Leigh Primary School

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'Caring, Sharing and Learning Together'

Child Protection 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.

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

Key Contacts

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What to do if you have a welfare concern in Leigh Primary School?

Why are you concerned?

For example

- Something a child has said – for example, an allegation of harm
- Child's appearance – may include frequent or unexplained injuries/ marks/bruises and//or dress
- Behaviour change(s)
- Witnessed concerning, harmful or inappropriate behaviour

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

Follow the school procedure (Record, Report and Refer through CPOMS)

- Reassure the child ¬!q
- Clarify concerns, using open questions if necessary (**TED**: **T**ell, **E**xplain, **D**escribe)
- Use child's own words, record facts not opinions.
- Sign and date your records
- Seek support for yourself if required from DSL (Jenna Halfhide and Joanne Shobbrook (DSLs), Victorian Short and Tracey Prockter DDSL)

Inform the Designated Safeguarding Lead (Jenna Halfhide and Joanne Shobbrook)

Designated Safeguarding Lead

- 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.
- If you believe a child may be in need of support but are unclear whether to refer, a no-named consultation can be sought from the Front Door Service via 03000 411 111.
- If support is required out of working hours, the school will contact the Out of Hours Service via 03000 41 91 91

If you are unhappy with the response

Staff:

- Follow Kent safeguarding partnership escalation procedures.
- Follow school whistleblowing procedures

Whistleblowing policy

Pupils and Parents:

- Follow school complaints procedures

https://www.leighprimaryschool.com/docs/policies/Complaints_Policy_2024-2026.pdf

Record decision making and action taken in the pupil/student child protection file 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**

1. Child Focused Approach to Safeguarding

1.1 Introduction

- Leigh Primary School recognises our 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/students) have an important role in safeguarding children and all have an essential role to play in making our community safe and secure.

- Leigh Primary School believe that the best interests of children always come first. All children (defined 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, gender, ability, culture, race, language, religion or sexual identity or orientation, have equal rights to protection.

- Staff working with children at Leigh Primary School 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 Leigh Primary School but may also apply to other children connected to the school, for example, siblings, or younger members of staff (under 18s) or children on student/work placements.

- Leigh Primary School 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 when determining what safeguarding action to take and what services to provide.
- Leigh Primary School recognises the need for trauma-informed approach to safeguarding considering the root causes and possible underlying trauma behind children's behaviour.

- 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.
  - **Collaborating with both parents where possible and other agencies**: to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.

- The procedures contained in this policy apply to all staff, including governors, temporary or third-party agency staff and volunteers, and are consistent with those outlined within KCSIE 2025.

1.2 Policy context

- This policy is implemented in accordance with our compliance with the current statutory guidance from the Department for Education, 'Keeping Children Safe in Education' 2024 (KCSIE) which requires individual schools and colleges to have an effective child protection policy.

- This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes but is not limited to:
    - Keeping Children Safe in Education 2024 (KCSIE)
    - Working Together to Safeguard Children 2018 (WTSC)
    - Ofsted: Education Inspection Framework'
    - Framework for the Assessment of Children in Need and their Families 2000
    - Kent and Medway Safeguarding Children Procedures
    - Early Years and Foundation Stage Framework 2021 (EYFS)
    - The Education Act 2002
    - Education and Inspections Act 2006
    - The Human Rights Act 1998
    - The Equality Act 2010 (including the Public Sector Equality Duty)

- Section 175 of the Education Act 2002 requires school governing bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are pupils at a school, or who are students under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.

- Leigh Primary School will follow local and 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 and the welfare of the child is paramount.

- Leigh Primary School recognise that, as a result of the Covid-19 pandemic, some members of our community may have been exposed to a range of adversity and trauma including bereavement, anxiety and in some cases experienced increased welfare and/or safeguarding risks. We will work with local services, such as health and the local authority, to ensure necessary support is in place. We will utilise our response to the impact of the COVID pandemic and apply and adapt strategies and school policies and practices to respond to any future pandemic or health emergency highlighted by Public Health England.

1.3 Definition of safeguarding

- In line with 'Working Together to Safeguard Children' and KCSIE 2024, 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, and
    - promoting the upbringing of children with their birth parents, or otherwise their family network, whenever possible and where this is in the best interests of the child(ren)
    - 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.

- The school acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):

- Abuse and neglect
- Bullying, including cyberbullying
- Child-on-child abuse
- Children with family members in prison
- Children who are absent or missing from education
- Child missing from home or care
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- Contextual safeguarding (risks outside the family home)
- County lines and gangs
- Domestic abuse
- Drugs and alcohol misuse
- Fabricated or induced illness
- Faith abuse
- Gender based abuse and violence against women and girls
- Hate
- Homelessness
- Human trafficking and modern slavery
- Mental health
- Nude/semi-nude image sharing, also known as youth produced/involved sexual imagery/ "Sexting"
- Online safety
- Preventing radicalisation and extremism
- Private fostering
- Relationship abuse
- Serious violence
- Sexual violence and sexual harassment
- So-called 'honour-based' abuse, including Female Genital Mutilation (FGM) and forced marriage
- 'Upskirting'

(Also see Part One and Annex B within 'Keeping Children Safe in Education' 2023)

1.4 Related safeguarding 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:
  - Behaviour, includingL behaviour management and use of physical intervention; screening, searching and confiscation; code of conduct for staff/pupils and anti-bullying.
  - Online safety including use of Generative Artificial Intelligence (AI)
  - Data protection and information sharing
  - Image use
  - Relationship, Sex and Health Education (RSHE) within Personal Development Policy
  - Personal and intimate care
  - Health and safety, including plans for school/college reopening
  - Attendance
  - Risk assessments within Staff Handbook
  - Complaints Policy
  - Emergency Procedure Policy
  - First aid and medical policies
  - Managing allegations against staff within Child Protection Policy
  - Acceptable Use of Technology Policies (AUP)
  - Safer recruitment within Recruitment Policy
  - Whistleblowing
  - Attendance
  - Exclusion Policy
  - Social Media Guidance in Staff Handbook
  - SEND Policy
  - Equal Opportunities

Supporting Guidance (to be read and followed alongside this document)

- "Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings" - Safer Recruitment Consortium
- "What to do if you are worried a child is being abused" – DfE, March 2015 – click here
- Early Years Foundation Stage 2021 Welfare Requirements – click here

1.5 Policy compliance, monitoring and review

- Leigh Primary School will review this policy at least annually (as a minimum) and will update it as needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. The policy will also be revised following any national or local updates, significant local or national safeguarding events and/or learning, and/or any changes to our own procedures.
- All staff (including temporary staff and volunteers) will be provided with a copy of this policy and Part One and/or Annex A of KCSIE 2025 as appropriate. This can be found on the Safeguarding display board, has been emailed to all staff, read as part of Safeguarding Training, is on the school website and procedures summarised in the staff handbook.
- 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: www.leighprimaryschool.com
- The policy forms part of our school development plan and will be reviewed annually by the governing body which 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

2. Key Responsibilities

2.1 Governance and leadership

- The governing body and leadership team have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation. The governing body have regard to the KCSIE guidance and will ensure our policies, procedures and training is effective and complies with the law at all times.

- The governing body will facilitate 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.

- The governing body are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements set out by the Kent Safeguarding Children Multi-Agency Partnership (KSCMP).
  - This includes but is not limited to safeguarding all members of the school community (for example, staff, pupils, parents/carers and other family members) identified with protected characteristics within the Equality Act; age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.
  - For further information about our approaches to equality, diversity, and inclusion, please access our schools' policies via the school website.

- The governing body and leadership team will ensure that there are policies and procedures in place to ensure appropriate action is taken in a timely manner to safeguard and promote children's welfare.

- The headteachers will ensure that our child protection and safeguarding policies and procedures, adopted by the governing body, are understood, and followed by all staff.

- The governing body will ensure an appropriate senior member of staff, from the school leadership team, is appointed to the role of designated safeguarding lead. The governing body and leadership team will ensure 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 has a nominated governor for safeguarding. The nominated governor will support the DSL and have oversight in ensuring that the school 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.

2.2 Designated Safeguarding Lead (DSL)

- The school has appointed (Jenna Halfhide and Joanne Shobbrook – Co-headteachers), members of the Senior Leadership Team as the Designated Safeguarding Leads (DSLs).

- The DSL has overall responsibility for 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. Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSLs and this responsibility will not be delegated. The Headteachers maintain overriding responsibility and weekly meetings between joint DSLs ensured continuity of leadership as well as a DSL being on sight in the headteacher's absence.

- The school has also appointed Deputy DSLs who will have delegated responsibilities and act in the DSL's absence.
  - Victoria Short (Inclusion Manger) and Tracey Prockter (Senior Teacher).

- The DSL (and any deputies) will be more likely to have a complete safeguarding picture and will be the most appropriate person to advise staff on the response to any safeguarding concerns.

- It is the role of the DSL to carry out their functions as identified in Annex C of KCISE 2025. This includes but is not limited to:

  - Acting as the central contact point for all staff to discuss any safeguarding concerns
  - Maintaining a confidential recording system for safeguarding and child protection concerns
  - Coordinating safeguarding action for individual children

- When supporting children with a social worker or looked after children, the DSL should 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 2022 and WTSC 2018
  - 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.
  - Representing, or ensure the school is appropriately represented at multi-agency safeguarding meetings (including child protection conferences)
  - Managing and monitoring the school 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.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff.
- Ensuring adequate and appropriate DSL cover arrangements in response to any closures and out of hours and/or out of term activities.
- Ensuring all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE.
- Liaising with the headteachers to inform them of any safeguarding issues, especially ongoing enquiries under 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).

- The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. Deputy DSLs will be trained to the same standard as the DSL. The DSLs' training will be updated formally at least every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.

2.3 Members of staff

- Our staff play a particularly important role in safeguarding as they are in a position to observe any 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.
  - be alert to any issues of concern in a child's life at home or elsewhere.
  - be aware of the indicators of abuse, neglect and exploitation so that they can identify cases of children who may need help or protection.
  - know what to do if a child tells them that they are being abused, neglected, or exploited and understand the impact abuse and neglect can have upon a child.
  - be able to identify/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 early help process and their role in it.
  - understand the Leigh Primary School safeguarding policies and systems.
  - undertake and engage in 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.
  - 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.
  - Act in line with our staff code of conduct/behaviour policy
  - act in line with Teachers' Standards 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 at Leigh Primary School 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 at Leigh Primary School will 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, for example, our staff and pupil behaviour policy.

2.4 Children and young people

- Children have a right to:
  - Feel safe, be listened to, and have their wishes and feelings taken into account.
  - Confidently report abuse, neglect and 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 Leigh safeguarding policies.
  - Receive help from a trusted adult.
  - Learn how to keep themselves safe, including online.

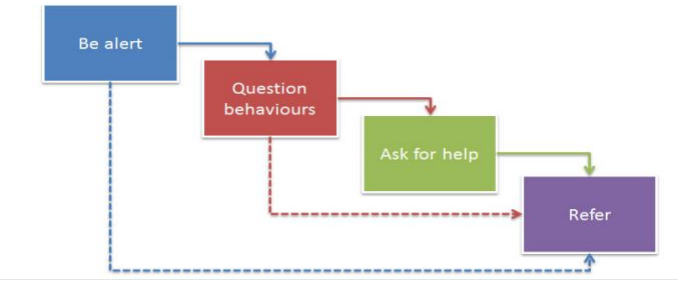
2.5 Parents and carers

- Parents/carers have a responsibility to:
  - Understand and adhere to the relevant school 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.

3. Child Protection Procedures

3.1 Recognising indicators of abuse, neglect and exploitation

- Staff 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.
- All staff are made aware of the definitions and indicators of abuse, neglect and exploitation as identified by Working Together to Safeguard Children (2018) and Keeping Children Safe in Education 2023. This is outlined locally within the Kent Support Levels Guidance.
- Leigh Primary School recognise 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
- By understanding the indicators or abuse, neglect and exploitation, we 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)



'What to do if you are worried a child is being abused' 2015

- Leigh Primary School recognises that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The 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. It is important to recognise that indicators of abuse, neglect and exploitation do not automatically mean a child is being harmed however all concerns should be taken seriously and will be explored by the DSL on a case-by-case basis.

- Leigh Primary School recognises 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, therefore staff will always be vigilant and always raise concerns with a DSL.

- Parental behaviors can indicate child abuse, neglect or exploitation; so staff will be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.

- Children may report abuse, neglect or exploitation happening to themselves, their peers or their family members. All reports made by children to staff will be taken seriously and will be responded to in line with this policy.

- Safeguarding incidents and/or behaviours can be associated with factors and risks outside the School. Children can be at risk of abuse, neglect or exploitation in situations outside their families; extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.

- Leigh Primary School recognises that technology can be a significant component in many safeguarding and wellbeing issues; children are at risk of abuse or exploitation online from people they know (including other children) and from people they do not know; in many cases, abuse will take place concurrently via online channels and in daily life.

- Leigh Primary School recognises that some children have additional or complex needs and may require access to intensive or specialist services to support them.

- Following a concern about a child's safety or welfare, the searching and screening of children and confiscation of any items, including any electronic devices, will be managed in line with the school behaviour policy which contains our 'Searching, Screening and Confiscation' policy which is informed by the DfE 'Searching, screening and confiscation at school' guidance.
  - The DSL (or deputy) will be informed of any searching incidents where there were reasonable grounds to suspect a pupil was in possession of a prohibited item as listed in our behaviour policy. The DSL (or deputy) will then consider the circumstances of the pupil who has been searched to assess the incident against any potential wider safeguarding concerns.
  - Staff will involve the DSL (or deputy) without delay if they believe that a search has revealed a safeguarding risk.

3.2 Responding to child protection concerns

- If staff are made aware of a child protection concern, they are expected to:
  - listen carefully to child, reflecting back the concern.
  - use the child's language.
  - be non-judgmental.
  - avoid leading questions; only prompting the child where necessary with open questions to clarify information where necessary. For example: who, what, where, when or Tell, Explain, Describe (TED)
  - not promise confidentiality as concerns will have to be shared further, for example, with the DSL and potentially Integrated Children's Services.
  - be clear about boundaries and how the report will be progressed.
  - record the concern using the facts as the child presents them, in line with school record keeping requirements. Details of how to record using CPOMS is in the staff handbook.
  - inform the DSL (or deputy), as soon as practically possible.

- If staff have any concerns about a child's welfare, they are expected to act on them immediately. If staff are unsure if something is a safeguarding issue, they will speak to the DSL (or deputy).

- The DSL or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, a DSL is not available, this should not delay appropriate action being taken by staff. Staff should speak to a member of the senior leadership team, take advice from the Education Safeguarding Service or a consultation with a social worker from the Front Door (for contact information, see flowchart on page 3). In these circumstances, any action taken will be shared with a DSL as soon as is possible.

- 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 will not assume a colleague, or another professional will act and share information that might be critical in keeping children safe.

- Leigh Primary School will respond to safeguarding concerns in line with the Kent Safeguarding Children Multi-Agency Partnership procedures (KSCMP).
  - The full KSCMP procedures and additional guidance relating to reporting concerns and specific safeguarding issues can be found on their website: www.kscmp.org.uk

- 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.

- 'Early help' is defined in 'Working together to safeguard children' as support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. It is not an individual service, but a system of support delivered by local authorities and their partners, including education providers, working together and taking collective responsibility to provide the right provision in their area.
  - 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.
  - 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.

- Where a child is suffering, or is likely to suffer from harm, or is in immediate danger (for example, 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.
  - Leigh Primary School recognise that in situations where there are immediate child protection concerns for a child as identified in line with Support Level Guidance, it is NOT to investigate as a single agency, but to act in line with KSCMP guidance which may involve multi-agency decision making**.**
  - If they believe a child may be in need of support but are unclear whether a Request for Support should be submitted, the DSL may seek advice or guidance from a social worker via the Front Door Service before deciding next steps.

- The DSL, or a deputy DSL in the absence of the DSL will have overall responsibility for making referrals. However, all staff are made aware of the local process for making referrals to Integrated Children's Services and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

- If staff have any concerns about a child's welfare, they are expected to act on them immediately. If staff are unsure if something is a safeguarding issue, they will speak to the DSL (or deputy). If in exceptional circumstances, a DSL is not available, this should not delay appropriate action being taken by staff.
  - Staff will speak to a member of the Leigh Primary School senior leadership team, request a consultation with a social worker from the Front Door Service, or make a request for support to the Front Door Service themselves; for contact information, see flowchart on page 4.
  - In these circumstances, any action taken by staff will be shared with a DSL as soon as is possible.

- In the event of a request for support to the Front Door being necessary, parents/carers will be informed and consent to this will be sought by the DSL in line with guidance provided by KSCMP and ICS. Parents/carers will be informed of this, unless there is a valid reason not to do so, for example, if to do so would put a child at risk of harm or would undermine a criminal investigation.

- If, after a request for support or any other planned external intervention, a child's situation does not appear to be improving, or concerns regarding receiving a decision or the decisions made, staff or the DSL will re-refer (if appropriate) and/or DSLs will follow the KSCMP escalation and Professional Challenge Policy to ensure their concerns have been addressed and, most importantly, that the child's situation improves. DSLs may request support with this via the Education Safeguarding Service.

- DSLs and staff will be mindful of the need for Leigh Primary 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. Where the school is unsure, advice will be sought from the Education Safeguarding Service.

3.3 Child Protection Records

- All safeguarding concerns, discussions, decisions, and reasons for those decisions, will be recorded in writing on the school safeguarding system (CPOMS) and passed without delay to the DSL. Our records will include a clear and comprehensive summary of any concerns, details of how concerns were followed up and resolved, and a note of any action taken, decisions reached and outcomes.

- Incident/Welfare concern forms are found on CPOMS

- Records will be completed as soon as possible after the incident/event, using the child's words and will be signed and dated by the member of staff. Child protection records will record facts and not personal opinions. A body map will be completed if visible injuries to a child have been observed.

- If there is an immediate safeguarding concern the member of staff will 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 will discuss their concerns with the DSL.

- Child protection records will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and details regarding any action taken, decisions reached and the outcome.

- Child protection records are kept confidential and stored securely. Child protection records will be kept for individual children and will be maintained separately from all other records relating to the child in the school. Child protection records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL.

3.4 Transferring Child Protection Files

- All child protection records will be transferred in accordance with data protection legislation to the child's subsequent school, under confidential and separate cover as soon as possible; within 5 days for an in-year transfer or within the first 5 days of the start of a new term. Child protection files will be transferred securely to the new DSL, separately to the child's main file, and a confirmation of receipt will be 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, for example, 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-Ordinator/Inclusion Manager (Victoria Short) 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.

3.5 Multi-agency working

- Leigh Primary School recognises the pivotal role we have to play in multi-agency safeguarding arrangements and is committed to its responsibility to work within the KSCMP multi-agency safeguarding arrangements as identified within 'Working Together to Safeguard Children'.

- The School leadership team, governing body and DSL will work to establish strong and co-operative local relationships with professionals in other agencies, including the safeguarding partners in line with local and national guidance. Some examples of multi-agency relationships may include, social workers, early help workers, health professionals (such as paediatricians, health visitors, mental health services and speech and language therapists), specialist teachers, education psychologists, other schools/settings where children attend more than one setting/provision and police.

- Leigh Primary School recognises the importance of multi-agency working and is committed to working alongside partner agencies to provide a coordinated response to promote children's welfare and protect them from harm. This includes contributing to KSCMP processes as required, such as, participation in relevant safeguarding multi-agency plans and meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.

- The School will allow access for Kent Children's Social Work Service and, where appropriate, from a placing local authority, to conduct, or to consider whether to conduct, a section 17 or 47 assessment.

- The headteachers and DDSLs are aware of the requirement for children to have an Appropriate Adult (PACE Code C 2019) where there is a need for detention, treatment and questioning by police officers and will respond to concerns in line with our school 'Searching, Screening and Confiscation' policy within the behaviour policy, which is informed by the DfE 'Searching, screening and confiscation at school' guidance.

3.6 Confidentiality and information sharing

- Leigh Primary School recognises our duty and powers to hold, use and share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE and WTSC.

- Leigh Primary School has an appropriately trained Data Protection Officer (DPO) as required by the UK General Data Protection Regulations (UK GDPR) to ensure that our school is compliant with all matters relating to confidentiality and information sharing requirements. The school's DPO is Satswana Ltd (https://www.satswana.com/Schools)

- All staff are made aware of the need to protect the privacy of the children in their care, as well the legal requirements that exist to ensure that information relating to the child is handled in a way that ensures both confidentiality and safeguarding.
    - Leigh Primary School will ensure staff are aware of our confidentiality and will ensure there is an area where staff may talk to parents and/or carers confidentially.
    - All staff are aware they cannot promise a child that they will not tell anyone about a report of any form of abuse, as this may not be in the best interests of the child.
    - Staff are made aware of their 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; this may include sharing information with the DSL and with other agencies as appropriate.

- Staff will have due regard to the relevant data protection principles, which allow them to share and withhold personal information.
    - The Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) places duties on schools and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.
    - All staff will be provided with training and information to ensure they understand the relevant data protection principles which allow them to share and/or withhold personal information. Detail how this is provided here or signpost to where this information is held, e.g. Information governance policies
    - KCSIE 2025, the Information Commissioner's Office (ICO), DfE Data Protection in schools guidance and DfE 'Information sharing advice for safeguarding practitioners guidance provides further details regarding information sharing principles and expectations.

- The headteacher and DSL will disclose relevant safeguarding information about a pupil with staff on a 'need to know' basis.

- Where reasonably possible, the school/college will hold more than one emergency contact number for each pupil/student. There is an expectation that contact information will be held for both parents and/or those with parental responsibility, unless doing so would put a child at risk of harm. Leigh Primary School is proactive in being inclusive of fathers to help schools understand the significant relationships and lived experiences of students.

- In regard to confidentiality and information sharing staff will only involve those who need to be involved, such as the DSL (or a deputy) and Kent Integrated Children's Services. All staff are aware they cannot promise a child that they will not tell anyone about a report of any form of abuse, as this may not be in the best interests of the child.

3.7 Complaints

- All members of the school community should feel able to raise or report any concerns about children's safety or potential failures in the school safeguarding regime. The school has a complaints procedure available to parents, pupils and members of staff and visitors who wish to report concerns or complaints. This can be found on the school website.

- Whilst we encourage members of our community to report concerns and complaints directly to us, we recognise this may not always be possible. Children and adults who have experienced abuse at school can contact the NSPCC 'Report Abuse in Education' helpline on 0800 136 663 or via email: help@nspcc.org.uk

- Staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally.
  - Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.

- The leadership team at Leigh Primary School will take all concerns reported to the school seriously and all complaints will be considered and responded to in line with the relevant and appropriate process.
  - Anything that constitutes an allegation against a member of staff or volunteer will be dealt with in line with section 8 of this policy.

4 Specific Safeguarding Issues

- Leigh Primary School is aware of the range of specific safeguarding issues and situations that can put children at greater risk of harm. In addition to Part one, DSLs, school leaders and staff who work directly with children will read Annex B of KCSIE 2025 which contains important additional information about specific forms of abuse and safeguarding issues.

- Where staff are unsure how to respond to specific safeguarding issues, they should follow the processes as identified in part 3 of this policy and speak with the DSL or a deputy.

4.1 Child-on-child abuse

- All members of staff at Leigh Primary School recognise that children can abuse other children (referred to as child-on-child abuse, previously known as 'peer-on-peer' abuse), and that it can happen both inside and outside of school and online.

- Leigh Primary School recognises that child-on-child abuse can take many forms, including but not 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
  - Sexual violence and sexual harassment
  - 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, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
  - Initiation/hazing type violence and rituals

- Any allegations of child-on-child abuse will be recorded, investigated, and dealt with in line with this child protection policy and KCSIE 2022 (in particular, part two and five).

- Leigh Primary School adopts a zero-tolerance approach to child-on-child abuse. We believe that abuse is abuse and it will never be tolerated or dismissed as "just banter", "just having a laugh", "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 role to play in challenging inappropriate behaviours between children. Staff recognise that some child-on-child abuse issues may be affected by gender, age, ability and culture of those involved. For example, for gender-based abuse, girls are more likely to be victims and boys more likely to be perpetrators.

- Leigh Primary School recognises that even if there are no reported cases of child-on-child abuse, such abuse is still likely to be taking place and it may be that it is just not being reported. As such, it is important that staff speak to the DSL (or deputy) about any concerns regarding child-on-child abuse.

- In order to minimise the risk of child-on-child abuse, Leigh Primary School will:
  - **Develop relationships through RRR (Respect, Responsibility and Resilience)**
  - ***PSHE lessons***
  - ***Assemblies***
  - ***Marvellous Me behaviour rewards***
  - ***Votes4Schools debate***
  - ***Online Safety including Online Anti-bullying***
  - ***Promotion of British Values***
  - ***Promotion of Whole School Code of Conduct***
  - ***Worry Boxes***
  - ***Rigorous online monitoring and filtering***

- Leigh Primary School children to feel able to confidently report abuse and know their concerns will be treated seriously. All allegations of child-on-child abuse will 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. **Note: section 89(5) of the Education and Inspections Act 2006 gives headteachers a statutory power to discipline pupils for poor behaviour outside of the school premises, for example, when children are not under the lawful control or charge of a member of school staff, to such extent as is reasonable. This legislation is for schools only and is not applicable to independent schools.**

- Alleged victims, alleged perpetrators and any other child affected by child-on-child abuse will be supported by:
  - **taking reports seriously, listening carefully, avoiding victim blaming, providing appropriate pastoral support, working with parents/carers, reviewing educational approaches, following procedures as identified in other policies, for example, the school/college anti-bullying, behaviour and child protection policy, and where necessary and appropriate, informing the police and/or ICS*.***

4.2 Sexual violence and sexual harassment

- When responding to concerns relating to child-on-child sexual violence or harassment, Leigh Primary School will follow the guidance outlined in Part five of KCSIE 2025.

- Leigh Primary School recognises that sexual violence and sexual abuse can happen anywhere, and all staff will maintain an attitude of 'it could happen here.' Leigh Primary School recognises sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children and can occur online and face to face (both physically and verbally). Sexual violence and sexual harassment is never acceptable.

- **All** victims of sexual violence or sexual harassment will be reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, or 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 behaviour, child protection, online safety.

- Leigh Primary School recognises that the law is in place to protect children rather than criminalise them, and this will be explained in such a way to pupils that avoids alarming or distressing them.

- Leigh Primary 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 will be aware certain children may face additional barriers to telling someone, for example because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation.

- The DSL (or deputy) is likely to have a complete safeguarding picture and will be the most appropriate person to advise on the initial response.
  - 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 2025 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) and/or the police. Important considerations which may influence this decision 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.

- The school will in most instances engage with both the victim's and alleged perpetrator's parents/carers when there has been a report of sexual violence; this might 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/carer 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.

- If at any stage the DSL is unsure how to proceed, advice will be sought from the Education Safeguarding Service/Front Door Service.

4.3 Nude and/or semi-nude image sharing by children

Note: 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 outlines how schools and colleges should respond to all incidents of consensual and non-consensual image sharing; it should be read and understood by all DSLs working with all age groups.

- Leigh Primary School recognises that consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as youth produced/involved sexual imagery or "sexting") can be a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).

- When made aware of concerns involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos by children, staff are advised:
  - to report any concerns to the DSL immediately.
  - 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 to delete the imagery or ask the child to delete it.
  - to avoid saying or doing anything to blame or shame any children involved.
  - to reassure the child(ren) involved and explain that the DSL will be informed so they can receive appropriate support and help. Do not promise confidentiality, as other agencies may need to be informed and be involved.
  - not to investigate or ask the child(ren) involved to disclose information regarding the imagery
  - to 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 concerns 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. When made aware of a concern involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos:
  - 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.

- Parents/carers will be informed at an early stage and be involved in the process to best support children, unless there is good reason to believe that involving them would put a child at risk of harm.
- All decisions and action taken will be recorded in line with our child protection procedures.
- A referral will be made to ICS via the children's portal and/or the police immediately if:
  - the incident involves an adult (over 18).
  - 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 DSLs are unsure how to proceed and if a request for support is appropriate, advice will be sought from the Education Safeguarding Service/ Front Door Service.

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

- Leigh Primary School recognises that both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

- Leigh Primary School recognises that children can become trapped in CCE as perpetrators can threaten victims and their families with violence or entrap and coerce them into debt. Children involved in criminal exploitation often commit crimes themselves which can mean their vulnerability as victims is not always recognised (particularly older children) and they are not treated as victims, despite the harm they have experienced. The experience of girls who are criminally exploited can also be very different to that of boys. We also recognise that boys and girls being criminally exploited may be at higher risk of child sexual exploitation (CSE).

- Leigh Primary School recognises that CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities and includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited, for example they may believe they are in a genuine romantic relationship.

- If staff are concerned that a child may be at risk of CSE or CCE, immediate action should be taken by speaking to the DSL or a deputy.

4.5 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.

- Leigh Primary School recognises that the likelihood of involvement in serious violence may be increased by factors such as being male, having been frequently absent or permanently excluded, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Additionally, violence can peak in the hours just before or just after school, when pupils are travelling to and from school and these may be particularly risky times for children involved in serious violence.

- 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.

4.6 Modern Slavery and the National Referral Mechanism (NRM)

- 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 and responded to in line with this policy.

4.7 So-called Honour Based Abuse (HBA)

- So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators.

- All forms of HBA are abuse, regardless of the motivation, and concerns will be responded to in line with section 3 of this policy. Staff will report any concerns about HBA to the DSL (or a deputy). If there is an immediate threat, the police will be contacted.

- All staff will 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 fmu@fcdo.gov.uk

- Whilst all staff will speak to the DSL (or deputy) if they have any concerns about FGM, there is a specific legal reporting duty on teachers.
  - Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to personally report to the police where they discover that FGM appears to have been carried out.
  - It will be rare for teachers to see visual evidence, and they should not be examining pupils/students, however teachers who do not personally report such concerns may face disciplinary sanctions. Further information on when and how to make a report can be found at: Mandatory reporting of female genital mutilation procedural information and FGM Mandatory reporting Duty Fact Sheet.

  - Unless the teacher has good reason not to, they are expected to also discuss any FGM concerns with the DSL (or a deputy), and Kent Integrated Children's Services should be informed as appropriate.

4.8 Preventing radicalisation

- Leigh Primary School recognises that children may be susceptible to radicalisation into terrorism.

- Leigh Primary School is aware of our duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), to have "due regard to the need to prevent people from being drawn into terrorism", also known as the Prevent duty and the specific obligations placed upon us as an education provider regarding risk assessments, working in partnership, staff training, and IT policies.

- It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn to terrorism. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection

- 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. All staff must complete Prevent Duty Awareness Training every 2 years from the government training. All DSLs complete the Referrals Course. Any member of staff asked to attend a Channel of Prevent Multi-Agency Panel (PMAP) course should complete Course 3 from the Government Training Website before they attend. https://www.support-people-susceptible-to-radicalisation.service.gov.uk/portal#awareness-course.

- Staff will be supported to use their judgement in identifying children who might be at risk of radicalisation and will act proportionately; staff will 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.

- Where a child is receiving support regarding concerns relating to preventing radicalisation, for example, through the 'Channel' programme, the DSL will consider if it would be appropriate to share any information if/when a child leaves to attend any new schools/colleges, so support can be put in place in place for when the child arrives.

4.9 Cybercrime

- Leigh Primary School recognises that children with particular skill and interest 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 will be informed, and consideration will be given to accessing local support and/or referring into the Cyber Choices programme, which aims to intervene when children 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 will be responded to in line with the child protection and other appropriate policies.

  Kent DSLs can seek advice from Kent Police and/or the Education Safeguarding Service.

4.10 Domestic abuse

- Leigh Primary 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.

- Leigh Primary School is an Operation Encompass School. This means we work in partnership with Kent Police to provide support to children experiencing 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 we have up to date and relevant information about children's circumstances and enables us to put immediate support 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 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 will be sought from the Education Safeguarding Service or the Operation Encompass helpline which is available 8AM to 1PM, Monday to Friday on 0204 513 9990.

- If staff are concerned that a child may be at risk of seeing, hearing, or experiencing domestic abuse in their home or in their own intimate relationships, immediate action should be taken by speaking to the DSL or a deputy.

4.11 Mental health

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

- Staff are aware that children's experiences, for example where children have suffered abuse and neglect, or other potentially traumatic Adverse Childhood Experiences (ACEs), can impact on their mental health, behaviour, and education.

- Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or a deputy.

5 Supporting Children Potentially at Greater Risk of Harm

- Whilst **all** children should be protected, Leigh Primary School acknowledge that some groups of children are potentially at greater risk of harm. This can include the following groups:

5.1 Safeguarding children with Special Educational Needs or Disabilities (SEND)

- Leigh Primary School acknowledges that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges and barriers for recognising abuse, neglect and exploitation.

- Leigh Primary School recognises that 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 special educational need or disability. Staff will be mindful that children with SEND or certain medical conditions may be disproportionally impacted by behaviours such as: exploitation, peer group isolation or bullying including prejudice-based bullying, without outwardly showing any signs.

- To address these additional challenges, our school will always consider implementing extra pastoral support and attention for children with SEND. The DSL will work closely with the SENDco (Gemma Hawken) to plan support as required.

- Our school has robust intimate/personal care policies ensure 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 our policies: Personal Care Policy

5.2 Children requiring mental health support

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

- Where there are concerns regarding possible mental health problems for pupils, staff should:
    - **Speak to the DSL, inclusions manager and discuss in 'children causing concern' sessions in staff meetings to escalation support and for referral pathways.**
- Age/ability appropriate education will be provided to our pupils to help promote positive health, wellbeing, and resilience. This is provided through:
    - Respect, responsibility and resilience assemblies
    - Votes for School debate topics
    - SRE and PSHE progressive curriculum
    - Online Safety Curriculum
    - Wellbeing curriculum
    - PE curriculum

5.3 Children who are absent from education

- 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.

- A robust response to children who are absent from education for prolonged periods and/or on repeat occasions will support the identification of such abuse and may help prevent the risk of children going missing in the future. This includes when problems are first emerging and also where children are already known to Kent Integrated Childrens Services and/or have a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

- Where possible, the school will hold more than one emergency contact number for each pupil, so we have additional options to make contact with a responsible adult if a child missing education is also identified as a welfare and/or safeguarding concern (see section 3.5). There is an expectation that emergency contact information will be held for both parents, unless doing so would put a child at risk of harm.

- 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 PRU, Inclusion and Attendance Service (PIAS).

5.4 Children attending alternative provision

- Where the school places a pupil/student with an alternative provision provider, we continues to be responsible for the safeguarding of our pupil/s. This includes Leigh Primary School:
  - having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend.
  - regularly reviewing (at least half termly) the alternative provision placements made to provide assurance that the child is regularly attending and the placement continues to be safe and meets the child's needs.

- Where safeguarding concerns arise, placements will be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

5.5 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.

5.6 Children who may benefit from Early Help

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

- Where it is identified a child may need early help, staff and DSLs will respond in line with section 3 of this policy.

5.7 Children who need a social worker (child in need and child protection plans)

- The DSL will hold details of social workers working with children in the school so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes.

- Where children have a social worker, this will inform school decisions about their safety and promoting their welfare, for example, responding to unauthorised absence and provision of pastoral and/or academic support.

5.8 Looked after children, previously looked after children and care Leavers

- Leigh Primary 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 a **'designated teacher'** Victoria Short, 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/who have been previously looked after including those in kinship care.

- The designated teacher will work with the DSL to ensure 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 the school believe a child is being cared for as part of a private fostering arrangement (occurs when a child under 16 or 18 if the child is disabled is cared for and lives with an adult who is not a relative for 28 days or more) there is a duty to recognise these arrangements and inform the Local Authority via the Front Door.

- Where a 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.

5.9 Children who are privately fostered

- Private fostering occurs when a child under the age of 16 (under 18 for children with a disability) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of our staff through the normal course of their interaction, and promotion of learning activities, with children.

- Where private fostering arrangements come to the attention of Leigh Primary School, we must notify Kent Integrated 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.

5.10 Children who are Lesbian, Gay, Bisexual or Gender Questioning

- The fact that a child may be lesbian, gay, bisexual or gender questioning is not in itself an inherent risk factor for harm, however, [Name of School/College] recognises that children who are lesbian, gay, bisexual or gender questioning or are perceived by other children to be lesbian, gay, bisexual or gender questioning (whether they are or not) can be targeted by other children or others within the wider community.

- 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 to support any complex mental health and psychosocial needs and to manage the risk of bullying.

- Leigh Primary School recognises risks can be compounded where children who are lesbian, gay, bisexual or gender questioning lack a trusted adult with whom they can be open. Appropriate education is included within our Relationships Education/ Relationship and Sex Education and Health Education curriculum and our staff will endeavour to reduce the additional barriers faced and provide a safe space that facilitates a culture where children can speak out or share any concerns.

6 Online Safety

- It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. Leigh Primary School will adopt a whole school approach to online safety which will empower, protect, and educate our pupils and staff in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.
- Leigh Primary School 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.
- Leigh Primary School identifies that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
  - **Content**: being exposed to illegal, inappropriate or harmful content. For example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including face news) and conspiracy theories.
  - **Contact**: being subjected to harmful online interaction with other users. For example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
  - **Conduct**: 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.
- Leigh Primary School recognises that technology, and the risks and harms related to it, evolve and change rapidly. The school will carry out an annual review of our approaches to online safety, supported by an annual risk assessment, which considers and reflects the current risks our children face online.
- The headteachers will be informed of any online safety concerns by the DSL, as appropriate. The named governor for safeguarding will report on online safety practice and incidents, including outcomes, on a regular basis to the wider governing body.
- The DSL has overall responsibility for online safety within the school but will liaise with other members of staff, for example IT technicians and curriculum leads as necessary.
- The DSL will respond to online safety concerns in line with our child protection and other associated policies, including our behaviour policy (includes anti-bullying).
  - 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.
- Leigh Primary School uses a wide range of technology. This includes: laptops, tablets and other digital devices, the internet, our learning platform, intranet and email systems.
- All school owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.

6.1 Generative Artificial Intelligence (AI)

- Generative artificial intelligence (AI) presents exciting opportunities; if used safely and effectively, AI can support children to achieve at school/college and develop the knowledge and skills they need for life. Additionally, AI has the power to transform education by helping teachers and staff focus on teaching, for example, by reducing workload. However, the use of AI also poses several safeguarding risks to children and staff, as well as risks to the safety and integrity of systems.
- Leigh Primary School recognises that when used safely, effectively and with the right infrastructure in place, generative artificial intelligence (AI) tools have many uses which could benefit our entire school community.
- However, it is important to recognise that AI tools can also pose safeguarding risks to our community as well as moral, ethical and legal concerns. This includes, but is not limited to:
  - exposure to inappropriate or harmful content, including bullying, harassment, abuse and exploitation

- privacy and data protection breaches/risks
- intellectual property infringements
- academic integrity challenges such as plagiarism and cheating
- exposure to inaccurate, misleading, or biased content.

Leigh Primary School permits the use of generative AI tools which have been approved and provided by the school for work and/or educational purposes, following the senior leadership team undertaking risk assessments and/or data protection impact assessments prior to use.

- Staff and pupils will be made aware of the benefits and risks of using generative AI tools and the school/ expectations by:
  - Online Safety Curriculum
  - Votes for School debate
  - Staff Training

Leigh Primary School will respond to any misuse of AI in line with relevant policies, including but not limited to, anti-bullying, behaviour, data protection, complaints and child protection.

Where the School believe that AI tools may have facilitated the creation of child sexual abuse material, the school/college will respond in line with existing local safeguarding procedures and national guidance from the IWF and NCA-CEOP.

Where Leigh Primary School are responding to concerns regarding digitally manipulated and AI-generated nudes and semi-nudes, the school/college will respond in line with section 4.3 of this policy and the local KSCMP safeguarding procedures and UKCIS 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' guidance.

Where the School/College believe that AI tools may have facilitated deep fake abuse of adults, advice and support will be provided to individuals affected, such as via Unions, Professionals Online Safety Helpline or Report Harmful Content and/or if a crime has been committed, via the police. Action will be taken in line with relevant School/College policies, including but not limited to, anti-bullying, behaviour and complaints.

6.2 Mobile and Smart Technology

- Leigh Primary School recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras, wearable technology and any other electronic devices with imaging and/or sharing capabilities.
- In accordance with KCSIE 2024 and EYFS 2021**,** Leigh Primary School has appropriate mobile and smart technology and image use policies in place, which are shared and understood by all members of the community. These policies can be found**: https://www.leighprimaryschool.com/Policies/**

6.3 Appropriate filtering and monitoring

- Leigh Primary School will do all we reasonably can to limit children's exposure to online harms through school provided IT systems, platforms and networks. In line with the requirements of the Prevent Duty and KCSIE 2025, we will ensure that appropriate filtering and monitoring systems are in place.
- This includes ensuring application of appropriate filtering and monitoring to both static content as well as dynamic and AI-generated materials, products and/or systems used.
- When implementing appropriate filtering and monitoring, [Name of School/College] will ensure that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.
  - **The school uses KCC filtering and monitoring procedures.**
  - If pupils or staff discover unsuitable sites or material, they are required to: **turn the screen off, close the computer down and tell an adult immediately.**
  - Our leadership team and relevant staff have an awareness and understanding of the filtering and monitoring provisions in place, manage them effectively and know how to escalate concerns when identified.
  - All users will be informed that use of our systems can be monitored, and that monitoring will be in line with data protection, human rights, and privacy legislation.
  - Filtering breaches or concerns identified through our monitoring approaches will be recorded and reported to the DSL who will respond as appropriate.

- Any access to material believed to be illegal will be reported immediately to the relevant agencies, such as the Internet Watch Foundation and the police.

- Whilst filtering and monitoring is an important part of our online safety responsibilities, it is only one part of Leigh Primary Schools approach to online safety and we recognise that we cannot rely on filtering and monitoring alone to safeguard our pupils; effective safeguarding practice, robust policies, appropriate classroom/behaviour management and regular education/training about safe and responsible use is essential and expected.
  - Pupils will use appropriate search tools, apps and online resources as identified by staff, following an informed risk assessment and/or a data privacy impact assessment as relevant.
  - Internet use will be supervised by staff as appropriate to pupils' age and ability and potential risk of harm.

6.3.1 Responsibilities

- Our governing body has overall strategic responsibility for our filtering and monitoring approaches, including ensuring that our filtering and monitoring systems are regularly reviewed, and that the leadership team and relevant staff have an awareness and understanding of the appropriate filtering and monitoring provisions in place, manage them effectively and know how to escalate concerns when identified.

- Jenna Halfhide and Joanne Shobbrook (DSLs) and Sharon Wade (safeguarding governor), are responsible for ensuring that our school/college has met the DfE Filtering and monitoring standards for schools and colleges.

- Our senior leadership team are responsible for:
  - procuring filtering and monitoring systems.
  - documenting decisions on what is blocked or allowed and why.
  - reviewing the effectiveness of our provision.
  - overseeing reports.
  - ensuring that all staff understand their role, are appropriately trained, follow policies, processes and procedures and act on reports and concerns.
  - ensuring the DSL and IT service providers and staff have sufficient time and support to manage their filtering and monitoring responsibilities.

- The DSL has lead responsibility for overseeing and acting on:
  - any filtering and monitoring reports.
  - any child protection or safeguarding concerns identified.
  - checks to filtering and monitoring system.

- The IT service providers/staff have technical responsibility for:
  - maintaining filtering and monitoring systems.
  - providing filtering and monitoring reports.
  - completing technical actions identified following any concerns or checks to systems.
  - working with the senior leadership team and DSL to procure systems, identify risks, carry out reviews and carry out checks.
- All members of staff are provided with an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring as part of our induction process, and in our child protection staff training.

- All staff, pupils and parents/carers have a responsibility to follow this policy to report and record any filtering or monitoring concerns.

6.3.2 Decision making and reviewing our filtering and monitoring provision

- When procuring and/or making decisions about our filtering and monitoring provision, our senior leadership team works closely with the DSL and the IT service providers/staff.

- Decisions have been recorded and informed by an approach which ensures our systems meet our school specific needs and circumstances, including but not limited to our pupil risk profile which considers the specific vulnerabilities (including age and ability), risk an context of our pupils, and our school specific technology use.

- Any changes to the filtering and monitoring approaches will be assessed by staff with safeguarding, educational and technical experience and, where appropriate, with consent from the leadership team; all changes to the filtering policy are logged and recorded.

- Our school undertakes an at least annual review of our filtering and monitoring systems to ensure we understand the changing needs and potential risks posed to our community.

- In addition, Leigh Primary School, undertakes regular checks on our filtering and monitoring systems, which are logged and recorded, to ensure our approaches are effective and can provide assurance to the governing body that we are meeting our safeguarding obligations.
    - These checks are achieved by: weekly checks are undertaken by a DSL, checks are undertaken with two members of staff present (DSL/DDSL), checks are undertaken in a location where confidentiality can be achieved, during working hours, when pupils/students are not present (e.g. headteachers office), checks are logged/record, any technical concerns are flagged to the IT staff/IT service provider and safeguarding concerns are actioned by the DSL etc.in line with this policy. All DDSLs have a separate mailbox for smooth wall notifications and a dummy teacher log in to make checks on filtering and monitoring systems.

6.3.3 Appropriate filtering

- Leigh Primary Schools education broadband connectivity is provided through Cantium and uses Smoothwall to block harmful content.
    - Cantium is a member of Internet Watch Foundation (IWF).
    - Smoothwall has signed up to Counter-Terrorism Internet Referral Unit list (CTIRU)
    - Smoothwall is blocking access to illegal content including child sexual abuse material (CSAM).
    - Smoothwall blocks access to sites which could promote or include harmful and/or inappropriate behaviour or material. This includes content which promotes discrimination or extremism, drugs/substance misuse, malware/hacking, gambling, piracy and copyright theft, pro-self-harm, eating disorder and/or suicide content, pornographic content and violent material.
- Cantium blocks school provided internet access to illegal content and activity as identified on the Online Safety Act including:
    - Child Sexual Abuse Material (CSAM)
    - Controlling or coercive behaviour
    - Extreme sexual violence

- Extreme pornography
- Fraud
- Racially or religiously aggravated public order offences
- Inciting violence
- Illegal immigration and people smuggling
- Promoting or facilitating suicide
- Intimate image abuse
- Selling illegal drugs or weapons
- Sexual exploitation
- Terrorism

- Cantium is a member of Internet Watch Foundation (IWF) and uses IWF services to block access to CSAM.

- Cantium has signed up to Counter-Terrorism Internet Referral Unit list (CTIRU)

- Cantium blocks school provided internet access to sites which could promote or include harmful and/or inappropriate behaviour or material. This includes content or activity which promotes hate speech or discrimination, gambling, harmful bullying content, malware/hacking, mis-disinformation, privacy and copyright theft, pornography, self-harm and eating disorders and/or violence against women and girls.

- Our filtering system is operational, up to date and applied to all users, including guest accounts, all school owned or provided devices, systems and networks, and all devices using the school internet connection: This is achieved by:
  - Our internet bound to Smoothwall and connection cannot be obtained without on school networked devices including personal devices that are on the school wi-fi and all school devices.
  - Applying different levels of filtering to staff and pupil log ins. Personal devices on school wi-fi automatically get pupil filtering.
  - Filtering systems should allow the school to identify device names or IDs, IP addresses, and where possible, individual users, the time and date of attempted access and the search term or content being blocked.

- The DSL and leadership team will work with Cantium and our IT service providers (ICT Networks) as appropriate and as identified in section 6.3.2, to ensure that our filtering policy is continually checked and reviewed to reflect our needs and requirements.

- Our filtering system is operational, up to date and is applied to all users, including guest accounts, all school owned devices and networks, and all devices using the school broadband connection.

- If there is failure in the software or abuse of the system, for example if pupils or staff accidentally or deliberately access, witness or suspect unsuitable material has been accessed, they are required to:
  - Smoothwall alerts will be sent to ICT Networks to raise with the School Senior Leadership Team and additionally, DSLs have a Smoothwall Email Inbox that we monitor. On receipt of a notification, school staff investigate the incident and log using a spreadsheet and any appropriate action is taken.
  - In addition our Netsweeper OnGuard system notifies us on any breach to action using appropriate policies and procedures.

- Our ICT Network provider performs testing and Senior Leaders also perform fortnightly. This is conducted via a 'test' pupil account and 'test' staff account.
- If a staff member or pupil accidentally access, witness, or suspect unsuitable material there are procedures for reporting to SLT. Any appropriate action to safeguarding pupils will then be taken.

- Filtering breaches will be reported to the DSL and technical staff and will be recorded and escalated as appropriate and in line with relevant policies, including our child protection, acceptable use, allegations against staff and behaviour policies.

- Parents/carers will be informed of filtering breaches involving their child immediately, unless to do so would place a child at risk of harm or compromise a criminal investigation.

- Any access to material believed to indicate a risk of significant harm, or that could be illegal, will be reported as soon as it is identified to the appropriate agencies, including but not limited to the Internet Watch Foundation (where there are concerns about child sexual abuse material), Kent Police, NCA-CEOP or Kent Integrated Children's Services.

- If staff are teaching topics which could create unusual activity on the filtering logs, or if staff perceive there to be unreasonable restrictions affecting teaching, learning or administration, they will report this to the DSL and/or leadership team.

6.3.4 Appropriate monitoring

Leigh Primary uses appropriate monitoring approaches. Leaders and DSLs have accessed **UK Safer Internet Centre guidance** and the **DfE filtering and monitoring standards** for further information about appropriate monitoring approaches and what they entail and works alongside their ICT Provider – ICT networks to ensure that these approaches are robust.

No monitoring system can be 100% effective; we recognise this with regard to the use of devices off site by staff as well as staff personal devices that are not connected to school wifi. This is why we implement Acceptable Use Policies for staff on their use and record staff's commitment and agreement to these procedures on our Single Central Record.

We will appropriately monitor internet use on all school provided devices and networks to detect safeguarding risks in real or near-real time, including accessing or attempting to access, or engaging with or attempting to engage with illegal and/or harmful/inappropriate content or activity by any user. This is achieved by:

- Physical supervision in lessons by school staff;
- Automatic safeguarding alerts provided by the smoothwall filtering system on all devices using school wifi;
- Netsweeper OnGuard logging and notifying DSLs of any alerts and devices if required relating to a specific concerns.
- There are Acceptable Use Policies which all staff read and abide by for use of social media sites, wi-fi, remote learning platforms and appropriate use of school devices.
- All users will be informed that use of our devices and networks can/will be monitored and that all monitoring is in line with data protection, human rights and privacy legislation.
- If a concern is identified via our monitoring approaches:

- Where the concern relates to pupils, it will be reported to the DSL and will be recorded and responded to in line with relevant policies, such as child protection, acceptable use, and behaviour policies.
- Where the concern relates to staff, it will be reported to the headteacher (or chair of governors if the concern relates to the headteacher), in line with our staff behaviour/ allegations policy.

- In accordance with our Mobile and Smart Technology Policy, Leigh Primary School does allow use of personal devices by staff and/or pupils/students. As such, we will ensure they are appropriately monitored in accordance with safeguarding and data protection legislation.
- All users will be informed that use of our devices and networks can/will be monitored and that all monitoring is in line with data protection, human rights and privacy legislation.
- If a concern is identified via our monitoring approaches:
  - Where the concern relates to pupils, it will be reported to the DSL and will be recorded and responded to in line with relevant policies, such as child protection, acceptable use, and behaviour policies.
  - Where the concern relates to staff, it will be reported to the headteacher (or chair of governors if the concern relates to the headteacher), in line with our staff behaviour/ allegations policy.
- Parents/carers will be informed of safeguarding concerns involving their child identified through our monitoring approaches, unless to do so would put a child at risk of harm or compromise a criminal investigation.
- Where our monitoring approaches detect any immediate risk of harm or illegal activity, this will be reported as soon as possible to the appropriate agencies; including but not limited to, the emergency services via 999, Kent Police via 101, NCA-CEOP , LADO or Kent Integrated Children's Services.

6.4 Information security and access management

- Leigh Primary School is responsible for ensuring an appropriate level of security protection procedures are in place, in order to safeguard our systems as well as staff and pupils. Further information can be found in acceptable use policies and online safety policy.

- Leigh Primary School will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

- Jenna Halfhide and Joanne Shobbrook (DSLs) and Sharon Wade (safeguarding governor), are responsible for ensuring that our school has met the DfE cyber security standards for schools and colleges.

6.5 Remote/Online learning

Note: Specific guidance for DSLs and SLT regarding remote learning is available at
- **DfE: Safeguarding and remote education during coronavirus (COVID-19)**
- **NSPCC: Undertaking remote teaching safely**
- **The Education People: Remote Learning Guidance for SLT**

- Leigh Primary School will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements and any local/national guidance.
- All communication with pupils and parents/carers will take 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/students will engage with remote teaching and learning in line with existing behaviour principles as set out in our school behaviour policy/code of conduct and Acceptable Use Policies.
- Staff and pupils will be encouraged to report issues experienced at home when participating in remote/online learning and concerns will be responded to in line with our child protection and other relevant policies.
- When delivering remote learning, staff will follow our Remote Learning Acceptable Use Policy (AUP)

6.6 Online Safety Staff training

- Leigh Primary School will ensure that all staff receive online safety training, which, amongst other things, will include providing them with an understanding of the expectations, applicable roles and their responsibilities in relation to filtering and monitoring, as part of induction.
- Ongoing online safety training and updates for all staff will be integrated, aligned and considered as part of our overarching safeguarding and child protection training approach. See section 7 for more information.

6.7 Educating pupils

- Leigh Primary School will ensure a comprehensive whole school curriculum response is in place to enable all pupils to learn about and manage online risks effectively as part of providing a broad and balanced curriculum. See section 9 for more information.
- At Leigh Primary School we teach Online Safety through themed assemblies using Votes4Schools, Purple Mash Online Safety Lessons, RSE/PSHE curriculum, Online Safety story books and Internet Matters online curriculum.

6.7 Working with parents/carers

- Leigh Primary School will build a partnership approach to online safety and will support parents/carers to become aware and alert of the potential benefits and risks and to reinforce the importance of children being safe online by: providing all parents with access to National Online Safety and highlighting current issues weekly in the school Newsletter 'Leigh Latest'.
- Leigh Primary School ensure 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. This is achieved by:
  - **Using National Online Safety**
  - **Providing them with information about the platforms the school uses**
  - **Using Google Platform to share information**
- Where the School is made aware of any potentially harmful risks, challenges and/or hoaxes circulating online, national or locally, we will respond in line with the DfE 'Harmful online challenges and online hoaxes' guidance to ensure we adopt a proportional and helpful response. **Note: Additional local advice and support is available for DSLs and SLT via the Education Safeguarding Service: ' Think before you scare'**

7 Staff Engagement and Expectations

7.1 Staff awareness, induction and training

- All members of staff have been provided with a copy of part one of 'Keeping Children Safe in Education' 2025 which covers safeguarding information for staff.
  - School leaders, including the DSL will read KCSIE 2025 in its entirety.
  - School leaders and all members of staff who work directly with children will read annex B of KCSIE 2025.
  - All members of staff have signed to confirm that they have read and understood the national guidance shared with them. **This is found in the Single Central Register**

- 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. All staff are expected to re-read this policy at least annually (and following any updates) to ensure they understand our expectations and requirements. All staff are provided with Child Protection newsletters.
- All new staff and volunteers (including agency and third-party staff) receive safeguarding and child protection training (including online safety, which, amongst over things, will include ensuring an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) to ensure they are aware of the school internal safeguarding processes, as part of their induction. **This will be done annually and all new staff will be inducted via e-learning.** This training is regularly updated and is in line with advice from the safeguarding partners.

- All staff members (including agency and third-party staff) will receive appropriate child protection training (including online safety) that is updated at least annually, to ensure they are aware of a range of safeguarding issues and how to report concerns. **This will be done annually and regular updates throughout the year.**
- All governors and trustees receive appropriate safeguarding and child protection (including online safety) training at induction. This training equips them with the knowledge to provide strategic challenge to test and assure that our safeguarding policies and procedures are effective and support the delivery of a robust whole school approach to safeguarding. This training is regularly updated. Governor safeguarding training will be completed annually and survey completed to check understanding and utilise results to provide further input.
- Online safety training for staff will be integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning. **This will be done annually and regular updates throughout the year.**
- In addition to specific child protection training, all staff will receive regular safeguarding and child protection updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. **This will be done annually and regular updates throughout the year.**
- Leigh Primary School recognises the expertise staff build by undertaking safeguarding training and from managing safeguarding concerns on a daily basis and staff are encouraged to contribute to and shape school safeguarding arrangements and child protection policies. This will be done in staff meetings weekly.
- The DSL and headteacher will provide an annual report to the governing body detailing safeguarding training undertaken by all staff and will maintain an up to date record of who has been trained.

7.2 Safer working practice

- Our school takes steps as outlined in this and other relevant policies to ensure processes are in place for staff that promote continuous vigilance, maintain an environment that deters and prevents abuse and challenges inappropriate behaviour.

- All members of staff are required to work within our clear guidelines on safer working practice as outlined in the school behaviour policy/code of conduct.

- The DSL will ensure that all staff and volunteers (including agency, third-party staff and contractors) are aware of the school's expectations regarding safe and professional practice via the staff behaviour policy/code of conduct and AUP (Acceptable Use Policy)

- Staff will be made aware of the school's behaviour management and physical intervention policies. Staff will manage behaviour effectively to ensure a good and safe educational environment and will have a clear understanding of the needs of all children. Any physical interventions and/or use of reasonable force will be in line with our agreed policy and procedures, and national guidance.

- All staff will be made aware of the professional risks associated with the use of social media and electronic communication (such as email, mobile phones, texting, social networking). Staff will adhere to relevant school policies including staff behaviour policy, mobile and smart technology, Acceptable Use Policies (AUPs), and social media.

7.3 Supervision and support

- The induction process will include familiarisation with child protection responsibilities and procedures to be followed if members of staff have any concerns about a child's safety or welfare.
- The school will ensure 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) 2021.
- The school will provide appropriate supervision and support for all members of staff to ensure that:
  - All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of 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.

8 Safer Recruitment and Allegations Against Staff

8.1 Safer recruitment and safeguarding checks

- Leigh Primary School is committed to ensure that we develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our pupils and staff.
  - Leigh Primary School will follow part 3, 'Safer Recruitment' of Keeping Children Safe in Education 2025 (Part Three, 'Safer Recruitment') and from The Disclosure and Barring Service (DBS). This is additionally detailed in our Recruitment Policy.
  - The governing body and leadership team are responsible for ensuring that the school follows safe recruitment processes as outlined within guidance.
  - The governing body will ensure that at least one of the persons who conducts an interview has completed safer recruitment training.

- The school maintains an accurate Single Central Record (SCR) in line with statutory guidance.

- Leigh Primary School are committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools.

- We advise all staff 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 will continue to be responsible for the safeguarding of that child and will need to satisfy ourselves that the provider can meet the needs of the pupil.
  - The school will obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e., those checks that our school/college would otherwise perform in respect of our own staff.
  - Obtain written confirmation that the alternative provider will inform the commissioning school of any arrangements that may put the child at risk (i.e. staff changes), so that the commissioning school can ensure itself that appropriate safeguarding checks have been carried out on new staff.

8.2 Allegations/concerns raised in relation to staff, including supply teachers, volunteers and contractors

- Any concerns or allegations about staff will be recorded and dealt with appropriately in line with Part 4 of KCSIE and reported as appropriate in line with local Kent allegations arrangements This includes discussions as necessary with the Local Authority Designated Officer (LADO).

- In depth information can be found within our 'Staff discipline policy', 'Grievance Policy', 'Complaints Policy', Capability and our Allegations against staff policy including low Level concerns policy in Appendix 3 of this document. Which policy is dependent upon the allegation type and the nature of the concern. Information on expected conduct is contained within our staff handbook in our staff code of conduct. These policies can be found on the website.
  https://www.leighprimaryschool.com/Policies/

- Any concerns or allegations about staff will be recorded and dealt with appropriately in line with national (Part four of KCSIE) and local guidance. Ensuring concerns are dealt with effectively will protect those working in or on behalf of the school from potential false allegations or misunderstandings.

- Where the headteachers are unsure how to respond, for example if the school is unsure if a concern meet the harm 'thresholds' (section 8.2.1), advice will be sought via the Local Authority Designated Officer (LADO) Enquiry Line and/or the Education Safeguarding Service.

- After resolving or concluding allegations or low-level concerns about staff, the headteacher/principal, along with the LADO, if involved, will review the case to identify lessons learned and any possible improvements.

- In all cases where allegations are made against staff or low-level concerns are reported, once proceedings have been concluded, the headteachers (and if they have been involved the LADO) will consider the facts and determine whether any lessons can be learned and if any improvements can be made.
- 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), we will follow our safeguarding policies and procedures, including informing the LADO.

8.2.1 Concerns that meet the 'harm threshold'

- Leigh Primary School recognises that it is possible for any member of staff, including volunteers, governors, contractors, agency and third-party staff (including supply teachers) and visitors to behave in a way that indicates a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college. This includes when someone 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/may have behaved in a way that indicates they may not be suitable to work with children.

- Allegations against staff which meet this threshold will be responded to and managed in line with part four of KCSIE. Allegations that meet the harm threshold will be referred immediately to the headteachers who will contact the LADO to agree further action to be taken in respect of the child and staff member.

- In the event of allegations of abuse being made against the headteacher staff are advised that allegations should be reported to the chair of governors who will contact the LADO.

- If staff are concerned that appropriate safeguarding action is not being taken following an allegation against a colleague, they are advised to follow our whistleblowing process and/or to contact the LADO directly themselves.

8.2.2 Concerns that do not meet the 'harm threshold'

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

- It is crucial that all low-level concerns are shared responsibly, recorded and dealt with appropriately to protect staff from becoming the subject of potential false low-level concerns or misunderstandings.

- Low-level concerns should be shared confidentially in line with our low-levels concerns policy/staff behaviour policy/code of conduct to Jenna Halfhide, Headteacher.
  - Where low-level concerns are reported to the school/college, the headteacher/principal will be informed of all low level concerns and is the ultimate decision maker in respect of the response to all low-level concerns.
  - The headteacher will share concerns and liaise with the LADO enquiries officer via the LADO Enquiry Line.
  - Low-level concerns shared about supply staff and contractors will be shared with their employers so any potential patterns of inappropriate behaviour can be identified.
  - If the school is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, we will consult with the LADO.

- Low-level concerns will be recorded in writing and reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified.
  - Records will be kept confidential and will be held securely and retained and in compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) and other relevant policies and procedures (for example data retention policies).
  - Where a pattern is identified, the school will implement appropriate action, for example consulting with the LADO enquiry line and following our disciplinary procedures.

8.3 Safe Culture

- As part of our approach to safeguarding, the School has created and embedded a culture of openness, trust and transparency in which our values and expected behaviour as set out in our staff code of conduct are constantly lived, monitored and reinforced by all (including supply teachers, volunteers and contractors) and where all concerns are dealt with promptly and appropriately.

- Staff are encouraged and should feel confident to self-refer, if they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards. This includes where concerns may be felt to be deliberately invented or malicious; such allegations are extremely rare and as such all concerns should be reported and recorded.

- All staff and volunteers should feel able to raise any concerns about poor or unsafe practice and potential failures in the school safeguarding regime. The leadership team at Leigh Primary School will take all concerns or allegations received seriously.

- All members of staff are made aware of the school Whistleblowing procedure It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk.

- Staff can access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.

- Leigh Primary School a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person. *If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO.*

9 Opportunities to Teach Safeguarding

- Leigh Primary School ensure that children are taught about safeguarding, including online safety, as part of providing a broad and balanced curriculum. This will include covering relevant issues through Relationships and Health Education.

- We recognise that school play an essential role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour, what is 'safe,' to recognise when they and others close to them are not safe, and how to seek advice and support when they are concerned. Our curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that pupils have a range of age-appropriate contacts and strategies to ensure their own protection and that of others.

- Leigh Primary School recognises the crucial role we have to play in preventative education. Preventative education is most effective in the context of a whole-school approach which prepares pupils for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment.

- Leigh Primary School has a clear set of values and standards, upheld and demonstrated throughout all aspects of school life which are underpinned by our behaviour policy and pastoral support system, as well as by a planned programme of evidence-based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. Our programme is fully inclusive and developed to be age and stage of development appropriate.

- Leigh Primary School 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, for example children who are victims of abuse, neglect or exploitation, and children with SEND.

- Our school systems support children to talk to a range of staff. All children will be listened to and heard, and their concerns will always be taken seriously and acted upon as appropriate.

- Leigh Primary School recognises the value of external organisations and/or speakers visiting to provide useful information or to help enrich children's education. However, school will always assess the suitability of external organisations or speakers before granting them access to pupils/students; this may include an assessment of the educational value, the age/ability appropriateness of content and whether relevant safeguarding checks will be required.

10 Physical Safety

10.1 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. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a child needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. Further information regarding our approach and expectations can be found in our behaviour policy and in line with the https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools

10.2 The use of premises by other organisations

- Where our 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) we will ensure that appropriate arrangements are in place to keep children safe.

  - Where those services or activities are provided under the direct supervision or management of our school staff, our 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.

10.3 Site security

- All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light.
- Appropriate checks will be undertaken in respect of visitors and volunteers coming into school/college as outlined within national guidance. Visitors will be expected to sign in and out via the office visitors log and to display a visitor's badge whilst on site.
- For visitors attending in a professional capacity, such as social workers, early help staff, the school/college will check their ID and be assured that they have has had the appropriate DBS check or their employers have confirmed that their staff have appropriate checks.
- 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.

11 Local Support

- All members of staff in Leigh Primary School are made aware of local support available.

- **Kent Integrated Children's Services; Children's Social Work Services and Early Help Intensive Support**
  - Kent Integrated Children's Services Portal – select 'urgent' if there is an immediate risk/concern
  - Front Door Service No Name Consultation: 03000 411111
  - Out of Hours Number: 03000 419191
  - Kent Support level guidance: www.kscmp.org.uk/guidance/kent-support-levels-guidance

  - **Local Early Help and Preventative Services and Family Hubs**
    - Early Help and Preventative Services - KELSI
    - Early Help contacts - KELSI
    - 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)**
    - kscmp@kent.gov.uk
    - www.kscmp.org.uk
    - 03000 421126

  - **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)**
  - Local Authority Designated Officer (LADO) - Kent Safeguarding Children Multi-Agency Partnership
  - To refer to the LADO following an allegation being made against a member of staff, complete a referral on the Kent Integrated Children's Services Portal.
  - To enquire if a LADO referral should be made, to request strategic education safeguarding or online safety advice, or request other LESAS commissioned services/support, please use the LESAS enquiry form.

Appendix 1: Categories of Abuse

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

Abuse: 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. Abuse can be carried out both on and offline and be perpetrated by men, women, and children.

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 PE
- Sexually transmitted disease
- Fire setting

The **Centre of Expertise on Child Sexual Abuse** provides resources to help education professionals identify and respond to concerns of child sexual abuse and abusive behaviours.

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
- Aggressive behaviour or severe temper outbursts.

- Injuries need to be accounted for. Inadequate, inconsistent, or excessively plausible explanations or a delay in seeking treatment should signal concern.

Emotional abuse: the persistent emotional maltreatment of a 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
- 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

Appendix 2: Support Organisations

Relevant local links should be added; additional links can also be found in Part Two and Annex B KCSIE.

KSCMP

- Factsheets: www.kscmp.org.uk/training/factsheets
- Supporting resources: www.kscmp.org.uk/training/training-resources
- Video explainers: www.kscmp.org.uk/training/video-explainers
- Missing children: www.kscmp.org.uk/guidance/missing-children

NSPCC 'Report Abuse in Education' Helpline

- 0800 136 663 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
- NSPCC Whistleblowing helpline: www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/

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
- Lucy Faithfull Foundation 'Shore Space': https://shorespace.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 Special Education Needs and Disabilities

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk
- Council for Disabled Children: https://councilfordisabledchildren.org.uk
- Kent Autistic Trust: www.kentautistictrust.org/
- AFASIC: www.afasic.org.uk/
- National Autistic Society: www.autism.org.uk/
- Kent County Council: www.kent.gov.uk/education-and-children/special-educational-needs-and-disabilities/support-for-parents-with-send-children
- Portage: www.kent.gov.uk/education-and-children/special-educational-needs-and-disabilities/support-for-children-under-5/portage-supporting-pre-school-children-with-send
- Information Advice and Support Kent (IASK): www.iask.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

- KSCMP: www.kscmp.org.uk/guidance/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

- KSCMP: www.kscmp.org.uk/guidance/exploitation
- Kent & Medway Violence Reduction Unit: https://kentandmedwayvru.co.uk/
- 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/
- The Children's Society: www.childrenssociety.org.uk/what-we-do/our-work/preventing-child-sexual-exploitation

So-called 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

- Kent Prevent Education Officers: www.kelsi.org.uk/child-protection-and-safeguarding/The-Prevent-Duty-In-Education
- 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/
- Bullying UK: www.bullying.co.uk
- Kidscape: www.kidscape.org.uk
- Centre of expertise on Child Sexual Abuse: www.csacentre.org.uk
- Lucy Faithfull Foundation 'Shore Space': https://shorespace.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/onlinesafety
- 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
- KSCMP: www.kscmp.org.uk/guidance/online-safety

Mental Health

- KSCMP: www.kscmp.org.uk/guidance/children-and-young-peoples-mental-health
- Kent & Medway Children & Young People's Mental Health Services (CYPMHS): www.nelft.nhs.uk/services-kent-children-young-peoples-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/
- MindEd: https://mindedforfamilies.org.uk/

Appendix 3 - Allegations against staff (including low-level concerns) policy

Section 1: allegations that may meet the harms threshold

This section is based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education. Amend or add to this as applicable to reflect your own approach.
This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

If we're in any doubt as to whether a concern meets the harm threshold, we will consult out local authority designated officer (LADO).
We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.
A 'case manager' will lead any investigation. This will be the headteacher, or the chair of governors where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.
Our procedures for dealing with allegations will be applied with common sense and judgement.
If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.
Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the local authority.

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Definitions for outcomes 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, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary, agree** and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed,** take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Trade Union representative should be contacted to support the individual concerned and an appropriate colleague can be nominated as a support to attend meetings.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome.
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation.
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required.
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary).

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it.

Confidentiality and information sharing

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.
The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).
For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.
We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.
This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.
We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.
Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.
Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – 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 meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.
We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system or policies relating to how we interact with children

Responding to low-level concerns

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff code of conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.
Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Low Level Concern Form

This form can be used to share any concern with the Headteacher or Chair of Governor if the concern is regarding the Headteacher, no matter how small or seemingly insignificant, even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that is inconsistent with the Schools' Code of Conduct [including inappropriate conduct outside of work] and/or in a way that on first glance does not appear to meet the allegation, 'harm' threshold.

A concise record is required, including brief context in which the low level concern arose, plus details which are chronological, precise and as accurate as possible, of any such concern and /or relevant incident[s]. [Continue on separate sheets as necessary]. The form should be signed, times and dated.

Details of CONCERN :

Name of Staff member :	**Department and Role :**
Signed :	**Time and Date :**

Received by :

At [time] : **Date :**

WAS THE STAFF MEMBER SPOKEN TO? [Good practice will require a response].
NO ☐ - Give a brief but valid reason/explanation for not;

YES ☐ - Please complete detail below - STAFF MEMBER'S RESPONSE TO CONCERN :

ACTION TAKEN :

Was advice/guidance sought from the LADO and or Human Resources? Yes : ☐ No : ☐

Signed	**Dated :**

This record form will be held securely, either digitally or in paper form, in one central file in accordance with the School's Code of Conduct and any associated guidance regarding the management of concerns and or allegations and in accordance with School's Data Management practices/policies.
Low Level Concern reporting will be treated as confidential as far as possible, however in certain circumstances it may be necessary to share and or disclose the information with third parties for relevant and necessary reasons. This includes where a reporter has indicated they wish to remain anonymous.