KENT LADO EDUCATION SAFEGUARDING ADVISORY SERVICE

Holy Trinity Church of England Primary School
'Growing Tomorrow's Leaders'

Child Protection Policy for Holy Trinity CEP School 2025-26

Published July 2025

Kent County Council kent.gov.uk

based on DfE 'Keeping Children Safe in Education' 2025

Suitable for use from 1st September 2025

Please note additional updates may be made to KCSIE 2025; DSLs and leaders will need to keep policies under review.

FRONT DOOR NUMBER : 03000 411 411

KEEPING CHILDREN SAFE IN THE CHILDREN'S WORKFORCE

Date written: September 2025
Date of last update: September 2024
Date agreed and ratified by: Full Governing Body October 2025
Date of next full review: September 2026

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

Key Contacts

	Name	School contact information For example, school email/phone number
Designated Safeguarding Lead (DSL)	Vikki Wall	School No: 01322 224474 schoolheadteacher@holytrinitydartford.co.uk
Deputy Designated Safeguarding Lead(s)	Gemma Hunter Luke Bennett Sarah Hudson Lisa O'Shaughnessy	g.hunter@holytrinitydartford.co.uk l.bennett@holytrinitydartford.co.uk s.hudson@holytrinitydartford.co.uk l.oshaughnessy@holytrinitydartford.co.uk
Headteacher	Vikki Wall	schoolheadteacher@holytrinitydartford.co.uk
Safeguarding Governor	Rachel Charles	r.charles@holytrinitydartofrd.co.uk

Contents

What to do if you have a welfare concern in Holy Trinity CE Primary Dartford 5
1. Child Focused Approach to Safeguarding 6
1.1 Introduction 6
1.2 Policy context 6
1.3 Definition of safeguarding 7
1.4 Related safeguarding policies 8
1.5 Policy compliance, monitoring and review 9
2. Key Responsibilities 10
2.1 Governance and leadership 10
2.2 Designated Safeguarding Lead (DSL) 10
2.3 Members of staff 11
2.4 Children 12
2.5 Parents and carers 12
3. Child Protection Procedures 12
3.1 Recognising indicators of abuse, neglect and exploitation 12
3.2 Responding to child protection concerns 14
3.3 Child Protection Records 16
3.4 Transferring Child Protection Files 17
3.5 Multi-agency working 17
3.6 Confidentiality and information sharing 18
3.7 Complaints 19
4. Specific Safeguarding Issues 19
4.1 Child-on-child abuse 19
4.2 Sexual violence and sexual harassment 21
4.3 Nude and/or semi-nude image sharing by children 22
4.4 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) 23
4.5 Serious violence 24
4.6 Modern Slavery and the National Referral Mechanism (NRM) 24
4.7 So-called Honour Based Abuse (HBA) 24
4.8 Preventing radicalisation 25
4.9 Cybercrime 25
4.10 Domestic abuse 26
4.11 Mental health 26
4.12 Bruising in non-mobile children (remove if not applicable to school type) 27
5. Supporting Children Potentially at Greater Risk of Harm 27
5.1 Safeguarding children with Special Educational Needs or Disabilities (SEND) 27
5.2 Children requiring mental health support 28
5.3 Children who are absent from education 28

5.4 Children attending alternative provision 29
5.5 Elective Home Education (EHE) 29
5.6 Children who may benefit from Early Help 29
5.7 Children who need a social worker (child in need and child protection plans) 30
5.8 Looked after children (including kinship care), previously looked after children and care leavers 30
5.9 Children who are privately fostered 30
5.10 Children who are Lesbian, Gay, Bisexual, or Gender Questioning 30
6. Online Safety 31
6.1 Generative Artificial Intelligence (AI) 32
6.2 Mobile and Smart Technology 33
6.3 Appropriate filtering and monitoring on school devices and networks 33
6.3.1 Responsibilities 34
6.3.2 Decision making and reviewing our filtering and monitoring provision 35
6.3.3 Appropriate filtering 35
6.3.4 Appropriate monitoring 37
6.4 Information security and access management 37
6.5 Remote/Online learning 38
6.6 Online Safety Training for Staff 38
6.7 Educating pupils 38
6.8 Working with parents/carers 39
7. Staff Engagement and Expectations 39
7.1 Staff awareness, induction and training 39
7.2 Safer working practice 40
7.3 Supervision and support 40
8. Safer Recruitment and Allegations Against Staff 41
8.1 Safer recruitment and safeguarding checks 41
8.2 Allegations/concerns raised in relation to staff, including supply teachers, volunteers and contractors 42
8.2.1 Concerns that meet the ‘harm threshold’ 42
8.2.2 Concerns that do not meet the ‘harm threshold’ 43
8.3 Safe Culture 43
9. Opportunities to Teach Safeguarding 44
10. Physical Safety 45
10.1 Use of ‘reasonable force’ 45
10.2 The use of school premises by other organisations 45
10.3 Site security 45
11. Local Support 46
Appendix 1: Categories of Abuse 47
Appendix 2: Support Organisations and Resources 49

What to do if you have a welfare concern in Holy Trinity CEP

Why are you concerned?

For example,

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

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

Follow the school procedure

- Reassure the child
- Clarify any concerns using open questions, if necessary (**TED**: **T**ell, **E**xplain, **D**escribe)
- Record facts and not opinions and use child's own words. Sign and date your record
- Seek support for yourself as required from DSL

Inform the school Designated Safeguarding Lead(s)

- If a child is at risk of immediate harm and/or is unsafe to go home, make an urgent Request for Support to the Front Door Service via the portal or call the Police on 999.
- If no immediate risk of harm, provide internal support and/or refer to other agencies in line with Kent Safeguarding Support Level Guidance and KSCMP procedures, as appropriate. For example, signposting to community services and/or early help open access, a non-urgent call to the Police via 101, reporting allegations against staff to the County LADO Service, or make a Request for Support via the Front Door Service Portal.
- If the school believes a child may be in need of support but are unclear whether to refer, a no-named consultation can be sought from the Front Door Service via **03000 411 111**
- If support is required out of working hours, the school will contact the Out of Hours Service via **03000 41 91 91**.

If you are unhappy with the response:

DSLs/Staff:

- Follow Holy Trinity CEP School whistleblowing procedures available on the website / shared drive or from front office
- Follow Kent safeguarding partnership escalation procedures.

Pupils or Parents:

- Follow Holy Trinity CEP School complaints procedures on the website or from obtain a copy

Record decision making and action taken in the pupils' child protection file on CPOMS

Monitor

Be clear about:

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

Review and **request further support** if necessary.

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

1. Child Focused Approach to Safeguarding

1.1 Introduction

- Holy Trinity Church of England Primary School recognise our statutory responsibility to safeguard and promote the welfare of all children. Safeguarding and promoting the welfare of children is **everybody's** responsibility and everyone has a role to play. All members of our community (staff, volunteers, governors, leaders, parents/carers, wider family networks, and pupils) have an important role in safeguarding children and all have an essential role to play in making our community safe and secure.

- Holy Trinity Church of England Primary School believe that the best interests of children always come first. All children (defined in law and in this policy as those up to the age of 18) have a right to be heard and all children regardless of age, sex (gender), ability, culture, race, language, religion or sexual identity or orientation, have equal rights to protection.

- Staff working with children at Holy Trinity Church of England Primary School will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child and if any member of our community has a safeguarding concern about any child or adult, they should act and act immediately.

- This policy applies where there are any child protection concerns regarding children who attend the school but may also apply to other children connected to the school, for example, siblings, younger members of staff (under 18) or children on student/work placements.

- Holy Trinity Church of England Primary School recognises the importance of providing an ethos and environment within school that will help children to be safe and to feel safe. In our school children are respected and are encouraged to talk openly. We will ensure children's wishes and feelings are taken into account when determining what safeguarding action to take and what services to provide.

- Holy Trinity Church of England Primary School recognises the need for a trauma-informed approach to safeguarding, considering the root causes and possible underlying trauma behind children's behaviour.

- Our core safeguarding principles are:
    - **Prevention**: positive, supportive, safe culture, curriculum and pastoral opportunities for children, safer recruitment procedures.
    - **Protection**: following the agreed procedures, ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns.
    - **Support**: adopt a child centred approach and provide support for all pupils, parents/carers and staff, and where appropriate, implement specific interventions for those who may be at risk of harm.
    - **Collaboration:** with both parents where possible, and other agencies to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.

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

1.2 Policy context

- This policy is implemented in accordance with our compliance with the current statutory guidance from the Department for Education 'Keeping Children Safe in Education' (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 national and local guidance. This includes but is not limited to:
    - Keeping Children Safe in Education (KCSIE)
    - Working Together to Safeguard Children (WTSC)
    - Early Years and Foundation Stage Framework (EYFS)
    - Ofsted: Education Inspection Framework
    - Framework for the Assessment of Children in Need and their Families, 2000
    - Kent and Medway Safeguarding Children Procedures
    - The Education Act 2002
    - Education and 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 the Public Sector Equality Duty)

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

- Holy Trinity Church of England Primary School will follow local or national guidance in response to any emergencies. We will amend this policy and our procedures as necessary but regardless of the action required, our safeguarding principles will always remain the same and the welfare of the child is paramount.

1.3 Definition of safeguarding

- In line with 'Working Together to Safeguard Children' and KCSIE, safeguarding and promoting the welfare of children is defined for the purposes of this policy as:
    - providing help and support to meet the needs of children as soon as problems emerge
    - protecting children from maltreatment, whether that is within or outside the home, including online
    - preventing impairment of children's mental and physical health or development
    - ensuring that children grow up in circumstances consistent with the provision of safe and effective care
    - promoting the upbringing of children with their birth parents, or otherwise their family network, whenever possible and where this is in the best interests of the child(ren)
    - taking action to enable all children to have the best outcomes.

- Child protection is part of safeguarding and promoting the welfare of all children and is defined as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

- The school acknowledges that safeguarding includes a wide range of specific issues including, but not limited to:
    - Abuse and neglect
    - Bullying, including cyberbullying
    - Child-on-child abuse
    - Children with family members in prison
    - Children who are absent or missing from education
    - Child missing from home or care
    - Child Sexual Exploitation (CSE)
    - Child Criminal Exploitation (CCE)
    - Contextual safeguarding (risks outside the family home)
    - County lines and gangs

- Domestic abuse
- Drugs and alcohol misuse
- Fabricated or induced illness
- Faith abuse
- Gender based abuse and violence against women and girls
- Hate
- Homelessness
- Human trafficking and modern slavery
- Mental health
- Nude or semi-nude image sharing, also known as 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')

1.4 Related safeguarding policies

- This policy is one of a series in the school integrated safeguarding portfolio and should be read and actioned in conjunction with the policies listed below:
  - Anti-bullying
  - Attendance
  - Behaviour, including behaviour management and use of physical intervention
  - Complaints
  - Confidentiality
  - Data protection and information sharing
  - Emergency procedures, such as evacuations and lockdowns
  - Health and safety
  - First aid and accidents, including medication and managing illness, safer eating and allergies, health and safety, and infection
  - Image use
  - Managing allegations against staff
  - Mobile and smart technology
  - Online safety
  - Use of Generative Artificial Intelligence (AI)
  - Personal and intimate care
  - Relationship, Sex and Health Education (RSHE)
  - Risk assessments, such as school trips, use of technology
  - Safer recruitment
  - Staff behaviour policy/code of conduct, including Acceptable Use of Technology Policies (AUP)
  - Whistleblowing

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

- Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings - Safer Recruitment Consortium
- What to do if you are worried a child is being abused

- These documents can be found in / at: T Drive or TEAMs under Policies 2025 or a hard copy can be obtained from the front office.

1.5 Policy compliance, monitoring and review

- Holy Trinity Church of England Primary School will review this policy at least annually (as a minimum) and will update it as needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. The policy will also be revised following any national or local updates, significant local or national safeguarding events and/or learning, and/or any changes to our own procedures.

- All staff (including temporary staff and volunteers) will be provided with a copy of this policy and Part One and/or Annex A of KCSIE as appropriate.

- Parents/carers can obtain a copy of the school Child Protection Policy and other related policies on request. Additionally, our policies can be viewed via the school website: https://www.holytrinityprimarydartford.co.uk/policies/

- The policy forms part of our school development plan and will be reviewed annually by the Governing Body team who has responsibility for oversight of safeguarding and child protection systems.

- The Designated Safeguarding Lead (DSL) and headteacher will ensure regular reporting on safeguarding activity and systems to the Governing Body . The Governing Body will not receive details of individual pupil situations or identifying features of families as part of their oversight responsibility.

2. Key Responsibilities

2.1 Governance and leadership

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

- The Governing Body will facilitate a whole school approach to safeguarding which involves everyone. They will ensure that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development, so that all systems, processes, and policies operate with the best interests of the child at their heart.

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

- 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 headteacher will ensure that our child protection and safeguarding policies and procedures adopted by the Governing Body, are understood, and followed by all staff.

- The Governing Body will ensure an appropriate senior member of staff, from the school leadership team, is appointed to the role of designated safeguarding lead. The Governing Body and leadership team will ensure that the DSL is supported in their role and is provided with sufficient time so they can provide appropriate support to staff and children regarding any safeguarding and welfare concerns.

- The school has 2 nominated governors for safeguarding. The nominated governors will support the DSL and have oversight in ensuring that the school 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.

2.2 Designated Safeguarding Lead (DSL)

- The school has appointed Mrs Vikki Wall, Headteacher, to act as our Designated Safeguarding Lead (DSL).
- The DSL has overall responsibility for the day-to-day oversight of safeguarding and child protection systems (including online safety and understanding the filtering and monitoring systems and processes in place) in school.
- The school has also appointed Deputy DSLs who will have delegated responsibilities and act in the DSLs absence:

Gemma Hunter – Deputy Headteacher	g,hunter@holytrinitydartford.co.uk
Luke Bennett – Assistant Headteacher	l.bennett@holytrinitydartford.co.uk
Sarah Hudson - Assistant Headteacher	s.hudson@holytrinitydartford.co.uk
Lisa O'Shaughnessy – Family Liaison Officer	l.oshaughnessy@holytrinitydartford.co.uk

- 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 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 KCSIE. 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 and WTSC.
    - Ensuring that locally established procedures as put in place by the three safeguarding partners as part of the Kent Safeguarding Children Multi-Agency Partnership (KSCMP) procedures, including referrals, are followed, as necessary.
    - Representing, or ensure the school is appropriately represented at multi-agency safeguarding meetings (including child protection conferences).
    - Managing and monitoring the school role in any multi-agency plan for a child.
    - Being available during term time (during school hours) for staff in the school to discuss any safeguarding concerns.
    - Ensuring adequate and appropriate DSL cover arrangements in response to any closures and any out of hours and/or out of term activities.
    - Taking lead responsibility for online safety, including understanding the filtering and monitoring systems and processes in place.
    - Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff.
    - Ensuring all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE.
    - Liaising with the 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 at least annually through a variety of methods at regular intervals.

2.3 Members of staff

- Our staff play a particularly important role in safeguarding as they are in a position to observe changes in a child's behaviour or appearance, identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating.

- All members of staff have a responsibility to:
    - provide a safe environment in which children can learn.
    - be alert to any issues of concern in a child's life at home or elsewhere.
    - be aware of the indicators of abuse, neglect and exploitation so that they can identify cases of children who may need help or protection.

- know what to do if a child tells them that they are being abused, neglected, or exploited and understand the impact this 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 and understand the early help process and their role in it.
- understand the school safeguarding policies and systems.
- undertake and engage in regular and appropriate training which is regularly updated.
- be aware of the local process of making referrals to children's social care and statutory assessment under the Children Act 1989.
- know how to maintain an appropriate level of confidentiality.
- reassure children who report concerns that they are being taken seriously and that they will be supported and kept safe.
- act in line with our staff code of conduct/behaviour policy
- act in line with the Teachers' Standards which state that teachers (including headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

- Staff at Holy Trinity Church of England Primary School recognise that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as being abusive or harmful. This should not prevent staff from having professional curiosity and speaking to a DSL if they have any concerns about a child.

- Staff at Holy Trinity Church of England Primary School will determine how best to build trusted relationships with children and parents/carers which facilitate appropriate professional communication in line with existing and relevant policies, for example, our staff behaviour and pupil/student behaviour policies.

2.4 Children

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

2.5 Parents and carers

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

3. Child Protection Procedures

3.1 Recognising indicators of abuse, neglect and exploitation

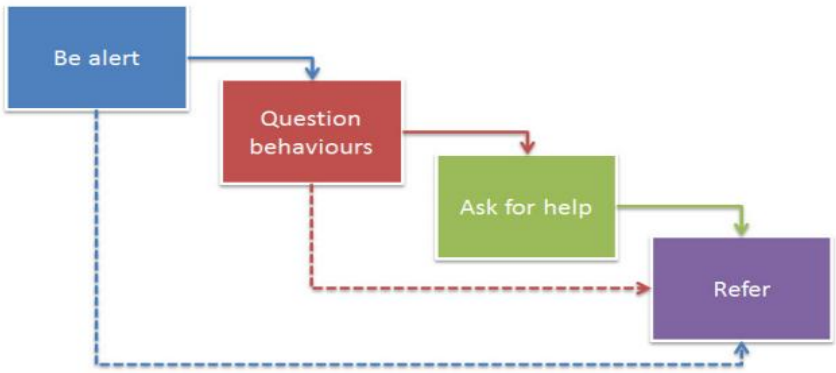
- Staff will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child.

- All staff are made aware of the definitions and indicators of abuse, neglect and exploitation as identified by 'Working Together to Safeguard Children' and 'Keeping Children Safe in Education'. This is outlined locally within the Kent Support Levels Guidance.

- Holy Trinity Church of England Primary School recognise that when assessing whether a child may be suffering actual or potential harm there are four categories of abuse (for more in-depth information, see appendix 1):
  - Physical abuse
  - Sexual abuse
  - Emotional abuse
  - Neglect

- By understanding the indicators of abuse, neglect and exploitation, we can respond to problems as early as possible and provide the right support and services for the child and their family.

- All members of staff are expected to be aware of and follow the 'What to do if you are worried a child is being abused' guidance if they are concerned about a child:



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

- Holy Trinity Church of England Primary School recognises that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of child abuse, neglect and exploitation can vary from child to child. Children develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child. It is important to recognise that indicators of abuse, neglect and exploitation do not automatically mean a child is being harmed, however all concerns should be taken seriously and will be explored by the DSL on a case-by-case basis.

- Holy Trinity Church of England Primary School recognises abuse, neglect, exploitation and other safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label alone. In many cases, multiple issues will overlap with one another, therefore staff will always be vigilant and always raise concerns with a DSL.

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

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

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

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

- Holy Trinity Church of England Primary School recognises that some children have additional or complex needs and may require access to intensive or specialist services to support them.

- Following a concern about a child's safety or welfare, the searching and screening of children and confiscation of any items, including any electronic devices, will be managed in line with the school behaviour policy which 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.

3.2 Responding to child protection concerns

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

- Holy Trinity Church of England Primary School will respond to safeguarding concerns in line with the Kent Safeguarding Children Multi-Agency Partnership procedures (KSCMP).
    - The full KSCMP procedures and additional guidance relating to reporting concerns and specific safeguarding issues can be found on their website: www.kscmp.org.uk
    - For pupils under Bexley Borough, their procedures, including Early Help and other supportive services can be found here: https://bexley.proceduresonline.com/contents.html#joint

- In Kent, Early Help and Preventative Services and Children's Social Work Services are part of Integrated Children's Services (ICS) and are accessed via the 'Front Door Service'/Kent Children's Services Portal.

- 'Early help' is defined in 'Working together to safeguard children' as support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. It is not an individual service, but a system of support delivered by local authorities and their partners, including education providers, working together and taking collective responsibility to provide the right provision in their area.
    - If early help support is appropriate, the DSL (or a deputy) will lead on exploring internal resources available and liaising with other universal or additional services available via local agencies.
    - Where Intensive Support Early Help (provided by ICS, outlined in the KSCMP support levels guidance) is considered to be appropriate, the DSL (or deputy) will make a 'request for support' via the Kent Children's Services Portal.
    - Staff, including the DSL, may be required to work with other agencies and professionals in an early help assessment.
    - The DSL will keep all Early Help cases under constant review and consideration will be given to escalating concerns and/or seeking advice from the Front Door Service if the situation does not appear to be improving or is getting worse.

- Where a child is suffering, or is likely to suffer from harm, or is in immediate danger (for example, under section 17 or 47 of the Children Act), intensive or specialist support is required and a 'request for support' will be made immediately to Kent Integrated Children's Services (via the portal) and/or the police, in line with the Kent Support Level Guidance and KSCMP procedures.
    - Holy Trinity Church of England Primary School recognise that in situations where there are immediate child protection concerns for a child as identified in line with Support Level Guidance, it is NOT to investigate as a single agency, but to act in line with KSCMP guidance which may involve multi-agency decision making**.**
    - If they believe a child may be in need of support but are unclear whether a Request for Support should be submitted, the DSL may seek advice or guidance from a social worker via the Front Door Service before deciding next steps.

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

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

- In the event of a request for support to the Front Door Service 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 always be informed in the case of a request for support being submitted by the school, unless there is a valid reason not to do so, for example, if informing them may put a child at risk of harm or could 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 Kent Escalation and Professional Challenge Policy to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

- DSLs and staff will be mindful of the need for the school to ensure any activity or support implemented to support children and/or families is recorded. Support provided by the school where families are struggling will be overseen and reviewed by the DSL on a regular basis to ensure activity does not obscure potential safeguarding concerns from the wider professional network.

3.3 Child Protection Records

- All safeguarding concerns, discussions, decisions, and reasons for those decisions, will be recorded in writing on the school safeguarding system via CPOMS and passed without delay to the DSL.
- Any welfare concerns must be logged via CPOMS https://holytrinitydartford.cpoms.net/auth/identity?origin=https://holytrinitydartford.cpoms.net/

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

- Paper forms for concerns and behaviour incidents are available in the school office for staff who have limited access to computers. These are to be filled in by the member of staff who observed/witnessed the incident/disclosure. The forms are to be handed in to the DSL on duty.

- If there is an immediate safeguarding concern the member of staff will consult with a DSL before completing the form as reporting urgent concerns takes priority.

- If members of staff are in any doubt about recording requirements, they will discuss their concerns with the DSL.

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

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

- 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 (SENCO) and DENS Team, will be made aware of relevant information as required.

- Where a pupil joins the school and no child protection files are received, the DSL will proactively seek to confirm from the previous setting whether any child protections exist for the pupil, and if so, if the files have been sent.

- Our child protection records will include a clear and comprehensive summary of any concerns, details of concerns which were followed up and resolved, a note of any action taken or not taken, how any decisions were reached and any outcomes.

3.4 Transferring Child Protection Files

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

- In addition to the child protection file, the DSL will also consider if it would be appropriate to share any information with the DSL at the new school or college in advance of a child leaving, for example, information that would allow the new school or college to continue to provide support.

- Where the school receives child protection files from another setting, the DSL will ensure key staff such as the Special Educational Needs Co-Ordinators (SENCOs)/ SEND Team, will be made aware of relevant information as required.

- Where a pupil joins the school and no child protection files are received, the DSL will proactively seek to confirm from the previous setting whether any child protections exist for the pupil, and if so, if the files have been sent.

3.5 Multi-agency working

- Holy Trinity Church of England Primary School recognises the pivotal role we have to play in multi-agency safeguarding arrangements and is committed to its responsibility to work within the KSCMP multi-agency safeguarding arrangements as identified within 'Working Together to Safeguard Children'. or for pupils who live within the Bexley Borough we will follow Bexley's SHIELD procedures: https://bexleysafeguardingpartnership.co.uk/ or other Bexley agency services: https://bexley.proceduresonline.com/contents.html#joint.
-

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

- Holy Trinity Church of England Primary School recognises the importance of multi-agency working and is committed to working alongside partner agencies to provide a coordinated response to promote children's welfare and protect them from harm. This includes contributing to KSCMP processes as required, such as, participation in relevant safeguarding multi-agency plans and meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings. **Amend or add to this statement if school context means working with or following procedures from other LSCPs.**

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

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

3.6 Confidentiality and information sharing

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

- Holy Trinity Church of England Primary School has an appropriately trained Data Protection Officer (DPO) as required by the UK General Data Protection Regulations (UK GDPR) to ensure that our setting is compliant with all matters relating to confidentiality and information sharing requirements. Our DPO is provided by Cantium available at:

  Email: dataprotection@cantium.solutions
  Post: Data Protection Officer, Cantium Business Solutions, Worrall House, 30 Kings Hill Avenue, West Malling, ME19 4AE

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

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

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

3.7 Complaints

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

- Whilst we encourage members of our community to report concerns and complaints directly to us, we recognise this may not always be possible. Children and adults who have experienced abuse in education 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 Holy Trinity Church of England Primary School will take all concerns and whistleblowing reports seriously, and all complaints will be considered and responded to in line with the relevant and appropriate process.
    - Anything that constitutes an allegation against a member of staff or volunteer will be dealt with in line with section 8 of this policy.

4. Specific Safeguarding Issues

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

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

4.1 Child-on-child abuse

- All members of staff at Holy Trinity Church of England Primary School recognise that children can abuse other children; this is known as child-on-child abuse and can happen both inside and outside of school and online.

- Holy Trinity Church of England Primary School recognises that child-on-child abuse can take many forms, including but not limited to:
    - Bullying, including cyberbullying, prejudice-based and discriminatory bullying
    - Abuse in intimate personal relationships between children
    - Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
    - Sexual violence and sexual harassment
    - Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
    - Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
    - Upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

- Initiation/hazing type violence and rituals

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

- Holy Trinity Church of England Primary School adopts a zero-tolerance approach to child-on-child abuse. We believe that abuse is abuse and it will never be tolerated or dismissed as "just banter", "just having a laugh", "part of growing up" or "boys being boys"; this can lead to a culture of unacceptable behaviours and can create an unsafe environment for children and a culture that normalises abuse, which can prevent children from coming forward to report it.

- All staff have a role to play in challenging inappropriate behaviours between children. Staff recognise that some child-on-child abuse issues may be affected by gender, age, ability and culture of those involved. For example, for gender-based abuse, girls are more likely to be victims and boys more likely to be perpetrators.

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

- To minimise the risk of child-on-child abuse, Holy Trinity Church of England Primary School will:
    - implementing a robust anti-bullying policy,
    - providing an age appropriate PSHE and RSE curriculum,
    - providing a range of reporting mechanisms, for example, worry boxes, monitor staff reporting of incidents via CPOMS, circle time, check in charts,
    - have dedicated wellbeing staff and trained ELSAs
    - promote how to stay safe and report via Safeguarding assemblies
    - provide an Online Safety Curriculum
    - provide a PSHE curriculum
    - send information home to parents to help them support online issues

- Holy Trinity Church of England Primary School want children to feel able to confidently report abuse and know their concerns will be treated seriously. All allegations of child-on-child abuse will be reported to the DSL and will be recorded, investigated, and dealt with in line with associated school policies, including child protection, anti-bullying, and behaviour. Pupils who experience abuse will be offered appropriate support, regardless of where the abuse takes place.

- Concerns about pupils' behaviour, including child-on-child abuse taking place offsite will be responded to as part of a partnership approach with pupils' and parents/carers. Offsite behaviour concerns will be recorded and responded to in line with existing appropriate policies, for example anti-bullying, acceptable use, behaviour and child protection policies.

  NB: 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 either in school or via additional external agencies, working with parents/carers, reviewing educational approaches, implement additional curriculum lessons, following guidance from other agencies, following procedures as identified in other policies, for

example, the school anti-bullying, behaviour and child protection policy, and where necessary and appropriate, informing the police and/or ICS.

4.2 Sexual violence and sexual harassment

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

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

- **All** victims of sexual violence or sexual harassment will be reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment or ever be made to feel ashamed for making a report.

- Abuse that occurs online or outside of the school will not be dismissed or downplayed and will be treated equally seriously and in line with relevant policies/procedures, for example anti-bullying, behaviour, child protection, online safety.

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

- Holy Trinity Church of England Primary School recognises that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory, so children may not be able to recall all details or timeline of abuse. All staff will be aware certain children may face additional barriers to telling someone, for example because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation.

- The DSL (or deputy) is likely to have a complete safeguarding picture and will be the most appropriate person to advise on the initial response.
    - The DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator, and any other children involved/impacted, in line with part five of KCSIE and relevant local/national guidance and support, for example KSCMP procedures.
    - The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children, and staff and any actions that are required to protect them.
    - Any concerns involving an online element will take place in accordance with relevant local/national guidance and advice.

- Reports will initially be managed internally by the school and where necessary will be referred to Integrated Children's Services (Early Help and/or Children's Social Work Service) via the Children's Portal and/or the police. Important considerations which may influence this decision include:
    - the wishes of the victim in terms of how they want to proceed.
    - the nature of the alleged incident(s), including whether a crime may have been committed and/or whether Harmful Sexual Behavior has been displayed.

- the ages of the children involved.
- the developmental stages of the children involved.
- any power imbalance between the children.
- if the alleged incident is a one-off or a sustained pattern of abuse - sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature.
- that sexual violence and sexual harassment can take place within intimate personal relationships between children.
- understanding intra familial harms and any necessary support for siblings following incidents.
- whether there are any ongoing risks to the victim, other children, adult students, or school/ college staff.
- any other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

- The school will in most instances engage with both the victim's and alleged perpetrator's parents/carers when there has been a report of sexual violence; this might not be necessary or proportionate in the case of sexual harassment and will depend on a case-by-case basis. The exception to this is if there is a reason to believe informing a parent/carer will put a child at additional risk. Any information shared with parents/carers will be in line with information sharing expectations, our confidentiality policy, and any data protection requirements, and where they are involved, will be subject to discussion with other agencies (for example Children's Social Work Service and/or the police) to ensure a consistent approach is taken.

- If at any stage the DSL is unsure if a request for support is appropriate, advice may be sought from the Front Door Service.

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

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 children under the age of eighteen. Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents complex. The **UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people' guidance** outlines how schools and colleges should respond to all incidents of consensual and non-consensual image sharing; it should be read and understood by all DSLs working with all age groups.

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

- When made aware of concerns involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos by children, staff are advised:
  - to report any concerns to the DSL immediately.
  - never to view, copy, print, share, forward, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already inadvertently viewed imagery, this will be immediately reported to the DSL.
  - not to delete the imagery or ask the child to delete it.
  - to avoid saying or doing anything to blame or shame any children involved.
  - to reassure the child(ren) involved and explain that the DSL will be informed so they can receive appropriate support and help. Do not promise confidentiality, as other agencies may need to be informed and be involved.
  - not to investigate or ask the child(ren) involved to disclose information regarding the imagery
  - to not share information about the incident with other members of staff, children, or parents/carers, including the families and child(ren) involved in the incident; this is the responsibility of the DSL.

- DSLs will respond to concerns in line with the non-statutory UKCIS guidance: 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' and the local KSCMP guidance. When made aware of a concern involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos:
    - The DSL will hold an initial review meeting to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child involved. This may mean speaking with relevant staff and the children involved as appropriate.
    - Parents/carers will be informed at an early stage and be involved in the process to best support children, unless there is good reason to believe that involving them would put a child at risk of harm.
    - All decisions and action taken will be recorded in line with our child protection procedures.
    - A referral will be made to ICS via the Children's Portal and/or the police immediately if:
        - the incident involves an adult (over 18).
        - there is reason to believe that a child has been coerced, blackmailed, or groomed, or there are concerns about their capacity to consent, for example, the age of the child or they have special educational needs.
        - the image/videos involve sexual acts and a child under the age of thirteen, depict sexual acts which are unusual for the child's developmental stage, or are violent.
        - a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes.
    - The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date.
    - If DSLs are unsure if a request for support is appropriate, advice may be sought from the Front Door Service.

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

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

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

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

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

4.5 Serious violence

- All staff are aware of the indicators which may signal children are at risk from or are involved with serious violent crime. These may include unexplained gifts or new possessions, increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of CCE.

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

- Any concerns regarding serious violence will be reported and responded to in line with other child protection concerns by speaking with a DSL or deputy. The initial response to child victims is important and staff will take any allegations seriously and work in ways that support children and keep them safe.

4.6 Modern Slavery and the National Referral Mechanism (NRM)

- Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Statutory Guidance: Modern slavery: how to identify and support victims.

- If there are concerns that any member of the community is a victim or involved with modern slavery, concerns should be shared with a DSL or deputy and will and responded to in line with this policy.

4.7 So-called Honour Based Abuse (HBA)

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

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

- All staff will speak to the DSL (or deputy) if they have any concerns about forced marriage. Staff can also contact the Forced Marriage Unit if they need advice or information: 020 7008 0151 or fmu@fcdo.gov.uk

- Whilst all staff will speak to the DSL (or deputy) if they have any concerns about risk or suspected cases of FGM, there is a specific legal duty on teachers.
    - Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to **personally report** to the police where they discover that FGM appears to have been carried out.
    - It will be rare for teachers to see visual evidence, and they should not be examining pupils, however teachers who do not personally report such concerns may face disciplinary sanctions. Further

information on when and how to make a report can be found at: Mandatory reporting of female genital mutilation procedural information and FGM Mandatory reporting Duty Fact Sheet.
  - Unless the teacher has good reason not to, they are expected to also discuss any FGM concerns with the DSL (or a deputy), and Kent Integrated Children's Services should be informed as appropriate.

4.8 Preventing radicalisation

DSLs and leaders should access and be aware of the DfE **The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK (www.gov.uk)** guidance.

- Holy Trinity Church of England Primary School recognises that children may be susceptible to radicalisation into terrorism.

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

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

- All staff have received appropriate training to enable them to be alert to changes in children's behaviour which could indicate that they may need help or protection from radicalisation.

- Staff will be supported to use their judgement in identifying children who might be at risk of radicalisation and will act proportionately; staff will report concerns to the DSL (or a deputy), who, where appropriate, will follow the local procedures in regard to making a Prevent referral.

- If there is an immediate threat to safety, the police will be contacted via 999.

- Where a child is receiving support regarding concerns relating to preventing radicalisation, for example, through the 'Channel' programme, the DSL will consider if it would be appropriate to share any information if/when a child leaves to attend any new schools/colleges, so support can be put in place in place for when the child arrives. **Statutory guidance on Channel is available at: Channel guidance and Channel training from the Home Office.**

4.9 Cybercrime

- Holy Trinity Church of England Primary School recognises that children with particular skills and interests in computing and technology may inadvertently or deliberately stray into 'cyber-enabled' (crimes that can happen offline but are enabled at scale and at speed online) or 'cyber dependent' (crimes that can be committed only by using a computer/internet enabled device) cybercrime.

- If staff are concerned that a child may be at risk of becoming involved in cyber-dependent cybercrime, the DSL or a deputy will be informed, and consideration will be given to accessing local support and/or referring into the Cyber Choices programme, which aims to intervene when children are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

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

Kent DSLs may also seek advice from Kent Police and/or the Front Door Service.

4.10 Domestic abuse

- Holy Trinity Church of England Primary School recognises that:
    - domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents.
    - domestic abuse can include, but is not limited to, psychological (including coercive control), physical, sexual, economic, or emotional abuse.
    - children can be victims of domestic abuse if they see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse).
    - anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background, and domestic abuse can take place inside or outside of the home.
    - domestic abuse can take place within different types of relationships, including ex-partners and family members.
    - there is always a potential for domestic abuse to take place when parents/families separate, or for existing domestic abuse to persist or escalate post separation.
    - domestic abuse can have a detrimental and long-term impact on children's health, well-being, development, and ability to learn.
    - domestic abuse concerns will not be looked at in isolation and our response will be considered as part of a holistic approach which takes into account children's lived experiences.
    - it is important not to use victim blaming language and to adopt a trauma informed approach when responding to concerns relating to domestic abuse.

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

- Holy Trinity Church of England Primary School is an Operation Encompass School. This means we work in partnership with Kent Police to provide support to children experiencing the effects of domestic abuse. An Operation Encompass notification is sent to the school when the police are called to an incident of domestic abuse and there are children in the household; the police are expected to inform schools before the child(ren) arrive the following day.
    - Operation Encompass notifications help ensure that we have up to date and relevant information about children's circumstances and enable us to put immediate support in place according to the child's needs.
    - Operation Encompass does not replace statutory safeguarding procedures and where appropriate, a referral to the Front Door Service will be made if there are any concerns about a child's welfare.
    - Where the school is unsure of how to respond to a notification, advice may be sought from the Front Door Service, or the Operation Encompass helpline which is available 8AM to 1PM, Monday to Friday on 0204 513 9990.

More information about the scheme and how schools can become involved is available on the Operation Encompass website. Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990.

4.11 Mental health

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

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

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

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

4.12 **Bruising in non-mobile children** (remove if not applicable to school type)

- Bruising in babies, infants or children with complex needs that are not mobile (meaning a child who is unable to move independently through rolling, crawling, cruising, or bottom shuffling) is unusual and should always be explored.

- If our School is concerned about actual or suspected bruising on a non-mobile child, we will respond in line with the 'Kent and Medway Protocol for the Management of Actual or Suspected Bruising in Infants and Children who are not Independently Mobile' procedures (2.2.8 of the KSCMP procedures). In summary, these procedures state:
    - If a child appears seriously ill or injured, emergency treatment should be sought through an emergency department (ED) and the Kent ICS should be notified of the concern and the child's location.

    - In all other cases:
        - Staff must inform the DSL immediately and describe and document accurately on a body map, the size, shape, colour, and position of the mark/s on the head and/or body.
        - Any explanation of the history of the injury or comments by the parents/carers will be documented accurately (verbatim) in the child's record, along with the body map.
        - If there is a concern about parental response to the injury, no explanation, or an explanation that is inadequate, unlikely or does not rule out abuse or neglect, an immediate referral will be made to Kent ICS, who have responsibility for arranging further multi-agency assessments.
        - If there are concerns regarding the immediate safety of the child or staff, the police will be called.
        - If the setting is in any doubt as to how to respond to bruising on a non-mobile child, advice may be sought from the Front Door Service.

5. Supporting Children Potentially at Greater Risk of Harm

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

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

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

- Holy Trinity Church of England Primary School recognises that children with SEND may face additional communication barriers and experience difficulties in managing or reporting abuse or challenges. Children with SEND will be supported to communicate and ensure that their voice is heard and acted upon.

- All members of staff are encouraged to appropriately explore potential indicators of abuse, neglect and exploitation, such as behaviour, mood changes or injuries and not to assume that they are related to the child's special educational needs or disability.

- Members of staff are encouraged to be aware that children with SEND, or certain medical conditions, can be disproportionally impacted by safeguarding concerns or behaviour, such as exploitation, peer group isolation or bullying including prejudice-based bullying, without outwardly showing any signs.

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

- Our school has robust intimate/personal care policies 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 policies:

5.2 Children requiring mental health support

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

- Where there are concerns regarding possible mental health problems for pupils, staff should:
    - Speak to the child regarding any concerns
    - Capture their concerns on CPOMS
    - Speak to the following leads to gain strategies: PSHE lead, Wellbeing Lead, SENDco, DSL
    - DSL and SENDCO will distribute additional resources to support with mental health concerns where necessary: Additional class lessons, ELSA sessions, counselling, intervention groups, school nurse etc.

- Age/ability appropriate education will be provided to our pupils to help promote positive health, wellbeing, and resilience. This may happen through our Online Safety, PSHE or RSHE curriculum, or through focuses Safeguarding Assemblies.

5.3 Children who are absent from education

- Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines.

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

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

- Where the school have concerns that a child has unexplainable and/or persistent absences from education and/or is missing from education, we will respond in line with our statutory duties (DfE: Children missing education) and local policies. Local support is available via the Kent PRU and Attendance Service (KPAS).

- Information regarding schools' duties regarding children missing education, including information schools must provide to the local authority when removing a child from the school roll at standard and non-standard transition points, can be found in the department's statutory guidance: Children Missing Education. Please see part two of KCSIE links to other relevant guidance**.**

5.4 Children attending alternative provision

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

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

5.5 Elective Home Education (EHE)

- Where a parent/carer expresses their intention to remove a child from school with a view to educating at home, we will respond in line with national Elective Home Education guidance and local Kent guidance.

- We will work together with parents/carers and other key professionals and organisations to ensure decisions are made in the best interest of the child.

5.6 Children who may benefit from Early Help

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

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

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

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

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

5.8 Looked after children (including kinship care), previously looked after children and care leavers

- Holy Trinity Church of England Primary School recognises the common reason for children becoming looked after is as a result of abuse, neglect and/or exploitation, and a previously looked after child also potentially remains vulnerable.

- The school has appointed a 'designated teacher' who works with local authorities, including the Virtual School Kent (including the virtual school head), to promote the educational achievement of registered pupils who are looked after or who have been previously looked after, including those in kinship care.

- The designated teacher will work with the DSL to ensure appropriate staff have the information they need in relation to a child's looked after legal status, contact arrangements with birth parents or those with parental responsibility, care arrangements and the levels of authority delegated to the carer by the authority looking after them.

- Where a child is looked after, the DSL will hold details of the social worker and the name of the virtual school head in the authority that looks after the child.

- Where a child is leaving care, the DSL will hold details of the local authority Personal Advisor appointed to guide and support them and will liaise with them as necessary regarding any issues of concern.

5.9 Children who are privately fostered

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

- Where private fostering arrangements come to the attention of the school, for example, through the normal course of their interaction and promotion of learning activities with children, we must notify Kent Integrated Childrens Services in line with the local KSCMP arrangements in order to allow the local authority to check the arrangement is suitable and safe for the child.

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

Additional support for education settings regarding equality, diversity and inclusion is available via the **Education People EDIT team**.

- The fact that a child may be lesbian, gay, bisexual or gender questioning is not in itself an inherent risk factor for harm, however, Holy Trinity Church of England Primary School recognises that children who are

lesbian, gay, bisexual or gender questioning or are perceived by other children to be lesbian, gay, bisexual or gender questioning (whether they are or not) can be targeted by other children or others within the wider community.

- When supporting a gender questioning child, the school will consider the broad range of their individual needs, in partnership with the child's parents (other than in the rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities, such as to support any complex mental health and psychosocial needs and to manage the risk of bullying. Schools should refer to our Guidance for Schools and Colleges in relation to Gender Questioning Children, when deciding how to proceed

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

6. Online Safety

- It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. Holy Trinity Church of England Primary School will adopt a whole school approach to online safety which will empower, protect, and educate our pupils and staff in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.

- Holy Trinity Church of England Primary School will ensure online safety is considered as a running and interrelated theme when devising and implementing our policies and procedures, and when planning our curriculum, staff training, the role and responsibilities of the DSL and parental engagement.

- Holy Trinity Church of England Primary School identifies that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
    - Content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
    - Contact: being subjected to harmful online interaction with other users. For example, peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
    - Conduct: personal online behaviour that increases the likelihood of, or causes, harm. For example, making, sending and receiving explicit images (including consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying.
    - Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

- Holy Trinity Church of England Primary School recognises that technology and the risks and harms related to it evolve and change rapidly. The school will carry out an annual review of our approaches to online safety, supported by an annual risk assessment, which considers and reflects the current risks our children face online.

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

- The DSL has overall responsibility for online safety within the school but will liaise with other members of staff, for example IT technicians and curriculum leads as necessary.

- The DSL will respond to online safety concerns in line with our child protection and other associated policies, including our Anti-bullying policy, and behaviour 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.

- Holy Trinity Church of England Primary School uses a wide range of technology. This includes computers, laptops, tablets and other digital devices, the internet, our learning platform, intranet and email systems.

- All school owned devices and systems will be used in accordance with relevant policies, including but not limited to acceptable use policies, bring your own device (BYOD) policies, mobile and smart technology policies, and with appropriate safety and security measures in place.

6.1 Generative Artificial Intelligence (AI) - Holy Trinity does not currently permit the use of AI – this is currently under review and this policy will be updated appropriately once a robust policy is in place.

Generative artificial intelligence (AI) presents exciting opportunities; if used safely and effectively, AI can support children to achieve at school and develop the knowledge and skills they need for life. Additionally, AI has the power to transform education by helping teachers and staff focus on teaching, for example, by reducing workload. However, the use of AI also poses several safeguarding risks to children and staff, as well as risks to the safety and integrity of systems.

The following links provide further information and policy templates for leaders to consider:

- **Generative artificial intelligence (AI) in education - GOV.UK**
- **Using AI in education settings: support materials - GOV.UK**
- **Generative AI: product safety expectations - GOV.UK**
- **Generative AI in education: user research and technical report - GOV.UK**
- **Generative AI in education: educator and expert views - GOV.UK**
- **Data protection in schools - Artificial intelligence (AI) and data protection in schools - Guidance - GOV.UK (www.gov.uk)**
- **Artificial Intelligence and Online Safety | SWGfL**
- **Using artificial intelligence (AI) safely | Internet Matters**
- **Integrating AI in Schools: New Policy Template Available | SWGfL**
- **Ofsted's approach to artificial intelligence (AI) - GOV.UK**
- **National AI Strategy - GOV.UK**

- Holy Trinity Church of England Primary School recognises that if used safely, effectively and with the right infrastructure in place, generative artificial intelligence (AI) tools have many uses which could benefit our entire school community.

- However, it is important to recognise that AI tools can also pose safeguarding risks to our community as well as moral, ethical and legal concerns. This includes, but is not limited to:
    - exposure to inappropriate or harmful content, including bullying, harassment, abuse and exploitation
    - privacy and data protection breaches/risks
    - intellectual property infringements
    - academic integrity challenges such as plagiarism and cheating
    - exposure to inaccurate, misleading, or biased content.

- Holy Trinity Church of England Primary School does not permit AI or the use of generative AI tools yet.

- Holy Trinity Church of England Primary School will respond to any misuse of AI in line with relevant guidance until a policy is agreed, including but not limited to, anti-bullying, behaviour, data protection, complaints and child protection.

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

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

6.2 Mobile and Smart Technology

- Holy Trinity Church of England Primary School recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras, wearable technology and any other electronic devices with imaging and/or sharing capabilities.

- In accordance with KCSIE Holy Trinity Church of England Primary School has appropriate mobile and smart technology and image use policies in place, which are shared and understood by all members of the community. These policies can be found on the T Drive or from the front office.

6.3 Appropriate filtering and monitoring on school devices and networks

The UK Safer Internet Centre published updated guidance in 2025 as to what "appropriate" filtering and monitoring might look like; DSLs and SLT should ensure they are familiar with this updated guidance and its implications, for example filtering and monitoring responsibilities now explicitly include technologies using generative AI.

- Holy Trinity Church of England Primary School will do all we reasonably can to limit children's exposure to online harms through school provided devices, systems, platforms and networks. In line with the requirements of the Prevent Duty and KCSIE, we will ensure that appropriate filtering and monitoring systems are in place.

- This includes ensuring application of appropriate filtering and monitoring to both static content, as well as dynamic and AI-generated materials, products and/or systems used.

- The DfE have published Generative AI: product safety expectations to support schools to use generative artificial intelligence safely, and explains how filtering and monitoring requirements apply to the use of generative AI in education.

- When implementing appropriate filtering and monitoring, Holy Trinity Church of England Primary School will ensure that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.

- Whilst filtering and monitoring is an important part of our online safety responsibilities, it is only one part of our approach, and we recognise that we cannot rely on filtering and monitoring alone to safeguard our pupils. Effective safeguarding practice, robust policies, appropriate classroom/ behaviour management and regular education/ training about safe and responsible use is essential and expected.

  All class staff are to support with filtering and monitoring by:

  - Pupils will use appropriate search tools, apps and online resources as identified by staff, following an informed risk assessment.

- Staff are expected to view any websites before asking their pupils to use them, to check the content is appropriate.
- Internet use will be supervised by staff as appropriate to pupils' age, ability and potential risk of harm:
  - Pupils are not permitted to use devices without an adult present in the room.
  - KS1 pupils will have websites provided to them.
  - KS2 will have a selection of websites provided to them, and may be able to use a google search, provided the teacher has checked the outcome of the search first.
  - Staff children are not permitted to use personal, or staff personal devices in school, including after school, as these are not part of our filtering and monitoring system.
  - Pupils are to log on using their specific log in details. This ensures any filtering and monitoring procedures can be traced to the user and support can be put into place if issues arise.

6.3.1 Responsibilities

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

- A member of the senior leadership team and a governor, are responsible for ensuring that our school has met the DfE Filtering and monitoring standards for schools and colleges.

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

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

- Cantium have technical responsibility for:
  - maintaining filtering and monitoring systems.
  - providing filtering and monitoring reports.
  - completing technical actions identified following any concerns or checks to systems.
  - working with the senior leadership team and DSL to procure systems, identify risks, carry out reviews and carry out checks.

- All members of staff are provided with an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring as part of our induction process, and in our child protection staff training.

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

6.3.2 Decision making and reviewing our filtering and monitoring provision

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

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

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

- Our school undertakes regular (at least annual) reviews of our filtering and monitoring approaches to ensure we understand the changing needs and potential risks posed to our community.

- In addition, our school undertakes regular and active checks on our filtering and monitoring systems to ensure our systems work effectively in practice and as expected, and to provide assurance to the Governing Body that we are continuing to meet our safeguarding obligations. These checks are logged and recorded.

  - Checks are completed and recorded as part of the schools filtering and monitoring review process.

6.3.3 Appropriate filtering

- Holy Trinity Church of England Primary School's education internet connectivity is provided through Medway Grid for Learning and Holy Trinity Church of England Primary School uses Netsweeper to block access to harmful content.

- Cloud Reporter - Netsweeper blocks school provided internet access to illegal content and activity as identified in the Online Safety Act, including:
    - Child Sexual Abuse Material (CSAM)
    - Controlling or coercive behaviour
    - Extreme sexual violence
    - Extreme pornography
    - Fraud
    - Racially or religiously aggravated public order offences
    - Inciting violence
    - Illegal immigration and people smuggling
    - Promoting or facilitating suicide
    - Intimate image abuse
    - Selling illegal drugs or weapons
    - Sexual exploitation
    - Terrorism

  - [Internet Service Provider] is a member of Internet Watch Foundation (IWF) and uses IWF services to block access to CSAM.

- Cloud reporter at Netsweeper blocks school provided internet access to sites which could promote or include harmful and/or inappropriate behaviour or material. This includes content or activity which promotes hate speech or discrimination, weapons, gambling, harmful bullying content, malware/hacking, mis-disinformation. This list is not exhaustive and other inappropriate content may be blocked.

- Our filtering system is operational, up to date and applied to all users, including guest accounts, all school owned or provided devices, systems and networks, and all devices using the school internet connection. This is achieved by:

    - We filter internet use on all school owned, or provided, internet enabled devices and networks. This is achieved through our broadband and every device that is linked is assigned a staff, pupil or guest user access. Guest access is the same as pupil in regards to filtering levels.

    - All iPad or mobile devices that connect to the school's network are given student level filtering by default unless otherwise specified.

    - Cloud Reporter - Netsweeper allows for identification by both IP and Username where applicable.

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

    - We work with School's Broadband (Medway Grid for Learning) and our Cantium staff to ensure that our filtering policy is continually reviewed to reflect our needs and requirements.

    - If there is failure in the software or abuse of the system, for example if pupils or staff accidentally or deliberately access, witness or suspect unsuitable material has been accessed, they are required to:
    - report the concern immediately to a member of Senior Leadership Team or DSL member.

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

    - Parents/carers will be informed of filtering breaches involving their child.

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

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

- The DSL and leadership team will work with Cloud Reporter - Netsweeper and Cantium as appropriate and as identified in section 6.3.2, to ensure that our filtering policy is continually checked and reviewed to reflect our needs and requirements.

- If there is failure in the software or abuse of the system, for example if pupils or staff accidentally or deliberately access, witness or suspect unsuitable material has been accessed, they are required to:
    - Turn off monitor/screen, use a screen cover widget, report the concern immediately to a member of staff, report the URL of the site to technical staff/services.

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

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

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

6.3.4 Appropriate monitoring

No monitoring system can be 100% effective; schools and colleges need to understand the coverage of their monitoring approaches system, any limitations, and mitigate accordingly to minimise harm and meet their statutory requirements as identified in KCSIE and the Prevent duty.

- We will appropriately monitor internet use on all school provided devices and networks. This is achieved by:
    - Staff physical monitoring (supervision) of internet usage when pupils are using devices in their lessons.
    - Pupils are not permitted to use devices without an adult present in the room.
    - System monitoring of internet and web access through daily, and instant, filtering breaches which are emailed to the Lead DSL. Emails include log in details and time of incident for any breach.
    - Any device is assigned internet access via one of three log in credentials: staff, pupil or guest.

- All users will be informed that use of our devices and networks can/will be monitored and that all monitoring is in line with data protection, human rights and privacy legislation.

- If a concern is identified via our monitoring approaches:
    - Where the concern relates to pupils, it will be reported by the DSL and will be recorded and responded to via CPOMS and in line with policies such as child protection, acceptable use, and/or behaviour policies.
    - Where the concern relates to staff, it will be reported to the headteacher (or chair of governors if the concern relates to the headteacher), in line with our staff code of conduct or allegations policy.

- Where our monitoring approaches detect any immediate risk of harm or illegal activity, this will be reported as soon as possible to the appropriate agencies; including but not limited to, the emergency services via 999, Kent Police via 101, NCA-CEOP , LADO or Kent Integrated Children's Services via the Kent Integrated Children's Services Portal.

6.4 Information security and access management

- Holy Trinity Church of England Primary School is responsible for ensuring an appropriate level of security protection procedures are in place, in order to safeguard our systems as well as staff and pupils. Further information can be found in list name of relevant policies, for example, information security, acceptable use policies and/or online safety policy.

- Holy Trinity Church of England Primary School will review the effectiveness of our procedures periodically to keep up with evolving cyber-crime technologies.

- A member of the senior leadership team and a governor, are responsible for ensuring that our school has met the DfE cyber security standards for schools and colleges.

6.5 Remote/Online learning

Specific guidance for DSLs and SLT regarding remote learning is available at

- **DfE: Safeguarding and remote education during coronavirus (COVID-19)**
- **NSPCC: Undertaking remote teaching safely**
- **Kent County Council: Remote Learning Guidance for SLT**

- Holy Trinity Church of England Primary School will ensure any remote/online sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements and any local/national guidance.

- All communication with pupils and parents/carers will take place using school provided or approved communication channels; for example, school provided email accounts and phone numbers and/or agreed systems: Google Classroom, Microsoft 365 or equivalent.
    - Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.

- Staff and pupils will engage with remote/online teaching and learning, in line with existing behaviour principles as set out in our school behaviour policy and Acceptable Use Policies.

- Staff and pupils will be encouraged to report issues experienced at home when participating in remote/online learning; concerns will be responded to in line with our child protection and other relevant policies.

- When delivering remote learning, staff will follow our Remote Learning Acceptable Use Policy (AUP).

6.6 Online Safety Training for Staff

- Holy Trinity Church of England Primary School will ensure that all staff receive online safety training, which, amongst other things, will include providing them with an understanding of the expectations, applicable roles and their responsibilities in relation to filtering and monitoring, as part of induction.

- Ongoing online safety training and updates for all staff will be integrated, aligned and considered as part of our overarching safeguarding and child protection training approach. See section 7 for more information.

6.7 Educating pupils

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

- DSLs and leaders may find it helpful to access UK Council for Internet Safety (UKCIS) 'Education for a Connected World Framework' and DfE 'Teaching online safety in school' guidance. A variety of online safety templates and guidance from the Education Safeguarding Service can be accessed here.

6.8 Working with parents/carers

- Holy Trinity Church of England Primary School will build a partnership approach to online safety and will support parents/carers to become aware and alert of the potential benefits and risks and to reinforce the importance of children being safe online by:
    - Sending out Online Safety Newsletters which keep parents informed of key online platforms and current issues
    - Holding Online Safety workshops
    - Sending out materials which support Online Safety awareness
    - Inform parents of individual cases of Online Safety breaches
    - Provide individual support material to parents to help then provide a safer online environment for their children

- Holy Trinity Church of England Primary School will ensure parents and carers understand what systems are used to filter and monitor their children's online use at school, what their children are being asked to do online, including the sites they will be asked to access and who from the school (if anyone) their child is going to be interacting with online. This is achieved by:
    - providing information on our school website and relevant policies such as acceptable use, home/school agreements and through existing communication channels.

- Where the School is made aware of any potentially harmful risks, challenges and/or hoaxes circulating online, national or locally, we will respond in line with the DfE 'Harmful online challenges and online hoaxes' guidance to ensure we adopt a proportional and helpful response.
- Additional local advice is available for DSLs and SLT via the LADO Education Safeguarding Advisory Service blog post: ' **Think before you scare'**.

7. Staff Engagement and Expectations

7.1 Staff awareness, induction and training

- All members of staff have been provided with a copy of part one or annex A of the current version of 'Keeping Children Safe in Education' which covers safeguarding information for staff.
    - School leaders, including the DSL and governors/trustees will read KCSIE in its entirety.
    - School leaders and all members of staff who work directly with children will read annex B of KCSIE.
    - All members of staff have signed to confirm that they have read and understood the national guidance shared with them.
    - All records and registers are kept in the SLT office with Mrs Castles.

- It is a requirement that all members of staff have access to this policy and sign to say they have read **and** understood its contents. All staff are expected to re-read this policy at least annually (and following any updates) to ensure they understand our expectations and requirements.

- All new staff and volunteers (including agency and third-party staff) receive safeguarding and child protection training (including online safety, which, amongst other things, will include ensuring an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) to ensure they are aware of the school internal safeguarding processes, as part of their induction. This training is regularly updated and is in line with advice from the local safeguarding partners and explores the Kent processes to follow.

- All staff members (including agency and third-party staff) will receive appropriate child protection training (including online safety) that is updated at least annually, to ensure they are aware of a range of safeguarding issues and how to report concerns.

- Online safety training for staff will be integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning.

- 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.

- Holy Trinity Church of England Primary School recognises the expertise staff build by undertaking safeguarding training and from managing safeguarding concerns on a daily basis, and staff are encouraged to contribute to and shape school safeguarding arrangements and child protection policies.

- 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 be assured 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.

- The DSL and headteacher will provide an annual report to the Governing Body detailing safeguarding training undertaken by all staff and will maintain an up-to-date record of who has been trained.

- All training and updates will carried put through appropriate training bodies on scheduled staff inset days / staff development meetings / and through daily and weekly updates.

7.2 Safer working practice

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

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

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

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

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

7.3 Supervision and support

- The induction process will include familiarisation with child protection responsibilities and procedures to be followed if members of staff have any concerns about a child’s safety or welfare.

- The school will ensure that members of staff who are working within the foundation stage are provided with appropriate supervision in accordance with the statutory requirements of Early Years Foundation Stage (EYFS).
- The school will provide appropriate supervision and support for all members of staff to ensure that:
    - All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children
    - All staff are supported by the DSL in their safeguarding role.
    - All members of staff have regular reviews of their own practice to ensure they improve over time.

- Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL.

- The DSL will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union, the Education Support Partnership or other similar organisations directly.

8. Safer Recruitment and Allegations Against Staff

8.1 Safer recruitment and safeguarding checks

- Holy Trinity Church of England Primary School is committed to ensure that we develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our pupils and staff. We recognise that we must ensure that people working with children in our setting are suitable, have the relevant qualifications/training and have passed any required checks to fulfil their roles.
    - Holy Trinity Church of England Primary School will follow Part three, 'Safer recruitment' of Keeping Children Safe in Education and relevant guidance from The Disclosure and Barring Service (DBS)
    - The Governing Body and leadership team are responsible for ensuring that the school follows safe recruitment processes as outlined within the KCSIE guidance.
    - The Governing Body and leadership team will ensure that at least one of the persons who conducts an interview has completed safer recruitment training.

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

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

- We advise all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, reprimands, and warnings.

- Where Holy Trinity Church of England Primary School places a pupil/student with an alternative provision provider, we will:
    - obtain written information from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e., those checks that our school would otherwise perform in respect of our own staff.
    - obtain written confirmation that the alternative provider will inform the commissioning school of any arrangements that may put the child at risk (i.e. staff changes), so that the commissioning school can ensure itself that appropriate safeguarding checks have been carried out on new staff.

- Where the school organises work experience placements, we will follow the advice and guidance as identified in Part three of KCSIE.

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

- Any concerns or allegations about staff will be recorded and dealt with appropriately in line with Part four of KCSIE and the local Kent allegations arrangements, including discussions as necessary with the Local Authority Designated Officer (LADO).
    - In depth information can be found within our 'Managing Allegations against Staff' and/or staff behaviour policy/code of conduct policy**.** This can be found on the website / front office.

- Any concerns or allegations about staff will be recorded and dealt with in line with Part four of KCSIE and reported as appropriate in line with local Kent allegations management arrangements. Ensuring concerns are dealt with effectively will protect those working in or on behalf of the school from potential false allegations or misunderstandings.

- Where the headteacher is unsure how to respond, for example if the school is unsure if a concern meet the harm 'thresholds' (section 8.2.1), advice will be sought via the LADO Education Safeguarding Advisory Service enquiry form.

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

- In the situation that the school receives an allegation relating to an incident that happened when an individual or organisation was using our premises for the purposes of running activities with our pupils (for example community groups, sports associations, or service providers that run extra-curricular activities), we will follow our safeguarding policies and procedures, including informing the LADO.

8.2.1 Concerns that meet the 'harm threshold'

- Holy Trinity Church of England Primary School recognises that it is possible for any member of staff, including volunteers, governors, contractors, agency and third-party staff (including supply teachers) and visitors to behave in a way that indicates a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college. This includes when someone has:
    - behaved in a way that has harmed a child, or may have harmed a child
    - possibly committed a criminal offence against or related to a child
    - behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
    - behaved or may have behaved in a way that indicates they may not be suitable to work with children.

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

- In the event of allegations of abuse being made against the headteacher, staff are advised that allegations should be reported to the chair of governors/chair of the management committee/proprietor of an independent school who will contact the LADO. **Note: In the event of concerns/allegations about the headteacher, where the headteacher is also the sole proprietor of an independent school, this should be reported directly to the LADO.**

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

8.2.2 Concerns that do not meet the 'harm threshold'

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

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

- Low-level concerns should be shared confidentially in line with our low-level concerns policy/staff behaviour policy/code of conduct to the headteacher.

    - Where low-level concerns are reported to the school, the 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.
    - The headteacher will share concerns and liaise with the LADO enquiries officer.
    - Low-level concerns shared about supply staff and contractors will be shared with their employers so any potential patterns of inappropriate behaviour can be identified.
    - If the school is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, we will consult with the LADO.

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

8.3 Safe Culture

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

- Staff are encouraged and should feel confident to self-refer, if they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards. This

includes where concerns may be felt to be deliberately invented or malicious; such allegations are extremely rare and as such all concerns should be reported and recorded.

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

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

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

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

9. Opportunities to Teach Safeguarding

- Holy Trinity Church of England Primary School will ensure that children are taught about safeguarding, including online safety, as part of providing a broad and balanced curriculum. This will include covering relevant issues through Relationships Education (primary schools).

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

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

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

- Holy Trinity Church of England Primary School recognise that a one size fits all approach will not be appropriate for all children, and a more personalised or contextualised approach, tailored to the specific needs and vulnerabilities of individual children might be needed, for example children who are victims of abuse, neglect or exploitation, and children with SEND.

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

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

10. Physical Safety

10.1 Use of 'reasonable force'

- There may be circumstances when it is appropriate for staff to use reasonable force in order to safeguard children from harm. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a child needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. Further information regarding our approach and expectations can be found in our behaviour policy.

10.2 The use of school premises by other organisations

- Where our school facilities or premises are rented/hired out to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) we will ensure that appropriate arrangements are in place to keep children safe.
    - Where those services or activities are provided under the direct supervision or management of our school staff, our existing arrangements for child protection, including this policy, will apply.
    - Where services or activities are provided separately by another body using the school facilities/premises, the headteacher and Governing Body will seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place for the provider to liaise with the school on these matters where appropriate. If this assurance is not achieved, an application to use premises will be refused.

- Safeguarding requirements will be included in any transfer of control agreement (such as a lease or hire agreement), as a condition of use and occupation of the premises. Failure to comply with this will lead to termination of the agreement.

10.3 Site security

- All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light, such as:
    - Ensuring Gates Are Closed,
    - Door Codes Are Not Shared,
    - Staff Wear Badges/Lanyards

- Appropriate checks and supervision will be undertaken in respect of visitors and volunteers coming into school as outlined within national guidance, such as:
    - visitors will be expected to sign in and out via the office visitors log and to display a visitor's badge whilst on site,
    - visitors without an appropriate DBS will be escorted/supervised at all times.
    - Staff Wi-Fi is not shared

- For visitors attending in a professional capacity, such as social workers, early help staff, the school will check their ID and be assured that they have has had the appropriate DBS check or their employers have confirmed that their staff have appropriate checks.

- Any individual who is not known or identifiable on site should be challenged for clarification and reassurance.

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

11. Local Support

- All members of staff in Holy Trinity Church of England Primary School are made aware of local support available.

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

  - **Local Early Help and Preventative Services and Family Hubs**
    - Schools/colleges should insert relevant local links/networks which can be found at:
      - Early Help and Preventative Services - KELSI
      - Early Help contacts - KELSI
      - Kent Family Hubs - Kent County Council

  - **Kent Police**
    - 101 or 999 if there is an immediate risk of harm

  - **Kent Safeguarding Children Multi-Agency Partnership (KSCMP)**
    - www.kscmp.org.uk
    - 03000 421126 or kscmp@kent.gov.uk

  - **Adult Safeguarding**
    - Adult Social Care via 03000 41 61 61 (text relay 18001 03000 41 61 61) or email social.services@kent.gov.uk

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

Appendix 1: Categories of Abuse

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

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Abuse can be carried out both on and offline and be perpetrated by men, women, and children.

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

Signs that MAY INDICATE Sexual Abuse

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

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

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

Signs that MAY INDICATE physical abuse

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bi-lateral injuries, such as two bruised eyes
- Bruising to soft area of the face such as the cheeks
- Fingertip bruising to the front or back of torso
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns, such as cigarette burns
- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot

- Inappropriate/harmful medication usage
- Aggressive behaviour or severe temper outbursts.
- Injuries that cannot be accounted for. Inadequate, inconsistent, or excessively plausible explanations for an injury, 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
- Secrecy relating to use of technology
- 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 caregivers); 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 and Resources

KSCMP

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

NSPCC 'Report Abuse in Education' Helpline

- 0800 136 663 or help@nspcc.org.uk

National Organisations

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

Support for Staff

- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline
- Harmful Sexual Behaviour Support Service: https://swgfl.org.uk/harmful-sexual-behaviour-support-service
- NSPCC Whistleblowing helpline: www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/

Support for pupils

- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- The Mix: www.themix.org.uk
- Shout: www.giveusashout.org
- Fearless: www.fearless.org
- Victim Support: www.victimsupport.org.uk
- Lucy Faithfull Foundation 'Shore Space': https://shorespace.org.uk/

Support for Adults

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

Support for Special Education Needs and Disabilities

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk
- Council for Disabled Children: https://councilfordisabledchildren.org.uk
- Kent Autistic Trust: www.kentautistictrust.org/
- AFASIC: www.afasic.org.uk/

- National Autistic Society: www.autism.org.uk/
- Kent County Council: www.kent.gov.uk/education-and-children/special-educational-needs-and-disabilities/support-for-parents-with-send-children
- Portage: www.kent.gov.uk/education-and-children/special-educational-needs-and-disabilities/support-for-children-under-5/portage-supporting-pre-school-children-with-send
- Information Advice and Support Kent (IASK): www.iask.org.uk/

Contextual Safeguarding Network

- https://contextualsafeguarding.org.uk/

Kent Resilience Hub

- https://kentresiliencehub.org.uk/

Children with Family Members in Prison

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

Substance Misuse

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

Domestic Abuse

- KSCMP: www.kscmp.org.uk/guidance/domestic-abuse
- Domestic abuse services: www.domesticabuseservices.org.uk
- Refuge: www.refuge.org.uk
- Women's Aid: www.womensaid.org.uk
- Men's Advice Line: www.mensadviceline.org.uk
- Mankind: www.mankindcounselling.org.uk
- National Domestic Abuse Helpline: www.nationaldahelpline.org.uk
- Respect Phoneline: https://respectphoneline.org.uk

Criminal and Sexual Exploitation

- KSCMP: www.kscmp.org.uk/guidance/exploitation
- Kent & Medway Violence Reduction Unit: https://kentandmedwayvru.co.uk/
- National Crime Agency: www.nationalcrimeagency.gov.uk/who-we-are
- It's not okay: www.itsnotokay.co.uk
- NWG Network: www.nwgnetwork.org
- County Lines Toolkit for Professionals: www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit
- The Children's Society: www.childrenssociety.org.uk/what-we-do/our-work/preventing-child-sexual-exploitation

So-called Honour Based Abuse

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

Radicalisation and hate

- Kent Prevent Education Officers: www.kelsi.org.uk/child-protection-and-safeguarding/The-Prevent-Duty-In-Education
- Educate against Hate: www.educateagainsthate.com
- Counter Terrorism Internet Referral Unit: www.gov.uk/report-terrorism
- True Vision: www.report-it.org.uk

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

- Rape Crisis: https://rapecrisis.org.uk
- Brook: www.brook.org.uk
- 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
- Kidscape: www.kidscape.org.uk
- Centre of expertise on Child Sexual Abuse: www.csacentre.org.uk
- Lucy Faithfull Foundation 'Shore Space': https://shorespace.org.uk/

Online Safety

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

Mental Health

- KSCMP: www.kscmp.org.uk/guidance/children-and-young-peoples-mental-health
- Kent & Medway Children & Young People's Mental Health Services (CYPMHS): www.nelft.nhs.uk/services-kent-children-young-peoples-mental-health/
- Mind: www.mind.org.uk
- Moodspark:https://moodspark.org.uk
- Young Minds: www.youngminds.org.uk
- We are with you: www.wearewithyou.org.uk/services/kent-for-young-people/
- Anna Freud: www.annafreud.org/schools-and-colleges/
- MindEd: https://mindedforfamilies.org.uk/