Operation Encompass notifications help ensure that the school has up to date and relevant information about children's circumstances and enables immediate support to be put in place according to the child's needs.
- Operation Encompass does not replace statutory safeguarding procedures and where appropriate, a referral to the Front Door Service will be made if there are any concerns about a child's welfare.
- Where the school is unsure of how to respond to a notification, advice may be sought from the Front Door Service, or the Operation Encompass helpline which is available 8AM to 1PM, Monday to Friday on 0204 513 9990.

Elective Home Education (EHE)

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

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property.

Looked after children, previously looked after children and care leavers

- The school recognises the common reason for children becoming looked after is as a result of abuse, neglect and/or exploitation, and a previously looked after child also potentially remains vulnerable.
- The school has appointed a '[designated teacher](#)' (Helen Cook - Acting Deputy Head & Head of Pre-Prep and DSL) who works with local authorities, including the [Virtual School Kent \(including the virtual school head\)](#), to promote the educational achievement of registered pupils who are looked after or who have been previously looked after.
- The designated teacher ensures appropriate staff have the information they need in relation to a child's looked after legal status, contact arrangements with birth parents or those with parental responsibility, care arrangements and the levels of authority delegated to the carer by the authority looking after them.

- Where a child is looked after, the DSL will hold details of the social worker and the name of the virtual school head in the authority that looks after the child.
- Where a child is leaving care, the DSL will hold details of the local authority Personal Advisor appointed to guide and support them and will liaise with them as necessary regarding any issues of concern.

So called ‘honour based’ abuse

HBA is a collection of practices, which are used to control behaviour and exert power within families to protect perceived cultural and religious beliefs and/or honour. Such abuse can occur when perpetrators perceive that an individual has shamed the family and/or community by breaking their honour code this includes 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.

Staff must report any concerns about HBA to the DSL (or a deputy). If there is an immediate threat the police must be contacted.

Forced Marriage

A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. A forced marriage is not the same as an arranged marriage which is common in many cultures. Forcing a person into a marriage is a crime in England and Wales.

All staff must speak to the DSL (or deputy) if they have any concerns about forced marriage. Staff can also contact the Forced Marriage Unit if they need advice or information: 020 7008 0151 or fmf@fcdo.gov.uk

Female Genital Mutilation

Female genital mutilation (FGM) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is a form of child abuse and is illegal in the UK. A pupil may have difficulty walking, sitting or standing and may even look uncomfortable. A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating. There may be prolonged or repeated absences from school and/or noticeable behaviour changes (e.g., withdrawal or depression) on the pupil’s return.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHCE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a ‘special’ procedure to become a woman

Mandatory Reporting of FGM

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. This will usually come from a disclosure. Under no circumstances should school staff physically examine pupils.

The duty applies to the individual who becomes aware of the case to make a report directly to the Police by dialling 101. The report should be made immediately. The duty to report must not be transferred to the DSL, however the DSL must be informed. Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including by dialling 999 if appropriate.

Modern Slavery

- Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Statutory Guidance: [Modern slavery: how to identify and support victims](#).
- If there are concerns that any member of the community is a victim or involved with modern slavery, concerns should be shared with a DSL or deputy and will be responded to in line with this policy.

Child-on-child abuse (also see Anti-bullying policy, Behaviour Policy, RSE Policy)

It should be noted that a child is anyone under the age of 18.

- a) Children are also vulnerable to abuse by other children. The school has a zero-tolerance approach to such abuse, and it will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up" or "boys being boys"; this can lead to a culture of unacceptable behaviours and can create an unsafe environment for children and a culture that normalises abuse, which can prevent children from coming forward to report it.

All staff have a duty to challenge inappropriate behaviours between children.

- b) Any child can be vulnerable to child-on-child abuse and staff should be alert to signs of such abuse amongst all children. However, individual and situational factors can increase a child's vulnerability to abuse. For example, children who are more likely to follow others and/or who are socially isolated may be more vulnerable, as may pupils with SEND or certain medical conditions.
- c) Children who identify as lesbian, gay, bisexual, questioning their gender (LGBGQT+) can also be targeted. In some cases, a pupil who is perceived to be LGBGQT+ (whether they are or not) can be just as vulnerable as children who identify as LGBGQT+.
- d) Risks can be compounded where children who are LGBGQT+ lack a trusted adult with whom they can be open. Staff will endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share any concerns with members of staff.
- e) All children involved whether victim or perpetrator will be treated as "at risk" and supported. The school recognises the gendered nature of child-on-child abuse and that it is more likely that girls will be

victims and that boys will be perpetrators, but all child-on-child abuse is unacceptable and will be taken seriously.

- f) Staff are made aware that child-on-child abuse may happen inside or outside school or online and that that even if there are no reports in the school it does not mean child-on-child abuse is not happening, it may be the case that it is just not being reported. A member of staff receiving an allegation of abuse by a pupil, or with concerns about a pupil, should report this immediately to the DSL following the reporting procedures outlined above.
- g) Child on child abuse is most likely to include, but may not be limited to:
 - bullying (including cyberbullying, prejudice-based and discriminatory bullying)
 - abuse in intimate personal relationships between children
 - physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
 - sexual violence and sexual harassment (see below and Part five of KCSIE)
 - Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
 - 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 is a criminal offence), which typically involves taking a picture under a person's clothing without their permission
 - initiation/hazing type violence and rituals.

Through safeguarding training and anti-bullying training, staff will be made aware of the harm caused by child-on-child abuse and will follow the school's Behaviour Policy, Anti-bullying Policy and safeguarding procedures as appropriate. It may be appropriate to regard a young person's behaviour as abusive if:

- there is a large difference in power (for example age, size, ability, development) between the young people concerned;
 - the perpetrator has repeatedly tried to harm one or more other children;
 - there are concerns about the intention of the alleged perpetrator;
 - there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm'
- All allegations of child-on-child abuse must be reported to the DSL and will be recorded, investigated, and dealt with in line with associated school policies, including child protection, anti-bullying, and behaviour. Pupils who experience abuse will be offered appropriate support, regardless of where the abuse takes place.
 - Concerns about pupils' behaviour, including child-on-child abuse taking place offsite will be responded to as part of a partnership approach with pupils and parents/carers. Offsite behaviour concerns will be recorded and responded to in line with existing appropriate policies, for example anti-bullying, acceptable use, behaviour and child protection policies.
 - Alleged victims, alleged perpetrators and any other child affected by child-on-child abuse will be supported by:
 - Ensuring that all reports are taken seriously,
 - Listening carefully

- Avoid victim blaming
 - Providing appropriate pastoral support
 - Working closely with parents and carers
 - Reviewing the school's educational approach, if necessary
 - Where appropriate, informing police and/or ICS
 - Taking account of any other relevant school policies
-
- The DSL will not undertake any enquiry or investigation where a case is referred to Children's Services or the police. The initial assessment of any allegation will be made by Children's Services and the DSL to judge whether there is a need for immediate action to protect the pupils involved, whether the allegation is demonstrably false or whether there has been inappropriate behaviour that can be dealt with through the school's usual disciplinary procedures. The DSL will lead enquiries at school level if agreed with the relevant investigating agencies.
 - The DSL will inform the parents of the pupil making the allegation and explain the likely course of action. If Children's Services or the police have been informed the school will follow the relevant agency's guidance about what information may be disclosed and to whom.
 - The DSL will ensure the parents of the pupil who is the alleged perpetrator are informed about the allegation and the likely course of action. If Children's Services or the police have been informed the school will follow the relevant agency's guidance about what information may be disclosed and to whom.
 - The necessary support and any required sanctions following child-on-child abuse will be determined on a case-by-case basis.
 - The Head will make the decision whether or not to suspend or exclude the pupil(s) involved.
 - The DSL will keep a written record of all conversations with parents and other professionals and any decisions made.
 - The management of pupils with harmful behaviour can be complex. The school will follow guidance and work with other relevant agencies to support perpetrators and to maintain the safety of the whole school community.
 - Appropriate support in school, and from outside agencies if applicable, will also be put in place for any victims or any other pupil affected. The support offered in these circumstances will be determined on a case-by-case basis depending on the circumstances.
 - If pupils are found to have made malicious allegations, appropriate sanctions will be applied, which could include temporary or permanent exclusion.

Strategies to reduce the risk of child-on-child abuse

In order to minimise the risk of child-on-child abuse, the school takes the following steps:

- Preventative strategies for child-on-child abuse are regularly considered.
- The school has an ethos where pupils feel safe to share information about anything that is upsetting them, and any derogatory language or behaviour is always challenged by staff.
- There is a strong and positive pastoral care system
children are made aware of the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults.

- implements a robust anti-bullying policy
- listens to pupils about all concerns and treats them seriously
- delivers key messages in school assemblies and form times
- provides an age and ability appropriate PSHE and RSE curriculum
- provides a range of reporting mechanisms including worry boxes, YouHQ and form times. These aspects are monitored by the school's safeguarding team and any relevant information passed onto the DSL and SLT.

Prejudiced Behaviour

Pupils may also display hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society – in particular, prejudices to do with disabilities, special educational needs, medical conditions, ethnic, cultural and religious backgrounds, gender, home life and sexual identity. These factors can make it more difficult for a child to report abuse.

Child on child abuse which involves sexual violence and sexual harassment

- When responding to concerns relating to child-on-child sexual violence or harassment, the school will follow the guidance outlined in Part Five of KCSIE.
- The school recognises that sexual violence and sexual abuse can happen anywhere, and all staff must maintain an attitude of 'it could happen here'.
- The school also has a zero-tolerance approach to any form sexual violence and sexual harassment; it is never acceptable and will not be tolerated.
- Sexual violence and sexual harassment can occur between children or groups of children of any age and sex, and within intimate personal relationships between young people. It can also occur online.
- It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.
- A victim must never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, or any other form of abuse. Nor should a victim ever be made to feel ashamed for making a report.
- Abuse that occurs online or outside of the school will not be dismissed or downplayed and will be treated equally seriously and in line with relevant policies/procedures, for example anti-bullying, behaviour, child protection, online safety.
- Staff should follow the processes outlined in this policy when dealing with any report of sexual violence or sexual harassment, including those that have happened outside the school and/or online.
- The school recognises that the law is in place to protect children and young people rather than criminalise them, and this will be explained in such a way to pupils that avoids alarming or distressing them.
- The school recognises that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory, so children may not be able to recall all details or timeline of abuse.

- All staff must be aware certain children may face additional barriers to telling someone, for example because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation.
- A child displaying harmful sexual behaviour may also be an indication that they are a victim of abuse themselves.
- When responding to a report of sexual violence the DSL will decide on the response following the advice in Section 5 of KCSIE. This will include
 - Initial response - considering the needs of both victim(s) and alleged perpetrator(s).
 - Record Keeping
 - Risk Assessment
 - Consideration of most appropriate response: internal management, early help, referral to Children's Social Care and/or referral to the Police.
 - Ongoing response – safeguarding and support for all parties
 - The DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator, and any other children involved/impacted, in line with part five of KCSIE and relevant local/national guidance and support, for example [KSCMP](#) procedures.
 - The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children, and staff and any actions that are required to protect them.
 - Any concerns involving an online element will take place in accordance with relevant local/national guidance and advice.
- Reports will initially be managed internally by the school and where necessary will be referred to [Integrated Children's Services](#) (Early Help and/or Children's Social Work Service) via the Children's Portal and/or the police. Important considerations which will influence the decision to refer include:
 - the wishes of the victim in terms of how they want to proceed
 - the nature of the alleged incident(s), including whether a crime may have been committed and/or whether Harmful Sexual Behavior has been displayed
 - the ages of the children involved
 - the developmental stages of the children involved
 - any power imbalance between the children
 - if the alleged incident is a one-off or a sustained pattern of abuse - sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature
 - that sexual violence and sexual harassment can take place within intimate personal relationships between children
 - understanding intra familial harms and any necessary support for siblings following incidents
 - whether there are any ongoing risks to the victim, other children, adult students, or school staff
 - any other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation
- In most instances the victim's and alleged perpetrator's parents/carers will be contacted when there has been a report of sexual violence; this may not be necessary or proportionate in the case of sexual

harassment and will depend on a case-by-case basis. The exception to this is if there is a reason to believe informing a parent/carers will put a child at additional risk.

- Any information shared with parents/carers will be in line with information sharing expectations, our confidentiality policy, and any data protection requirements, and where they are involved, will be subject to discussion with other agencies (for example Children's Social Work Service and/or the police) to ensure a consistent approach is taken.
- The DSL will not undertake any investigation where it is decided a case must be referred to Children's Services or the police. The initial assessment will be made by Children's Services and the DSL to judge whether there is a need for immediate action to protect the pupils involved. The DSL will lead enquiries at school level if agreed with the relevant investigating agencies.
- The DSL will inform the parents of the pupil making the allegation and the alleged perpetrator and will explain the course of action. If Children's Services or the police have been informed the school will follow the relevant agency's guidance about what information may be disclosed and to whom.
- The DSL will keep a written record of all conversations with parents and other professionals and any decisions made.
- The management of pupils with harmful behaviour (including sexually harmful behaviour) can be complex. The school will follow guidance and work with other relevant agencies to support perpetrators and to maintain the safety of the whole school community.
- Any sanctions required following a report of child-on-child abuse will be determined on a case-by-case basis.
- Appropriate support in school, and from outside agencies if applicable, will also be put in place for any victims or any other pupil affected. The support offered in these circumstances will be determined on a case-by-case basis depending on the circumstances.

If at any stage the DSL is unsure if a request for support is appropriate, advice may be sought from the Front Door Service.

Youth produced sexual imagery, nudes/semi-nudes, sexting, upskirting

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

Upskirting is also a criminal offence and typically involves taking 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. Anyone of any gender can be a victim.

If a member of staff becomes aware of an incident involving inappropriate material (whether this has taken place in or out of school) they should follow the safeguarding procedures and report it to the DSL immediately.

The member of staff must:

- never to view, copy, print, share, forward, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already inadvertently viewed imagery, this will be immediately reported to the DSL.
 - not delete the imagery or ask the child to delete it.
 - avoid saying or doing anything to blame or shame any children involved.
 - reassure the child(ren) involved and explain that the DSL will be informed so they can receive appropriate support and help.
 - not promise confidentiality, as other agencies may need to be informed and be involved.
 - not investigate or ask the child(ren) involved to disclose information regarding the imagery
 - not share information about the incident with other members of staff, children/young people, or parents/carers, including the families and child(ren) involved in the incident; this is the responsibility of the DSL.
- DSLs will respond to any reports in line with the non-statutory UKCIS guidance: '[Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)' and the local [KSCMP](#) guidance. The DSL will:
 - hold an initial review meeting to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child involved. This may mean speaking with relevant staff and the children involved as appropriate.
 - Inform Parents/carers at an early stage to best support children, unless there is good reason to believe that involving them would put a child at risk of harm.
 - record all decisions and action taken in line with our child protection procedures.
 - referral will be made to ICS via the Children's Portal and/or the police immediately if:
 - the incident involves anyone aged 18 or over.
 - there is reason to believe that a child has been coerced, blackmailed, or groomed, or there are concerns about their capacity to consent, for example, age of the child or they have special educational needs.
 - the image/videos involve sexual acts and a child under the age of thirteen, depict sexual acts which are unusual for the child's developmental stage, or are violent.
 - a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes.

The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date. If the DSLs is unsure if a request for support is appropriate, advice will be sought from the Front Door Service.

Sexual behaviour by children

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation.

Developmental sexual activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

Abusive sexual activity includes any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base.

Children's sexual behaviour is usually categorised by professionals using the following 'traffic light' approach:

Green behaviours reflect safe and healthy sexual development. They are

- i. Displayed between children or young people of similar age or developmental ability
- ii. Reflective of natural curiosity, experimentation, consensual activities and positive choices

Amber behaviours have the potential to be outside safe and healthy development. They may be:

- i. Unusual for that particular child or young person
- ii. Of potential concern due to age or developmental differences
- iii. Of potential concern due to activity type, frequency, duration or the context in which they occur.

Amber behaviours signal the need to make a report to the DSL.

Red behaviours are outside safe and healthy behaviour. They may be:

- i. Excessive, secretive, compulsive, coercive, degrading or threatening
- ii. Involving significant age, developmental or power differences
- iii. Of concern due to the activity type, frequency, duration or the context in which they occur.

Red behaviours would indicate a need for referral to Children's Services.

Online Safety

(also see [E-safety and Online Safety Policy](#) and advice documents listed in KCSIE Annex B)

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

If staff suspect that a pupil may be at risk of or suffering from online harm, they should follow the reporting procedures set out in this policy.

- Sevenoaks Prep recognises that technology and the risks and harms related to it evolve and change rapidly. The School carries out an annual review of its approaches to online safety, supported by an annual risk assessment, which considers and reflects the current risks pupils face online. The school uses Part Two of KCSIE reference tools to support with this process.
- The headteacher must be informed of any online safety concerns by the DSL, as appropriate. The named governor for safeguarding reports on online safety practice and incidents, including outcomes, on a regular basis to the wider governing body.

Policies and procedures

- The DSL has overall responsibility for online safety within the School but will liaise with other members of staff, for example IT and the Head of Digital Creativity as well as the mental health and wellbeing curriculum leads as necessary.
- The DSL will respond to online safety concerns in line with our child protection and other associated policies, including our Anti-bullying policy and behaviour policies.
 - Internal sanctions and/or support will be implemented as appropriate.
 - Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.
- The school uses a wide range of technology. This includes: computers, laptops, tablets, iPads and other digital devices, the internet, our learning platform, intranet and email systems. All school-owned devices and systems must be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.
- Generative artificial intelligence (AI) tools has many uses which could benefit the school community. However, it is important to recognise that AI tools can also pose risks; this is including, but not limited to, bullying and harassment, abuse and exploitation (including child sexual abuse), privacy and data protection risks, plagiarism and cheating, and inaccurate, harmful and/or biased material, and additionally its use can pose moral, ethical and legal concerns.
 - Staff and pupils will be made aware of the benefits and risks of using AI tools; this will be carried out via staff training events, regular updates to staff in staff meetings / briefings, lessons with the children and assembly times.
 - Staff are required to carry out a risk assessment and seek written approval from the senior leadership team prior to any use of AI in school.
Any misuse of AI in line will be responded to in line with relevant policies, including but not limited to, anti-bullying, behaviour and child protection.
 - Where the school believes that AI tools may have facilitated the creation of child sexual abuse material, including the sharing of nude/semi-nude images by children, the school will respond in line with the UKCIS guidance [‘Sharing nudes and semi-nudes: advice for education settings working with children and young people’](#) and the local [KSCMP](#) guidance.

Remote/Online learning

- Any remote sharing of information, communication and use of online learning tools and systems is in line with privacy and data protection requirements and any local/national guidance.
- All communication with pupils and parents/carers takes place using school-provided or approved communication channels; for example, school provided email accounts and phone numbers and/or agreed systems: Google Classroom, Microsoft 365 or equivalent.
 - Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.
- Staff and pupils must engage with remote teaching and learning in line with existing behaviour principles as set out in the school behaviour policy/code of conduct and Acceptable Use Policies.
- Staff and pupils are instructed to report issues experienced at home and concerns will be responded to in line with child protection and other relevant policies.
- When delivering remote learning, staff must follow the school's Remote Learning Acceptable Use Policy (AUP).

Working with parents/carers

The school:

- operates a partnership approach to online safety and supports parents/carers to be aware and alert of the potential benefits and risks and to reinforce the importance of children being safe online
- provides information on the school website and through existing communication channels (such as official social media, newsletters), offering specific online safety events for parents/carers or highlighting online safety at existing events
- ensures parents and carers understand what systems are used to filter and monitor their children's online use at school, what their children are being asked to do online, including the sites they will be asked to access and who from the school (if anyone) their child is going to be interacting with online.
- Where the school is made aware of any potentially harmful risks, challenges and/or hoaxes circulating online, national or locally, it will respond in line with the DfE '[Harmful online challenges and online hoaxes](#)' guidance to ensure it adopts a proportional and helpful response.

Cybercrime

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

- If staff are concerned that a child may be at risk of becoming involved in cyber-dependent cybercrime, the DSL or a deputy must be informed, and consideration will be given to accessing local support and/or referring into the [Cyber Choices](#) programme, which aims to intervene when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.
- Where there are concerns about 'cyber-enabled' crime such as fraud, purchasing of illegal drugs online, child sexual abuse and exploitation, or other areas of concern such as online bullying or general online safety, they must be reported to the DSL.

The DSL / DDSLs may also seek advice from Kent Police and/or the Front Door Service

Preventing Radicalisation

As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people being drawn into terrorism'. This is known as the 'Prevent Duty'. 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.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces, whether in this country or overseas 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.

Recognising Extremism

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
 - glorifying violence, especially to other faiths or cultures
 - making remarks or comments about being at extremist events or rallies outside school
 - evidence of possessing illegal or extremist literature
 - advocating messages similar to illegal organisations or other extremist groups
 - out of character changes in dress, behaviour and child relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
 - secretive behaviour
 - online searches or sharing extremist messages or social profiles
 - intolerance of difference, including faith, culture, gender, race or sexuality
 - graffiti, artwork or writing that displays extremist themes
 - attempts to impose extremist views or practices on others
 - verbalising anti-Western or anti-British views
 - advocating violence towards others
- All staff have received appropriate training to enable them to be alert to changes in children's behaviour which could [indicate that they may need help or protection from radicalisation](#).

Staff are supported to use their judgement in identifying children who might be at risk of radicalisation and must report concerns to the DSL (or a deputy), who, where appropriate, will follow the [local procedures](#) in regard to making a Prevent referral. If there is an immediate threat to safety, the police will be contacted via 999.

Visiting speakers are always vetted and staff must obtain permission from the Head for any speakers to visit the school.

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.

Private Fostering

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 years old or 18 years old if the child is disabled.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Social Care as soon as possible. However, where a member of staff becomes aware that a child may be in a private fostering arrangement, they must notify the DSL immediately.

Where private fostering arrangements come to the attention of the school, it will notify Kent Children's Services in line with the local [KSCMP arrangements](#) in order to allow the local authority to check the arrangement is suitable and safe for the child.

Fabricated Illness

Fabricated or induced illness is a condition whereby a child has suffered, or is likely to suffer, significant harm through the deliberate action of their parent and which is attributed by the parent to another cause. There are three main ways of the parent fabricating (making up or lying about) or inducing illness in a child:

- Fabrication of signs and symptoms, including fabrication of past medical history;
- Fabrication of signs and symptoms and falsification of hospital charts, records, letters and documents and specimens of bodily fluid
- Induction of illness by a variety of means

Further information may be found at

https://www.londonsafeguardingchildrenprocedures.co.uk/fab_ind_ill.html?zoom_highlight=fabricated

Appendix 3: Support Organisations

NSPCC 'Report Abuse in Education' Helpline

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

National Organisations

- NSPCC: www.nspcc.org.uk
- Barnardo's: www.barnardos.org.uk
- Action for Children: www.actionforchildren.org.uk
- Children's Society: www.childrenssociety.org.uk
- Centre of Expertise on Child Sexual Abuse: www.csacentre.org.uk

Support for Staff

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

Support for pupils/students

- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- The Mix: www.themix.org.uk
- Shout: www.giveusashout.org
- Fearless: www.fearless.org
- Victim Support: www.victimsupport.org.uk

Support for Adults

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

Support for Learning Disabilities

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk
- Council for Disabled Children: <https://councilfordisabledchildren.org.uk>

Contextual Safeguarding Network

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

Kent Resilience Hub

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

Children with Family Members in Prison

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

Substance Misuse

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

Domestic Abuse

- Domestic abuse services: www.domesticabuseservices.org.uk
- Refuge: www.refuge.org.uk
- Women's Aid: www.womensaid.org.uk
- Men's Advice Line: www.mensadviceline.org.uk
- Mankind: www.mankindcounselling.org.uk
- National Domestic Abuse Helpline: www.nationaldahelpline.org.uk
- Respect Phoneline: <https://respectphoneline.org.uk>

Criminal and Sexual Exploitation

- National Crime Agency: www.nationalcrimeagency.gov.uk/who-we-are
- It's not okay: www.itsnotokay.co.uk
- NWG Network: www.nwgnetwork.org
- County Lines Toolkit for Professionals: www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit
- Multi-agency practice principles for responding to child exploitation and extra-familial harm: <https://tce.researchinpractice.org.uk/>

Honour Based Abuse

- Karma Nirvana: <https://karmanirvana.org.uk>
- Forced Marriage Unit: www.gov.uk/guidance/forced-marriage
- FGM Factsheet: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf
- Mandatory reporting of female genital mutilation: procedural information: www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information
- The right to choose - government guidance on forced marriage: www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage

Radicalisation and hate

- Educate against Hate: www.educateagainsthate.com

- Counter Terrorism Internet Referral Unit: www.gov.uk/report-terrorism
- True Vision: www.report-it.org.uk

Child-on-Child abuse, including bullying, sexual violence and harassment

- Rape Crisis: <https://rapecrisis.org.uk>
- Brook: www.brook.org.uk
- Disrespect Nobody: www.disrespectnobody.co.uk
- Upskirting – know your rights: www.gov.uk/government/news/upskirting-know-your-rights
- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Stop it Now! www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- Anti-Bullying Alliance: www.anti-bullyingalliance.org.uk
- Diana Award: www.antibullyingpro.com
- Kidscape: www.kidscape.org.uk
- Centre of expertise on Child Sexual Abuse: www.csacentre.org.uk

Online Safety

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

Mental Health

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