Child Protection and Safeguarding Policy

Equalities Statement

In our Trust we work to ensure that there is equality of opportunity for all members of our community who hold a range of protected characteristics as defined by the Equality Act 2010, as well as having regard to other factors which have the potential to cause inequality, such as socio-economic factors.

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Contents

1.0 A Proactive Safeguarding Culture 4

1.1 Rationale 4

2.0 The Strategic Leadership of Safeguarding 5

2.1 Trust Board 5

2.2 The Local Governing Body and Nominated Governor for Safeguarding & Child Protection 5

2.3 The Headteacher 6

2.4 The Designated Safeguarding Lead (DSL) 6

The Designated Safeguarding Lead (DSL) in each school takes lead responsibility for safeguarding and child protection (including online safety) in the school. 6

2.5 Deputy DSLs (DDSLs) 6

Our Deputy DSLs (DDSLs) are trained to the same level as the DSL and support the DSL with safeguarding matters on a day-to-day basis. The ultimate lead responsibility for child protection remains with the DSL. 6

3.0 Children Who May be Particularly Vulnerable 6

3.1 Alternative Provision (AP) Safeguarding Procedures 6

4.0 Minimising Risk 6

5.0 Investigating Reported Concerns 7

6.0 Record Keeping 8

7.0 Children with Special Educational Needs and Disabilities 8

8.0 Attendance including Children Missing Education and Elective Home Education 8

9.0 Mental Health and Wellbeing 9

10.0 Children who are Lesbian, Gay, Bi or Trans (LGBT) or Gender Questioning 9

11.0 Child-on-child Abuse 9

12.0 Serious Violence 10

13.0 Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE) 10

14.0 Sharing Nudes and Semi-nudes 10

15.0 Online Safety 10

16.0 Domestic Abuse 11

17.0 'So called' Honour-Based abuse 11

17.1 Female Genital Mutilation 11

17.2 Forced Marriage 12

18.0 Radicalisation and Extremism 12

19.0 Staff/Pupil Relationships 13

20.0 Safeguarding concerns and allegations made about staff, supply staff, contractors and volunteers 13

21.0 Supervision 13

22.0 Whistleblowing if you have concerns about a colleague 13

23.0 Staff and Governor/Trustee Training 14

24.0 Safer Recruitment 14

25.0 Site security 15

26.0 Child Protection Procedures 15

26.1 Recognising abuse and neglect 15

26.2 Taking action 15

26.3 If you are concerned about a pupil's welfare 15

26.4 If a pupil discloses to you 16

26.5 Notifying parents 16
27.0 Referral to Children's Social Care 16
28.0 Reporting directly to child protection agencies 17
29.0 Confidentiality and sharing information 17
29.1 Sharing information 17
29.2 Storing information 18
30.0 Special Circumstances 18
30.1 Looked after children, Previously Looked After Children and Children in Kinship Care 18
30.2 Children who have a social worker 18
30.3 Work Experience 18
30.4 Children staying with host families 18
30.5 Private fostering arrangements 19
Appendix One - Four categories of abuse 19
Appendix Two - Related Safeguarding Policies & Guidance 19

1.0 A Proactive Safeguarding Culture

Swale Academies Trust (the 'Trust') is committed across all our schools to providing a safe and secure environment for children, staff and visitors and to promoting a culture in which everyone feels confident about sharing all concerns they may have about their own safety and well-being or the safety and well-being of others. Safeguarding is everyone's responsibility, and it is the duty of Swale Academies Trust and its schools to safeguard and promote the welfare of children. This is our core safeguarding principle. In adhering to this principle, we focus on providing a safe and welcoming environment for all of our children regardless of age, ability, culture, race, language, religion, gender identity or sexual identity.

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 the impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes.

The Trust aims to promote a positive safeguarding culture through a focus on recognising that the right values, behaviour and attitudes are key, whilst providing opportunities for pupil voice to be heard and understood. Trust staff act as authentic inclusive role models whilst our leaders demonstrate their commitment and understanding of safeguarding through the permeation of safeguarding values throughout our school curricula.

All staff should be aware of the indicators of abuse, neglect and exploitation.

This policy applies to all staff, volunteers, trustees and governors, all of whom are trained upon its contents and on their safeguarding duties. We keep this policy under constant review to reflect changes to law and guidance and best practice. This policy should be read alongside our other safeguarding related policies, procedures and guidance.

We work with our local safeguarding partners to promote the welfare of children and protect them from harm. All of our staff have an equal responsibility to act on any suspicion or disclosure that may indicate that a child is at risk of harm. Any pupils or staff involved in child protection or safeguarding issues will receive appropriate support.

All of our staff will reassure children that their concerns and disclosures will be taken seriously and that they will be supported and kept safe.

The Trust will ensure that the following parts of the DfE guidance "Keeping Children Safe in Education" are fully understood by:

- Whole document: Senior leaders and Designated Safeguarding Leads.
- Part one: All staff.
- Part Two, Part Three and Annex A: Governors and Trustees

Trust school leaders ensure that a cycle of safeguarding related CPD is followed, including induction, whole school and role specific. Schools will identify training needs which are appropriate for their community.

1.1 Rationale

The policy aims to ensure that Trust schools have a culture of safeguarding in place which is proactive in reducing risk to children. This policy aims to:

• Identify the safeguarding roles in the Trust and within individual schools. Further details can be found on our school website: https://www.phcs.org.uk/page/?title=Safeguarding+%26amp%3B+Wellbeing&pid=14

• Set out clearly the expectations of accountability and responsibilities of The Trust Board, Safeguarding Leadership Group (SLG), Local Governing Body (LGB), Headteachers, Senior Leadership Teams & Designated Safeguarding Leads (DSLs).

• Ensure schools have effective arrangements in place to identify vulnerable children as outlined in KCSIE, reduce risk by securing appropriate support as quickly as possible.

• Identify the particular attention that should be paid to those children who might be deemed vulnerable as defined in the DfE statutory guidance. (This policy has been updated in line with the 2026 KCSiE)

• Set out our policy on training for staff including induction for ECTs.

• Ensure that those responsible for recruitment have up to date Safer Recruitment Training (updated every 2 years)

• Ensure that schools have an effective curriculum in place which supports personal development and safety.

• Set out expectations of how to ensure children are safeguarded when there is contact with non school staff, e.g. volunteers, contractors, etc.

• Outline how safeguarding complaints against staff will be handled.

• Set out expectations regarding record keeping.

• Outline how the implementation of this policy will be monitored.

This policy has been drafted with due consideration made to statutory legislation and guidance

2.0 The Strategic Leadership of Safeguarding

2.1 Trust Board

The Trust Board has established a Safeguarding Leadership Group who are responsible for ensuring that the quality of safeguarding in Trust schools is of the highest possible standard and report to the Board of Directors on a termly basis.

2.2 The Local Governing Body and Nominated Governor for Safeguarding & Child Protection

2.2.1 The role of the nominated governor for safeguarding and child protection is to provide support and challenge to the Schools' Lead DSL and the leadership of the Trust on how they manage safeguarding so that the safety and wellbeing of the children can continuously improve. They are supported by an appointed Safeguarding Trustee. The role includes:

- understanding the requirements of the Governance Handbook and Keeping Children Safe in Education 2026
- confirming that consistent and compliant safeguarding practice takes place across the school
- reporting to the Executive Team about the standard of safeguarding in the school

The school DSL and the nominated governor for safeguarding and child protection meet on a regular basis to discuss safeguarding issues and to agree steps to continuously improve safeguarding practices in the school.

2.3 The Headteacher

The Headteacher has overall accountability to ensure that safeguarding arrangements are effective in the school.

2.4 The Designated Safeguarding Lead (DSL)

The Designated Safeguarding Lead (DSL) in each school takes lead responsibility for safeguarding and child protection (including online safety) in the school.

To ensure continuity of safeguarding, the school will implement robust cover arrangements, including a confidential shared mailbox, to ensure concerns are monitored and acted upon without delay

2.5 Deputy DSLs (DDSLs)

Our Deputy DSLs (DDSLs) are trained to the same level as the DSL and support the DSL with safeguarding matters on a day-to-day basis. The ultimate lead responsibility for child protection remains with the DSL.

2.6 The school will promote an inclusive, anti-discriminatory culture as part of their safeguarding responsibilities

3.0 Children Who May be Particularly Vulnerable

Some children are at greater risk of abuse, neglect and exploitation. This increased risk can be caused by many factors including social exclusion, isolation, discrimination and prejudice. To ensure that all of our pupils receive equal protection, we give special consideration to children as identified on page 11 of Keeping Children Safe in Education (KCSIE), and from page 57, ensuring their needs are assessed to determine if they require universal services and community-based early help, or a more coordinated response via the targeted early help level of Family Help.

3.1 Alternative Provision (AP) Safeguarding Procedures

Where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs which are often complex. Schools should obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment (i.e. those checks that schools would otherwise perform on their own staff). This includes 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. Refer guidance from page 56 of KCSiE and the Arranging Alternative Provision - A Guide for Local Authorities and Schools

3.2 Young Carers

The school will be alert to the needs of young carers, recognising that caring responsibilities can impact their attendance, attainment, and mental health

4.0 Minimising Risk

The school take the following steps to minimise or prevent the risk of child-on-child abuse:

- Promoting an open and honest environment where children feel safe and confident to share their concerns and worries
- Using assemblies to outline acceptable and unacceptable behaviour
- Using RSE and PSHE to educate and reinforce our messages through stories, role play, current affairs and other suitable activities (in line with DfE PSHE and RSE guidance)
- Ensuring that the school is well supervised, especially in areas where children might be vulnerable.
- Recognising the importance of sharing relevant information with partner agencies in line with the DFE information sharing guidance

5.0 Investigating Reported Concerns

5.1 All allegations of abuse, neglect or exploitation must be passed to the DSL immediately who will investigate and manage the allegation as follows: (a link to separate guidance is contained within this policy to support the management of allegations against staff please also refer to the Information Commissioner's Employment Practices Code)

Refer to pages 21, 50, 106, 120, 132 or 184 for details about reporting and investigating concerns for further detail.



Seek Advice - The nature of the incident may be triaged. Based on professional judgment the school will take advice from Children's Services or the Police.



Gather information - children and staff will be spoken with immediately to gather relevant information depending on the advice or next steps given by the relevant external agencies.



Decide on action - if it is believed that any child is at risk of significant harm, a referral will be made to children's social care. The DSL will then work with children's social care to decide on next steps, which may include contacting the police. In other cases, we may follow our behaviour policy alongside this Child Protection and Safeguarding Policy.



Inform parents - we will usually discuss concerns with the parents. However, our focus is the safety and wellbeing of the pupil and so if the school believes that notifying parents could increase the risk to a child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are contacted.



Record – all concerns, discussions and decisions made, and the reasons for those decisions will be recorded in writing, kept confidential and stored securely on the school's child protection and safeguarding systems and/or in the child's separate child protection file. The record will include a clear and comprehensive summary of the concern, including the use of a body map, details of how the concern was followed up and resolved, and a note of the action taken, the rationale for any decisions made and the outcome, including where the decision has been made not to refer.

5.2 Where allegations of a sexual nature are made the school will refer to page 132 of KCSiE.

5.3 Children can report allegations or concerns of child-on-child abuse to any staff member and that staff member will pass on the allegation to the DSL in accordance with this policy. To ensure children can report their concerns easily, each school will have a clear system in place for children to confidently and easily report abuse.

5.4 Supporting those involved: Our staff reassure all victims 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. Our staff will never give a victim the impression that they are creating a problem by reporting sexual violence or sexual harassment, nor will victims be made to feel ashamed for making a report.

5.5 Abuse that occurs online or outside of school will not be downplayed and will be treated equally seriously. We recognise that sexual violence and sexual harassment occurring online can introduce a number of complex factors. Amongst other things, this can include widespread abuse or harm across a number of social media platforms that leads to repeat victimisation.

5.6 The support required for the pupil who has been harmed will depend on their particular circumstance and the nature of the abuse. The support we provide could include counselling and mentoring or some restorative justice work taking into consideration the wishes of the pupil who has been harmed.

5.7 Support may also be required for the pupil that caused harm. We will seek to understand why the pupil acted in this way and consider what support may be required to help the pupil and/or change behaviours. The consequences for the harm caused or intended will be addressed.

6.0 Record Keeping

6.1 All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. This will also help if/when responding to any complaints about the way a case has been handled by the school. Information will be kept confidential and stored securely within CPOMS/MyConcern/Bromcom. We adhere to the guidance set out on page 24 of KCSiE and ensure records include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved, and
- a rationale of any action taken, decisions reached and the outcome, including where the decision was made not to refer.

6.2 If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or a deputy).

7.0 Children with Special Educational Needs Disabilities or Health Issues

7.1 Children with special educational needs (SEN) disabilities or health issues can face additional safeguarding challenges. Additional barriers can exist when recognising abuse, neglect and exploitation in this group of children, further detail can be found on page 64 of KCSiE and on the NSPCC Learning website.

7.2 Our staff are trained to be aware of and identify these additional barriers to ensure this group of children are appropriately safeguarded.

8.0 Attendance including Children Missing Education and Elective Home Education

8.1 Children missing education, particularly repeatedly, can be an indicator of abuse and neglect, including sexual abuse or exploitation, child criminal exploitation, mental health problems, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Our staff are alert to these risks and will consider whether a child's attendance patterns require an intervention through universal services and community-based early help, or an escalation to the targeted early help level of Family Help. We adhere to the guidance set out on page 58 of KCSIE and guidance in 'Working together to improve school attendance'

8.2 We closely monitor attendance, absence, suspensions and permanent exclusions. Our school has a robust Attendance Policy and will make referrals to external agencies when appropriate. Our DSL will take appropriate action including notifying the local authority, particularly where children go missing on repeated occasions and/or are missing for periods during the school day including absence from any Alternative Provision.

8.3 Where a parent/carer has expressed their intention to remove a child from the school with a view to educating at home, the DSL will liaise with the local authority to ensure that any safeguarding concerns (should there be any) are shared adequately with them, so as to inform next steps. For further guidance please refer to page 59 of KCSiE.

9.0 Mental Health and Wellbeing

9.1 Schools have an important role to play in supporting the mental health and wellbeing of their pupils. Each school in the Trust has a designated Senior Mental Health Leader who has completed the required training.

9.2 All staff are aware that mental health problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are also aware that where children have suffered adverse childhood experiences those experiences can impact on their mental health, behaviour and education.

9.3 Where staff are concerned that a child's mental health is also a safeguarding concern, they will discuss it

with the DSL or a deputy. The school has a tiered approach to supporting children with mental health concerns and follows the KCSiE guidance on page 19.

9.4 Additional support and guidance can be found within the DfE 'Promoting mental health and wellbeing in our schools' document.

10.0 Children who are Lesbian, Gay, Bi or Trans (LGBT) or Gender Questioning

10.1 The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. Unfortunately, children who are LGBT, or are simply perceived to be LGBT, can be targeted by other children. The risk to these children can be compounded where children who are LGBT lack a trusted adult with whom they can be open. For further detail please refer to KCSiE page 66.

10.2 Our staff endeavour to reduce the barriers and provide a safe space for those children to speak out or share their concerns with them. We are aware that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism and/or attention deficit hyperactivity disorder. We encourage families/carers making decisions about support for gender questioning children to seek clinical help and advice.

10.3 LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse.

10.4 Accommodating social transition is an active intervention; therefore, the school will take a very careful approach. Parents and carers will be engaged as a matter of priority, and their views will be treated with importance.

10.5 The school will not allow children into toilets or changing rooms designated for the opposite biological sex, regardless of any request for social transition. For further guidance see page 33 in KCSIE.

11.0 Child-on-child Abuse

11.1 Child-on-child abuse – children harming other children - is unacceptable and will be taken seriously; it will not be tolerated or passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'. It is more likely that boys will be perpetrators of child-on-child abuse and girls the victims, but allegations will be dealt with in the same manner, regardless of whether they are made by boys or girls.

11.2 All staff should be clear about the school's policy and procedures for addressing child-on-child abuse and maintain an attitude of 'it could happen here'.

11.3 Child-on-child abuse can take many forms, the details of which can be found on page 51 of KCSiE and within our Child on Child Harmful Sexual Behaviour Protocol please also refer to the Lucy Faithfull Foundation

11.4 All staff recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place but is not being reported. This requires leadership teams to be professionally curious and to use pupil voice as a means to identify where abuse may be taking place so they can plan appropriate responses.

12.0 Serious Violence

Page 20 of KCSiE outlines the impact of serious violence and the risks that children face with regard to this linked to Child Criminal Exploitation.

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

We follow the guidance set out on page 16 of KCSiE. Please refer to this section of the document for further information. Please note this section of the guidance also covers 'County Lines'. Further detail regarding exploitation can be found from page 17 onwards and on page 158 of Annex A.

14.0 Self-generated intimate images and/or videos including those generated using AI e.g. deepfakes

Please refer to page 6 of KCSiE for further detail and guidance.

14.1 All incidents involving the consensual and non-consensual sharing of self-generated intimate images and/or videos, including those generated using AI (e.g., deepfakes) will be managed as follows:

- The incident will be referred to the DSL immediately and the DSL will discuss it with the appropriate staff. If necessary, the DSL may also interview the children involved.
- Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put a child at risk of harm.
- At any point in the process, if there is a concern that a young person has been harmed or is at risk of harm, we will refer the matter to the police and/or children's social care.

14.2 The UK Council for Internet Safety updated its Sharing nudes and semi-nudes: how to respond to an incident The school will have regard to this advice when managing these issues.

15.0 Online Safety

15.1 Our school has an online safety policy in place which includes reference to the **DfE guidance on Generative AI** and its principles including online safety measures and curriculum: https://www.phcs.org.uk/_site/data/files/users/policies/4556DBFD462A3B390F987A8D6D3458BB.pdf

15.2 It is essential that children are safeguarded from potentially harmful and inappropriate online material. As well as educating children about online risks, we have appropriate filtering and monitoring systems in place to limit the risk of children being exposed to inappropriate content, subjected to harmful online interaction with other users and to ensure their own personal online behaviour does not put them at risk. Filtering and monitoring systems will be reviewed at least once every academic year. This review will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations. See Adherence to the DfE's filtering and monitoring standards for further information.

15.3 We inform parents and carers that we use Lightspeed to filter and monitor children's online activities so

they can understand how we work to keep children safe. Lightspeed letter to parents.

15.4 We analyse data from the filtering and monitoring system to identify patterns and trends of children's online activities and form appropriate responses.

15.5 We will also inform parents and carers of what we are asking children to do online, including the sites they need to access, and with whom they will be interacting online.

15.6 Our curriculum supports children's understanding of online safety risks which can be categorised into four areas:

- **Content:** being exposed to illegal, inappropriate or harmful content such as pornography, fake news, misogyny, self-harm, suicide, radicalisation and extremism
- **Contact:** being subjected to harmful online interaction with other users such as peer to peer pressure and adults posing as children or young adults to groom or exploit children
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm such as making, sending and receiving explicit images, sharing other explicit images and online bullying, self-generated intimate images and/or videos including those generated using AI e.g. deepfakes
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing or financial scams.

15.7 "Misinformation, disinformation, and conspiracy theories" alongside "fake news" are categories of harmful online content. Please refer to page 46 of KCSiE for further information and guidance.

15.8 All staff are aware of these risk areas and should report any concerns to the DSL.

15.9 The school is a mobile phone-free environment by default. Pupils will not have access to their mobile phones throughout the school day. Please refer to the DfE guidance on mobile phones in schools.

16.0 Domestic Abuse

We follow the guidance set out on page 18 of KCSiE.

Our school is linked to Operation Encompass so that wellbeing checks can be made on any student who may have witnessed domestic violence. Learn more here: Operation Encompass. All reports received will be stored in line with the school's agreed record keeping procedures for safeguarding.

17.0 'So called' Honour-Based abuse

Please refer to page 172 of KCSiE for support and guidance.

17.1 Female Genital Mutilation

Please refer to page 173 of KCSiE for support and guidance.

Teachers are under a personal legal duty to report to the police where they discover that FGM has been carried out on a child under 18. In such circumstances, teachers will personally report the matter to the police as well as

informing the designated safeguarding lead. Please refer to page 173 of KCSiE for further support and guidance.

17.2 Forced Marriage

Please refer to page 172, 173 & 174 of KCSiE for support and guidance.

18.0 Radicalisation and Extremism

Click here to view the Prevent self-assessment tool.

18.1 The Counter-Terrorism and Security Act 2015 places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism.

18.2 Young people can be exposed to extremist influences or prejudiced views, in particular via the internet and other social media. Schools can help to protect children from extremist and violent views in the same way that they help to safeguard children from drugs, gang violence or alcohol.

18.3 Extremism is defined as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

18.4 Children are vulnerable to extremist ideology and radicalisation. Whilst Islamic fundamentalism is the most widely publicised, extremism and radicalisation can occur in other cultures, religions and beliefs, including the far right and white supremacy. Our staff are trained to identify those at risk of being radicalised or drawn into extremism.

18.5 If staff are concerned that a child may be at risk of radicalisation or being drawn into extremism, they should speak to the designated safeguarding lead who will in turn refer concerns to the Headteacher.

18.6 The Headteacher will refer children at risk of harm as a result of involvement or potential involvement in extremist activity to the Multi Agency Safeguarding Hub (MASH). The MASH will share the referral details of new referrals with the Prevent lead police officer and local authority Prevent coordinator at the point the referral is received.

18.7 The referral will be processed through the MASH multi agency information sharing system and parallel to this the Prevent police officer will carry out initial screening checks.

18.8 Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism that uses existing collaboration between local authorities, the police, statutory partners (such as the education sector, social services, children's and youth services and offender management services) and the local community.

18.9 The Prevent police officer will make a referral to the Channel Practitioner if there are sufficient concerns. The individual referred will be discussed at the Channel panel to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from our school will attend the Channel panel if and when we are asked to help with this assessment.

For further information please refer to page 169 of KCSiE or the Prevent Duty Guidance: England and Wales.

19.0 Staff/Pupil Relationships (This procedure applies to all staff, including supply teachers, volunteers, contractors, and trainee teachers)

19.1 Staff are aware that inappropriate behaviour towards pupils is unacceptable and that it is a criminal offence for them to engage in any sexual activity with a pupil under the age of 18. Sexual activity with a child is a matter for criminal and disciplinary procedures including referral to LADO and the police.

19.2 Engaging in sexual activity with a young person over 18 years of age who is still a student at the school will also be regarded as unacceptable and a member of staff who does so will be subject to disciplinary procedures, including referral to LADO.

19.3 We provide our staff with advice regarding their personal online activity, and we have clear rules regarding electronic communications and online contact with pupils. It is considered a serious disciplinary issue if staff breach these rules.

19.4 Our staff Discipline and Conduct policy sets out our expectations of staff and is signed by all staff members.

19.5 Our Low Level Concerns Protocol sets out guidance based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

20.0 Safeguarding concerns and allegations made about staff, supply staff, contractors and volunteers and trainee teachers

20.1 If a safeguarding concern or allegation is made about a member of staff, supply staff, contractor or a volunteer, our set procedures must be followed. The full procedure for managing such allegations or concerns are set out on page 25 of KCSiE and in line with the Information Commissioner's Employment Practices Code please also refer to our Managing Allegations Against Staff Policy.

20.2 Where a transferable risk, or risk by association, to children becomes apparent a risk assessment should be undertaken and advice sought from the LADO.

20.3 Safeguarding concerns or allegations made about staff who no longer work at the school will be reported to the LADO and the police.

21.0 Supervision

Our Trust recognises that staff supervision is integral to the effective delivery of services, the quality of staff supervision impacts on outcomes for children and the delivery of supervision must be a priority task within the school. Please see our Supervision Policy for further guidance.

22.0 Whistleblowing if you have concerns about a colleague

22.1 It is important that all staff and volunteers feel able to raise concerns about a colleague's practice. All such concerns should be reported to the headteacher, unless the complaint is about the headteacher, in which case concern should be reported to the Trust CEO.

22.2 Staff may also report their concerns directly to children's social care or the police if they believe direct reporting is necessary to secure action.

22.3 The Trust's Whistleblowing Policy allows staff to raise concerns or make allegations and for an appropriate enquiry to take place.

23.0 Staff and Governor/Trustee Training

23.1 Our staff receive appropriate safeguarding and child protection training which is regularly updated. In addition, all staff receive safeguarding and child protection updates on a regular basis to ensure they are up to date and empowered to provide exceptional safeguarding to our pupils.

23.2 New staff and volunteers receive a briefing during their induction which covers this Child Protection and Safeguarding policy and our staff behaviour policy, how to report and record concerns and information about our Designated Safeguarding Lead and deputy DSLs.

23.3 Our governors and trustees receive appropriate safeguarding and child protection (including online) training at induction which equips them with the knowledge to provide strategic challenge to test and assure themselves that there is an effective whole trust approach to safeguarding. This training is updated at least annually.

23.4 Our safeguarding trustee receives additional training to empower them to support and challenge the SLG and support the delivery of high-quality safeguarding across the trust.

23.5 Our nominated governor for safeguarding and child protection receives additional training to empower them to support and challenge the school Designated Safeguarding Lead and support the delivery of high-quality safeguarding in the school.

23.6 Our governors receive additional safeguarding training to support them in their role through the Trust created Governor CPD website.

24.0 Safer Recruitment

24.1 The Trust board and the Trust executive team are responsible for ensuring we follow recruitment procedures that help to deter, reject or identify people who might harm children. When doing so we check and verify the applicant's identity, qualifications and work history in accordance with Keeping Children Safe in Education 2026 and the local safeguarding partner arrangements. In exceptional circumstances it may be necessary to construct an individual risk assessment for a member of staff while these checks are being finalised. Refer to page 194 of KCSiE for further information and guidance.

24.2 All relevant staff (involved in early years settings and/or before or after school care for children under eight) are made aware of the disqualification from childcare guidance and their obligations to disclose to us relevant information that could lead to disqualification. Volunteers will not be permitted to begin working within the settings covered by the EYFS framework, Section 3 until the school or maintained nursery school has received the volunteer's enhanced DBS certificate including barred list information.

24.3 We ensure that our volunteers are appropriately checked and supervised when in school. We check the identity of all contractors working on site and request DBS checks where required by Keeping Children Safe in Education 2026. Contractors who have not undergone checks will not be allowed to work unsupervised during the school day. See the Trust Maintenance and Building Contractors' Safeguarding Procedure.

24.4 When using supply staff, we will obtain written confirmation from supply agencies or third-party

organisations that staff they provide have been appropriately checked and are suitable to work with children. This will include staff who are providing education on the school's behalf via online delivery. Trainee teachers will be checked either by the school or by the training provider, from whom written confirmation will be obtained confirming their suitability to work with children.

24.5 Each school maintains the single central record.

25.0 Site security

25.1 Visitors are asked to sign in at the school reception and are given a badge, which confirms they have permission to be on site. If visitors have undergone the appropriate identity checks, they can be provided with unescorted access to the school site. Visitors who have not undergone the required checks will be escorted at all times. Please refer to the Trust visitor checklist for further information.

25.2 Risk assessments will be constructed for site security to manage any temporary adjustments, e.g. building works.

26.0 Child Protection Procedures

For further information please refer to page 21 of KCSiE.

26.1 Recognising abuse and neglect

26.1.1 Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Abuse may be committed by adult men or women and by other children and young people.

26.1.2 Keeping Children Safe in Education 2026 refers to four categories of abuse. These are set out in Appendix One along with indicators of abuse.

26.2 Taking action

26.2.1 Any child could become a victim of abuse. Key points for staff to remember for taking action are:

- in an emergency take the action necessary to help the child, if necessary call 999
- complete a record of concern form as soon as possible on CPOMs/My Concern/Bromcom and this will generate an alert to the school DSL and DDSLs.
- share information on a need-to-know basis only and do not discuss the issue with colleagues, friends or family.

26.3 If you are concerned about a pupil's welfare

26.3.1 Staff may suspect that a pupil may be at risk. This may be because the pupil's behaviour has changed, their appearance has changed, or physical signs are noticed. In these circumstances, staff will give the pupil the opportunity to talk and ask if they are OK.

26.3.2 If the pupil does reveal that they are being harmed, staff should follow the advice below in para 26.4.

26.3.3 Staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. Children may feel embarrassed, humiliated, or being threatened, which could be due to their vulnerability, disability and/or sexual orientation or language barriers. This will not prevent our staff from having a professional curiosity and speaking to our DSL if they have concerns about a child.

26.4 If a pupil discloses to you

If a pupil tells a member of staff about a risk to their safety or wellbeing, the staff member will:

- remain calm and not overreact
- allow them to speak freely
- not be afraid of silences
- not ask investigative questions
- give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'
- not automatically offer physical touch as comfort
- let the pupil know that in order to help them they must pass the information on to the DSL
- tell the pupil what will happen next
- complete the **Add Incident form on CPOMS/My Concern/Bromcom** and this will generate an alert to the school DSL and DDSLs immediately.
- report verbally to the DSL even if the child has promised to do it by themselves

26.5 Notifying parents

The school will normally seek to discuss any concerns about a pupil with their parents. If the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are notified.

27.0 Referral to Children's Social Care

27.1 The DSL will make a referral to children's social care if it is believed that a pupil is suffering or is at risk of suffering significant harm. The pupil (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

27.2 Referrals to services regarding concerns about a child or family typically fall into three categories:

- Universal services and community-based early help
- The targeted early help level of Family Help
- Child in need - Section 17 (Children Act 1989) referrals
- Child protection - Section 47 (Children Act 1989) referrals

27.3 Safeguarding referrals should be made to local authority's Multi Agency Safeguarding Hub (MASH) via the referral form and copied to the local authority's Schools Safeguarding Coordinator. Prior to any referral form being sent to social care, there should be a verbal consultation with the MASH social worker or manager, by calling the duty desk, to ensure that making a referral is an appropriate action.

27.4 The parent/carer will normally be contacted to obtain their consent before a referral is made. However, if the concern involves, for example, alleged or suspected child sexual abuse, Honour Based Abuse, fabricated or induced illness or the Designated Safeguarding Lead has reason to believe that informing the parent at this stage

might compromise the safety of the child or a staff member, nothing should be said to the parent/carer before the referral and the reasons for the decision to progress without consent should be provided with the referral.

27.5 When the school makes a referral, the local authority should decide, within one working day of a referral being made, about the type of response that is required and should let the school, as the referrer, know the outcome. The DSL will follow up if this information is not forthcoming.

27.6 If, after a referral, the child's situation does not appear to be improving, the DSL will consider following local escalation procedures to ensure that the concerns have been addressed and, most importantly, that the child's situation improves.

2.4 Professional Differences, Resolution and Escalation Protocol

27.7 The Family Help Referral will be used to request additional early help for a family when the needs of a child are beyond the level of support that can be provided by universal services.

27.8 If a child has an unexplained or suspicious injury that requires urgent medical attention, the CP referral process should not delay the administration of first aid or emergency medical assistance. If a pupil is thought to be at immediate risk because of parental violence, intoxication, substance abuse, mental illness or threats to remove the child during the school day, for example, urgent Police intervention must be requested.

27.9 Where a child sustains a physical injury or is distressed as a result of reported chastisement or alleges that they have been chastised by the use of an implement or substance, this will immediately be reported for investigation.

27.10 All parents applying for places at our schools will be informed of our safeguarding responsibilities and of this policy. Where a pupil sustains injury or is otherwise affected by an accident or incident whilst they are the responsibility of the school, their parents will be notified as soon as possible.

27.11 Swale Academies Trust and its schools recognise the need to be alert to the risks posed by strangers or others (including the parents or carers of other students) who may wish to harm children in school or travelling to and from school and will take all reasonable steps to lessen such risks.

27.12 At all stages of the referral process staff must keep the child's circumstances under review and re-refer if appropriate, to ensure that the child's circumstances improve. Each school has the right to complain and/or escalate the referral if they feel that the local authority has not conducted its duty fully.

28.0 Reporting directly to child protection agencies

28.1 Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care or the police if they are convinced that a direct report is required or if the Designated Safeguarding Lead, the deputies, the headteacher or the Chair of Governors are not available, and a referral is required immediately.

28.2 Staff may also contact the NSPCC helpline on 0808 800 5000 if the Designated Safeguarding Lead, the deputies, the headteacher or the chair of governors are not available, and they need advice.

29.0 Confidentiality and sharing information

Child protection issues necessitate a high level of confidentiality. Staff should only discuss concerns with the Designated Safeguarding Lead, Headteacher or Chair of Trustees.

29.1 Sharing information

29.1.1 The DSL will normally obtain consent from the pupil and/or parents to share child protection information. Where there is good reason to do so, the DSL may share information without consent, and will record the reason for deciding to do so.

29.1.2 Information sharing will take place in a timely and secure manner and only when it is necessary and proportionate to do so and the information to be shared is relevant, adequate and accurate.

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

29.1.4 The UK GDPR, Data Protection Act 2018 and Data (Use and Access) Act 2025 do not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child. If any member of staff receives a request from a pupil or parent to see child protection records, they will refer the request to the Trust Data Protection Officer.

29.2 Storing information

Safeguarding file transfer management

29.2.1 Child protection information will be stored separately from the pupil's school file and the school file will be 'tagged' to indicate that separate information is held. It will be stored and handled in line with the Trust Records Retention and Destruction Policy.

29.2.2 The Trust Data Protection policy and privacy notices are available to view on the Trust website. The Trust Records Retention and Destruction policy is available to parents and pupils on request.

30.0 Special Circumstances

30.1 Looked after children, Previously Looked After Children and Children in Kinship Care

The most common reason for children becoming looked after is as a result of abuse or neglect. The school ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The designated teacher for looked after children and the DSL have details of the child's social worker and the name and contact details of the local authority's Virtual School Head for children in care Virtual School Heads also have a non-statutory responsibility for promoting the educational achievement of children in kinship care. For further information and guidance refer to page 61 of KCSiE.

30.2 Children who have a social worker

Children may need a social worker due to safeguarding or welfare needs. Local authorities will share this information with us, and the DSL will hold and use this information to inform decisions about safeguarding and

promoting the child's welfare.

30.3 Work Experience

The school has detailed procedures to safeguard pupils undertaking work experience, including arrangements for checking people who provide placements and supervise pupils on work experience which are in accordance with statutory guidance found on page 100 of KCSiE.

30.4 Children staying with host families

Details and guidance can be found on page 101 of KCSiE.

30.5 Private fostering arrangements

Details and guidance can be found on page 102 of KCSiE.

PLEASE NOTE THAT SOME LINKS TO INTERNAL DOCUMENTS ARE ONLY ACCESSIBLE BY SWALE.AT USERS

Appendix One - Four categories of abuse

Details of the different categories of abuse and the types of behavioural indicators can be found between pages 12, 13 and 14 of KCSiE.

Appendix Two - Related Safeguarding Policies & Guidance

Policy	Policy Link
Staff code of conduct	Staff Code of Conduct
Administration of Medicines Policy within: **Supporting Students with Medical Conditions Policy**	Supporting Students with Medical Conditions Policy Sections 8 and 9.
Allergy Policy	Allergy Policy
Supporting Students with Medical Needs Policy	Supporting Students with Medical Needs Policy
Attendance Policy	Attendance Policy
Suspensions & Permanent Exclusions Policy	Suspensions & Permanent Exclusions Policy
Complaints Policy	Complaints Policy
Equalities Statement	Equalities Statement
Data Protection Policy	Data Protection Policy

Health and Safety Policy	Health & Safety Policy
Whistleblowing Policy	Whistle Blowing Policy
PSHE Policy & RSE Policy	PSHE Policy & RSE Policy
Acceptable Use Policy	Acceptable Use Policy
Managing Allegations Against Members of Staff Policy	Managing Allegations Policy
SEND Policy	SEND Policy
Offsite Activities and Educational Visits Policy and risk assessments	Offsite & Education Visits Protocol
Restrictive Intervention Policy Restrictive Intervention Record	Restrictive Interventions Policy Trust Restrictive Intervention Record **MAKE A C…
Online Safety Policy	Model Online Safety Policy
Anti-Bullying Policy	Anti-Bullying Policy
Behaviour/Positive Discipline Policy	Behaviour/Positive Discipline Policy
Intimate Care policy	Intimate care is referenced in Supporting Students with Medical Conditions policy, Section 8.5. Any specific procedures are included in students' IHPs.
Employment of Ex Offenders Protocol	Employment of Ex Offenders Protocol
Maintenance and Building Contractors' Safeguarding Procedure	Maintenance and Building Contractors' Safeguarding Procedure