



SOUTH AVENUE PRIMARY SCHOOL

SAFEGUARDING AND CHILD PROTECTION

POLICY

Key Contact Personnel in School

Designated Safeguarding Lead:

Mrs Claire Telford – Senior Leader – Primary Phase

Deputy Designated Safeguarding Leads:

Miss Tracy Cadwallader – Head of School

Mrs Helen Lofts – Family Liaison Officer

Miss Emma Smith – Curriculum, Teaching & Learning Lead

Mr Stavros Savva – SENDCo

Named Safeguarding Governor: Mr Ola Talabi

Date written: October 2023

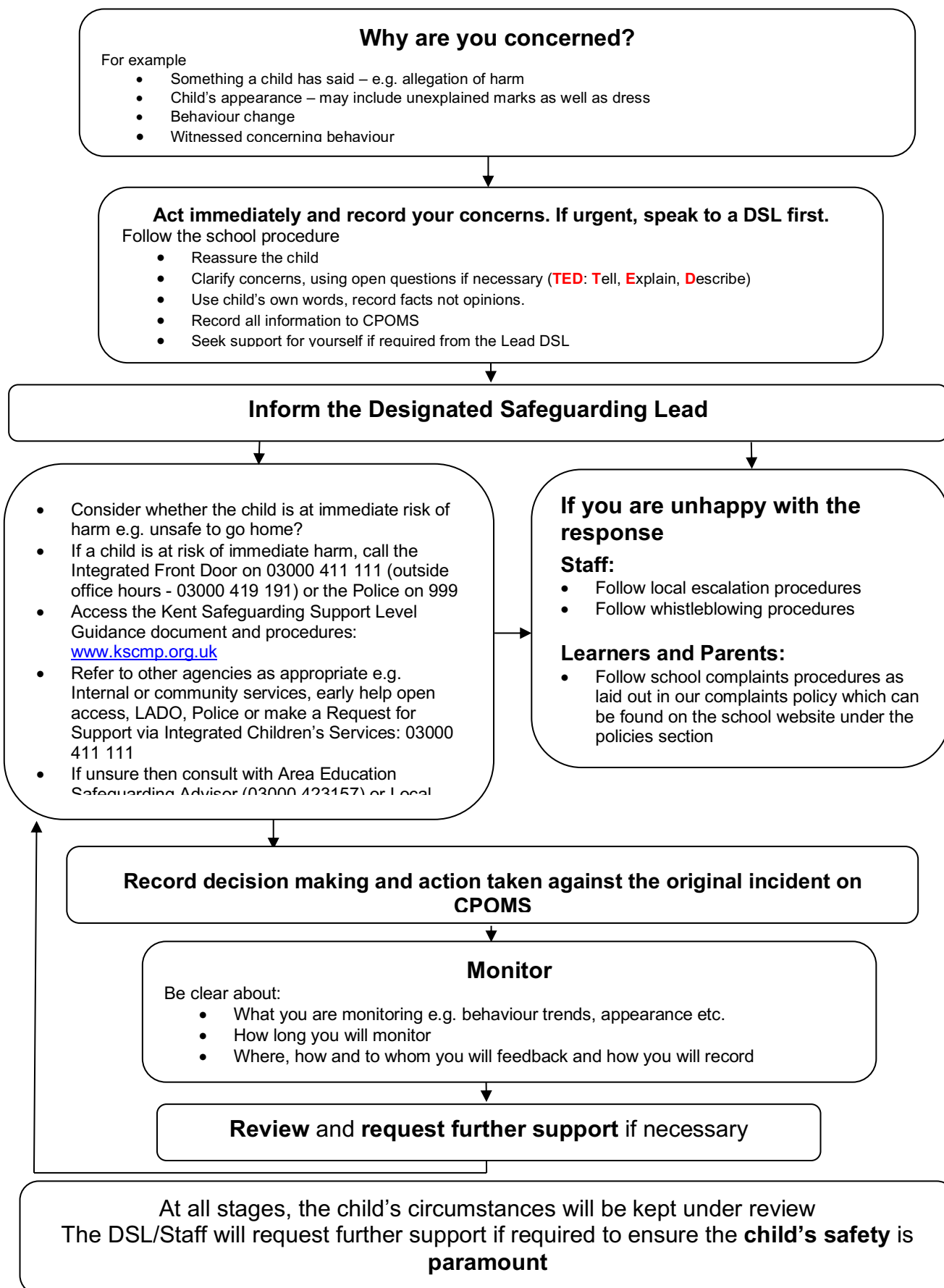
Date agreed: January 2024

Date of next review: September 2024

Contents

	Page
What to do if you have a welfare concern flowchart	3
Procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger) flowchart	4
1. Child Focused Approach to Safeguarding	5
2. Key Responsibilities	8
3. Child Protection Procedures	13
4. Specific Safeguarding Issues	20
5. Supporting Children Potentially at Greater Risk of Harm	26
6. Online Safety	28
7. Staff Engagement and Expectations	33
8. Safer Recruitment and Allegations	35
9. Opportunities to teach safeguarding	37
10. Physical Safety	38
11. Local Contacts	39
Appendix 1: Categories of Abuse	40
Appendix 2: Support Organisations	42

Figure 1. What to do if you have a welfare concern in South Avenue



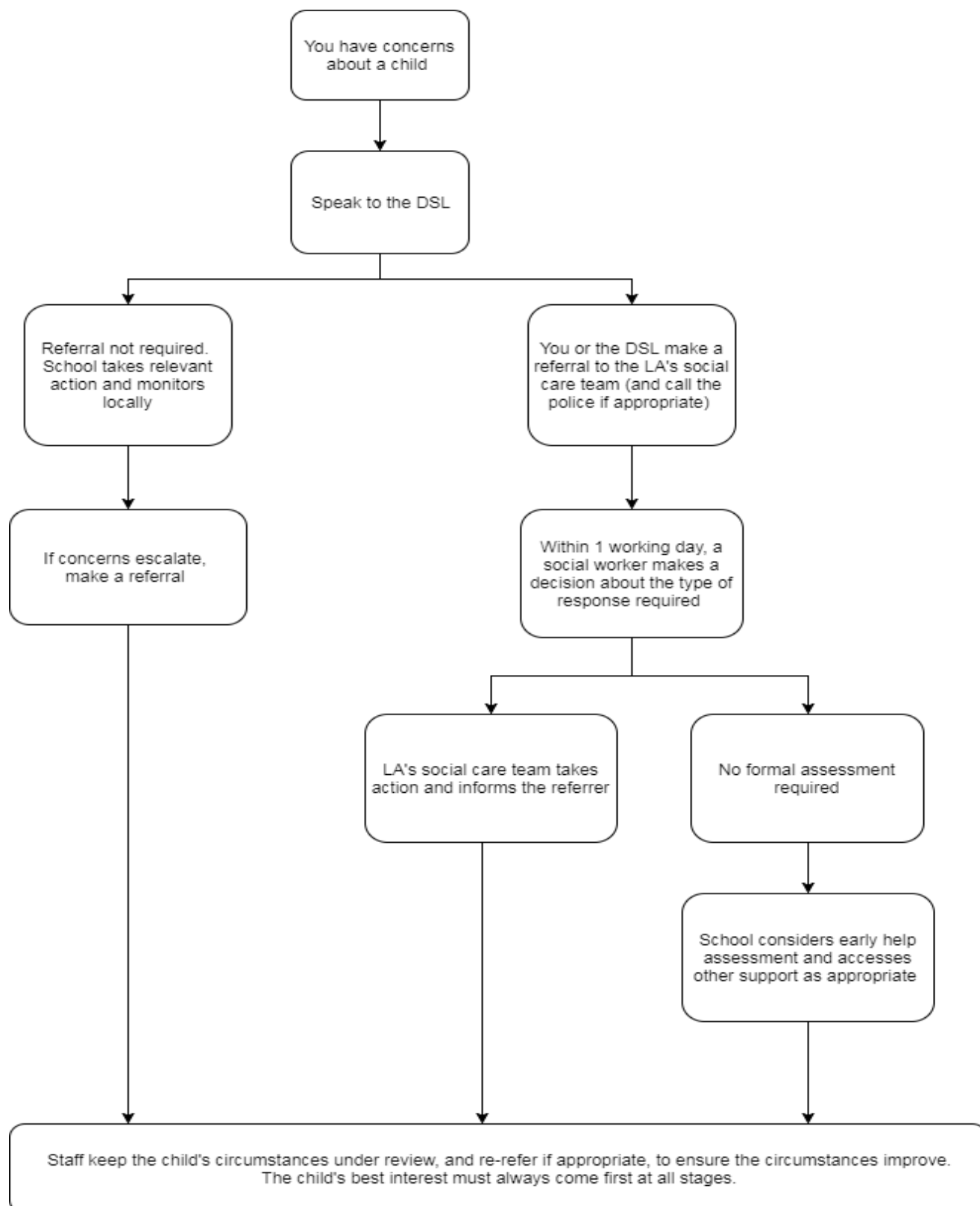


Figure 2. Procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

1. Child Focused Approach to Safeguarding

1.1 Introduction

- South Avenue Primary School recognise our statutory responsibility to safeguard and promote the welfare of all children. Safeguarding is everybody's responsibility and all those directly connected (staff, volunteers, governors, leaders, parents, families, and pupils) are an important part of the wider safeguarding system for children and have an essential role to play in making this community safe and secure.
- South Avenue Primary School believe that the best interests of children always come first. All children (defined as those up to the age of 18) have a right to be heard and to have their wishes and feelings taken into account and all children regardless of age, sex (gender), ability, culture, race, language, religion or sexual identity or orientation, have equal rights to protection.
- Staff working with children at South Avenue Primary School will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child and if any member of our community has a safeguarding concern about any child or adult, they should act and act immediately.
- South Avenue Primary School recognises the importance of providing an ethos and environment within school that will help children to be safe and feel safe. In our school children are respected and encouraged to talk openly. We will ensure children's wishes and feelings are taken into account when determining what safeguarding action to take and what services to provide.
- Our school core safeguarding principles are:
 - **Prevention** - positive, supportive, safe school culture, curriculum and pastoral opportunities for children, safer recruitment procedures.
 - **Protection** - by following the agreed procedures, ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns.
 - **Support** - for all pupils, parents and staff, and where appropriate specific intervention are required for those who may be at risk of harm.
 - **Collaborating with parents and other agencies** - to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.
- The procedures contained in this policy apply to all staff, including and governors, temporary or third-party agency staff and volunteers) and are consistent with those outlined within 'Keeping Children Safe in Education' 2023 (KCSIE).

1.2 Policy Context

- This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, 'Keeping Children Safe in Education' 2023 (KCSIE) which requires individual schools and colleges to have an effective child protection policy.
- This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes but is not limited to:
 - [Keeping Children Safe in Education \(2023\)](#)

- [Working Together to Safeguard Children \(2018\)](#)
 - [Governance Handbook](#)
 - [The Children Act 1989](#) and [2004 amendment](#)
 - Ofsted: Education Inspection Framework' 2021
 - Framework for the Assessment of Children in Need and their Families 2000
 - [Kent and Medway Safeguarding Children Procedures](#)
 - Early Years and Foundation Stage Framework 2021 (EYFS)
 - [Education Act 2002](#)
 - Education and Inspections Act 2006
 - [Education \(Independent School Standards\) Regulations 2014](#)
 - [The Human Rights Act 1998](#)
 - [The Equality Act 2010](#) (including [The Public Sector Equality Duty \(PSED\)](#))
 - [The School Staffing \(England\) Regulations 2009](#)
 - Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#)
 - [Statutory guidance on FGM](#)
- 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.

1.3 Definition of Safeguarding

- In line with KCSIE 2023, safeguarding and promoting the welfare of children is defined for the purposes of this policy as:
 - protecting children from maltreatment
 - preventing impairment of children's mental and physical health or development
 - ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and
 - taking action to enable all children to have the best outcomes.
- The school acknowledges safeguarding includes a wide range of specific safeguarding issues including (but not limited to):
 - Abuse and neglect
 - Bullying, including cyberbullying
 - Child-on-child abuse
 - Children with family members in prison
 - Children Missing Education (CME)
 - Children Absent from Education
 - Child missing from home or care
 - Child Sexual Exploitation (CSE)
 - Child Criminal Exploitation (CCE)
 - Contextual safeguarding (risks outside the family home)
 - County lines and gangs
 - Domestic abuse
 - Drugs and alcohol misuse
 - Fabricated or induced illness
 - Faith abuse
 - Gender based abuse and violence against women and girls

- Hate
- Homelessness
- Human trafficking and modern slavery
- Mental health
- Nude or semi-nude image sharing, aka youth produced/involved sexual imagery or “Sexting”
- Online safety
- Preventing radicalisation and extremism
- Private fostering
- Relationship abuse
- Serious violence
- Sexual violence and sexual harassment
- So-called ‘honour-based’ abuse, including Female Genital Mutilation (FGM) and forced marriage
- Upskirting

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

1.4 Equality Statement

Some children have an increased risk of abuse, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children’s diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- › Have special educational needs and/or disabilities (SEND) or health conditions (see section 10)
- › Are young carers
- › May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- › Have English as an additional language
- › Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- › Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- › Are asylum seekers
- › Are at risk due to either their own or a family member’s mental health needs
- › Are looked after or previously looked after (see section 12)
- › Are missing or absent from education for prolonged periods and/or repeat occasions
- › Whose parent/carers has expressed an intention to remove them from school to be home educated

1.5 Related Safeguarding Policies

- This policy is one of a series in the school’s integrated safeguarding portfolio and should be read and actioned in conjunction with the policies as listed below:
 - Behaviour
 - Online Safety
 - Anti-Bullying
 - Data Protection

- Relationship and Sex Education
- Health and Safety
- Attendance
- Risk Assessments
- First Aid
- Managing Allegations Against Staff
- Staff Code of Conduct
- Acceptable Use of Technology
- Safer Recruitment
- Whistleblowing
- Red Alert
- Complaints
- Mobile & Smart Technology

1.6 Policy Compliance, Monitoring and Review

- South Avenue Primary School will review this policy at least annually (as a minimum) and will update it as needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. The policy will also be revised following any national or local updates, significant local or national safeguarding events and/or learning, and/or any changes to our own procedures.
- All staff (including temporary staff and volunteers) will be provided with a copy of this policy and Part One and/or Annex A of KCSIE 2023 as appropriate. A copy of this policy can be found on the school website.
- Parents/carers can obtain a copy of the school Child Protection Policy and other related policies on request. Additionally, our policies can be viewed via the school website.
- The policy forms part of our school development plan and will be reviewed annually by the governing body who has responsibility for oversight of safeguarding and child protection systems.
- The Designated Safeguarding Lead and Head of School will ensure regular reporting on safeguarding activity and systems to the governing body. The governing body will not receive details of individual pupil situations or identifying features of families as part of their oversight responsibility.

2. Key Responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- › Behaviour policy
- › Pastoral support system
- › Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
 - Healthy and respectful relationships

- Boundaries and consent
- Stereotyping, prejudice and equality
- Body confidence and self-esteem
- How to recognise an abusive relationship (including coercive and controlling behaviour)
- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
- What constitutes sexual harassment and sexual violence and why they're always unacceptable

2.1 Governance and Leadership

- The governing body and leadership team have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation.
- The governing body have regard to the KCSIE guidance and will ensure our policies, procedures and training is effective and complies with the law at all times.
- The governing body will facilitate a whole school approach to safeguarding which involves everyone. They will ensure that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development, so that all systems, processes, and policies operate with the best interests of the child at their heart.
- The governing body are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements set out by the Kent Safeguarding Children Multi-Agency Partnership ([KSCMP](#)).
 - This includes but is not limited to safeguarding all members of the school community (for example, staff, pupils, parents/carers and other family members) identified with protected characteristics within the Equality Act; age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.
 - For further information about our approaches to equality, diversity, and inclusion, please access our schools' website.
- The governing body and leadership team will ensure that there are policies and procedures in place to ensure appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- The head of school will ensure that our child protection and safeguarding policies and procedures adopted by the governing body, are understood, and followed by all staff.
- The governing body will ensure an appropriate senior member of staff, from the school leadership team, is appointed to the role of designated safeguarding lead. The governing body and leadership team will ensure that the DSL is supported in their role and is provided with sufficient time so they can provide appropriate support to staff and children regarding any safeguarding and welfare concerns.
- The school has a nominated governor for safeguarding. The nominated governor will support the DSL and have oversight in ensuring that the school/college has an effective policy which interlinks with other related policies, that locally agreed procedures are in place and being followed, and that the policies are reviewed at least annually and when required.

- Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
 - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
 - Reviewing the [DfE's filtering and monitoring standards](#), and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
- Make sure:
 - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
 - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
 - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
 - The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
 - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
 - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
 - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
 - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).

All governors will read Keeping Children Safe in Education in its entirety.

The headteacher is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
 - Are informed of our systems which support safeguarding, including this policy, as part of their induction
 - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent

- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Ensuring the relevant staffing ratios are met, where applicable

2.2 Designated Safeguarding Lead (DSL)

- The school has appointed a member of the leadership team Mrs Claire Telford, Senior Leader – Primary Phase, as the Designated Safeguarding Lead (DSL).
- The DSL has the overall responsibility for the day to day oversight of safeguarding and child protection. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online. Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. The DSL can also be contacted out of school hours if necessary, via their mobile phone (number in staff handbook).

- The school has also appointed Deputy DSLs who will have delegated responsibilities and act in the DSLs absence.
 - Miss Tracy Cadwallader – Safer Recruitment & Designated Teacher
 - Mr Helen Lofts
 - Miss Emma Smith
 - Mr Stavros Savva
- The DSL (and any deputies) will be more likely to have a complete safeguarding picture and will be the most appropriate person to advise staff on the response to any safeguarding concerns.
- It is the role of the DSL to carry out their functions as identified in Annex C of KCISE 2023. The DSL will be given the time, funding, training, resources and support to:
- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Have a good understanding of the filtering and monitoring systems and processes in place at our school

The DSL will also:

- Keep the headteacher informed of any issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies

- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

The full responsibilities of the DSL are set out in their job description.

2.3 All staff

- Our staff play a particularly important role in safeguarding as they are in a position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating.
- All members of staff have a responsibility to:
 - Provide a safe environment in which children can learn.
 - Be aware of the indicators of abuse and neglect so that they can identify cases of children who may need help or protection.
 - Know what to do if a child tells them that they are being abused or neglected, or exploited and understand the impact abuse and neglect can have upon a child.
 - Be able to identify and act upon indicators that children are, or at risk of developing mental health issues.
 - Be prepared to identify children who may benefit from early help.
 - Understand the early help process and their role in it.
 - Understand the school safeguarding policies and systems.
 - Undertake regular and appropriate training which is regularly updated.
 - Be aware of the local process of making referrals to children's social care and statutory assessment under the Children Act 1989.
 - Know how to maintain an appropriate level of confidentiality.
 - Reassure children who report concerns that they are being taken seriously and that they will be supported and kept safe.
 - act in line with Teachers' Standards 2012 which state that teachers (including headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
 - Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
 - Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns
- Staff at South Avenue Primary School recognise that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as being abusive or harmful. This should not prevent staff from having professional curiosity and speaking to a DSL if they have any concerns about a child.
- Staff at South Avenue Primary School will determine how best to build trusted relationships with children, young people and parents/carers which facilitate appropriate professional communication in line with existing and relevant policies.
- Staff who work directly and indirectly with children are expected to read and understand at least part 1 of Keeping Children Safe in Education (KCSIE) and Annex B annually and sign a declaration at the beginning of each academic year to say they have reviewed the guidance (this may be electronically via CPOMS)

2.4 Children and Young People

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

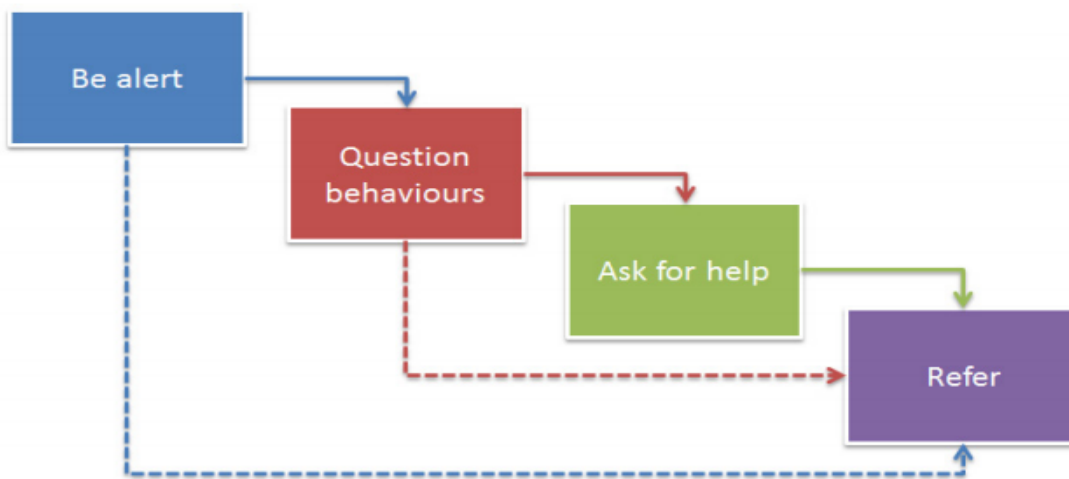
2.5 Parents and Carers

- **Parents/carers have a responsibility to:**
 - Understand and adhere the relevant school policies and procedures.
 - Talk to their children about safeguarding issues with their children & support the school in their safeguarding approaches.
 - Identify behaviours which could indicate that their child is at risk of harm including online
 - Seek help and support from the school, or other agencies.

3. Child Protection Procedures

3.1 Recognising Indicators of Abuse and Neglect

- Staff will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child.
- All staff are made aware of the definitions and indicators of abuse and neglect as identified by Working Together to Safeguard Children (2018) and Keeping Children Safe in Education 2021. This is outlined locally within the [Kent Support Levels Guidance](#).
- South Avenue Primary School recognise that when assessing whether a child may be suffering actual or potential harm there are four categories of abuse:
 - Physical abuse
 - Sexual abuse
 - Emotional abuse
 - Neglect
- By understanding the indicators of abuse and neglect, we can respond to problems as early as possible and provide the right support and services for the child and their family.
- All members of staff are expected to be aware of and follow this approach if they are concerned about a child:



['What to do if you are worried a child is being abused'](#) 2015

- South Avenue Primary School recognises that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of child abuse and neglect can vary from child to child. Children develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child. It is important to recognise that indicators of abuse and neglect do not automatically mean a child is being abused however all concerns should be taken seriously and will be explored by the DSL on a case-by-case basis.
- South Avenue Primary School recognises abuse, neglect, and safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label alone. In many cases, multiple issues will overlap with one another, therefore staff will always be vigilant and always raise concerns with a DSL.
- Parental behaviors can indicate child abuse or neglect, so staff will be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.
- Children may report abuse happening to themselves, their peers or their family members. All reports made by children to staff will be taken seriously and will be responded to in line with this policy.
- Safeguarding incidents and/or behaviours can be associated with factors and risks outside the School. Children can be at risk of abuse or exploitation in situations outside their families; extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.
- South Avenue Primary School recognises that technology can be a significant component in many safeguarding and wellbeing issues; children are at risk of abuse online from people they know (including other children) and from people they do not know; in many cases, abuse will take place concurrently via online channels and in daily life.
- South Avenue Primary School recognises that some children have additional or complex needs and may require access to intensive or specialist services to support them.

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

3.2 Responding to Child Protection Concerns

If a child is suffering or likely to suffer harm, or is in immediate danger:

Make a referral to children's social care and/or the police **immediately**. **Anyone can make a referral**.
Tell the DSL as soon as possible if you make a referral directly.

- If staff are made aware of a child protection concern, they are expected to:
 - listen carefully to child, reflecting back the concern.
 - use the child's language.
 - be non-judgmental.
 - avoid leading questions; only prompting the child where necessary with open questions to clarify information where necessary. For example, who, what, where, when or Tell, Explain, Describe (TED).
 - not promise confidentiality as concerns will have to be shared further, for example, with the DSL and potentially Integrated Children's Services.
 - be clear about boundaries and how the report will be progressed.
 - record the concern using the facts as the child presents them, on CPOMS
 - inform the DSL (or deputy), as soon as practically possible.
- If staff have any concerns about a child's welfare, they are expected to act on them immediately. If staff are unsure if something is a safeguarding issue, they will speak to the DSL (or deputy).
- The DSL or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, a DSL is not available, this should not delay appropriate action being taken by staff. Staff should speak to a member of the senior leadership team, take advice from the Education Safeguarding Service or a consultation with a social worker from the Front Door (for contact information, see flowchart on page 3). In these circumstances, any action taken will be shared with a DSL as soon as is practically possible.
- South Avenue Primary School will respond to concerns in line with the Kent Safeguarding Children Multi-Agency Partnership procedures (KSCMP).
 - The full KSCMP procedures and additional guidance relating to reporting concerns and specific safeguarding issues can be found on their website: www.kscmp.org.uk
- In Kent, Early Help and Preventative Services and Children's Social Work Services are part of Integrated Children's Services (ICS). Specific information and guidance to follow with regards to accessing support and/or making referrals in Kent can be found here: www.kelsi.org.uk/support-for-children-and-young-people/integrated-childrens-services

- Where it is identified a child may benefit from Early Help support (as provided by ICS), the DSL (or deputy) will generally lead as appropriate and make a request for support via the Front Door.
 - The DSL will keep all early help cases under constant review and consideration will be given to escalating concerns to the Front Door or seeking advice via the [Education Safeguarding Service](#) if the situation does not appear to be improving or is getting worse.
- All staff are made aware of the process for making referrals to Integrated Children's Services and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.
- Where a child is suffering, or is likely to suffer from harm, or is in immediate danger (for example, under section 17 or 47 of the Children Act), a 'request for support' will be made immediately to [Integrated Children's Services](#) (via the 'Front Door') and/or the police, in line with KSCMP procedures.
 - South Avenue Primary School recognise that in situations where there are immediate child protection concerns for a child as identified in line with Support Level Guidance, it is NOT to investigate as a single agency, but to act in line with KSCMP guidance which may involve multi-agency decision making.
 - The DSL may seek advice or guidance from their Area Education Safeguarding Advisor from the [Education Safeguarding Service](#) before deciding next steps.
 - They may also seek advice or guidance from a social worker at the Front Door service who are the first point of contact for [Integrated Children's Services](#) (ICS).
- In the event of a request for support to the Front Door being necessary, parents/carers will be informed and consent to this will be sought by the DSL in line with guidance provided by KSCMP and ICS. Parents/carers will be informed of this, unless there is a valid reason not to do so, for example, if to do so would put a child at risk of harm or would undermine a criminal investigation.
- If, after a request for support or any other planned external intervention, a child's situation does not appear to be improving, or concerns regarding receiving a decision or the decisions made, staff or the DSL will re-refer (if appropriate) and/or DSLs will follow the [KSCMP escalation procedures](#) to ensure their concerns have been addressed and, most importantly, that the child's situation improves. DSLs may request support with this via the [Education Safeguarding Service](#).
- South Avenue Primary School is an [Operation Encompass School](#). This means we work in partnership with Kent Police to provide support to children experiencing domestic abuse.

3.3 If you Discover FGM has taken place or a pupil is at risk of FGM

Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out should speak to the DSL and follow our local safeguarding procedures.

3.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 2 above, illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to a DSL first to agree a course of action.

If in exceptional circumstances a DSL is not available, this should not delay appropriate action being taken. Take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0800 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

Early help assessment

If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 3.2), you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

3.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- › Think someone is in immediate danger
- › Think someone may be planning to travel to join an extremist group
- › See or hear something that may be terrorist-related

3.6 Recording Concerns

- All safeguarding concerns, discussions and decisions, and reasons for those decisions, will be recorded in writing on the school safeguarding system and passed without delay to the DSL. Our records will include a clear and comprehensive summary of any concerns, details of how concerns were followed up and resolved, a note of any action taken or not taken, how any decisions were reached and any outcomes.
- CPOMS is the schools online system for recording concerns.
- For any staff unable to access the system, green concern forms are kept in both staffrooms and in the senior leaders office.
- Records will be completed as soon as possible after the incident/event, using the child's words and will be signed and dated by the member of staff. Child protection records will record facts and not personal opinions. A body map will be completed if visible injuries have been observed.
- If there is an immediate safeguarding concern the member of staff will consult with a DSL before completing the form/system as reporting urgent concerns takes priority.
- If members of staff are in any doubt about recording requirements, they will discuss their concerns with the DSL.
- Child protection records will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and details regarding any action taken, decisions reached and the outcome.
- Child protection records will be kept confidential and stored securely. Child protection records will be kept for individual children and will be maintained separately from all other records relating to the child in the school. Child protection records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL.
- All child protection records will be transferred in accordance with data protection legislation to the child's subsequent school, under confidential and separate cover as soon as possible; within 5 days for an in-year transfer or within the first 5 days of the start of a new term. Child Protection files will be transferred securely to the new DSL, separately to the child's main file, and a confirmation of receipt will be obtained.
- In addition to the child protection file, the DSL will also consider if it would be appropriate to share any information with the DSL at the new school or college in advance of a child leaving, for example, information that would allow the new school or college to continue to provide support.
- Where the school receives child protection files from another setting, the DSL will ensure key staff such as the special educational needs co-ordinators (SENDCo), will be made aware of relevant information as required.
- Where a pupil joins the school and no child protection files are received, the DSL will proactively seek to confirm from the previous setting whether any child protections exist for the pupil, and if so, if the files have been sent.

3.7 Multi-Agency Working

- South Avenue Primary School recognises the pivotal role we have to play in multi-agency safeguarding arrangements and is committed to its responsibility to work within the [KSCMP](#) multi-agency safeguarding arrangements as identified within 'Working Together to Safeguard Children'.
- The School leadership team, governing body and DSL will work to establish strong and co-operative local relationships with professionals in other agencies, including the safeguarding partners in line with local and national guidance.
- South Avenue Primary School recognises the importance of multi-agency working and is committed to working alongside partner agencies to provide a coordinated response to promote children's welfare and protect them from harm. This includes contributing to [KSCMP](#) processes as required, such as, participation in relevant safeguarding multi-agency plans and meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.
- The School will allow access for Kent Children's Social Work Service and, where appropriate, from a placing local authority, to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.
- The head of school and DSL are aware of the requirement for children to have an Appropriate Adult ([PACE Code C 2019](#)) where there is a need for detention, treatment and questioning by police officers and will respond to concerns in line with our behaviour policy, which is informed by the DfE '[Searching, screening and confiscation at school](#)' guidance.

3.8 Confidentiality and Information Sharing

- South Avenue Primary School recognises our duty and powers to hold, use and share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE.
- South Avenue Primary School has an appropriately trained Data Protection Officer (DPO) as required by the General Data Protection Regulations (GDPR) to ensure that our school is compliant with all matters relating to confidentiality and information sharing requirements. The schools DPO is:
 - Miss T Cadwallader – Head of School
- Staff will have due regard to the relevant data protection principles, which allow them to share and withhold personal information. The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children (KCSIE 2023). KCSIE 2023, the [Information Commissioner's Office](#) (ICO) and the DfE '[Information sharing advice for safeguarding practitioners](#)' (2018) guidance provides further details regarding information sharing principles and expectations.
- The head of school and DSL will disclose relevant safeguarding information about a pupil with staff on a 'need to know' basis.
- All members of staff must be aware that whilst they have duties to keep information confidential, in line with our confidentiality policy, they also have a professional responsibility to be proactive in sharing information as early as

possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children; this may include sharing information with the DSL and with other agencies as appropriate.

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

3.9 Complaints

- All members of the school community should feel able to raise or report any concerns about children's safety or potential failures in the school safeguarding regime. The school has a complaints procedure available to parents, pupils and members of staff and visitors who wish to report concerns or complaints. This can be found on the school website.
- Whilst we encourage members of our community to report concerns and complaints directly to us, we recognise this may not always be possible. Children, young people, and adults who have experienced abuse at school can contact the NSPCC 'Report Abuse in Education' helpline on 0800 136 663 or via email: help@nspcc.org.uk
- Staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally.
 - Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.
- The leadership team at South Avenue Primary School will take all concerns reported to the school seriously and all complaints will be considered and responded to in line with the relevant and appropriate process.
 - Anything that constitutes an allegation against a member of staff or volunteer will be dealt with in line with section 8 of this policy.

4. Specific Safeguarding Issues

- South Avenue Primary School is aware of the range of specific safeguarding issues and situations that can put children at greater risk of harm. In addition to Part One, DSLs, school leaders and staff who work directly with children will read Annex B of KCSIE 2023 which contains important additional information about specific forms of abuse and safeguarding issues.
- Where staff are unsure how to respond to specific safeguarding issues, they should follow the processes as identified in part 3 of this policy and speak with the DSL or a deputy.

4.1 Child-on-Child Abuse

- All members of staff at South Avenue Primary School recognise that children can abuse other children (referred to as child-on-child abuse, previously known as 'peer-on-peer' abuse), and that it can happen both inside and outside of school and online.
- South Avenue Primary School recognises that child on child abuse can take many forms, including but not limited to:
 - Bullying, including cyberbullying, prejudice-based and discriminatory bullying
 - abuse in intimate personal relationships between children
 - physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
 - sexual violence and sexual harassment

- consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
 - causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
 - upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
 - initiation/hazing type violence and rituals
- Any allegations of child-on-child abuse will be recorded, investigated, and dealt with in line with this child protection policy and KCSIE 2023 (in particular, part two and five).
 - South Avenue Primary School adopts a zero-tolerance approach to child-on-child abuse. We believe that abuse is abuse and it will never be tolerated or dismissed as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys”; this can lead to a culture of unacceptable behaviours and can create an unsafe environment for children and a culture that normalises abuse, which can prevent children from coming forward to report it.
 - All staff have a role to play in challenging inappropriate behaviours between children. Staff recognise that that some child on child abuse issues may be affected by gender, age, ability and culture of those involved, i.e. for gender based abuse, girls are more likely to be victims and boys more likely to be perpetrators.
 - South Avenue Primary School recognises that even if there are no reported cases of child on child abuse, such abuse is still likely to be taking place and it may be the case that it is just not being reported. As such, it is important that staff speak to the DSL (or deputy) about any concerns regarding child-on-child abuse.
 - In order to minimise the risk of child on child abuse, South Avenue Primary School will:
 - Implement a robust Anti-Bullying Policy
 - Provide an age appropriate PSHE programme
 - Provide an age appropriate RSE curriculum
 - Provide all children with access to worry/concern boxes in their classrooms
 - Provide ‘Time to Talk’ for children
 - South Avenue Primary School want children to feel able to confidently report abuse and know their concerns will be treated seriously. All allegations of child on child abuse will be reported to the DSL and will be recorded, investigated, and dealt with in line with associated school policies, including child protection, anti-bullying and behaviour. Children who experience abuse will be offered appropriate support, regardless of where the abuse takes place.
 - Concerns about pupil's behaviour, including child on child abuse taking place offsite will be responded to as part of a partnership approach with pupils and parents/carers. Offsite behaviour concerns will be recorded and responded to in line with existing appropriate policies, for example anti-bullying, acceptable use, behaviour and child protection policies.
 - Alleged victims, alleged perpetrators and any other child affected by child on child abuse will be supported by:
 - Having their concerns taken seriously
 - Being given the time and space for staff to listen to their concerns
 - Ensuring victim blaming is avoided
 - Offering appropriate wellbeing support either by school staff or external agencies
 - The school working together with parents/carers
 - Where necessary involving the police and/or integrated children's services

4.2 Child on Child Sexual Violence and Sexual Harassment

- When responding to concerns relating to child on child sexual violence or harassment, South Avenue Primary School will follow the guidance outlined in Part Five of KCSIE 2023.
- South Avenue Primary School recognises that sexual violence and sexual abuse can happen anywhere, and all staff will maintain an attitude of 'it could happen here.' South Avenue Primary School recognises that sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children and can occur online and face to face (both physically and verbally). Sexual violence and sexual harassment is never acceptable.
- **All** victims of sexual violence or sexual harassment will be reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, or be made to feel ashamed for making a report.
- Abuse that occurs online or outside of the school will not be dismissed or downplayed and will be treated equally seriously and in line with relevant policies/procedures.
- South Avenue Primary School recognises that the law is in place to protect children and young people rather than criminalise them, and this will be explained in such a way to pupils that avoids alarming or distressing them.
- South Avenue Primary School recognises that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory, so children may not be able to recall all details or timeline of abuse. All staff will be aware certain children may face additional barriers to telling someone, for example because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation.
- The DSL (or deputy) is likely to have a complete safeguarding picture and will be the most appropriate person to advise on the initial response.
 - The DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator, and any other children involved/impacted, in line with part five of KCSIE 2023 and relevant local/national guidance and support, for example [KSCMP](#) procedures and support from the [Education Safeguarding Service](#).
 - The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children, and staff and any actions that are required to protect them.
 - Any concerns involving an online element will take place in accordance with relevant local/national guidance and advice.
- Reports will initially be managed internally by the school and where necessary will be referred to [Integrated Children's Services](#) (Early Help and/or Children's Social Work Service) and/or the police. Important considerations which may influence this decision include:
 - the wishes of the victim in terms of how they want to proceed.
 - the nature of the alleged incident(s), including whether a crime may have been committed and/or whether Harmful Sexual Behavior has been displayed.
 - the ages of the children involved.
 - the developmental stages of the children involved.
 - any power imbalance between the children.

- if the alleged incident is a one-off or a sustained pattern of abuse - sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature.
 - that sexual violence and sexual harassment can take place within intimate personal relationships between children.
 - understanding intra familial harms and any necessary support for siblings following incidents.
 - whether there are any ongoing risks to the victim, other children, adult students, or school staff.
 - any other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.
- The school will in most instances engage with both the victim's and alleged perpetrator's parents/carers when there has been a report of sexual violence; this might not be necessary or proportionate in the case of sexual harassment and will depend on a case-by-case basis. The exception to this is if there is a reason to believe informing a parent/carer will put a child at additional risk. Any information shared with parents/carers will be in line with information sharing expectations, our confidentiality policy, and any data protection requirements, and where they are involved, will be subject to discussion with other agencies (for example Children's Social Work Service and/or the police) to ensure a consistent approach is taken.
 - If at any stage the DSL is unsure how to proceed, advice will be sought from the [Education Safeguarding Service](#).

4.3 Nude and/or Semi-Nude Image Sharing by Children

- South Avenue Primary School recognises that consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as youth produced/involved sexual imagery or "sexting") can be a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).
- When made aware of concerns involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos by children, staff are advised to:
 - Report any concerns to the DSL immediately.
 - Never view, copy, print, share, forward, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already inadvertently viewed imagery, this will be immediately reported to the DSL.
 - Not delete the imagery or ask the child to delete it.
 - Not say or do anything to blame or shame any children involved.
 - Explain to child(ren) involved that they will report the issue to the DSL and reassure them that they will receive appropriate support and help.
 - Not ask the child or children involved in the incident to disclose information regarding the imagery and not share information about the incident with other members of staff, the child(ren) involved or their, or other, parents and/or carers. This is the responsibility of the DSL.
- DSLs will respond to concerns in line with the non-statutory UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) and the local [KSCMP](#) guidance. When made aware of a concern involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos:
 - the DSL will hold an initial review meeting to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child involved. This may mean speaking with relevant staff and the children involved as appropriate.
 - parents and carers will be informed at an early stage and be involved in the process to best support children, unless there is good reason to believe that involving them would put a child at risk of harm.
 - All decisions and action taken will be recorded in line with our child protection procedures.
 - a referral will be made to ICS and/or the police immediately if:
 - the incident involves an adult (over 18).

- there is reason to believe that a child has been coerced, blackmailed, or groomed, or there are concerns about their capacity to consent, for example, age of the child or they have special educational needs.
- the image/videos involve sexual acts and a child under the age of 13, depict sexual acts which are unusual for the child's developmental stage, or are violent.
- a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes.
- The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date.
- If DSLs are unsure how to proceed, advice will be sought from the [Education Safeguarding Service](#).

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

- South Avenue Primary School recognises that both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.
- South Avenue Primary School recognises that children can become trapped in CCE as perpetrators can threaten victims and their families with violence or entrap and coerce them into debt. Children involved in criminal exploitation often commit crimes themselves which can mean their vulnerability as victims is not always recognised (particularly older children) and they are not treated as victims, despite the harm they have experienced. The experience of girls who are criminally exploited can also be very different to that of boys. We also recognise that boys and girls being criminally exploited may be at higher risk of child sexual exploitation (CSE).
- South Avenue Primary School recognises that CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities and includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited, for example they may believe they are in a genuine romantic relationship.
- If staff are concerned that a child may be at risk of CSE or CCE, immediate action should be taken by speaking to the DSL or a deputy.

4.5 Serious Violence

- All staff are aware of the indicators which may signal children are at risk from or are involved with serious violent crime. These may include unexplained gifts or new possessions, increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of CCE.
- Any concerns regarding serious violence will be reported and responded to in line with other child protection concerns by speaking with a DSL or deputy. The initial response to child victims is important and staff will take any allegations seriously and work in ways that support children and keep them safe.

4.6 Modern Slavery

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

4.7 So-called Honour Based Abuse (HBA)

- So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.
- All forms of HBA are abuse, regardless of the motivation, and concerns will be responded to in line with section 3 of this policy. Staff will report any concerns about HBA to the DSL (or a deputy). If there is an immediate threat, the police will be contacted
- Whilst all staff will speak to the DSL (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers.
 - Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. It will be rare for teachers to see visual evidence, and they should not be examining [pupils/students](#), however teachers who do not personally report such concerns may face disciplinary sanctions. Further information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#) and [FGM Fact Sheet](#).

Unless the teacher has good reason not to, they should still consider and discuss any FGM concerns with the designated safeguarding lead (or a deputy), and ICS should be informed as appropriate.

4.8 Preventing Radicalisation

- South Avenue Primary School recognises that children are vulnerable to extremist ideology and radicalisation. South Avenue Primary School is aware of our duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), to have “due regard to the need to prevent people from being drawn into terrorism”, also known as the Prevent duty and the [specific obligations](#) placed upon us as an education provider regarding risk assessments, working in partnership, staff training, and IT policies.
- All staff have received appropriate training to enable them to be alert to changes in children’s behaviour which could indicate that they may need help or protection from radicalisation.
- Staff will report any concerns to the DSL (or a deputy), who is aware of the [local procedures](#) to follow for making a Prevent referral. If there is an immediate threat, the police will be contacted via 999.

4.9 Cybercrime

- South Avenue Primary School recognises that children with particular skills and interest in computing and technology may inadvertently or deliberately stray into 'cyber-enabled' (crimes that can happen offline but are enabled at scale and at speed online) or 'cyber dependent' (crimes that can be committed only by using a computer/internet enabled device) cybercrime.
- If staff are concerned that a child may be at risk of becoming involved in cyber-dependent cybercrime, the DSL or a deputy will be informed, and consideration will be given to accessing local support and/or referring into the [Cyber Choices](#) programme, which aims to intervene when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.
- Where there are concerns about 'cyber-enabled' crime such as fraud, purchasing of illegal drugs online, child sexual abuse and exploitation, or other areas of concern such as online bullying or general online safety, they will be responded to in line with the child protection policy and other appropriate policies.

4.10 Domestic Abuse

- South Avenue Primary School recognises that 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 abuse. Children can be victims of domestic abuse and may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). Domestic abuse can have a detrimental and long-term impact on children's health, well-being, development, and ability to learn.
- If staff are concerned that a child may be at risk of seeing, hearing, or experiencing the effects of domestic abuse in their home, or in their own intimate relationships, immediate action should be taken by speaking to the DSL or a deputy.
- South Avenue Primary School is an [Operation Encompass School](#). This means we work in partnership with Kent Police to provide support to children experiencing the effects of domestic abuse. An Operation Encompass notification is sent to the school when the police are called to an incident of domestic abuse and there are children in the household; the police are expected to inform schools before the child(ren) arrive the following day.
 - Operation Encompass notifications help ensure that we have up to date and relevant information about children's circumstances and enables us to put immediate support in place according to the child's needs.
 - Operation Encompass does not replace statutory safeguarding procedures and where appropriate, a referral to the front door will be made if there are any concerns about a child's welfare.
 - Where the school is unsure of how to respond to a notification, advice will be sought from the Education Safeguarding Service or the Operation Encompass helpline which is available 8AM to 1PM, Monday to Friday on 0204 513 9990.

4.11 Mental Health

- All staff recognise that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Staff are aware that children's experiences, for example where children have suffered abuse and neglect, or other potentially traumatic Adverse Childhood Experiences (ACEs), can impact on their mental health, behaviour, and education.

- Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or a deputy.

5. Supporting Children Potentially at Greater Risk of Harm

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

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

- South Avenue Primary School acknowledges that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges and barriers for recognising abuse and neglect.
- South Avenue Primary School recognises that children with SEND may face additional communication barriers and experience difficulties in managing or reporting abuse or challenges. Children with SEND will be appropriately supported to communicate and ensure that their voice is heard and acted upon.
- All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour, mood changes or injuries and not to assume that they are related to the child's disability. Staff will be mindful that children with SEND or certain medical conditions may be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Members of staff are encouraged to be aware that children with SEND can be disproportionately impacted by safeguarding concerns, such as exploitation, peer group isolation or bullying including prejudice-based bullying.
- To address these additional challenges, our school will always consider implementing extra pastoral support and attention for children with SEND. The DSL will work closely with the SENDCo to plan support as required.
- Our school has an intimate care policy which ensure that the health, safety, independence, and welfare of children is promoted, and their dignity and privacy are respected. Arrangements for intimate and personal care are open and transparent and accompanied by robust recording systems.

5.2 Children Requiring Mental Health Support

- South Avenue Primary School has an important role to play in supporting the mental health and wellbeing of pupils. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Where there are concerns regarding possible mental health problems for pupils, staff should:
 - Log the concern on CPOMS tagging the Senior Mental Health Lead and SENDCO
 - Follow up with the Senior Mental Health Lead and/or SENDCO should the situation deteriorate
 - If the concern is also of a safeguarding nature, immediate action should be taken by speaking to the DSL or deputy.

- Age/ability appropriate education will be provided to our pupils to help promote positive health, wellbeing, and resilience. This will be delivered via PSHE, RSE and Thrive action planning and interventions.

5.3 Children Missing from Education (CME)

- Children missing from education, particularly persistently, can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse, and child sexual and criminal exploitation - particularly county lines. A robust response to children missing from education will support the identification of such abuse and may help prevent the risk of children going missing in the future.
- Where possible, the school will hold more than one emergency contact number for each pupil so we have additional options to make contact with a responsible adult if a child missing education is also identified as being a welfare and/or safeguarding concern.
- Where the school have concerns that a child is missing from education, we will respond in line with our statutory duties (DfE: [Children missing education](#)) and local policies. Local support is available via the [PRU, Inclusion and Attendance Service \(PIAS\)](#).

5.4 Elective Home Education (EHE)

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

5.5 Children who need a Social Worker (child in need and child protection plans)

- The DSL will hold details of social workers working with children in the school so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes.
- Where children have a social worker, this will inform school decisions about their safety and promoting their welfare, for example, responding to unauthorised absence and provision of pastoral and/or academic support.

5.6 Looked after children, previously looked after children and care leavers

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

- Where a child is looked after, the DSL will hold details of the social worker and the name of the virtual school head in the authority that looks after the child.
- Where the school believe a child is being cared for as part of a private fostering arrangement (occurs when a child under 16 or 18 if the child is disabled is cared for and lives with an adult who is not a relative for 28 days or more) there is a duty to recognise these arrangements and inform the Local Authority via the front door.
- Where a child is leaving care, the DSL will hold details of the local authority Personal Advisor appointed to guide and support them and will liaise with them as necessary regarding any issues of concern.

5.7 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, South Avenue Primary School recognises that children who are LGBT or are perceived by other children to be LGBT (whether they are or not) can be targeted by other children or others within the wider community.
- South Avenue Primary School recognises risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. LGBT is included within our Relationship, Sex Education and Health Education curriculum and our staff will endeavour to reduce the additional barriers faced and provide a safe space for children to speak out or share any concerns.

6. Online Safety

- It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. South Avenue Primary School will adopt a whole school approach to online safety which will empower, protect, and educate our pupils and staff in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.
- South Avenue Primary School will ensure online safety is reflected as required in all relevant policies. Online safety is considered as a running and interrelated theme when devising and implementing our policies and procedures and when planning our curriculum, staff training, the role and responsibilities of the DSL and parental engagement.
- South Avenue Primary School identifies that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
 - Content: being exposed to illegal, inappropriate or harmful content. For example pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation 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.
 - Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.
- South Avenue Primary School recognises that technology, and the risks and harms related to it, evolve and change rapidly. The school will carry out an annual review of our approaches to online safety, supported by an annual risk assessment which considers and reflects the risks our children face.

- The head of school will be informed of online safety concerns by the DSL, as appropriate. The named governor for safeguarding will report on online safety practice and incidents, including outcomes, on a regular basis to the wider governing body.

To meet our aims and address the risks above, we will:

- › Educate pupils about online safety as part of our curriculum. For example:
 - The safe use of social media, the internet and technology
 - Keeping personal information private
 - How to recognise unacceptable behaviour online
 - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim
- › Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year
- › Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- › Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
 - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- › Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- › Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- › Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- › Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- › Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- › Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- › Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to our online safety policy and mobile phone policies which can be found on our website.

6.1 Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

South Avenue Primary School recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

South Avenue Primary School will treat any use of AI to access harmful content or bully pupils in line with this policy and our behaviour policy.

Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used by the school.

6.2 Policies and Procedures

- The DSL has overall responsibility for online safety within the school but will liaise with other members of staff, for example IT technicians, subject leads etc. as necessary.
- The DSL will respond to online safety concerns reported in line with our child protection and other associated policies, including our anti-bullying and behaviour policies.
 - Internal sanctions and/or support will be implemented as appropriate.
 - Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.
- South Avenue Primary School uses a wide range of technology. This includes computers, laptops, tablets and other digital devices, the internet, our learning platform, intranet and email systems.
 - All School owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.
- South Avenue Primary School recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras and wearable technology. In accordance with KCSIE 2023 and EYFS 2021 South Avenue Primary School has appropriate mobile and smart technology and image use policies in place, which are shared and understood by all members of the community.

6.3 Appropriate Filtering and Monitoring

- South Avenue Primary School will do all we reasonably can to limit children's exposure to online risks through school provided IT systems and will ensure that appropriate filtering and monitoring systems are in place.
 - The filtering system at South Avenue is a Fortigate system, this includes the Firewall. All appropriate updates and patches will be applied within 7 working days to ensure that the school's systems are protected from outside attacks and to minimise the risk of inappropriate web access.
 - All staff that connect their personal mobile phones to the wireless network must understand that they will be filtered in the same way that a desktop computer would be filtered and can be monitored.
 - Our leadership team and relevant staff have an awareness and understanding of the filtering and monitoring provisions in place, manage them effectively and know how to escalate concerns when identified.
 - All users will be informed that use of our systems can be monitored, and that monitoring will be in line with data protection, human rights, and privacy legislation.

- Filtering breaches or concerns identified through our monitoring approaches will be recorded and reported to the DSL who will respond as appropriate.
 - If learners or staff discover unsuitable sites or material, they are required to:
 - Remove the device if this is held by a child
 - Cover the screen as depicted by the type of technology
 - Advise a DSL
 - E-mail IT Helpdesk on helpdesk@fulstonmanor.kent.sch.uk with information of the concern including where appropriate the URL
 - Any access to material believed to be illegal will be reported immediately to the appropriate agencies, such as the [Internet Watch Foundation](#) and the police.
 - When implementing appropriate filtering and monitoring, South Avenue Primary School will ensure that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.
- South Avenue Primary School acknowledges that whilst filtering and monitoring is an important part of school online safety responsibilities, it is only one part of our approach to online safety.
 - Pupils will use appropriate search tools, apps and online resources as identified following an informed risk assessment.
 - Internet use will be supervised by staff as appropriate to pupils age and ability.
 - Pupils will be directed to use age/ability appropriate online resources and tools by staff.

6.4 Information Security and Access Management

- South Avenue Primary School is responsible for ensuring an appropriate level of security protection procedures are in place, in order to safeguard our systems as well as staff and pupils. Further information can be found in the school’s acceptable use policies.
- South Avenue Primary School will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

6.5 Remote Learning

- South Avenue Primary School will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements and any local/national guidance.
- All communication with pupils and parents/carers will take place using school provided or approved communication channels; for example, school provided email accounts and phone numbers and/or agreed systems e.g. Microsoft 365, Arbor and Tapestry.
 - Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.
- Staff and pupils will engage with remote teaching and learning in line with existing behaviour principles as set out in our school behaviour policy and Acceptable Use Policies.
- Staff and pupils will be encouraged to report issues experienced at home and concerns will be responded to in line with our child protection and other relevant policies.

- When delivering remote learning, staff will follow our Remote Learning Policy.

6.6 Staff Training

- South Avenue Primary School will ensure that all staff receive online safety training as part of induction and that ongoing online safety training and update for all staff will be integrated, aligned and considered as part of our overarching safeguarding approach. See section 7 for more information

6.7 Educating Pupils

- South Avenue Primary School will ensure a comprehensive whole school curriculum response is in place to enable all pupils to learn about and manage online risks effectively as part of providing a broad and balanced curriculum. See section 9 for more information.

6.8 Working with Parents/Carers

- South Avenue Primary School will build a partnership approach to online safety and will support parents/carers to become aware and alert of the potential online benefits and risks for children by:
 - Sending out weekly parent guides on online safety topics produced by The Safer Internet Centre
 - Including online safety updates in newsletters
- South Avenue Primary School will ensure parents and carers understand what systems are used to filter and monitor their children's online use at school, what their children are being asked to do online, including the sites they will be asked to access and who from the school (if anyone) their child is going to be interacting with online. This is achieved by:
 - Using a Fortigate firewall / web filtering system that tracks website usage.
- Where the School is made aware of any potentially harmful risks, challenges and/or hoaxes circulating online, national or locally, we will respond in line with the DfE [‘Harmful online challenges and online hoaxes’](#) guidance to ensure we adopt a proportional and helpful response.

7. Staff Engagement & Expectations

7.1 Awareness, Induction & Training

- All members of staff have been provided with a copy of Part One or annex A of *“Keeping Children Safe in Education”* (2023) which covers safeguarding information for all staff.
 - School leaders, including the DSL will read KCSIE in its entirety.
 - School leaders and all members of staff who work directly with children will read annex B.
 - All members of staff have signed to confirm that they have read and understood the national guidance shared with them. This is noted on the single central record.

- All new staff and volunteers (including agency and third party staff) receive safeguarding and child protection training (including online safety), including information to ensure they are aware of the school internal safeguarding processes, as part of their induction. This will be achieved via:
 - Online learning
 - Specific training via the DSL or deputy
 -
- All governors and trustees receive appropriate safeguarding and child protection (including online safety) training at induction. This training equips them with the knowledge to provide strategic challenge to test and assure that our safeguarding policies and procedures are effective and support the delivery of a robust whole school approach to safeguarding. This training is regularly updated.

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

- All staff members (including agency and third-party staff) will receive appropriate child protection training (including online safety) to ensure they are aware of a range of safeguarding issues. This training will be updated at least annually.
 - Annual face to face safeguarding training for all staff using staff development days run by the DSL ensuring local context is given
 - Updates within staff meetings
 - E-mails to staff
 - On line training from accredited providers
- Online safety training for staff will be integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning.
 - Annual face to face safeguarding training for all staff using staff development days run by the DSL ensuring local context is given
 - Updates within staff meetings
 - E-mails to staff
 - On line training from accredited providers
- In addition to specific child protection training, all staff will receive regular safeguarding and child protection updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. This will be achieved by:
 - Annual face to face safeguarding training for all staff using staff development days run by the DSL ensuring local context is given
 - Updates within staff meetings
 - E-mails to staff
 - On line training from accredited providers
- South Avenue Primary School recognises the expertise staff build by undertaking safeguarding training and from managing safeguarding concerns on a daily basis and staff are encouraged to contribute to and shape school safeguarding arrangements and child protection policies.
 - Regular DSL Meetings
 - Staff meetings
- The DSL and head of school will provide an annual report to the governing body detailing safeguarding training undertaken by all staff and will maintain an up to date record of who has been trained.

7.2 Safe Working Practice

- All members of staff are required to work within our clear guidelines on safer working practice as outlined in the school's code of conduct.
- The DSL will ensure that all staff and volunteers (including agency and third-party staff) have read the child protection policy and are aware of the school expectations regarding safe and professional practice via the staff code of conduct and Acceptable Use Policy.
- Staff will be made aware of the school behaviour management and physical intervention policies. Staff will manage behaviour effectively to ensure a good and safe educational environment and will have a clear understanding of the needs of all children. Any physical interventions and/or use of reasonable force will be in line with our agreed policy and procedures and national guidance.
- All staff will be made aware of the professional risks associated with the use of social media and electronic communication (such as email, mobile phones, texting, social networking). Staff will adhere to relevant school policies including the staff Acceptable Use Policy and mobile and smart technology.

7.3 Supervision and Support

- The induction process will include familiarisation with child protection responsibilities and procedures to be followed if members of staff have any concerns about a child's safety or welfare.
- The school will ensure that members of staff who are working within the foundation stage are provided with appropriate supervision in accordance with the statutory requirements of Early Years Foundation Stage (EYFS) 2021.
- The school will provide appropriate supervision and support for all members of staff to ensure that:
 - All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children
 - All staff are supported by the DSL in their safeguarding role.
 - All members of staff have regular reviews of their own practice to ensure they improve over time.
- Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL.
- The DSL will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union, the Education Support Partnership or other similar organisations directly.

8 Safer Recruitment and Allegations

8.1 Safer Recruitment and Safeguarding Checks

- South Avenue Primary School is committed to ensure that they develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our pupils and staff.
 - South Avenue Primary School will follow relevant guidance in Keeping Children Safe in Education 2023 (Part Three, 'Safer Recruitment') and from The Disclosure and Barring Service (DBS)

- The governing body and leadership team are responsible for ensuring that the school follows safe recruitment processes as outlined within guidance.
- The governing body will ensure that there is at least one of the persons who conducts an interview has completed safer recruitment training.
- The school maintains an accurate Single Central Record (SCR) in line with statutory guidance.
- South Avenue Primary School are committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools.
- We advise all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands, and warnings.
- Where the school places a pupil with an alternative provision provider, the school will continue to be responsible for the safeguarding of that child.
 - The school will undertake appropriate checks to ensure the provider meets the needs of the pupil, including written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment.

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

- Any concerns or allegations about staff will be recorded and dealt with appropriately in line with national (Part four of KCSIE 2023) and the [local Kent allegations arrangements](#). In depth information can be found within our and/or code of conduct.
- Any concerns or allegations about staff will be recorded and dealt with appropriately in line with national (Part four of KCSIE) and local guidance. Ensuring concerns are dealt with effectively will protect those working in or on behalf of the school from potential false allegations or misunderstandings.
- Where the head of school is unsure how to respond, for example if the school is unsure if a concern meet the harm 'thresholds', advice will be sought via the [Local Authority Designated Officer](#) (LADO) Enquiry Line and/or the [Education Safeguarding Service](#).
- Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer (LADO).

8.2.1 Concerns that meet the 'harm threshold'

- South Avenue Primary School recognises that it is possible for any member of staff, including volunteers, governors, contractors, agency and third-party staff (including supply teachers) and visitors to behave in a way that indicates a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college. This includes when someone has
 - behaved in a way that has harmed a child, or may have harmed a child and/or
 - possibly committed a criminal offence against or related to a child and/or;

- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
 - behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- Allegations against staff which meet this threshold will be responded to and managed in line with part four of KCSIE. Allegations that meet the harm threshold will be referred immediately to the head of school who will contact the [LADO](#) to agree further action to be taken in respect of the child and staff member. In the event of allegations of abuse being made against the head of school, staff are advised that allegations should be reported to the chair of governors who will contact the LADO.

8.2.2 Concerns that do not meet the ‘harm threshold’

- South Avenue Primary School may also need to take action in response to ‘low-level’ concerns about staff. Additional information regarding low-level concerns is contained with our code of conduct – this includes what a low-level concern is, the importance of sharing them and the confidential procedure to follow when sharing them.
 - South Avenue Primary School has an open and transparent culture in which all concerns about all adults working in or on behalf of the school are dealt with promptly and appropriately; this enables us to identify inappropriate, problematic or concerning behaviour early, minimise the risk of abuse and ensure that adults working in or on behalf of the school are clear about and act within appropriate professional boundaries, and in accordance with our ethos and values.
 - A ‘low-level’ concern does not mean that it is insignificant; a low-level concern is any concern that an adult working in or on behalf of the school may have acted in a way that is inconsistent with our staff code of conduct, including inappropriate conduct outside of work and does not meet the ‘harm threshold’ or is otherwise not serious enough to consider a referral to the LADO.
 - Low-level concerns may arise in several ways and from a number of sources. For example, suspicion, complaints, or allegations made by a child, parent or other adult within or outside of the organisation, or as a result of vetting checks.
- It is crucial that all low-level concerns are shared responsibly, recorded and dealt with appropriately to protect staff from becoming the subject of potential false low-level concerns or misunderstandings.
- Low-level concerns should be shared confidentially in line with our code of conduct to either Mr S Savva (SENDCO) or Miss E Smith (Vice Head of School).
 - Where low-level concerns are reported to the school, the head of school will be informed of all low-level concerns and is the ultimate decision maker in respect of the response to all low-level concerns.
 - The head of school will share concerns and liaise with the LADO enquiries officer via the [LADO Enquiry Line](#).
 - Low-level concerns shared about supply staff and contractors will be shared with their employers so any potential patterns of inappropriate behaviour can be identified.
 - If the school is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, we will consult with the LADO.
- Low-level concerns will be recorded in writing and reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified.
 - Records will be kept confidential and will be held securely and retained and in compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) and other relevant policies and procedures (for example data retention policies).
 - Where a pattern is identified, the school will implement appropriate action, for example consulting with [the LADO enquiry line](#) and following our disciplinary procedures.

8.3 Safe Culture

- As part of our approach to safeguarding, the School has created and embedded a culture of openness, trust and transparency in which our values and expected behaviour as set out in our code of conduct are constantly lived, monitored and reinforced by all staff (including supply teachers, volunteers and contractors) and where all concerns are dealt with promptly and appropriately.
- Staff are encouraged and should feel confident to self-refer, if they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards. This includes where concerns may be felt to be deliberately invented or malicious; such allegations are extremely rare and as such all concerns should be reported and recorded.
- All staff and volunteers should feel able to raise any concerns about poor or unsafe practice and potential failures in the school safeguarding regime. The leadership team at South Avenue Primary School takes all concerns or allegations received seriously.
- All members of staff are made aware of the school Whistleblowing procedure. It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk.
- Staff can access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.
- South Avenue Primary School has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person.
 - If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the [LADO](#) and/or FMAT HR & Finance Director.

9. Opportunities to Teach Safeguarding

- South Avenue Primary School will ensure that children are taught about safeguarding, including online safety, as part of providing a broad and balanced curriculum. This will include covering relevant issues through RSE and PSHE.
- 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 curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that pupils have a range of age appropriate contacts and strategies to ensure their own protection and that of others.
- South Avenue Primary School recognises the crucial role we have to play in preventative education. Preventative education is most effective in the context of a whole school approach which prepares pupils for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment.

- South Avenue Primary School has a clear set of values and standards, upheld, and demonstrated throughout all aspects of school life which are underpinned by our behaviour policy and pastoral support system, as well as by a planned programme of evidence based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. Our programme is fully inclusive and developed to be age and stage of development appropriate.
- South Avenue Primary School recognise that a one size fits all approach will not be appropriate for all children, and a more personalised or contextualised approach, tailored to the specific needs and vulnerabilities of individual children might be needed, for example children who are victims of abuse and children with SEND.
- Our school systems support children to talk to a range of staff. All children will be listened to and heard, and their concerns will always be taken seriously and acted upon as appropriate

10. Physical Safety

10.1 Use of 'reasonable force'

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

10.2 The Use of Premises by Other Organisations

- Where services or activities are provided separately by another body using the school facilities/premises, the head of school and governing body will seek written assurance that the organisation concerned has appropriate policies and procedures in place regarding safeguarding children and child protection, and that relevant safeguarding checks have been made in respect of staff and volunteers. If this assurance is not achieved, an application to use premises will be refused.
- Safeguarding requirements will be included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises. Failure to comply with this will lead to termination of the agreement.
 - If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

10.3 Site Security

- All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light.
- Appropriate checks will be undertaken in respect of visitors and volunteers coming into school as outlined within national guidance. Visitors will be expected to, sign in and out via the office visitors log and to display a visitor's badge whilst on site.
- Staff and visitors will be expected to adhere to any safety arrangements implemented in response to Covid-19 restrictions.

- Any individual who is not known or identifiable on site should be challenged for clarification and reassurance.
- The school will not accept the behaviour of any individual (parent or other) that threatens school security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school site.

11. Local Support

- All members of staff in South Avenue Primary School are made aware of local support available
 - **Education Safeguarding Service**
 - **Area Safeguarding Advisor**
 - 03000 423157
 - **Online Safety in the Education Safeguarding Service**
 - 03000 423164
 - **LADO Service**
 - Telephone: 03000 410888
 - Email: kentchildrenslado@kent.gov.uk
 - **Integrated Children's Services/ Children's Social Work Services**
 - Front Door: 03000 411111
 - Out of Hours Number: 03000 419191
 - **Early Help**
 - 03000 42 11 62
 - EarlyHelpSwale@kent.gov.uk
 - **Kent Police**
 - 101 or 999 if there is an immediate risk of harm
 - **Kent Safeguarding Children Multi-Agency Partnership (KSCMP)**
 - kscmp@kent.gov.uk
 - www.kscmp.org.uk
 - 03000 421126
 - **Adult Safeguarding**
 - Adult Social Care via 03000 41 61 61 (text relay 18001 03000 41 61 61) or email social.services@kent.gov.uk

Appendix 1: Categories of Abuse

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

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children. It should be noted that abuse can be carried out both on and offline and be perpetrated by men, women, and children.

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

Signs that MAY INDICATE Sexual Abuse

- Sudden changes in behaviour and performance
- Displays of affection which are sexual and age inappropriate
- Self-harm, self-mutilation or attempts at suicide
- Alluding to secrets which they cannot reveal
- Tendency to cling or need constant reassurance
- Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby
- Distrust of familiar adults e.g. anxiety of being left with relatives, a childminder or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Fear of undressing for PE
- Sexually transmitted disease
- Fire setting

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

Signs that MAY INDICATE physical abuse

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft area of the face such as the cheeks
- Fingertip bruising to the front or back of torso
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns
- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot
- Aggressive behaviour or severe temper outbursts.
- Injuries need to be accounted for. Inadequate, inconsistent, or excessively plausible explanations or a delay in seeking treatment should signal concern.

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

Signs that MAY INDICATE emotional abuse

- Over reaction to mistakes
- Lack of self-confidence/esteem
- Sudden speech disorders
- Self-harming
- Eating Disorders
- Extremes of passivity and/or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parents being contacted
- Unwillingness or inability to play
- Excessive need for approval, attention, and affection

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

Signs that MAY INDICATE neglect.

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing
- Frequent lateness or non-attendance
- Untreated medical problems
- Poor relationship with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight
- Low self esteem

Appendix 2: Support Organisations

NSPCC 'Report Abuse in Education' Helpline

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

National Organisations

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

Support for Staff

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

Support for pupils/students

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

Support for Adults

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

Support for Learning Disabilities

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

Contextual Safeguarding Network

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

Kent Resilience Hub

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

Substance Misuse

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

Domestic Abuse

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

Criminal and Sexual Exploitation

- National Crime Agency: www.nationalcrimeagency.gov.uk/who-we-are
- It's not okay: www.itsnotokay.co.uk
- NWG Network: www.nwgnetwork.org
- County Lines Toolkit for Professionals:
www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit

Honour Based Abuse

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

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

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

Online Safety

- NCA-CEOP: www.ceop.police.uk and www.thinkuknow.co.uk

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

Mental Health

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

Radicalisation and hate

- Educate against Hate: www.educateagainsthate.com
- Counter Terrorism Internet Referral Unit: www.gov.uk/report-terrorism
- True Vision: www.report-it.org.uk

Children with Family Members in Prison

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