



Sheerness West Federation

CHILD PROTECTION (SAFEGUARDING) POLICY





September 22

Review: **December 23**

"Dreams Come True With A Positive View"

Policy Review Process	
Frequency of Review	Annually
Reviewed	September 22
Reviewed By	Mrs S Mackay
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Policy Status	Statutory
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Policy Approval			
Policy to be approved by:		Governing Body	
Title	Name	Signed	Dated
Chair of Governing Body	Mr M Azzi		05.10.2022
Executive Headteacher	Mr A Pattenden		05.10.2022
Head of Rose Street	Mrs S Mackay		05.10.2022
Head of West Minster	Miss H Brewer		05.10.2022
Date Policy Ratified by Governing Body / FLT			05.10.2022

This document is stored electronically in Office 365 and can be printed on request.

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

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

All due regard has been given to the Equality Act 2010 when creating the terms and conditions of this policy.

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Key Contact Personnel In Schools

	Name	School contact information
Designated Safeguarding Lead (DSL)	Sam Mackay (RS) Claire Carter (WM)	Rose Street 01795 663012 West Minster 01795 662178
Deputy Designated Safeguarding Lead	Yvonne Bower (RS) Sally Creavin (RS) Hazel Brewer (WM) Tina Ovenden (WM)	Rose Street 01795 663012 West Minster 01795 662178
Executive Headteacher	Anna Pattenden	Rose Street 01795 663012 West Minster 01795 662178
Safeguarding Governor	Alan Norley	Rose Street 01795 663012 West Minster 01795 662178

What to do if you have a welfare concern

Why are you concerned?

For example

- Something a child has said – for example, an allegation of harm
- Child's appearance – may include unexplained marks as well as dress
- Behaviour change
- Witnessed concerning behaviour

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

Follow the school procedure by using MYCONCERN or Green Forms.

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

Inform the Designated Safeguarding Leads

Designated Safeguarding Lead

- Consider whether the child is at immediate risk of harm: are they safe to go home?
- Access the Kent Safeguarding Support Level Guidance document and procedures: www.kscmp.org.uk
- Refer to other agencies as appropriate, for example, Internal or community services, early help open access, LADO, Police or make a Request for Support via Integrated Children's Services
- If unsure, consult with Area Education Safeguarding Advisor 03000 412455 or Local Authority Social Worker at the Front Door: 03000 411111 www.kscmp.org.uk

If you are unhappy with the response

Staff:

- Follow local escalation procedures
- Follow whistleblowing procedures

Pupils/Students and Parents:

- Follow school complaints procedures <http://www.rose-street.kent.sch.uk/>
- <http://www.west-minster.kent.sch.uk/>

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

Monitor

Be clear about:

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

Review and request further support if necessary

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

Child Focused Approach to Safeguarding

Introduction

- Sheerness West Federation 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/students) 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.
- Sheerness West Federation believe that the best interests of children always come first. All children (defined as those up to the age of 18) have a right to be heard and to have their wishes and feelings taken into account and all children regardless of age, gender, ability, culture, race, language, religion or sexual identity or orientation, have equal rights to protection.
- Staff working with children at Sheerness West Federation 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.
- Sheerness West Federation recognises the importance of providing an ethos and environment within Sheerness West Federation that will help children to be safe and to feel safe. In Sheerness West Federation children are respected and are encouraged to talk openly. We will ensure children's wishes and feelings are taken into account when determining what safeguarding action to take and what services to provide.
- Our core safeguarding principles are:
 - **Prevention**
 - ✦ positive, supportive, safe culture, curriculum and pastoral opportunities for children, safer recruitment procedures.
 - **Protection**
 - ✦ following the agreed procedures, ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns.
 - **Support**
 - ✦ for all pupils/students, parents and staff, and where appropriate specific interventions 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 KCSIE 2022.

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' 2022 (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 2022 (KCSIE)
 - Working Together to Safeguard Children 2018 (WTSC)
 - Ofsted: Education Inspection Framework'
 - Framework for the Assessment of Children in Need and their Families 2000
 - Kent and Medway Safeguarding Children Procedures
 - Early Years and Foundation Stage Framework 2021 (EYFS)
 - The Education Act 2002
 - Education Inspections Act 2006
 - The Education (Independent School Standards) Regulations 2014
 - The Non-Maintained Special Schools (England) Regulations 2015
 - The Human Rights Act 1998
 - The Equality Act 2010 (including Public Sector Equality Duty)

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

- Sheerness West Federation will continue to follow government guidance in response to the coronavirus (Covid-19) pandemic; regardless of the action required, our safeguarding principles will always remain the same. We will amend this policy and our approaches, as necessary.

- Sheerness West Federation recognise that as a result of the Covid-19 pandemic, some members of our community may have been exposed to a range of adversity and trauma including bereavement, anxiety and in some cases experienced increased welfare and/or safeguarding risks. We will work with local services, such as health and the local authority, to ensure necessary support is in place.

Definition of Safeguarding

- In line with KCSIE 2022, 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.

- Sheerness West Federation acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):
 - Abuse and neglect
 - Bullying, including cyberbullying
 - Child-on-child abuse
 - Children with family members in prison
 - Children Missing Education (CME)
 - 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’ 2022)

Related Safeguarding Policies

- This policy is one of a series in Sheerness West Federation integrated safeguarding portfolio and should be read and actioned in conjunction with the policies as listed below:
 - School Behaviour and Anti-Bullying Policy
 - Home School Agreement
 - Use of Force Policy
 - Staff Code of Conduct
 - Social Media Policy
 - Mobile and Smart Technology
 - GDPR and Data Protection Policy
 - Relationship, Sex and Health Education (RSHE)
 - Supporting Pupils With Medical Conditions Policy
 - Health and Safety Policy
 - Attendance Policy
 - Risk assessments
 - First Aid Policy
 - Safeguarding Procedures for Managing Allegations Against Staff
 - Acceptable Use of Technology Policies (AUP)
 - Recruitment Policy
 - Whistleblowing Policy

Policy Compliance, Monitoring and Review

- Sheerness West Federation 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 2022 as appropriate. These documents can be found in the staff rooms at each school and on the school websites. KCSIE will be issued to all staff whenever it is updated and to new staff joining the Federation during the academic year.
- Parents/carers can obtain a copy of the Sheerness West Federation Child Protection Policy and other related policies on request. Additionally, our statutory policies can be viewed via the school websites: (<http://www.rose-street.kent.sch.uk/>) (<http://www.west-minster.kent.sch.uk>)
- The policy forms part of our Sheerness West Federation 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 Executive Headteacher will ensure regular reporting on safeguarding activity and systems to the Governing Body. The Governing Body will not receive details of individual learner situations or identifying features of families as part of their oversight responsibility.

Key Responsibilities

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 2022 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).
- 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 Sheerness West Federation has a nominated governor for safeguarding. The nominated governor will support the DSL and have oversight in ensuring that the Sheerness West Federation 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.

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

Designated Safeguarding Lead (DSL)

- The Sheerness West Federation has appointed Sam Mackay, Head of School for Rose Street Primary), a member of the senior leadership team and Claire Carter the Well-being Manager for West Minster Primary as the Designated Safeguarding Leads (DSL).
- The DSL's has overall responsibility for the day-to-day oversight of safeguarding and child protection systems (including online safety) in Sheerness West Federation. Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.
- The Sheerness West Federation has also appointed Deputy DSLs who will have delegated responsibilities and act in the DSLs absence.
 - Yvonne Bower – Deputy Head of Rose Street
 - Sally Creavin – FLO at Rose Street
 - Hazel Brewer – Head of School of West Minster
 - Tina Ovenden – Deputy Head of West Minster
- 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 2022. This includes but is not limited to:
 - Acting as the central contact point for all staff to discuss any safeguarding concerns
 - Maintaining a confidential recording system for safeguarding and child protection concerns
 - Coordinating safeguarding action for individual children
 - ✦ When supporting children with a social worker or looked after children the DSL should have the details of the child's social worker and the name of the virtual school head in the authority that looks after the child (with the DSL liaising closely with the designated teacher)
 - Liaising with other agencies and professionals in line with KCSIE 2022 and WTSC 2018
 - Ensuring that locally established procedures as put in place by the three safeguarding partners as part of the Kent Safeguarding Children Multi-Agency Partnership procedures (KSCMP), including referrals, are followed, as necessary.
 - Representing, or ensure the Sheerness West Federation is appropriately represented at multi-agency safeguarding meetings (including child protection conferences)
 - Managing and monitoring the Sheerness West Federation role in any multi-agency plan for a child.
 - Being available during term time (during Sheerness West Federation hours) for staff in the Sheerness West Federation to discuss any safeguarding concerns.

- Helping promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and Sheerness West Federation leadership staff.
 - Ensuring adequate and appropriate DSL cover arrangements in response to any closures and out of hours and/or out of term activities.
 - Ensuring all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE.
 - Informing the Executive Headteacher of any significant safeguarding issues.
 - Liaising with the Executive Headteacher to inform them of any safeguarding issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This includes being aware of the requirement for children to have an Appropriate Adult (PACE Code C 2019).
- The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. Deputy DSLs will be trained to the same standard as the DSL. The DSLs training will be updated formally at least every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.

Members of 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 he or she is being abused, 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 Sheerness West Federation 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.
- Staff at Sheerness West Federation 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.

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- Staff at Sheerness West Federation 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.

Children and Young People

- Children and young people (learners) 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 Sheerness West Federation safeguarding policies.
 - Receive help from a trusted adult.
 - Learn how to keep themselves safe, including online.

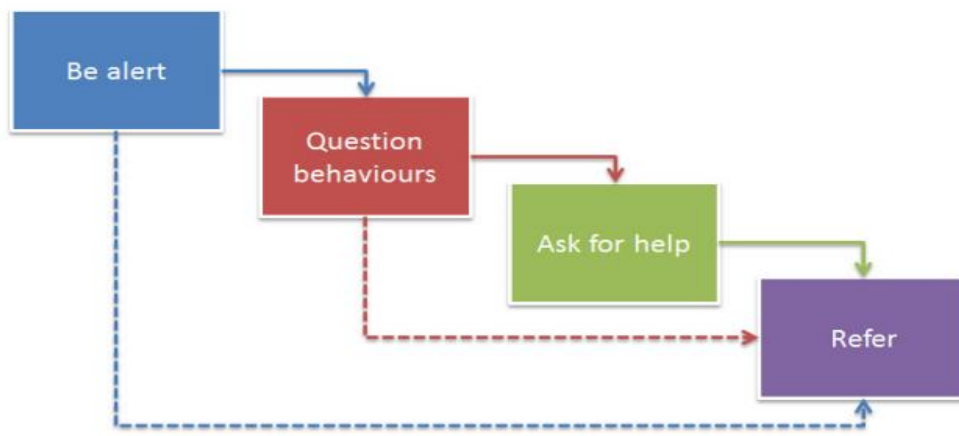
Parents and Carers

- Parents/carers have a responsibility to:
 - Understand and adhere the relevant Sheerness West Federation policies and procedures.
 - Talk to their children about safeguarding issues with their children and support the Sheerness West Federation 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 Sheerness West Federation or other agencies.

Child Protection Procedures

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 2022. This is outlined locally within the [Kent Support Levels Guidance](#).
- Sheerness West Federation of Rose Street School and West Minster Primary recognise that when assessing whether a child may be suffering actual or potential harm there are four categories of abuse (for more in-depth information, see appendix 1):
 - Physical abuse
 - Sexual abuse
 - Emotional abuse
 - Neglect
- By understanding the indicators 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

- Sheerness West Federation 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.
- Sheerness West Federation 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 Sheerness West Federation. 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.
- Sheerness West Federation 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.
- Sheerness West Federation recognises that some children have additional or complex needs and may require access to intensive or specialist services to support them.
- Following a concern about a child's safety or welfare, the searching and screening of children and confiscation of any items, including any electronic devices, will be managed in line with the School Behaviour and Anti-Bullying Policy which is informed by the DfE ['Searching, screening and confiscation at school'](#) guidance.

- The DSL (or deputy) will be informed of any searching incidents where there were reasonable grounds to suspect a pupil/student 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/student 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.

Responding to Child Protection Concerns

- If staff are made aware of a child protection concern, they are expected to:
 - listen carefully to child, reflecting back the concern.
 - use the child's language.
 - be non-judgmental.
 - avoid leading questions; only prompting the child where necessary with open questions to clarify information where necessary. For example who, what, where, when or Tell, Explain, Describe (TED).
 - not promise confidentiality as concerns will have to be shared further, for example, with the DSL and potentially Integrated Children's Services.
 - be clear about boundaries and how the report will be progressed.
 - record the concern using the facts as the child presents them, in line with MYCONCERN record keeping requirements.
 - 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. Staff should speak to a member of the senior leadership team and/or take advice from Education Safeguarding Service or via consultation with a social worker from the Front Door. In these circumstances, any action taken will be shared with a DSL as soon as is practically possible.
- All staff are made aware that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to other agencies. Staff will not assume a colleague, or another professional will act and share information that might be critical in keeping children safe.
- Sheerness West Federation 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.
 - Sheerness West Federation 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 an 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](#).
- Sheerness West Federation of Rose Street School and West Minster Primary is an [Operation Encompass School](#). This means we work in partnership with Kent Police to provide support to children experiencing domestic abuse.

Recording Concerns

- All safeguarding concerns, discussions and decisions, and reasons for those decisions, will be recorded on the Sheerness West Federation safeguarding **electronic My Concern form or a 'Green Form'** and passed without delay to the DSL.
- 'Green Forms' are kept in class safeguarding folders and the master folder in the staff rooms.
- 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 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 Sheerness West Federation. 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 (SENCOs) will be made aware of relevant information as required.
- Where a child joins the school and no child protection files are received, the DSL will proactively seek to confirm with the previous setting whether any child protections exist for the child, and if so, if the files have been sent

Multi-Agency Working

- Sheerness West Federation 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 Sheerness West Federation Leadership Team, Governing Body and DSLs 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.
- Sheerness West Federation 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 Sheerness West Federation 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.

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- The Executive Headteacher, Heads of School and DSLs 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 Sheerness West Federation School Behaviour and Anti-Bullying Policy, which is informed by the DfE Searching, Screening and Confiscation at School guidance.

Confidentiality and Information Sharing

- Sheerness West Federation 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.
- Sheerness West Federation has a Cantium DPO as a Service contract which provides an appropriately trained Data Protection Officer (DPO) as required by the UK General Data Protection Regulations (UK GDPR) and ensures that our Federation is compliant with all matters relating to confidentiality and information sharing requirements.
- 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 2022). The Information Commissioner's Office (ICO) and the DfE "[Information sharing advice for safeguarding practitioners](#)" (2018) provides further details regarding information sharing principles and expectations. A copy of which is kept in the Safeguarding Masters folder kept in the main Staffroom at both Rose Street and West Minster.
- The Executive Headteacher, Heads of School and DSLs will disclose relevant safeguarding information about a child 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 Staff Code of Conduct 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.

Complaints

- All members of the Sheerness West Federation community should feel able to raise or report any concerns about children's safety or potential failures in the school safeguarding regime. The Sheerness West Federation has a complaints procedure available to parents, students and members of staff and visitors who wish to report concerns or complaints. This can be found in the staff room and 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 Sheerness West Federation will take all concerns reported to the Federation 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.

Specific Safeguarding Issues

- Sheerness West Federation 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, Federation leaders and staff who work directly with children will read annex B of KCSIE 2022 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.

Child on Child Abuse

- All members of staff at Sheerness West Federation 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.
- Sheerness West Federation of Rose Street School and West Minster Primary recognises that peer on peer abuse can take many forms, including but not limited to:
 - Bullying, including cyberbullying, prejudice-based and discriminatory bullying
 - abuse in intimate personal relationships between children
 - physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
 - sexual violence and sexual harassment
 - consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
 - causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
 - upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
 - initiation/hazing type violence and rituals
- Any allegations of child-on-child abuse will be recorded, investigated, and dealt with in line with this child protection policy and KCSIE 2022 (in particular, part two and five.)
- Sheerness West Federation 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” as this can lead to a culture of unacceptable behaviours and can create an unsafe environment for children and a culture that normalises abuse, which can prevent children from coming forward to report it.

- All staff have a role to play in challenging inappropriate behaviours between children. Staff recognise that some child-on-child abuse issues may be affected by gender, age, ability and culture of those involved. For example, for gender-based abuse, girls are more likely to be victims and boys more likely to be perpetrators.
- Sheerness West Federation 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 peer-on-peer abuse, Sheerness West Federation will:
 - implementing a robust anti-bullying policy, providing an age/ability appropriate PSHE and RSE curriculum, providing a range of reporting mechanisms e.g. worry boxes, dedicated reporting emails monitored by DSLs, online report forms.
- Sheerness West Federation 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 Federation policies, including child protection, anti-bullying and behaviour. Students who experience abuse will be offered appropriate support, regardless of where the abuse takes place.
- Concerns about student's behaviour, including child-on-child abuse taking place offsite will be responded to as part of a partnership approach with [pupils/students](#)' and parents/carers. Offsite behaviour concerns will be recorded and responded to in line with existing appropriate policies, for example anti-bullying, acceptable use, behaviour and child protection policies.

Note: section 89(5) of the Education and Inspections Act 2006 gives headteachers a statutory power to discipline pupils for poor behaviour outside of the school premises, for example, when children are not under the lawful control or charge of a member of school staff, to such extent as is reasonable. This legislation is for schools only and is not applicable to independent schools.

- Alleged victims, alleged perpetrators and any other child affected by child-on-child abuse will be supported by
 - Taking reports seriously, listening carefully, avoiding victim blaming, providing appropriate pastoral support, working with parents/carers, reviewing educational approaches, following procedures as identified in other policies e.g. the School Behaviour and Anti bullying Policy. The child protection policy and, where necessary and appropriate, informing the police and/or ICS.

Child on Child Sexual Violence and Sexual Harassment

- When responding to concerns relating to child-on-child sexual violence or harassment, Sheerness West Federation will follow the guidance outlined in Part Five of KCSIE 2022.
- Sheerness West Federation recognises sexual violence and sexual abuse can happen anywhere, and all staff will maintain an attitude of 'it could happen here.' Sheerness West Federation recognised sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children and can occur online and face to face (both physically and verbally). Sexual violence and sexual harassment is never acceptable.
- **All** victims of sexual violence or sexual harassment will be reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. A victim will never be given the impression that they are creating a

problem by reporting sexual violence or sexual harassment, or ever be made to feel ashamed for making a report.

- Abuse that occurs online or outside of the Sheerness West Federation will not be dismissed or downplayed and will be treated equally seriously and in line with relevant policies/procedures, for example school behaviour and anti-bullying, child protection.
- Sheerness West Federation 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 students that avoids alarming or distressing them.
- Sheerness West Federation 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 2022 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 Sheerness West Federation 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, or federation staff.
 - any other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.
- The Federation 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.

Nude and/or Semi-Nude Image Sharing by Children

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

- Sheerness West Federation 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 the imagery, this will be immediately reported to the DSL.
 - Not delete the imagery or ask the child to delete it.
 - To avoid saying or doing anything to blame or shame any children involved.
 - To reassure the child(ren) involved and explain that the DSL will be informed so they can receive appropriate support and help. Do not promise confidentiality, as other agencies may need to be informed and be involved.
 - Not to investigate or ask the child(ren) involved to disclose information regarding the imagery.
 - To not share information about the incident with other members of staff, the children/young people or parents/carers, including the families and child(ren) involved in the incident, this is the responsibility of the DSL.
- DSLs will respond to concerns in line with the non-statutory UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) and the local [KSCMP](#) guidance. When made aware of a concern involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos:
 - The DSL will hold an initial review meeting to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child involved.
This may mean speaking with relevant staff and the children involved as appropriate.
 - Parents 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.

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

- Sheerness West Federation 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.
- Sheerness West Federation 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).
- Sheerness West Federation 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.

Serious Violence

- All staff are made 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.

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 should 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.
- If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

Preventing Radicalisation

- Sheerness West Federation 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.
- Sheerness West Federation recognises that children are vulnerable to extremist ideology and radicalisation and staff will be alert to changes in children’s behaviour which could indicate that they may be in need of help or protection.
- Staff will report any concerns to the DSL (or a deputy), who is aware of the [local procedures](#) to follow. If there is an immediate threat, the police will be contacted via 999

Cybercrime

- Sheerness West Federation recognises that children with particular skill and interest in computing and technology may inadvertently or deliberately stray into ‘cyber-enabled’ (crimes that can happen offline but are enabled at scale and at speed online) or ‘cyber dependent’ (crimes that can be committed only by using a computer/internet enabled device) cybercrime.
- If staff are concerned that a child may be at risk of becoming involved in cyber-dependent cybercrime, the DSL or a deputy will be informed, and consideration will be given to accessing local support and/or referring into the [Cyber Choices](#) programme, which aims to intervene when 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.

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- Where there are concerns about ‘cyber-enabled’ crime such as fraud, purchasing of illegal drugs online, child sexual abuse and exploitation, or other areas of concern such as online bullying or general online safety, they will be responded to in line with the child protection and other appropriate policies.

Domestic Abuse

- Sheerness West Federation 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.
- Sheerness West Federation is an [Operation Encompass School](#). This means we work in partnership with Kent Police to provide support to children experiencing domestic abuse.
- If staff are concerned that a child may be at risk of seeing, hearing, or experiencing domestic abuse in their home or in their own intimate relationships, immediate action should be taken by speaking to the DSL or a deputy.

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.

Supporting Children Potentially at Greater Risk of Harm

- Whilst **all** children should be protected, Sheerness West Federation acknowledges that some groups of children are potentially at greater risk of harm. This can include the following groups:

Safeguarding Children with Special Educational Needs or Disabilities (SEND)

- Sheerness West Federation 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.
- Sheerness West Federation 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 Federation will always consider implementing extra pastoral support and attention for children with SEND. The DSL will work closely with the SENDco [Michelle Davies \(West Minster\)](#) and [Fay Griffiths \(Rose Street\)](#) to plan support as required.
- Our Federation has robust intimate/personal care policies (Toileting & 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. Further information can be found in our policy.

Children Requiring Mental Health Support

- Sheerness West Federation has an important role to play in supporting the mental health and wellbeing of our students. 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.
- 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, Deputy DSL or Yvonne Bower Mental Health Lead for the Federation.
- Age / ability appropriate education will be provided to our students to help promote positive health, wellbeing and resilience.

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 student 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 either of the Schools 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 \(PIAS\)](#).

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.

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 Federation 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 Federation decisions about their safety and promoting their welfare, for example, responding to unauthorised absence and provision of pastoral and/or academic support.

Looked after children, previously looked after children and care leavers

- Sheerness West Federation of Rose Street School and West Minster 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' [Yvonne Bower \(Rose Street\)](#) and [Tina Ovenden \(West Minster\)](#) who work 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 teachers will work with the DSLs 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 Federation 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.

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, Sheerness West Federation 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.
- Sheerness West Federation 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 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.

Online Safety

It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. Sheerness West Federation will adopt a whole Federation approach to online safety which will empower, protect, and educate our students and staff in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.

- Sheerness West Federation will ensure online safety is considered as a running and interrelated theme when devising and implementing our policies and procedures and when planning our curriculum, staff training, the role and responsibilities of the DSL and parental engagement.
- Sheerness West Federation 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.
- Sheerness West Federation recognises that technology, and the risks and harms related to it, evolve and change rapidly. The Federation 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 Executive Headteacher 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.

Policies and Procedures

- The DSLs has overall responsibility for online safety within the Federation but will liaise with other members of staff, for example IT Technicians and curriculum leads as necessary.
- The DSLs will respond to online safety concerns reported in line with our child protection and other associated policies, including our School Behaviour and Anti Bullying Policy and Social Media Policy.
 - 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.
- Sheerness West Federation uses a wide range of technology. This includes computers, laptops, tablets, iPads and other digital devices, the internet, our learning platform and email systems.

- All Federation owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.
- Sheerness West Federation 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 2022 and EYFS 2021 Sheerness West Federation has appropriate mobile and smart technology and image use policies in place, which are shared and understood by all members of the community. These policies can be found in the Microsoft Teams SWF Policies section.

Examining electronic devices

School staff have the specific power under the Education and Inspections Act 2006 (which has been increased by the Education Act 2011) to search for and, if necessary, delete inappropriate images or files on pupils' electronic devices, including mobile phones, iPads and other tablet devices, where they believe there is a 'good reason' to do so.

When deciding whether there is a good reason to examine or erase data or files on an electronic device, staff must reasonably suspect that the data or file in question has been, or could be, used to:

- Cause harm, and/or
- Disrupt teaching, and/or
- Break any of the school rules

If inappropriate material is found on the device, it is up to the staff member in conjunction with the DSL or other member of the senior leadership team to decide whether they should:

- Delete that material, or
- Retain it as evidence (of a criminal offence or a breach of school discipline), and/or
- Report it to the police*

* Staff may also confiscate devices for evidence to hand to the police, if a pupil discloses that they are being abused and that this abuse includes an online element.

Any searching of pupils will be carried out in line with:

- The DfE's latest guidance on [screening, searching and confiscation](#)
- UKCIS guidance on [sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
- The school's COVID-19 risk assessment

Any complaints about searching for or deleting inappropriate images or files on pupils' electronic devices will be dealt with through the school complaints procedure.

Pupils using mobile devices in school

Pupils are not allowed to use mobile devices from home in school.

Should a device be in school, this will be confiscated and held at the school office for safekeeping. Parents will be contacted. Items will be returned to the child / parent at the end of the school day.

Staff using own mobile devices in school

Sheerness west Federation provides devices, or access to devices for use in school. Staff who bring their own personal devices into school do so at their own risk. They will not be able to

connect them to the school wi-fi and are to ensure they remain securely out of sight or reach of any student.

Staff may only access their personal devices during official breaks when they are in a staff only environment, e.g. staffroom. Staff mobile phones should be stored in provided lockable storage boxes / lockers during working hours.

Staff using work devices outside school

All staff members will take appropriate steps to ensure their devices remain secure. This includes, but is not limited to:

- Keeping the device password-protected – strong passwords are at least 8 characters, with a combination of upper and lower-case letters, numbers and special characters (e.g. asterisk or currency symbol)
- Ensuring their hard drive is encrypted – this means if the device is lost or stolen, no one can access the files stored on the hard drive by attaching it to a new device
- Making sure the device locks if left inactive for a period of time
- Not sharing the device among family or friends
- Installing anti-virus and anti-spyware software
- Keeping operating systems up to date – always install the latest updates

Staff members must not use the device in any way which would violate the school's terms of acceptable use, as set out in Acceptable Use Policy.

Work devices must be used solely for work activities.

If staff have any concerns over the security of their device, they must seek advice from the Network Manager.

How the school will respond to issues of misuse

Where a pupil misuses the school's ICT systems or internet, we will follow the procedures set out in our policies on School Behaviour and Acceptable Use Policy. The action taken will depend on the individual circumstances, nature and seriousness of the specific incident, and will be proportionate.

Where a staff member misuses the school's ICT systems or the internet, or misuses a personal device where the action constitutes misconduct, the matter will be dealt with in accordance with the staff disciplinary procedures / staff code of conduct. The action taken will depend on the individual circumstances, nature and seriousness of the specific incident.

The school will consider whether incidents which involve illegal activity or content, or otherwise serious incidents, should be reported to the police.

Training

All new staff members will receive training, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation.

All staff members will receive refresher training at least once each academic year as part of safeguarding training, as well as relevant updates as required (for example through emails, e-bulletins and staff meetings).

By way of this training, all staff will be made aware that:

- Technology is a significant component in many safeguarding and wellbeing issues, and that children are at risk of online abuse
- Children can abuse their peers online through:
 - Abusive, harassing, and misogynistic messages
 - Non-consensual sharing of indecent nude and semi-nude images and/or videos, especially around chat groups
 - Sharing of abusive images and pornography, to those who don't want to receive such content
- Physical abuse, sexual violence and initiation/hazing type violence can all contain an online element

Training will also help staff:

- develop better awareness to assist in spotting the signs and symptoms of online abuse
- develop the ability to ensure pupils can recognise dangers and risks in online activity and can weigh the risks up
- develop the ability to influence pupils to make the healthiest long-term choices and keep them safe from harm in the short term

The DSL and deputies will undertake child protection and safeguarding training, which will include online safety, at least every 2 years. They will also update their knowledge and skills on the subject of online safety at regular intervals, and at least annually.

Governors will receive training on safe internet use and online safeguarding issues as part of their safeguarding training.

Volunteers will receive appropriate training and updates, if applicable.

Monitoring arrangements

The DSL logs behaviour and safeguarding issues related to online safety.

Online Safety will be reviewed every year as part of this annual policy review. At every review, the policy will be shared with the governing board. The review will be supported by an annual risk assessment that considers and reflects the risks pupils face online. This is important because technology, and the risks and harms related to it, evolve and change rapidly.

Roles and Responsibilities

The governing board

The governing board has overall responsibility for monitoring this policy and holding the headteacher to account for its implementation.

The governing board will co-ordinate regular meetings with appropriate staff to discuss online safety, and monitor online safety logs as provided by the designated safeguarding lead (DSL).

All governors will:

- Ensure that they have read and understand this policy
- Agree and adhere to the terms on acceptable use of the school's ICT systems and the internet (see AUP)
- Ensure that, where necessary, teaching about safeguarding, including online safety, is adapted for vulnerable children, victims of abuse and some pupils with SEND because of the importance of recognising that a 'one size fits all' approach may not be appropriate for all children in all situations, and a more personalised or contextualised approach may often be more suitable

The Executive Headteacher

The Executive Headteacher is responsible for ensuring that staff understand this policy, and that it is being implemented consistently throughout the school.

The Designated Safeguarding Lead

Details of the school's DSL and deputies are set out in our child protection and safeguarding policy as well as relevant job descriptions.

The DSL takes lead responsibility for online safety in school, in particular:

- Supporting the headteacher in ensuring that staff understand this policy and that it is being implemented consistently throughout the school
- Working with the headteacher, ICT manager and other staff, as necessary, to address any online safety issues or incidents
- Managing all online safety issues and incidents in line with the school child protection policy
- Ensuring that any online safety incidents are logged (see appendix 5) and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are logged and dealt with appropriately in line with the school behaviour policy
- Updating and delivering staff training on online safety (appendix 4 contains a self-audit for staff on online safety training needs)
- Liaising with other agencies and/or external services if necessary
- Providing regular reports on online safety in school to the headteacher and/or governing board

This list is not intended to be exhaustive.

The ICT Manager

The ICT manager is responsible for:

- Putting in place an appropriate level of security protection procedures, such as filtering and monitoring systems, which are reviewed and updated on a regular basis to assess effectiveness and ensure pupils are kept safe from potentially harmful and inappropriate content and contact online while at school, including terrorist and extremist material
- Ensuring that the school's ICT systems are secure and protected against viruses and malware, and that such safety mechanisms are updated regularly
- Conducting a full security check and monitoring the school's ICT systems on a regular basis
- Blocking access to potentially dangerous sites and, where possible, preventing the downloading of potentially dangerous files
- Ensuring that any online safety incidents are logged and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with the school behaviour policy

This list is not intended to be exhaustive.

All staff and volunteers

All staff, including contractors and agency staff, and volunteers are responsible for:

- Maintaining an understanding of this policy

- Implementing this policy consistently
- Agreeing and adhering to the terms on acceptable use of the school's ICT systems and the internet (appendix 3), and ensuring that pupils follow the school's terms on acceptable use (appendices 1 and 2)
- Working with the DSL to ensure that any online safety incidents are logged (see appendix 5) and dealt with appropriately in line with this policy
- Ensuring that any incidents of cyber-bullying are dealt with appropriately in line with the school behaviour policy
- Responding appropriately to all reports and concerns about sexual violence and/or harassment, both online and offline and maintaining an attitude of 'it could happen here' This list is not intended to be exhaustive.

Parents

Parents are expected to:

- Notify a member of staff or the headteacher of any concerns or queries regarding this policy
- Ensure their child has read, understood and agreed to the terms on acceptable use of the school's ICT systems and internet (appendices 1 and 2)

Parents can seek further guidance on keeping children safe online from the following organisations and websites:

- What are the issues? – [UK Safer Internet Centre](#)
- Hot topics – [Childnet International](#)
- Parent resource sheet – [Childnet International](#) ➤ [Healthy relationships – Disrespect Nobody](#)

Visitors and members of the community

Visitors and members of the community who use the school's ICT systems or internet will be made aware of this policy, when relevant, and expected to read and follow it. If appropriate, they will be expected to agree to the terms on acceptable use policy.

Appropriate Filtering and Monitoring

- Sheerness West Federation will do all we reasonably can to limit children's exposure to online risks through Federation provided IT systems. Working with our Support Partner, Cantium Business Solutions, they will provide and manage an appropriate filtering system which we are also able to monitor for security.
 - If learners or staff discover unsuitable sites or material, they are required to immediately tell an adult.
 - Our leadership team and relevant staff have an awareness and understanding of the filtering and monitoring provisions in place, manage them effectively and know how to escalate concerns when identified.
 - All users will be informed that use of our systems can be monitored, and that monitoring will be in line with data protection, human rights, and privacy legislation. ○ Filtering breaches or concerns identified through our monitoring approaches will be recorded and reported to the DSL who will respond as appropriate.

- Any access to material believed to be illegal will be reported immediately to the appropriate agencies, such as the [Internet Watch Foundation](#) and the police.
 - When implementing appropriate filtering and monitoring, Sheerness West Federation 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.
- Whilst filtering and monitoring is an important part of our online safety responsibilities, it is only one part of Sheerness West Federation’s approach to online safety.
 - Students will use appropriate search tools, apps and online resources as identified by staff, following an informed risk assessment.
 - Internet use will be supervised by staff as appropriate to students age and ability.
 - Students will be directed to use age / ability appropriate online resources and tools by staff.

Information Security and Access Management

- Sheerness West Federation 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 students. Further information can be found in Acceptable Use Policy.
- Sheerness West Federation will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

Remote/Online learning

- Sheerness West Federation 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 students and parents/carers will take place using federation provided or approved communication channels; for example, federation provided email accounts and phone numbers or agreed systems: Class Dojo, Microsoft 365 or equivalent.
 - Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.
- Staff and students will engage with remote teaching and learning in line with existing behaviour principles as set out in our school behaviour and acceptable use policies.
- Staff and students 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 Acceptable Use Policy (AUP)
- Parents/carers will be made aware of what their children are being asked to do online, including the sites they will be asked to access. Sheerness West Federation continue to be clear who from the Federation their child is going to be interacting with online.
- Parents/carers will be encouraged to ensure children are appropriately supervised online and that appropriate parent controls are implemented at home.

Staff Training

- Sheerness West Federation 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.

Educating Students

- Sheerness West Federation will ensure a comprehensive whole Federation curriculum response is in place to enable all students to learn about and manage online risks effectively as part of providing a broad and balanced curriculum. **UK Council for Internet Safety (UKCIS) '[Education for a Connected World Framework](#)' and DfE '[Teaching online safety in school](#)' documents will be used for guidance.**

Pupils will be taught about online safety as part of the curriculum:

The text below is taken from the [National Curriculum computing programmes of study](#).

It is also taken from the [guidance on relationships education, relationships and sex education \(RSE\) and health education](#).

All schools have to teach:

- [Relationships education and health education](#) in primary schools

In **Key Stage 1**, pupils will be taught to:

- Use technology safely and respectfully, keeping personal information private
- Identify where to go for help and support when they have concerns about content or contact on the internet or other online technologies

Pupils in **Key Stage 2** will be taught to:

- Use technology safely, respectfully and responsibly
- Recognise acceptable and unacceptable behaviour
- Identify a range of ways to report concerns about content and contact

By the **end of primary school**, pupils will know:

- That people sometimes behave differently online, including by pretending to be someone they are not
- That the same principles apply to online relationships as to face-to-face relationships, including the importance of respect for others online including when we are anonymous
- The rules and principles for keeping safe online, how to recognise risks, harmful content and contact, and how to report them
- How to critically consider their online friendships and sources of information including awareness of the risks associated with people they have never met
- How information and data is shared and used online
- What sorts of boundaries are appropriate in friendships with peers and others (including in a digital context)
- How to respond safely and appropriately to adults they may encounter (in all contexts, including online) whom they do not know

The safe use of social media and the internet will also be covered in other subjects where relevant.

Where necessary, teaching about safeguarding, including online safety, will be adapted for vulnerable children, victims of abuse and some pupils with SEND.

Working with Parents/Carers

- Sheerness West Federation 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 and to reinforce the importance of children being safe online by:
 - Providing information and advice on the school websites
 - ClassDojo communication
 - Newsletter
 - Parents Evenings
 - Individual support as required
- Sheerness West Federation 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 federation (if anyone) their child is going to be interacting with online.
- Where the federation 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.

Staff Engagement and Expectations

Staff Awareness, Induction and Training

- All members of staff have been provided with a copy of part one or annex A of 'Keeping Children Safe in Education' 2022 which covers safeguarding information for staff.
 - Sheerness West Federation leaders, including the DSL will read KCSIE in its entirety.
 - Sheerness West Federation 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. The Federation HR Manager will keep this information in the single central record.
- The DSLs will ensure that 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 Sheerness West Federation internal safeguarding processes, as part of their induction via leaflets, specific training by the DSL, e-Learning (MyConcern) and staff meetings. This training is regularly updated and is in line with advice from our safeguarding partners.
- 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 via annual invitation to the whole federation safeguarding training event.

- 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.
- Safeguarding training for staff, including online safety training, will be integrated, aligned and considered as part of the whole Sheerness West Federation safeguarding approach and wider staff training and curriculum planning.
- 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 including weekly NSPCC email updates, MY CONCERN updates, staff meetings and termly staff safeguarding newsletter.
- Staff will be encouraged to contribute to and shape Sheerness West Federation safeguarding arrangements and child protection policies. This will be achieved for example, via input from knowledgeable and experienced staff, inviting input at staff meetings and staff safeguarding audits.
- The DSLs and Executive Headteacher will provide an annual report to the governing body detailing safeguarding training undertaken by all staff and will maintain an up to date record of who has been trained.
- Although the Sheerness West Federation has a nominated lead for the governing body (Alan Norley), all members of the governing body will access appropriate safeguarding training which covers their specific strategic responsibilities on a regular basis.

Safer Working Practice

- All members of staff are required to work within our clear guidelines on safer working practice as outlined in the Sheerness West Federation Staff Code of Conduct.
- The DSL will ensure that all staff and volunteers (including agency and third-party staff) have read our child protection policy and are aware of the Sheerness West Federation expectations regarding safe and professional practice via the Staff Code of Conduct and Acceptable Use Policy (AUP).
- Staff will be made aware of the Federation 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 Sheerness West Federation including Staff Code of Conduct, Mobile and Smart Technology Policy, Acceptable Use Policy, and Social Media Policy.

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 Sheerness West Federation 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 Sheerness West Federation 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.

Safer Recruitment and Allegations

Safer Recruitment and Safeguarding Checks

- Sheerness West Federation is committed to ensure that develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our students and staff.
 - Sheerness West Federation will follow relevant guidance in Keeping Children Safe in Education 2022 (Part Three, ‘Safer Recruitment’) and from The Disclosure and Barring Service (DBS)
 - The governing body and leadership team are responsible for ensuring that the Sheerness West Federation follows safe recruitment processes as outlined within guidance.
 - The governing body and leadership will ensure that there is at least one of the persons who conducts an interview has completed safer recruitment training.
- The Sheerness West Federation maintains an accurate Single Central Record (SCR) in line with statutory guidance.
- Sheerness West Federation are committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools.
- We advise all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, reprimands, and warnings.
- Where the Sheerness West Federation places a student with an alternative provision provider, the Federation will continue to be responsible for the safeguarding of that child.
 - The Sheerness West Federation will undertake appropriate checks to ensure the provider meets the needs of the student, including written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment.
- Where the Federation organises work experience placements, we will follow the advice and guidance as identified in part Three of KCSIE 2022.

Allegations/concerns raised in relation to teachers, 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 2022) and the [local Kent allegations arrangements](#). In depth information can be found within our 'Managing Allegations against Staff' and Staff Code of Conduct. This can be found on Teams, with paper copies available on request.
- 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 Federation from potential false allegations or misunderstandings.
- Where Heads of School / Executive Head are unsure how to respond, for example if the Federation 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](#).

Concerns that meet the 'harm threshold'

- Sheerness West Federation 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
 - o behaved in a way that has harmed a child, or may have harmed a child
 - o possibly committed a criminal offence against or related to a child
 - o behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
 - o 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 hard threshold will be referred immediately to the Heads of School / Executive Head 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 Executive Head, staff are advised that allegations should be reported to the chair of governors who will contact the LADO.

Concerns that do not meet the 'harm threshold'

- Sheerness West Federation may also need to take action in response to 'low-level' concerns about staff. Additional information regarding low level concerns is contained within our Staff 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.
 - o Sheerness West Federation has an open and transparent culture in which all concerns about all adults working in or on behalf of the federation 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 federation are clear about and act within appropriate professional boundaries, and in accordance with our ethos and values.

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- o 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 federation 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.
 - o 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 staff code of conduct to a member of the Federation leadership Team.
 - o Where low-level concerns are reported to the federation, the Executive Headteacher will be informed of all low-level concerns and is the ultimate decision maker in respect of the response to all low-level concerns.
 - o The Executive Headteacher will share concerns and liaise with the LADO enquiries officer via the [LADO Enquiry Line](#).
 - o 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.
 - o If the federation 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.
 - o 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).
 - o Where a pattern is identified, the Sheerness West Federation will implement appropriate action, for example consulting with [the LADO enquiry line](#) and following our disciplinary procedures.

Safe Culture

- As part of our approach to safeguarding, the Federation has created and embedded a culture of openness, trust and transparency in which our values and expected behaviour as set out in our Staff Code of Conduct are constantly lived, monitored and reinforced by all 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 Federation safeguarding regime. The leadership team at Sheerness West Federation will take all concerns or allegations received seriously.

- All members of staff are made aware of the Federation Whistleblowing procedure (which is available in the staff room or on the Microsoft Teams SWF Policies area). 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.
- Sheerness West Federation 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 Federation, 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 Schools Personnel Service.

Opportunities to Teach Safeguarding

- Sheerness West Federation 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 Relationships Education.
- We recognise that school plays 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 students have a range of age appropriate contacts and strategies to ensure their own protection and that of others.
- Sheerness West Federation recognises the crucial role we have to play in preventative education. Preventative education is most effective in the context of a whole federation approach which prepares students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment.
- Sheerness West Federation 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.
- Sheerness West Federation 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 Federation systems support children to talk to a range of staff. All children will be listened to and heard, and their concerns will be taken seriously and acted upon as appropriate.

Physical Safety

Use of 'reasonable force'

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

The Use of Premises by Other Organisations

- Where services or activities are provided separately by another body using the Federation facilities/premises, the Heads of School / Executive Headteacher 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.

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 either 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 any Covid-19 restrictions.
- Any individual who is not known or identifiable on site should be challenged for clarification and reassurance.
- The Federation will not accept the behaviour of any individual (parent or other) that threatens Federation 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 either schools' site.

Local Support

- All members of staff in Sheerness West Federation are made aware of local support available.
- ✦ **Education Safeguarding Service**
Area Safeguarding Advisor
 - ✦ Myles O’Keefe 03301 651140 :
<https://www.theeducationpeople.org/ourexpertise/safeguarding/safeguarding-contacts/>
- ✦ **Online Safety in the Education Safeguarding Service**
 - ✦ 03301 651500
 - ✦ onlinesafety@theeducationpeople.org (non-urgent issues only)
- ✦ **LADO Service**
 - ✦ Telephone: 03000 410888
 - ✦ Email: kentchildrenslado@kent.gov.uk
- ✦ **Integrated Children’s Services**
 - Front door: 03000 411111
 - Out of Hours Number: 03000 419191
- **Early Help**
 - Early Help and Preventative Services:
 - Telephone: 03000 421162
 - Email: 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 Learners

- 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-youngpeople/
- 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.mensadvice.org.uk
- Mankind: www.mankindcounselling.org.uk
- National Domestic Abuse Helpline: www.nationaldahelpline.org.uk
- Respect Phonenumber: <https://respectphonenumber.org.uk>

Criminal and Sexual Exploitation

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

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-mutilationprocedural-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 and www.net-aware.org.uk
- Get Safe Online: www.getsafeonline.org
- Parents Protect: www.parentsprotect.co.uk

- Cyber Choices: <https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cybercrime/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-youngpeople/
- 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): <https://www.nicco.org.uk/>

