



SAFEGUARDING POLICY

Updated – September 2022

Safeguarding Policy Statement

WROTHAM SCHOOL

COVID-19- The DFE issued non-statutory interim guidance on safeguarding in schools, colleges and other providers during the coronavirus outbreak. This guidance has now been withdrawn as the government expects all settings across the nation to reopen for the new academic year in September, with full availability to all learners.

Requirements for local interventions in educational settings will continue to be reviewed.

Key contact personnel in School

Designated Safeguarding Lead: Michael Cater

Deputy Safeguarding Lead – Alison Sanders

Named Safeguarding Governor: Stefan Hargreaves

Named Safeguarding Trust Lead – Sheila Smith

All staff have access to this policy and have signed to the effect that they have read and understood its content.

GOVERNING BODY APPROVAL – DATE

Updated: SEPTEMBER 2021

Date of next review: SEPTEMBER 2022

What to do if you have a welfare concern at Wrotham School

Why are you concerned?

For example

- Something a child has said – e.g. allegation of harm
- Child's appearance – may include unexplained marks as well as dress
- Behaviour change
- Witnessed concerning behaviour

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

Follow the school procedure by logging your concerns on CPOMS or by email to the DSL.

- Reassure the child
- Clarify concerns, using open questions if necessary (**TED**: Tell, Explain, Describe)
- Use child's own words, record facts not opinions.
- Sign and date your records

Inform the Designated Safeguarding Lead – Michael Cater – HT

Designated Safeguarding Lead

- Consider whether the child is at immediate risk of harm e.g. unsafe to go home
- Access the Kent Safeguarding Support Level Guidance document and procedures: www.kscmp.org.uk
- Refer to other agencies as appropriate e.g. Internal or community services, early help open access, LADO, Police or Request for Support for integrated children's services
- If unsure then consult with Area Education Safeguarding Advisor (Clare Ray) or Local Authority Social Worker at the Front Door.

If you are unhappy with the response

Staff:

- Follow local escalation procedures
- Follow whistleblowing procedures

Learners and Parents:

- Follow school complaints procedures <https://www.wrothamschool.com/statutory-documents-policies/>
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Record decision making and action taken in the learner's child protection file (CPOMS)

Monitor

Be clear about:

- What you are monitoring e.g. behaviour trends, appearance etc.
- 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**

REPORTING AN INCIDENT

CPOMS

REPORTING SAFEGUARDING CONCERNS

Dear All,

We use an electronic reporting system for the reporting of safeguarding concerns.

This is monitored live by the safeguarding team.

This will work in the same way as the previous system of submitting a green form to me as DSL in order to report **any** concerns about the welfare of safety of a child.

If you have filled in an online incident form you **do not** need to repeat this information on a green form.

If a situation arises that means you are not able to log on or access the CPOMS site for any reason – please do not hesitate to fill in a green form. Particularly if the concern you are raising is urgent or time dependent.

To report any concern about the safety of a child you need to do the following:

Login in details

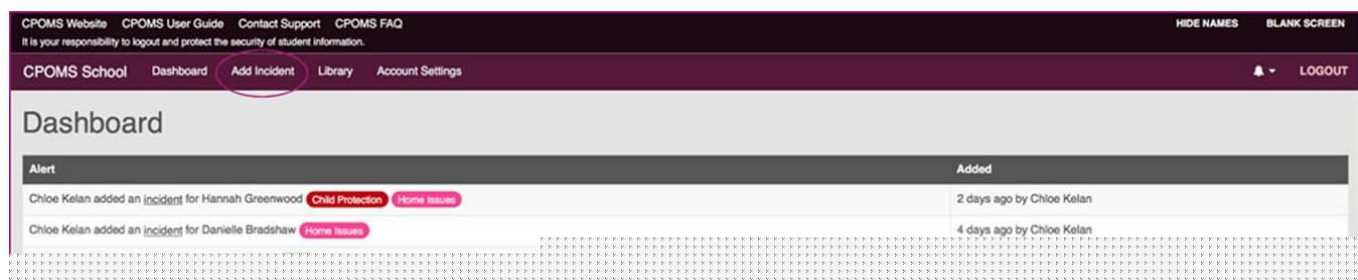
<https://wrotham.cpoms.net>

Logging in for the first time

To ensure optimum security all members of staff must firstly create their own password. This can be done by selecting the **'Forgotten your password or using CPOMS for the first time?'** option beneath the 'Log in' button. Simply input the email address which was supplied to us and click 'Reset Password'. This will then send you a link to your email address where you can create your first CPOMS password.

Adding an Incident

To add a new incident to the system click on the **'Add Incident'** link at the top of your screen.



This will take you to the incident page where you can proceed to fill in all the required information.

Firstly select the child to whom you want to add the incident, begin typing the name in the student box at the top of the page. This will begin to filter through all the pupil names held within the system. Once you have selected a name, the box will turn grey. If you have selected the wrong name click the red 'X' delete button to choose an alternative.

Fill in the incident text box with all of the details about the incident which you are adding. This is a free text box so you can add as much or as little as needed. Be careful to be accurate and specific.

N.B When inputting any linked student names into the incident text box, please ensure that you spell their name identically to how it is spelt within your MIS. This ensures that if you do need to use the 'Hide Names' feature in the future, their name will be detected and blanked out. If the student is not linked in to the incident, we recommend using their initials as they will not automatically be picked up by the 'Hide Names' feature.

After you have filled in all of the details of the incident you need to select at least one category to assign it to (if there is an overlap you can select more than one).

You can then choose to link in other students if more than one is involved in a particular incident. This will copy the incident to all pupils selected. You can also click to monitor the linked student under the same category, if necessary, and also share any documents attached to the incident.

The 'Body map' feature allows you to apply numbered markers to a body map image to support your incident text.

Following this you can select a time and date. These will both default to the current time and date you are adding the incident, however if you wish to change it to when the incident actually occurred you can do so here.

Next, you can choose which members of staff you wish to alert. Begin typing a name and CPOMS will filter through all CPOMS registered staff members. Alternatively you can select to alert an entire alert group by choosing the relevant alert group button(s) (beneath the individual alert option).

If you would like to attach a document to support the incident e.g. a social services letter, previous school case notes, or meeting minutes etc. you can do so at this point. Simply click to browse and find the relevant document on your pc and add as you would an email attachment, or drag a file from one of your folders to upload.

Next, you can add any agency names to the incident to make others aware of which agencies are involved with this pupil.

Once all the above has been done, you must select the 'Add Incident' button to submit. This will then send out email alerts to all of the selected staff members telling them that they need to log in to CPOMS to look at a newly added incident.

MAIN POLICY

INTRODUCTION:

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes

- DfE guidance Keeping Children Safe in Education (September, 2021)
- Working Together to Safeguard Children (2018)
- Kent and Medway Online Safeguarding Children Procedures (2014)
- Working Together to Safeguard Children

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/942454/Working_together_to_safeguard_children_inter_agency_guidance.pdf

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.

A child centred and coordinated approach to safeguarding

Schools and colleges and their staff are an important part of the wider safeguarding system for children. This system is described in the statutory guidance Working Together to Safeguard Children.

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.

No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- protecting children from maltreatment;
- 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; and

- **_taking action to enable all children to have the best outcomes.**

Children includes everyone under the age of 18.

The role of school staff

- **All staff and adults working with children have a responsibility to safeguard children this includes reporting and sharing information to protect the child.**
- School and college staff are particularly important, as they are in a position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating.
- All staff have a responsibility to provide a safe environment in which children can learn.
- All staff should be prepared to identify children who may benefit from early help.
- Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.
- Staff should expect to support social workers and other agencies following any referral.
- Every school and college should have a designated safeguarding lead who will provide support to staff to carry out their safeguarding duties and who will liaise closely with other services such as children's social care.
- The designated safeguarding lead (and any deputies) are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to safeguarding concerns.
- The Teachers' Standards 2012 state that teachers (which includes headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

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

TRAINING

Governing bodies and proprietors should ensure that all governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

Governing bodies and proprietors should be aware of their obligations under the Human Rights Act 1998 21, the Equality Act 201022, (including the Public Sector Equality Duty23), and their local multi-agency safeguarding arrangements

All staff are required to complete the following training before the start of each year:

ALL STAFF including NEW STAFF, GOVERNORS and SUPPORT STAFF complete the following annual training:

- Safeguarding Children - for Education - Level 1 - 2 hours
- Trauma Awareness – 1 hour 45 Minutes

These courses can be found by following this link:

<https://www.kscmp.org.uk/training/e-learning>

NEW STAFF or staff who have not completed their PREVENT training will need to do so here:

<https://www.elearning.prevent.homeoffice.gov.uk/edu/screen1.html>

Once this is complete a certificate will be printed and kept on file.

This does not include whole staff safeguarding, context specific training provided by the school at the start of each year and throughout the year.

The child's wishes:

Where there is a safeguarding concern, governing bodies, proprietors and school or college leaders should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.

Systems should be in place for children to express their views and give feedback. Ultimately, all systems and processes should operate with the best interests of the child at heart.

LINKED POLICIES:

- E- Safety Policy
- Staff Conduct Policy
- Sex and Relationships Policy
- Equality Policy
- Whistle Blowing Policy
- Safer Recruitment Policy
- DBS Policy
- Anti Bullying Policy
- Behaviour Policy and Values
- Accessibility Policy
- LAC and Previously LAC

THE HUMAN RIGHTS ACT

<https://www.legislation.gov.uk/ukpga/1998/42/contents>

The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them.

Under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention.
The specific convention rights applying to schools and colleges are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination,

And

- Protocol 1, Article 2: protects the right to education.

Schools and colleges have obligations under the Equality Act 2010 (the Equality Act)

<https://www.gov.uk/government/publications/equality-act-2010-advice-for-schools>

According to the Equality Act, schools and colleges must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics)

Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. Further information (including on absolute and qualified rights) can be found at Human Rights | Equality and Human Rights Commission (equalityhumanrights.com).

According to the Equality Act, schools and colleges must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).

Whilst all of the above protections are important, in the context of safeguarding, this guidance, and the legal duties placed on schools and colleges in relation to safeguarding and promoting the welfare of children, governing bodies and proprietors should carefully consider how they are supporting their pupils and students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race.

Provisions within the Equality Act allow schools and colleges to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with a particular protected characteristic in order to meet their specific need, this includes a duty to make reasonable adjustments for disabled children and young people, including those with long term conditions. A school or college, could, for example, consider taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment.

Guidance to help schools understand how the Equality Act affects them and how to fulfil their duties under the act can be found at:

Public Sector Equality Duty

The Public Sector Equality Duty (PSED) is found in the Equality Act. Compliance with the PSED is a legal requirement for state-funded schools and colleges, advice on this – including on specific duties, is set out in the advice linked in paragraph 90.

The PSED places a general duty on schools and colleges to have, in the exercise of their functions, due regard to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not. The duty applies to all protected characteristics (see para 87) and means that whenever significant decisions are being made or policies developed, specific consideration must be given to the equality implications of these such as, for example, the need to eliminate unlawful behaviours that relate to them such as sexual violence and sexual harassment, misogyny/misandry and racism. This is one reason why good record-keeping and monitoring of all forms of abuse and harassment is essential.

These can be found here: <https://www.wrothamschool.com/statutory-documents-policies/>

SAFEGUARDING AT WROTHAM SCHOOL

Safeguarding is everyone's responsibility. Our school is a community and all those directly connected (staff, governors, parents, families and pupils) have an essential role to play in making it safe and secure. We welcome suggestions and comments that will contribute to this process.

Wrotham School recognises the importance of providing an ethos and environment within school that will help children to feel safe, secure and respected; encourage them to talk openly; and enable them to feel confident that they will be listened to.

We recognise that children who are abused or witness violence are likely to have low self-esteem and may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. Our school may be the only stable, secure and predictable element in their lives.

The school strives to have a deep and working understanding of the issues that impact on our student's safety and recognise that these are constantly changing. The team work closely with students and the LA to identify and address priority safeguarding issues and trends and ensure that harm to children is minimised effectively.

The Safeguarding Team (updated September 2022)

- **Trust Governor – Mrs Sheila Smith**
- **Local Governor – Stefan Hargreaves**
- **Designated Safeguarding Lead – Mr M. Cater (Headteacher)**

- Deputy Safeguarding Lead – Alison Sanders
- Safeguarding Officers – Mrs S Groves and Ms K Fielder
- Upper School Safeguarding Team – Mr Zamblera, Laura Elliott,
- Lower Safeguarding Team – Beth Flannery
- Safeguarding PA/ ADMIN – Mrs Lee

KEY LOCAL AUTHORITY CONTACTS

Contact details for Education Safeguarding Team and LADO

Area safeguarding adviser (Education): Claire Ray- Tel. 03000 415788

Online Safety: 03000 415 797

Area Contacts: <https://www.kelsi.org.uk/child-protection-and-safeguarding/safeguarding-contacts>

To contact the **LADO** Team please call **03000 41 08 88** or email kentchildrenslado@kent.gov.uk.

Ofsted's definition of safeguarding

"Safeguarding is not just about protecting children from deliberate harm. It includes issues for schools such as: pupil health and safety; bullying; racist abuse; harassment and discrimination; use of physical intervention; meeting the needs of pupils with medical conditions; providing first aid; drug and substance misuse; educational visits; intimate care; internet safety; issues which may be specific to a local area or population, for example gang activity; school security." **(Briefing for Section 5 Inspectors on Safeguarding Children, Ofsted January 2019)**

The school policy sits alongside the more detailed safeguarding guidance and legislation as published in the following document. This document is followed complicity by the school in relation to all aspects of safeguarding and should be read alongside this policy.

Keeping Children Safe in Education (September 2022)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1080047/KCSIE_2022_revised.pdf

All policies will be reviewed on an annual basis by the Governing Body which has responsibility for oversight of school safeguarding and child protection systems. The Designated Safeguarding Lead / Head Teacher will ensure regular reporting on safeguarding activity and systems in school 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 unless appropriate to do so for the safety of a child.

ETHOS

Our school is a community and all those directly connected (staff, governors, parents, families and pupils) have an essential role to play in making it safe and secure. We welcome suggestions and comments that will contribute to this process.

Wrotham School recognises the importance of providing an ethos and environment within school that will help children to feel safe, secure and respected; encourage them to talk openly; and enable them to feel confident that they will be listened to.

We recognise that children who are abused or witness violence are likely to have low self-esteem and may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. Our school may be the only stable, secure and predictable element in their lives.

Wrotham School will endeavour to support the welfare and safety of all pupils through:

- Maintaining children's welfare as our paramount concern.
- Protecting children from maltreatment.
- Preventing impairment of children's health or development.
- Taking action to ensure all children have the best outcomes.
- Ensuring a child centred approach to safeguarding.
- ensuring the content of the curriculum includes social and emotional aspects of learning
- ensuring that child protection is included in the curriculum to help children stay safe, recognise when they don't feel safe and identify who they might / can talk to
- providing suitable support and guidance so that students have a range of appropriate adults to approach if they are in difficulties
- promoting a positive, supportive, neutral and secure environment where pupils can develop a sense of being valued and heard in their own right
- ensuring all steps are taken to maintain site security and student's physical safety
- working with parents to build an understanding of the school's responsibility to ensure the welfare of all children including the need for referral to other agencies in some situations
- ensuring all staff are able to recognise the signs and symptoms of abuse and are aware of the school's

procedures and lines of communication.

- All staff receive up to date safeguarding training on a regular basis and know how to recognise and report any concern regarding a child.
- monitoring children and young people who have been identified as having welfare or protection concerns; keeping confidential records which are stored securely and shared appropriately with other professionals
- developing effective and supportive liaison with other agencies including the local authority and the police.

RESPONSIBILITIES OF ALL STAFF

All school and college staff have a responsibility to provide a safe environment in which children can learn.

Everyone who comes into contact with children and their families has a role to play in safeguarding children. Schools and colleges form part of the wider safeguarding system for children.

All school and college staff have a responsibility to identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm. All staff then have a responsibility to take appropriate action, working with other services as needed.

- **All staff have a legal duty to have read and understood this policy.**
- **All staff have a duty to protect the welfare and safety of children by reporting any concerns they have about a child or any concern that is reported to them.**
- **All staff have a duty to ensure this policy is followed when reporting incidents of safeguarding concern.**
- **All staff have a duty to follow our safeguarding and whistle blowing policy and report any adult employed by the school, where there are concerns regarding their behaviour in relation to children, to the DSL or if the concerns are about the DSL or the SG team to the local authority/ LADO.**

All staff should be particularly alert to the following children 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 care or from home
- is at risk of modern slavery, trafficking, sexual or criminal exploitation
- is at risk of being radicalised or exploited
- has a family member in prison, 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
- has returned home to their family from care
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child, and
- is persistently absent from education, including persistent absences for part of the school day.

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

THE DESIGNATED SAFEGUARDING LEAD

(Michael Cater – Headteacher)

The DSL has overall responsibility for the day-to-day oversight of safeguarding and child protection systems in school. This includes

- Acting as a consultant for staff to discuss concerns
- Maintaining a confidential recording system
- Co-ordinating safeguarding action for individual children
- Liaising with other agencies and professionals
- Ensuring that locally established procedures are followed and making referrals as necessary
- Representing or ensuring the school is appropriately represented at inter-agency safeguarding meetings (including Child Protection conferences)
- Managing and monitoring the school's part in Kent Family Support Framework (KFSF) / EHA (Early Help Assessment) / Child in Need / Child Protection plans
- Organising training for all school staff

The Deputy DSL (Alison Sanders) Will deputise in the absence of the DSL and will support with day to day safeguarding work. In the absence of both DSSL and DDSL the fully trained safeguarding team will ensure SG is managed effectively keeping the EHT (Matthew Wright) and the link governors at local and trust level up to date on any significant issues/ concerns.

It is the responsibility of the DSL and the SG team to receive and collate information regarding individual children, to make immediate and on-going assessments of potential risk and to decide actions necessary (with parents / carers in most cases). This includes the need to make referrals to partner agencies and services. To help with this decision s/he may choose to consult with the Area Education Safeguarding Adviser. Advice may also be sought from Specialist Children's Services Duty Social Workers who offer opportunities for consultation as part of the Child in Need / Child Protection process.

Such referrals might include referral to Specialist Children's Services as either Child Protection or Child in Need, to Police where there are potential criminal issues, referral to the Kent Family Support Framework (KFSF) / EHA (Early Help Assessment) process or referral to services such as Child and Adolescent Mental Health Service

(CAMHS), counselling, MARAC, etc.

Referrals to Specialist Children's Services will be made using Kent's inter-agency referral form and with reference to the Kent and Medway Interagency Threshold Criteria for Children in Need. In situations where there are felt to be urgent or grave concerns, a telephone referral will be made prior to the form being completed and sent to the County Duty Team. All referrals are now made via the County Duty Team unless it's already an open case.

In all but the most exceptional circumstances, parents /carers will be made aware of the concerns felt for a child or young person at the earliest possible stage. In the event of a referral to Specialist Children's Services being necessary, parents/carers will be informed and consent to this will be sought unless there is a valid reason not to do so.

In the absence of the availability of the DSL to discuss an immediate and urgent concern, staff can seek advice from Alison Sanders or the safeguarding team. If the advice needed relates to an allegation towards a member of staff then the Head Teacher will make contact with the LADO to seek advice and to report concerns. If the allegation is toward the Headteacher the EHT, Link governor or the LADO should be informed.

The Trust and Local Governing Body and school Leadership Team will ensure that the DSL is properly supported in this role at a time and resource level.

The welfare and safety of children however are the responsibility of all staff in school and ANY concern for a pupil's welfare MUST be reported to the Designated Safeguarding Lead, Michael Cater.

In order to protect privacy, safeguarding information about individual children is openly and willingly shared on a need to know basis only to ensure the privacy of a child and their family is respected. This does not mean that safeguarding information is confidential and should always be shared with other professionals both internally and externally where it is in the best interests and safety of the child. Information will be reviewed by the DSL before sharing to ensure it is appropriate to right to do so. All issues, no matter how small should be reported to the DSL and the SG team using our reporting process below. On occasion, staff may pass information about a child to the DSL, but remain anxious about action subsequently taken. Staff should feel able to clarify with the DSL further progress, so that they can reassure themselves the child is safe and their welfare is being considered. If following this process, the staff member remains concerned that appropriate action is not being taken, it is the responsibility of that staff member to seek further direct consultation from either a member of the Education Safeguarding Team or the Local Specialist Children's Services Team (numbers as above) who will be able to discuss the concern and advise on appropriate action to be taken.

SAFEGUARDING AND CHILD PROTECTION PROCEDURES

If you have concerns about a child you should ensure the following:

The incident is passed to the DSL and/ or the safeguarding team without delay. This should be recorded on CPOMS or if not accessible, in person, by phone or by email directly to the DSL.

You should ensure that your concerns are described clearly, with detail on who, where, when and why giving as much info as possible. Even small, seemingly irrelevant pieces of information may be useful as part of a wider picture of the issue.

When speaking to a child or when approached by a child you should:

- Listen carefully.
- Make notes if possible or as soon after any disclosure as possible.
- Remind them that you are not able to “keep secrets” and will have to pass this on to the DSL who will be able to support them.
- Take any immediate action, in your best judgement to keep the child safe.

You must not under any circumstances:

- Promise to keep information secret or not pass info on.
- Ask leading questions.
- Give your own opinions or judgments.
- Dismiss their concerns or give anything more than general advice to stay safe.
- Delay the reporting of the concern.
- Share their concerns with home/ other until the DSL and SG team has been consulted.

Wrotham School adheres to the KSCB Safeguarding Children Procedures (2014). The full KSCB procedures document and additional guidance relating to specific safeguarding issues can be found on the KSCB website

https://www.kscmp.org.uk/_data/assets/pdf_file/0012/111513/FINAL-Kent-Safeguarding-Children-Multi-agency-Partnership-Arrangement-Doc_-25-June-2019.pdf

All staff have been provided with an electronic copy of the DfE guidance “*Keeping Children Safe in Education*” that covers Safeguarding information.

Staff taking a disclosure should never promise confidentiality as it is very likely that it will be in the best interests of the victim to seek advice and guidance from others in order to provide support and engage appropriate agencies.

The school or college should only engage staff and agencies who are required to support the children involved and/or be involved in any investigation.

LINK GOVERNORS

The school has a nominated governor and trust member for safeguarding named on the front of this document. The nominated governor will take the lead role in ensuring that the school has an effective policy which interlinks with related policies; that locally agreed procedures are in place and being followed; and that the policy and structures supporting safeguarding children are reviewed annually.

SCHOOL SAFEGUARDING PRIORITIES

Each year the school reviews the priorities of the local area and school context to ensure that increased awareness and understanding is promoted of the key issues that are likely to impact on our children. This is not

an exclusive list and does not mean that other issues will not impact on our students. This focus allows the school to proactively address and prevent risk from harm. These are assessed by the SG team based on training, local information, case numbers and details of current, relevant open cases.

KEY RISK FOR STUDENTS AT WROTHAM SCHOOL

- Witnessing of Domestic abuse/ Victims of domestic abuse – physical and emotional.
- At risk of neglectful or dangerous parental influence.
- Parents involved in crime, in prison due to criminal prosecution.
- Misinformation online – including extreme and dangerous political views/ radicalisation, including influence of parents.
- Mental Health – following pandemic, including eating disorders and self- harm.
- Sexualisation/ sharing of nude images – online grooming.
- Sexual harassment and abuse- particularly female students
- Drug use/ County lines involvement, grooming.

Our website has a specific and easy to access page that provides safeguarding information and support for students, parents and staff.

It can be found here:

<https://www.wrothamschool.com/information/wellbeing-safeguarding-and-e-safety/>

OUR LOCAL CONTEXT:

- Increase in “county lines” gang activity.
 - Parental neglect/ poor parental choices or advice.
 - Conflict in the family home/ domestic violence/ criminal activity.
 - Large increase in supply of drugs in area.
 - Many students “out late” at night with other groups of students.
 - Open rural area – travel on bikes/ scooters, e scooters.
 - Some parents unaware or lack care with dangerous behaviour in evenings/ on weekends in local area.
- For example – large gangs, riding bikes, drug use, alcohol use.

COUNTY LINES TOOLKIT

<https://www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit>

As part of their professional knowledge of safeguarding staff should have a working knowledge of drugs and how to spot the signs of their use. Please see this guide for more information:

<https://www.talktofrank.com>

CATEGORIES OF ABUSE

All staff in school should be aware of the definitions and signs and symptoms of abuse. There are four categories

of abuse:

- Abuse and Neglect
- Physical abuse
- Emotional abuse
- Peer- on- Peer Abuse
- Child Sexual Exploitation (CSE) / Female Genital Mutilation (FGM)/ Sexual abuse, harassment, sexual violence and
- Harmful sexual behaviours/ exposure to extreme pornography
- CCE (CHILD CRIMINAL EXPLOITATION) Serious Violence/ Gangs/ County Lines
- Self-Abuse – Self Harm/ Suicidal intentions
- Domestic Violence

ABUSE AND NEGLECT

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

- All staff should be aware of indicators of abuse and neglect (see below), understanding that children can be at risk of harm inside and outside of the school/college, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.
- All school and college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another.
- All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.
- All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

In all cases, if staff are unsure, they should always speak to the designated safeguarding lead or deputy.

Neglect is 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. It may occur in pregnancy as a result of maternal substance abuse. Once a child is born it may involve a parent or carer failing to provide adequate food, shelter and clothing (including exclusion from home or abandonment), failing to protect a child from physical or

emotional harm or danger, failure to ensure adequate supervision including the use of inadequate care-givers or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to a child's basic emotional needs.

PHYSICAL ABUSE

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

This also includes physical bullying and assault by an adult or another child that is significant or sustained over a period of time.

Signs of physical abuse, as well as directly witnessing an incident can include, bruising, burns, broken bones, scratches, marks, unexplained illness and may be underpinned by low mood, tiredness or abnormal behaviour.

Students may also witness the physical abuse of their parent or siblings and these are also serious safeguarding concerns

FEMALE GENITAL MUTILATION:

Female Genital Mutilation (FGM) comprises all procedures involving the partial or total removal of the external female genitalia or any other injury to the female genital organs for nonmedical reasons. FGM is sometimes known as 'female genital cutting' or female circumcision. Communities tend to use local names for referring to this practice, including 'sunna'.

At Wrotham School we believe that all our pupils should be kept safe from harm. Female Genital Mutilation affects girls particularly from north African countries, including Egypt, Sudan, Somalia and Sierra Leone. Although our school has no children from these backgrounds and consider girls in our school safe from FGM, we will continue to review our policy annually.

It is the school's legal obligation to report all suspected or confirmed cases of FGM to the police.

EMOTIONAL ABUSE

Emotional Abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children 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 and may include interactions beyond the child's developmental ability, overprotection, limitation of exploration or learning, prevention of normal social interaction. Seeing or hearing ill-treatment of another, serious bullying (including Cyberbullying) causing children to frequently feel frightened or in danger, or exploitation and corruption of children. Some level of emotional abuse is involved in all types of ill-treatment of a child, although it may occur alone.

PEER ON PEER ABUSE (OR CHILD ON CHILD ABUSE)

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school or college and online. All staff should be clear as to the school's or college's policy and procedures with regard to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

- Bullying ((including cyberbullying, prejudice-based and discriminatory bullying)
- Physical assault
- Sexual violence
- Sexual harassment
- Forced or coerced sexual activity without consent including remotely.
- Up-skirting
- Sexting/ Sharing of "nudes" even if consensual.
- Initiation/ hazing rituals.
- Coercion – For example to behave illegally, take drugs, launder money.

Wrotham School does not tolerate peer on peer abuse and treats this as both a safeguarding issue and a behavioural issue. If you are concerned about a child who is experiencing or responsible for peer-on-peer abuse, please report this by following our behaviour and safeguarding reporting policies.

Children can abuse other children. This is generally referred to as peer-on-peer abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.

To tackle Peer on Peer abuse:

- The school regularly consults with students on their experiences or POP in a safe environment. Reports are shared with governors and staff.
- The school educates students through bespoke activities in progress time and in discreet lessons often in response to student feedback.
- This subject is monitored and discussed at governors meetings.
- The school has clear and well understood structures/ processes for reporting POP abuse through pastoral and SG teams.
- The school has a support team for the victims of POP abuse.
- Victims of POP abuse are always listened to, never dismissed or judged for making disclosures.
- Victims are kept safe by the SG and Pastoral team whilst investigations are undertaken.
- Our partner school is utilised to keep students separate whilst investigations are undertaken as appropriate.

SEXUAL ABUSE

For the purpose of this policy, when referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment.

Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Sexual 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 penetrative (i.e. rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may include non-contact activities, such as involving children in looking at, or the production of, sexual images, or watching sexual activities, or 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.

CSE AND FGM

FGM

FGM is a procedure where the female genital organs are injured or changed and there is no medical reason for this. It is frequently a very traumatic and violent act for the victim and can cause harm in many ways. The practice can cause severe pain and there may be [immediate](#) and/or [long-term health consequences](#), including mental health problems, difficulties in childbirth, causing danger to the child and mother; and/or death.

The age at which FGM is carried out varies enormously according to the community. The procedure may be carried out shortly after birth, during childhood or adolescence, just before marriage or during a woman's first pregnancy.

FGM is a deeply rooted practice, widely carried out mainly among specific ethnic populations in Africa and parts of the Middle East and Asia. It serves as a complex form of social control of women's sexual and reproductive rights. The exact number of girls and women alive today who have undergone FGM is unknown, however,

UNICEF estimates that over 200 million girls and women worldwide have undergone

While FGM is concentrated in countries around the Atlantic coast to the Horn of Africa, and areas of the Middle East like Iraq and Yemen, it has also been documented in communities in:

Colombia; Iran; Israel (within the Bedouin community and within the immigrant Ethiopian Jewish community in its country of origin); Oman; The United Arab Emirates; The Occupied Palestinian Territories; India; Indonesia; Malaysia; Pakistan; and Saudi Arabia. It has also been identified in parts of Europe, North America and Australia.

FGM is illegal in England and Wales under the Female Genital Mutilation Act 2003.

As amended by the Serious Crime Act 2015, the Female Genital Mutilation Act 2003 now includes:

- An offence of [failing to protect a girl](#) from the risk of FGM;
- [Extra-territorial jurisdiction](#) over offences of FGM committed abroad by UK

nationals and those habitually (as well as permanently) resident in the UK

- Lifelong anonymity for victims of FGM;
- FGM Protection Orders which can be used to protect girls at risk; and
- A mandatory reporting duty which requires specified professionals to report known cases of FGM in under 18s to the police.

There are a number of factors in addition to a girl's or woman's community, country of origin and family history that could indicate she is at risk of being subjected to FGM. Potential risk factors may include:

- a female child is born to a woman who has undergone FGM;
- a female child has an older sibling or cousin who has undergone FGM;
- a female child's father comes from a community known to practise FGM;
- the family indicate that there are strong levels of influence held by elders and/or elders are involved in bringing up female children;
- a woman/family believe FGM is integral to cultural or religious identity;
- a girl/family has limited level of integration within UK community;
- parents have limited access to information about FGM and do not know about the harmful effects of FGM or UK law;
- a girl confides to a professional that she is to have a 'special procedure' or to attend a special occasion to 'become a woman'; a girl talks about a long holiday to her country of origin or another country where the practice is prevalent (see Section 2.3 for the nationalities that traditionally practise FGM);
- parents state that they or a relative will take the girl out of the country for a prolonged period;
- a parent or family member expresses concern that FGM may be carried out on the girl;
- a family is not engaging with professionals (health, education or other);
- a family is already known to social care in relation to other safeguarding issues;
- a girl requests help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM;
- a girl talks about FGM in conversation, for example, a girl may tell other children about it (see Annex G for commonly used terms in different languages) – it is important to take into account the context of the discussion;
- a girl from a practising community is withdrawn from Personal, Social, Health and Economic (PSHE) education or its equivalent;
- a girl is unexpectedly absent from school;
- sections are missing from a girl's Red book; and/or
- a girl has attended a travel clinic or equivalent for vaccinations / anti-malarials.

Wrotham School Follows the statutory guidance, good practice and advice from the home office regarding FGM.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/912996/6-1914-HO-Multi_Agency_Statutory_Guidance_on_FGM_-_MASTER_V7_-_FINAL_July_2020.pdf

Staff at Wrotham school are trained regularly on ways to recognise and prevent CSE and FGM. Our website contains support information for staff, students and parents.

This information can be found here:

<https://www.wrothamschool.com/information/wellbeing-safeguarding-and-e-safety/>

CSE

The sexual exploitation of children defines a broader context of abuse than formal 'prostitution'; the full spectrum of sexually exploitative situations includes children and young people exchanging sex for accommodation, food, gifts, drugs and/or safety.

Child Sexual Exploitation is a form of Child Sexual Abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victims needs or wants, and/or (b) for financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. 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. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

Child Sexual Exploitation does not always involve physical contact, it can occur through the use of technology. (Child Sexual Exploitation – Definition and a guide for practitioners, local leaders and decision makers working to protect children from Child Sexual Exploitation - DfE February 2017)

Sexually exploited children are rarely visible on the streets, and it is therefore difficult to gather meaningful data. Moreover, street based sexual exploitation of children is only a small part of the bigger picture of sexual exploitation of children by adults and other children and young people.

A growing number of the young people are being sexually exploited by adults and other young people they meet via the Internet. This is referred to as 'online or non-contact abuse', and the access it affords to groom children for abuse has contributed to the invisibility of the sexual exploitation of children.

The age range of children who are victimised through sexual exploitation has lowered in recent years from the 16-18 age group, to children under 16 years of age. The evidence suggests that children across all cultures, and including a significant proportion of children in the care of Local Authorities, can be at risk of sexual exploitation. Vulnerability and low self-esteem are the most common factors among children who are at risk of being sexually exploited.

In some cases, children may be drawn into sexual exploitation by peers who are already involved. Girls in particular are frequently coerced into sexual exploitation by an older young person or man who poses as, and who they view as, their boyfriend. The girl becomes physically and emotionally dependent upon the 'boyfriend', and this may be reinforced by the use of alcohol and drugs. Over time, the girl's access to her friends and family becomes curtailed and she becomes alienated from agencies which may be able to identify and interrupt the abuse.

There is some evidence of the involvement of gangs in sexual exploitation in Kent and Medway. Sexual exploitation is used in gangs to exert power and control over members. It can be part of the initiation of young people, male and female, into the gang.

Young people may exchange sexual activity for status or protection. Gangs may entrap rival gang members by exploiting girls and young women or inflict sexual assault as a weapon in conflict.

With increasing use of online media and technology (such as mobile phones, games consoles, social networking sites, instant messaging and webcams etc.) children, young people, and adults need to be aware that it is a crime to take, make, permit to take, distribute, show, possess, possess with intent to distribute, or to advertise indecent photographs or pseudo-photographs of any person below the age of 18, as per Section 1 of the Protection of Children Act 1978, as amended by Section 45 of the Sexual Offences Act 2003, to extend the definition of children from under 16s to under 18s.

For young people from 16 to 18 years old, consideration may be given, in very limited circumstances and where all other options have failed, to the use of criminal justice action.

Many sexually exploited children have difficulty distinguishing between their own choices around sex and sexuality, and the sexual activities they are coerced into. This potential confusion needs to be handled with care and sensitivity.

The primary law enforcement effort must be against the coercers and sex abusers who may be adult, but could also be the child's peers, or young people who are older than the child. Careful consideration needs to be given to criminalising offending behaviour by children who are also victims.

Children and young people who are sexually exploited are children in need of services under the Children Act 1989. They are also children in need of protection. A multi-agency network or planning meeting / discussion should take place for all children considered at risk of sexual exploitation. The younger the child, the more likely it is that the child protection procedures set out in Kent and Medway Safeguarding Children Procedures should be followed. Child protection procedures must always be followed where:

- The child is at immediate risk of significant harm and has other additional vulnerabilities.
- There is a concern that the sexual exploitation is being facilitated by the child's parent/carer.
- There is concern that a related or unrelated adult in a position of trust or responsibility to the child is organising or encouraging the sexual exploitation.

Vulnerability Factors to Sexual Exploitation

Children are more vulnerable to abuse through sexual exploitation if they have experience of one or more of the following:

- Child Sexual Abuse.
- Domestic Abuse within the family.
- Family breakdown.
- Physical abuse and emotional deprivation.
- Bullying in or out of school.
- Family involvement in sexual exploitation.
- Parents with a high level of vulnerabilities (drug, alcohol, mental health issues etc.)
- Drug, alcohol, mental health or other difficulties themselves.
- Being looked after in residential care.
- Going missing frequently.

Staff should be aware of these risk factors and report any concerns they have using the schools reporting process.

Once received the school SG team will undertake an investigation and work with external agencies to ensure the child's safety and welfare.

Interventions to interrupt abuse through sexual exploitation and support children to recover a healthy lifestyle are more likely to be successful if a child who is at risk can be identified and information about concerns shared within a multi-agency support network as early as possible.

Professionals are often in a position of having to develop the child's trust or having established this are concerned about breaking that trust through the sharing of confidential information with other agencies. These issues should be discussed with the ~~any~~ nominated safeguarding children adviser, and efforts made to share information as soon as possible. (See the KSCB and MSCB Information Sharing Agreement).

SEXUAL VIOLENCE AND SEXUAL HARASSMENT BETWEEN CHILDREN IN SCHOOLS AND COLLEGES

The school has a duty to prevent and take action against all forms of sexual harassment, violence and harm.

Sexual violence and sexual harassment can occur between two children of **any** age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that **all** victims are taken seriously and offered appropriate support.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;
- physical behaviour, such as: deliberating brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment, which might include non-consensual sharing of sexual images and videos and sharing sexual images and videos (both often referred to as sexting); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.
- It is important that schools and colleges consider sexual harassment in broad terms. Sexual harassment (as set out above) creates an atmosphere that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

Staff need to remember that child abuse and sexual abuse can occur within all social groups regardless of religion, culture, social class or financial position. **Children who have a disability** are statistically subject to greater risk of abuse and are particularly vulnerable. It is also important to remember that those who abuse children can be of any age, gender, ethnic group or background and it is important not to allow personal preconceptions to prevent recognition or action taking place.

Evidence shows girls, children with SEND and LGBT children are at greater risk.

Children with Special Educational Needs and Disabilities (SEND) can be especially vulnerable. Disabled and deaf children are three times more likely to be abused than their peers. Additional barriers can sometimes exist when recognising and communicating abuse in SEND children.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- the potential for children with SEND being disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs; and communication barriers and difficulties overcoming these barriers.

Children who are Lesbian, Gay, Bi, or Trans (LGBT) can be targeted by their peers. In some cases, a child who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT

Staff should be aware of the importance of:

- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- Not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and
- Challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

This section of the policy has been written in reference to the DFE guidance Dec 2017 on managing sexual harassment between children in schools and colleges.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/667862/Sexual_Harassment_and_Sexual_Violence_-_Advice.pdf

SEXUAL VIOLENCE

It is important that schools and colleges are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence in this advice, we do so in the context of child on child sexual violence.

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

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

not consent to the penetration and A does not reasonably believe that B consents.

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

CONSENT

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

Legal statutory definitions:

- a child under the age of 13 can never consent to any sexual activity
- the age of consent is 16
- sexual intercourse without consent is rape;
- rape, assault by penetration and sexual assault are defined in law
- creating and sharing sexual photos and videos of under-18s is illegal (often referred to as sexting). This includes children making and sharing sexual images and videos of themselves.

The school ensures the following in order to prevent and manage sexual harassment between children in schools:

- The school operates and enforces a clear “no touch policy” between students.
- Students are educated through our pastoral programme and SMSC provision on healthy relationships and how to report sexual harassment as defined above. This is recorded on our SMSC tracker to ensure effective coverage and consistency. This coverage is monitored to include:
 - healthy and respectful relationships.
 - Teaching what respectful behaviour looks like;
 - Learning about gender roles, stereotyping, equality.
 - body confidence and self-esteem.
 - prejudiced behaviour.
 - that sexual violence and sexual harassment is always wrong; and
 - addressing cultures of sexual harassment.
- Students are encouraged to report sexual harassment or harmful sexual behaviour via our SG structure and pastoral network.
- Staff are trained and updated regularly on this as a SG behaviour and report concerns through our “green form” reporting system.
- The SG team follows the guidance in the Sexual violence and sexual harassment between children in schools and colleges guidance (DFE, Dec 2017) to effectively deal with and manage sexual harassment between children in school and in SG situations outside of school that pose a risk to the child.
- Outside agencies including a visit from the sexual health nurse, qualified outside speakers and early help are used to support the school in effectively dealing with sexual harassment and harmful sexual behaviours.

- The school website contains a student wellbeing section that offers external links to advice on related issues.
- The school has an up-to-date equality policy that supports the equal treatment of all students in relation to dealing with sexual harassment and harmful sexual behaviours.
- The school will ensure that it meets its requirements for sexual education.
- The school complies with PSED guidance relating to equality in schools and the workplace. This is defined in our equality policy.
- Safeguarding training is updated regularly and includes training on sexual harassment and harmful sexual behaviours.
- Where sexual harassment is reported the school will create a risk assessment that is shared appropriately to manage the risk of anyone being involved in a level of sexual harassment which is likely to be repeated.
- Victims of Sexual harassment or related crimes will be supported carefully by the school to minimise any existing or further harm. This will be conducted by the SG team and reviewed weekly.
- Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator will be removed from any classes they share with the victim. The school or college should also consider how best to keep the victim and alleged perpetrator a reasonable distance apart on school or college premises and on transport to and from school or college where appropriate. This is in the best interests of both children and should not be perceived to be a judgement on the guilt of the alleged perpetrator. Rape, assault by penetration and sexual assaults are crimes. The starting point is that reports will be passed to the police.

VICTIMS AND ALLEGED PERPETRATORS

The school follows the following guidance on Sexual Violence and harassment between students and takes all advice to protect both alleged perpetrator and victim.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719902/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf

There are many different ways to describe children who have been subjected to sexual violence and/or sexual harassment and many ways to describe those who are alleged to have carried out any form of abuse.

For the purposes of this advice, we use the term 'victim'. It is a widely recognised and understood term. It is important that schools and colleges recognise that not everyone who has been subjected to sexual violence and/or sexual harassment considers themselves a victim or would want to be described in this way.

Ultimately, schools and colleges should be conscious of this when managing any incident and be prepared to use any term with which the individual child is most comfortable. For the purpose of this advice, we use the term 'alleged perpetrator'.

It is important to remember that, as a child, any alleged perpetrator is entitled to, deserving of, and should be provided with, a different level of support to that which might be provided to an adult who is alleged to have abused a child.

This policy does not exist in isolation and the school endorses and utilises the advice and guidance found in the following documents:

- Exclusions From Maintained Schools, Academies and PRUs (statutory guidance)
- Keeping Children Safe in Education (statutory guidance)
- Sex and Relationship Education (statutory guidance)
- Working Together to Safeguard Children (statutory guidance)
- Behaviour and Discipline in Schools (advice for schools)
- Children Missing Education (advice for schools)
- Cyberbullying (advice for schools) • Equality Act 2010 and Public Sector Equality Duty (advice for schools)
- Equality Act 2010 Technical Guidance (advice for further and higher education)
- Mental Health and Behaviour in Schools (advice for schools)
- Preventing and Tackling Bullying (advice for schools) • The Equality and Human Rights Commission (provides advice on avoiding discrimination in a variety of educational contexts)

ANONYMITY

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, schools and colleges should be aware of anonymity, witness support and the criminal process in general so they can offer support and act appropriately.

As a general SG practice anonymity of both victim and alleged perpetrator must be maintained outside of the discussions of the SG team and outside agencies.

HARMFUL SEXUAL BEHAVIOURS:

Children's sexual behaviours exist on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent.

Problematic, abusive and violent sexual behaviours are developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviours".

Harmful sexual behaviours can occur online and offline and can occur simultaneously between the two.

Harmful sexual behaviours are to be considered in a child protection context.

When considering harmful sexual behaviours, ages and the stages of development of the children are critical factors to consider. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference in age or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

The Brook sexual behaviours traffic light tool is used by the SG team to assess harmful sexual behaviours.

SG staff are trained in recognising harmful sexual behaviours and how to deal with these effectively for the children involved

The victim may ask the school or college not to tell anyone about the sexual violence or sexual harassment. There are no easy or definitive answers when a victim makes this request. If the victim does not give consent to

share information, staff may still lawfully share it, if it can be justified to be in the public interest, for example, to protect children from harm and to promote the welfare of children.

The designated safeguarding lead (or a deputy) should consider the following:

Parents or carers should normally be informed (unless this would put the victim at greater risk).

The school follows the basic safeguarding principle which is: if a child is at risk of harm, is in immediate danger or has been harmed a referral should be made to children's social care.

If the designated safeguarding lead (or a deputy) do decide to go ahead and make a referral to children's social care and/or a report to the police against the victim's wishes, this should be handled extremely carefully, the reasons should be explained to the victim and appropriate specialist support offered.

EXPOSURE TO EXTREME PORNOGRAPHY

In the modern world young people are potentially exposed to harmful pornography. This is harmful because:

- It is graphic and can depict abusive physical relationships.
- It is easy to access in unregulated online spaces.
- It can distort a young person's understanding of appropriate and safe sexual relationships
- It can depict misogyny and violence.
- It can objectify human relationships.
- It can cause unhealthy dependency.

Students are taught in their pastoral time and life and society sessions about staying safe online and about safe and appropriate sexual relationships.

Parents are kept up to date on potential risks of online behaviour via parent safety presentations, shared resources and in frequent newsletters.

CCE (CHILD CRIMINAL EXPLOITATION) - GANGS/ COUNTY LINES/ KNIFE CRIME/ SERIOUS VIOLENCE

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Some students may become involved in serious or gang related crime. Possible indicators of this involvement are listed below and, if seen, should be reported to the DSL and the school behavioural leadership team:

- Increased and unexplained absence from school.
- Change in friendships and social behaviour, possibly older children or young adults/adults.
- Sudden decline in performance at school.
- Self-harm and unexplained injuries.
- Unexplained gifts/ money or possessions.
- Carrying of weapons
- Multiple phones.
- Anxiety.
- Often out at night in local area
- Change in use of language – Slang.
- Secretive behaviour and unusual casual relationships with other students.

School staff will be updated on the local context. This contextual approach to safeguarding ensures good local knowledge that can be used to keep children safe.

SELF ABUSE/ HARM/ SUICIDAL INTENTIONS

Self-harm is when a student hurts themselves through physical acts often as a way of expressing emotional upset.

Self-harm can include (amongst other forms of harm):

- Scratching, Cutting, Burning.
- Punching walls, banging head against hard surface.
- Taking part in risky behaviour likely to cause harm.
- Drug overdoses.

The school can support parents and students with self-harm and if you notice any signs of self-harm, no matter how small, these must be reported.

Where a student is at risk of self-harming in school the following will take place:

- Meeting with SG team/ Support from school counsellor.
- Parents informed to and support given.
- Full individual risk assessment completed and shared as needed.
- MAC Team. SG risk assessment completed and plan in place.
- Student added to priority on-call list.
- Outside agencies used as appropriate.
- Students safety monitored and enhanced checks.

- Staff emailed to remove dangerous items from classrooms as required.
- Staff contact given to child to seek help immediately if needed.

DOMESTIC VIOLENCE

Students may witness domestic violence in their homes. This may be inflicted on the students, their parent or their siblings.

Domestic Abuse can be physical and emotional or both.

This can cause significant distress and upset to the child on the short and long term. There may also be risk of serious long term effects and risk to safety of the child. As such this should be taken very seriously, and any reports made to the SG team via the normal process.

The SG team will assess the case, consult with the child protection team and where appropriate the police.

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

CHILDREN WITH FAMILY MEMBERS IN PRISON

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

MODERN SLAVERY AND THE NATIONAL REFERRAL MECHANISM

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.

FORCED MARRIAGE

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit has published [statutory guidance](#) and [Multi-agency guidelines](#), pages 32-36 of which focus on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

ALLEGATIONS AGAINST MEMBERS OF STAFF AND VOLUNTEERS

Any allegations of this nature should be referred to the headteacher or principal; where there are concerns/allegations about the headteacher or principal, this should be referred to the chair of governors, chair of the management committee or proprietor of an independent school; and in the event of concerns/allegations about the headteacher, where the headteacher is also the sole proprietor of an independent school, or a situation where there is a conflict of interest in reporting the matter to the headteacher, this should be reported directly to the local authority designated officer(s) (LADOs).

Wrotham School recognises that it is possible for staff and volunteers to behave in a way that might cause harm to children and takes seriously any allegation received. Such allegations should be referred immediately to the Head Teacher who will first contact the Local Authority Designated Officer (LADO) to agree further action to be taken in respect of the child and staff member.

You can also report a concern to Public Concern at Work (pcaw.org.uk) if you feel you cannot speak to the Headteacher.

Tel: 020 7404 6609

All staff need to be aware of the school's Whistle-blowing procedure and that it is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk. When in doubt – consult.

For specific guidance on how to respond to allegations against staff, please refer to the Safeguarding flowchart in your handbook and consult the **“Procedures for Managing Allegations Against Staff”** document.

<https://www.wrothamschool.com/statutory-documents-policies/>

SAFER RECRUITMENT, INDUCTION AND TRAINING

Wrotham School is committed to ensure that all steps are taken to recruit staff and volunteers identified as undertaking regulated activity who are safe to work with our pupils/students and have their welfare and protection as the highest priority. The Governing Body and School Leadership Team are responsible for ensuring that the school follows safe recruitment processes outlined within Guidance, including accurate maintenance of the Single Central Record; and an application, vetting and recruitment process which places safeguarding at its centre, regardless of employee or voluntary role.

We follow the following processes to ensure safer recruitment of all staff at the school as detailed in KCSIE – September 2022 Part Three – All paragraphs.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1080047/KCSIE_2022_revised.pdf

When asked to provide references, schools and colleges should ensure the information confirms whether they are satisfied with the applicant's suitability to work with children, and provide the facts (not opinions) of any substantiated safeguarding concerns/allegations that meet the harm threshold. They should not include information about

concerns/allegations which are unsubstantiated, unfounded, false, or malicious. Further guidance on references, including on the position regarding low-level concerns, is set out in Part four. References are an important part of the recruitment process and should be provided in a timely manner and not hold up proceedings. Any repeated concerns or allegations which have all been found to be false, unfounded, unsubstantiated or malicious should not be included in any reference

SINGLE CENTRAL RECORD

Wrotham School maintains a single central record of pre-appointment checks, referred to in the Regulations as the register and more commonly known as the single central record. This is checked routinely by our link governors.

The single central record **must** cover the following people:

- **All** staff, including teacher trainees on salaried routes, agency and third-party supply staff, even if they work for one day. This includes construction and service workers and other visiting workers.
- Any visiting worker must be supervised by a checked and vetted employee of the school at all times whilst working in the school unless this has been carried out.
- For agency and third-party supply staff, the school includes whether written confirmation has been received that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, the date this confirmation was received and whether details of any enhanced DBS certificate have been provided in respect of the member of staff.

The single central record indicates whether the following checks have been carried out or certificates obtained, and the date on which each check was completed, or certificate obtained:

- an identity check, (identification checking guidelines can be found on the [GOV.UK](https://www.gov.uk) website);
- a barred list check;⁸²
- an enhanced DBS check requested/certificate provided.
- a prohibition from teaching check;⁸³
- further checks on people who have lived or worked outside the UK (see paragraphs 262-267);
- a check of professional qualifications, where required; and
- a check to establish the person's right to work in the United Kingdom.

The details of an individual should be removed from the single central record once they no longer work at the school or college.

Governors in maintained schools are required to have an enhanced DBS check. It is the responsibility of the governing body to apply for the certificate for any governors who do not already have one.

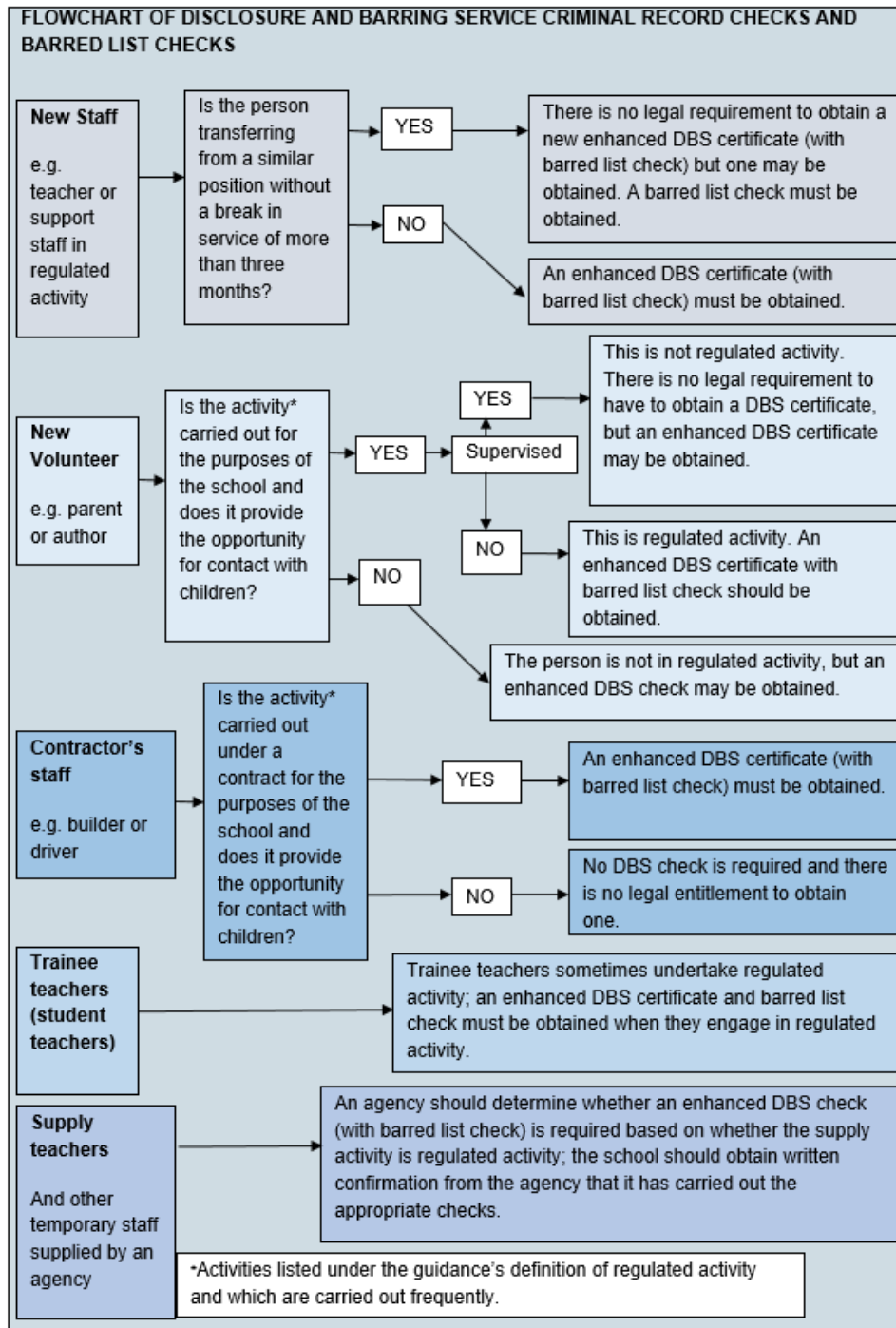
Governance is not a regulated activity relating to children, so governors do not need a children's barred list check unless, in addition to their governance duties, they also engage in regulated activity.

The Governing Body will ensure that the Head Teacher, other senior staff responsible for recruitment and one member of the Governing Body complete accredited Safer Recruitment Training in line with government

requirements.

Our DBS policy can be found here:

<https://www.wrothamschool.com/wp-content/uploads/2021/06/DBS-Policy-WS-2019.pdf>



All interviews will be conducted with someone who has completed safer recruitment training and will ask specific safeguarding questions, review DBS checks and explore any gaps in employment history or other areas of concern. All references are fully checked and followed up prior to appointment.

When advertising new posts, the school considers and makes clear the following:

- the skills, abilities, experience, attitude, and behaviours required for the post; and
- the safeguarding requirements, i.e. to what extent will the role involve contact with children and will they be engaging in regulated activity relevant to children. See page 55 for further information about regulated activity.
- the school's or college's commitment to safeguarding and promoting the welfare of children and make clear that safeguarding checks will be undertaken;
- the safeguarding responsibilities of the post as per the job description and personal specification; and
- whether the post is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. Which means that when applying for certain jobs and activities certain spent convictions and cautions are 'protected', so they do not need to be disclosed to employers, and if they are disclosed, employers cannot take them into account.

Where the school places a pupil with an alternative provision provider, the school continues to be responsible for the safeguarding of that pupil and will be satisfied that the provider meets the needs of the pupil.

All school-based staff will be offered an appropriate level of safeguarding training. This will include internal school responsibilities, child protection processes, how to recognise and respond to signs and symptoms of concern and abuse and safe working practice. Training is organised by the DSL in line with government guidance that currently requires this to be updated every three years.

The nominated governor should receive safeguarding training from a strategic perspective on a three-yearly basis, to be disseminated to the rest of the Governing Body. School governors nominated to undertake this role will also have experience in a safeguarding role within a school as appropriate.

Governing bodies and proprietors should ensure they have processes in place for continuous vigilance, maintaining an environment that deters and prevents abuse and challenges inappropriate behaviour.

To support this, it is important that school and college leaders create the right culture and environment so that staff feel comfortable to discuss matters both within, and where it is appropriate, outside of the workplace, which may have implications for the safeguarding of children. This can assist employers to support staff, where there is a need, and help them manage children's safety and welfare, potentially providing them with information that will help them consider whether there are further measures or changes to procedures that need to be put in place to safeguard children in their care.

The school leadership team will ensure the DSL attends the required DSL safeguarding training when they first take up the role and that they continue to update their knowledge on an on-going basis and at least every 2 years as required by guidance.

The DSL will ensure that all new staff and volunteers are appropriately inducted as regards the school's internal safeguarding procedures and communication lines. A summary information sheet is available to be given to staff and volunteers to support this process.

The DSL and Head Teacher will provide an annual report to the Governing Body detailing safeguarding training

undertaken by all staff and will maintain up to date registers of who has been trained.

All staff receive access to a copy of this document provided by the local authority on induction.

<https://www.wrothamschool.com/wp-content/uploads/2021/06/School-Child-Protection-induction-leaflet.pdf>

DSL training updated – February 2020 – (MCA/ SGR/ ASA/ KFE/ KLE)

RECORDING AND MONITORING OF SAFEGUARDING INFORMATION

The safeguarding team meets weekly and keeps written records of all incidents, actions and timelines.

Safeguarding records are kept separate from all other records relating to the child in school. They are retained centrally and securely by the DSL and the safeguarding team who are the only staff to have full access.

Where possible, the school will ensure that more than 1 emergency contact is kept for each child/ family at the school.

Parents may request a copy of their safeguarding file. The school and the DSL will always consult with the local authority when making a decision on what information should be provided and will only be provided when this information does not pose a risk to the child or others. This will be in full compliance with data access and GDPR law.

Detailed guidance on Record Keeping is found in a separate document “*Guidelines for Safeguarding Record Keeping in Schools*” – Staff MUST familiarise themselves with the responsibilities outlined in this document.

https://www.kelsi.org.uk/data/assets/pdf_file/0017/65051/Safeguarding-record-keeping-guidelines.pdf

All safeguarding records will be forwarded to a child’s subsequent school under confidential and separate cover to the new DSL or Head Teacher.

CHILDREN MISSING IN EDUCATION – CMIE

CMIE

By "suitable education" we mean efficient full time education appropriate to the child's age, ability and any special educational needs that the child may have. Education is compulsory for children starting from the school term after their fifth birthday and the last Friday in June of the school year that they turn 16. A child missing from education is a compulsory school-age child who is not on the roll of a school, not placed in alternative provision by a Local Authority (LA) and who is not receiving suitable education at home.

At Wrotham School we follow the current local authority guidance and processes:

https://www.kelsi.org.uk/data/assets/pdf_file/0007/62656/CME-Guidance-Document.pdf

ELECTIVE HOME EDUCATION (EHE)

Many home educated children have a positive learning experience. We would expect the parents' decision to home educate to be made with their child's best education at the heart of the decision. However, this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs.

From September 2016 the Education (Pupil Registration) (England) Regulations 2006 were amended so that schools must inform their LA of all deletions from their admission register when a child is taken off roll.

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, we recommend that LAs, schools, and other key professionals work together to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.

DfE guidance for local authorities on Elective home education sets out the role and responsibilities of LAs and their powers to engage with parents in relation to EHE. Although this is primarily aimed at LAs, schools should also be familiar with this guidance.

WORKING WITH OTHER AGENCIES

The school follows the following document – Working together to safeguard children (July2018)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779401/Working_Together_to_Safeguard-Children.pdf

Wrotham School recognises and is committed to its responsibility to work with other professionals and agencies both to ensure children's needs are met and to protect them from harm. We will endeavour to identify those children and families who may benefit from the intervention and support of external professionals and will seek to enable referrals, in discussion with parents/carers as appropriate.

Schools are not the investigating agency when there are child protection concerns and the school will therefore pass all relevant cases to the statutory agencies. We will however contribute to the investigation and assessment processes as required and recognise a crucial part of this may be in supporting the child while these take place.

Wrotham School recognises the importance of multi-agency working and will ensure that staff are enabled to attend relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings and any meetings arising from Early Help Assessment Forms.

The School Leadership Team and DSL will work to establish strong and co-operative relationships with relevant professionals in other agencies.

RECORD KEEPING, PRIVACY AND INFORMATION SHARING

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing using our CPOMS software. Information is kept confidential and stored securely.

Records include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.
- If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy).

We recognise that all matters relating to child should have appropriate respect for the privacy of the child. The Headteacher or DSL will share all safeguarding information with the SG team and the governor lead and will disclose any information about a pupil to other members of staff on a strictly need to know basis. Information recorded will be appropriate to the safety of the child.

Parents with parental responsibility for a child have the right to be informed of a safeguarding issue relating to their child. However, when the school judges that doing this would further put the child at risk the DSL and SG team might make a decision not to share this information with a parent. Where parents are separated both parents should be informed unless there is a good reason not to. For example – a court order.

RESPONSES

The following principles are based on effective safeguarding practice and should help shape any decisions regarding safeguarding and supporting the victim.

- The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim's daily experience as normal as possible, so that the school or college is a safe space for them.
- Consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. Schools and colleges should be aware that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s).
- The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report.
- Consider the proportionality of the response. Support should be tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape.
- Schools should be aware that sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre (SARC). SARCs offer confidential and non-judgemental support to victims and survivors of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all children and adults, regardless of when the incident occurred.
- Support can include: o Early help and children's social care as set out in Part one of this guidance
- Children and Young People's Independent Sexual Violence Advisors (ChISVAs) provide emotional and

practical support for victims of sexual violence. They are based within the specialist sexual violence sector and will help the victim understand what their options are and how the criminal justice process works if they have reported or are considering reporting to the police. ChISVAs will work in partnership with schools and colleges to ensure the best possible outcomes for the victim.

- Police and social care agencies can signpost to ChISVA services (where available) or referrals can be made directly to the ChISVA service by the young person or school or college. Contact details for ChISVAs can be found at Rape Crisis and The Survivors Trust.
- Child and adolescent mental health services (CAMHS) is used as a term for all services that work with children who have difficulties with their emotional or behavioural wellbeing. Services vary depending on local authority. Most CAHMS have their own website, which will have information about access, referrals and contact numbers.
- The specialist sexual violence sector can provide therapeutic support for children who have experienced sexual violence. Contact Rape Crisis (England & Wales) or The Survivors Trust for details of local specialist organisations. The Male Survivors Partnership can provide details of services which specialise in supporting men and boys.
- NHS - Help after rape and sexual assault - NHS (www.nhs.uk) provides a range of advice, help and support including advice about the risk of pregnancy, sexually transmitted infections (STI), reporting to the police and forensics.
- Rape and sexual assault referral centres services can be found at: Find Rape and sexual assault referral centres. Sexual assault referral centres (SARCs) offer medical, practical and emotional support. They have specially trained doctors, nurses and support workers. If children, young people, or their families are unsure which service to access, they should contact their GP or call the NHS on 111.
- Childline provides free and confidential advice for children and young people.
- Internet Watch Foundation works internationally to remove child sexual abuse online images and videos and offers a place for the public to report them anonymously.
- Childline / IWF: Remove a nude image shared online Report Remove is a free tool that allows children to report nude or sexual images and videos of themselves that they think might have been shared online, to see if they can be removed from the internet.

The Data Protection Act 2018 and GDPR

These acts and laws 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.

BULLYING AND CYBERBULLYING

The school has a policy to tackle all forms of bullying and cyber bullying – this can be found here:

<https://www.wrothamschool.com/wp-content/uploads/Anti-Bullying-Policy.pdf>

Our behaviour policy and equality policy makes clear our expectations regarding discriminatory bullying.

These can be found here:

<https://www.wrothamschool.com/wp-content/uploads/2021/07/Equality-Policy-2020.pdf>

<https://www.wrothamschool.com/wp-content/uploads/2021/06/Behaviour-Policy-and-Statement-of->

CURRICULUM AND STAYING SAFE

We recognise that schools 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 Life and Society and sex and relationships policy are taught as a discreet subject and cover a comprehensive range of topics and general issues relating to safety and health. Full details of these can be found here:

Curriculum Policy: <https://www.wrothamschool.com/information/curriculum-policy/>

Sex and relationships policy: <https://www.wrothamschool.com/wp-content/uploads/Sex-Relationships-and-Health-Policy-1.pdf>

Wrotham School will use the curriculum to provide opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that students have a range of contacts and strategies to ensure their own protection and understand the importance of protecting others.

Systems have been established to support the empowerment of children to talk to a range of staff. Children at Wrotham School will be listened to and heard and their concerns will be taken seriously and acted upon as appropriate.

Specific systems outside of expected day to day classroom interaction and support include: Students are made aware that they can bring concerns to any member of staff they feel comfortable talking to, students also have access to Deputy Progress Leaders and Progress Leaders before school, at break times and after school. Students know that we have a school nurse and a school counsellor that they can seek an appointment with through any member of the Progress Team. Students cover safeguarding and well-being topics during Progress Group Time and on PSHE days and they are involved in school campaigns to raise awareness. We also have student voice representatives in every Progress Group who liaise and meet with a member of SLT on a regular basis.

The school will ensure that topics of current interest that relate to safety and welfare are explored thoroughly in progress time and as part of our wider curriculum.

CHILDREN WHO ARE LESBIAN, GAY, BI, OR TRANS (LGBT)

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore

vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.

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, bi-phobic and transphobic bullying and abuse.

SAFEGUARDING SUPPORT (MAC) TEAM

Our MAC (MULTI AGENCY CENTRE) comprises of 2 fully trained SG officers who support students through early intervention, group work, and liaise with outside agencies to ensure students with SG concerns receive the support they need. This highly effective team sits on the safeguarding team with the DSL and the DDSL.

COUNSELLING

We have 2 fully qualified counsellors who are employed at the school to offer support to those students who need it. These are prioritised on a case by case basis according to assessment of need by the safeguarding team.

Our counselling policy can be found here: <https://www.wrothamschool.com/wp-content/uploads/2021/06/Counselling-at-Wrotham-School-2019-2-1.pdf>

SAFEGUARDING WHILST TEACHING ONLINE

Since March 2020 there has been an increase in online teaching due to the CXovid-19 pandemic and school closures. This brings specific safeguarding priorities, and we have specific guidance for staff and students which can be found here:

<https://www.wrothamschool.com/information/wellbeing-safeguarding-and-e-safety/>

and here:

<https://www.wrothamschool.com/wp-content/uploads/2021/07/REMOTE-EDUCTAION-POLICY-2020-2021.pdf>

PREVENT

Prevent awareness training will be held at the beginning of each academic year for all staff and will form part of the induction safeguarding training for new staff.

Our key main contextual risks under the PREVENT strategy, as part of our safeguarding of young people are:

- Radicalisation by extreme political or religious groups – Including extreme Right-Wing groups and INCEL groups online.
- County lines/ organised crime.

Staff are trained on what to look out for each year and PREVENT online training is regularly completed/ updated.

Students and teachers will learn about the risks posed by the online activity of extremist and terrorist groups. This will be achieved through the current Life and Society programme, delivered in Progress Group Time, individual lessons and through assemblies. We will build students' resilience to radicalisation by providing a safe environment for debating controversial issues and helping them to understand how they can influence and participate in decision-making. We already promote the spiritual, moral, social and cultural development of students and, within this, fundamental British values.

School staff will understand when it is appropriate to make a referral to the Sg team or the Channel programme. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation.

RADICALISATION

Protecting children from the risk of radicalisation is seen as part of the schools' wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which will include reporting this to the DSL through our safeguarding process and may include making a referral to the Channel programme or liaising with local police forces and the KCC safeguarding team.

E-SAFETY

It is recognised that the use of new technologies presents particular challenges and risks to children both inside and outside of school. Wrotham School will ensure a comprehensive curriculum response to enable all pupils/students to learn about and manage the associated risks effectively and will support parents and the school community (including all members of staff) to become aware and alert to the needs of keeping children safe online.

This is monitored and checked by the governing body and safeguarding governors.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.

- **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes’.
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- **commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

Our life and society and pastoral programme ensure that online safety is taught as a core part of our curriculum provision.

Our school network and associated devices are fully monitored and filtered and are reviewed regularly.

Detailed information can be found in the school’s **e-Safety policy** which can be found at:

<https://www.wrothamschool.com/wp-content/uploads/2021/07/E-safety-Policy.pdf>

Students can also be at risk of falling victim of online challenges and hoaxes

<https://www.gov.uk/government/publications/harmful-online-challenges-and-online-hoaxes>

Involvement in these should be reported as a safeguarding concern via the normal channels.

The school actively teaches students about staying safe online including how to understand information they are presented online, its reliability and any potential risks/ dangers. This is taught in progress/ form time and in life and society lessons as well as in the wider curriculum.

SAFE WORKING PRACTICE

Staff are required to work within clear Guidelines on Safe Working Practice / the school’s Code of Conduct.

Children may make allegations against staff in situations where they feel vulnerable or where they perceive there to be a possible risk to their welfare. As such, all school staff should take care not to place themselves in a vulnerable position regarding child protection or potential allegations. For example, it is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.

Physical intervention should only be used when the child is endangering him/herself or others and such events should be recorded and signed by a witness. Staff should be aware of the school’s **Behaviour Management and Physical Intervention Policies**, and any physical interventions must be in line with agreed policy and procedure in which appropriate training should be provided.

<https://www.wrothamschool.com/wp-content/uploads/2021/06/Behaviour-Policy-and-Statement-of-Behaviour-Values.pdf>

https://www.wrothamschool.com/wp-content/uploads/2021/06/Searching_screening_and_confiscation.pdf

https://www.wrothamschool.com/wp-content/uploads/2021/06/Use_of_reasonable_force_advice_Reviewed_July_2015.pdf

Staff should be particularly aware of the professional risks associated with the use of electronic communication (e-mail; mobile phones; texting; social network sites) and should familiarise themselves with advice and professional expectations outlined in **Guidance for Safer Working Practice for Adults who Work with Children and Young People**, the school's **e-Safety Policy**, KSCB document : **Safer Practice with Technology – Guidance for Adults who Work with Children and Young People**

https://www.kelsi.org.uk/_data/assets/pdf_file/0004/60934/Safer-Practice-August-2016.pdf

MENTAL HEALTH

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

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

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

The school has an early intervention support programme via the MAC team and the school counsellors employed by the school to provide appropriate intervention regarding mental health at a variety of levels.

Resources are shared widely and are readily available to support staff, students and parents with mental health – these can be found here:

<https://www.wrothamschool.com/%EF%BB%BFresources-for-mental-health-and-wellbeing-2-11-2020/>

Our life, society and pastoral curriculum includes work on ensuring good mental health and how to manage poor mental health.

COMPLAINTS AND COMMUNICATIONS

The school has a **Complaints Policy** and a **Communications Policy** available to parents, pupils/students and staff who wish to report concerns. This can be found at:

<https://www.wrothamschool.com/wp-content/uploads/CET-Communications-Policy-08-07-21-FINAL.docx.pdf>

<https://www.wrothamschool.com/wp-content/uploads/CET-Complaints-Policy-08-07-21-FINAL-1.pdf>

All reported concerns will be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation against a member of staff or volunteer will be dealt with under the specific **Procedures for Managing Allegations Against Staff (see below)**.

DESIGNATED TEACHER – LAC and YOUNG CARERS

Our designated teacher who is responsible for LAC and children with SEN and disabilities is Mr KWilliams, AHT.

Our Lead for young carers at the school is Mrs Lisa Young. Information regarding young carers provision can be found here:

<https://www.wrothamschool.com/statutory-documents-policies/>

This role is to ensure that these students, who are at higher risk of facing additional safeguarding barriers, are kept safe and supported at the school and outside of school as appropriate.

VISITORS, SITE SECURITY AND THE USE OF SCHOOL PREMISES BY OTHER ORGANISATIONS

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

Students and staff are regularly reminded on how to report a concern.

Appropriate checks will be undertaken in respect of visitors and volunteers coming into school as outlined within guidance. Visitors will be expected to sign in and out via the office visitors log and to display a visitors' badge whilst on school site. Any individual who is not known or identifiable 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

Where services or activities are provided separately by another body using the school premises, the Head Teacher and Governing Body will seek assurance that the organisation concerned has appropriate policies and procedures in place with regard to safeguarding children and child protection and that relevant safeguarding checks have been made in respect of staff and volunteers. If assurance is not achieved, an application to use or work on the premises may be refused.

VISITORS

Schools and colleges have different types of visitors, those with a professional role i.e. educational

psychologists, social workers etc. those connected with the building, grounds maintenance, children's relatives or other visitors attending an activity in school such as a sports day.

Schools and colleges should not request DBS checks or barred list checks, or ask to see existing DBS certificates, for visitors such as children's relatives or other visitors attending a sports day.

Headteachers and principals should use their professional judgment about the need to escort or supervise such visitors.

For visitors who are there in a professional capacity check ID and be assured that the visitor has had the appropriate DBS check (or the visitor's employers have confirmed that their staff have appropriate checks).

Whilst external organisations can provide a varied and useful range of information, resources and speakers that can help schools and colleges enrich children's education, careful consideration should be given to the suitability of any external organisations.

Under no circumstances should a volunteer on whom no checks have been obtained be left unsupervised or allowed to work in regulated activity.

Whilst volunteers play an important role and are often seen by children as being safe and trustworthy adults, the nature of voluntary roles varies, so schools and colleges should undertake a written risk assessment and use their professional judgement and experience when deciding what checks, if any, are required.

Our electronic signing in system automatically checks and records identity and also monitors DBS checks.

ALLEGATIONS TOWARDS A MEMBER OF STAFF

Teachers are expected to follow the high expectations and standards as described in the following Teacher Standards Document. This can be found here:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1007716/Teachers_Standards_2021_update.pdf

In addition to this, all staff are expected to follow the staff code of conduct and all relevant policies of the school including our e safety policy and updates. Staff must fully read and understand these policies and additional communications relating to these policies sent from time to time by the headteacher and the trust. Not having read these documents is not a reasonable excuse for not following them.

When dealing with allegations towards a member of staff (teaching or non- teaching) the school follows the guidance provided in the following documents as well as its own Conduct and disciplinary policies.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1007260/Keeping_children_safe_in_education_2021.pdf

OTHER

HOMESTAYS

The school do not currently engage of host Homestays for visitors or stay with others.

Linked Policies

E Safety Policy
Communications Policy
Code Of Conduct
Discipline and Conduct Policy
NQT policy/ NQT induction Policy
Whistleblowing policy

ADDITIONAL RESOURCES

Additional information can be found at [GOV.UK](https://www.gov.uk).

- [_ Childnet - STAR SEND Toolkit](#) equips, enables and empowers educators with the knowledge they need to support young people with special educational needs and disabilities.
- [_ Childnet - Just a joke?](#) provides lesson plans, activities, a quiz and teaching guide designed to explore problematic online sexual behaviour with 9-12 year olds.
- [_ Childnet - Step Up, Speak Up](#) a practical campaign toolkit that addresses the issue of online sexual harassment amongst young people aged 13-17 years old.
- [_ Preventing Harmful Sexual Behaviour toolkit](#) by the Lucy Faithfull Foundation, the toolkit contains links to useful information, resources and support, including practical tips to prevent HSB.
- [_ NSPCC - Harmful sexual behaviour framework](#) An evidence-informed framework for children and young people displaying HSB.
- [_ Contextual Safeguarding Network – Beyond Referrals - Schools](#) levers for addressing HSB in schools.
- [_ What to do if you're worried a child is being abused](#) – DfE advice
- [_ Domestic abuse: Various Information/Guidance](#) - Home Office (HO)
- [_ Faith based abuse: National Action Plan](#) - DfE advice
- [_ Relationship abuse: disrespect nobody](#) - Home Office website
- [_ Tackling Child Sexual Abuse Strategy](#) – Home Office policy paper
- [_ Together we can stop child sexual abuse](#) – HM Government campaign
- [_ Preventing bullying including cyberbullying](#) - DfE advice
- [_ Children missing education](#) - DfE statutory guidance
- [_ Child missing from home or care](#) - DfE statutory guidance
- [_ Children and adults missing strategy](#) - Home Office strategy
- [_ National Information Centre on Children of Offenders](#) - Barnardo's in partnership with HM Prison and Probation Service
- [_ Trafficking: safeguarding children](#) - DfE and HO guidance
- [_ Care of unaccompanied and trafficked children](#) – DfE statutory guidance
- [_ Modern slavery: how to identify and support victims](#) – HO statutory guidance
- [_ Drug strategy 2017](#) - Home Office strategy
- [_ Information and advice on drugs](#) - Talk to Frank website
- [_ Drug and Alcohol education — teacher guidance & evidence review](#) – PSHE Association website
- [_ Female genital mutilation: information and resources](#)- Home Office guidance
- [_ Female genital mutilation: multi agency statutory guidance](#) - DfE, DH, and HO statutory guidance
- [_ Forced marriage](#) - Forced Marriage Unit (FMU) statutory guidance

- [_ FGM resource pack](#) – HM Government guidance
- [_ Fabricated or induced illness: safeguarding children](#) - DfE, DH, HO
- [_ Rise Above: Free PSHE resources on health, wellbeing and resilience](#) - Public Health England
- [_ Medical-conditions: supporting pupils at school](#) - DfE statutory guidance
- [_ Mental health and behaviour](#) - DfE advice
- [_ Homelessness: How local authorities should exercise their functions](#) - Ministry of Housing, Communities &

Local Government guidance

- [_ Private fostering: local authorities](#) - DfE statutory guidance
- [_ Prevent duty guidance](#)- Home Office guidance
- [_ Prevent duty: additional advice for schools and childcare providers](#) - DfE advice
- [_ Educate Against Hate website](#) - DfE and Home Office advice
- [_ Prevent for FE and Training](#) - Education and Training Foundation (ETF)
- [_ Serious violence strategy](#) - Home Office Strategy
- [_ Factors linked to serious violence and how these factors can be used to identify individuals for intervention](#) –

Home Office

- [_ Youth Endowment Fund](#) – Home Office
- [_ Gangs and youth violence: for schools and colleges](#) - Home Office advice
- [_ Ending violence against women and girls 2016-2020 strategy](#) - Home Office strategy
- [_ Violence against women and girls: national statement of expectations for victims](#) - Home Office guidance
- [_ Sexual violence and sexual harassment between children in schools and colleges](#)- DfE advice

END

