Egerton Church of England Primary School

Together, we inspire, nurture and thrive

Perseverance Compassion Respect Honesty Forgiveness Hope

Child Protection Policy

Key Contact Personnel in School

Designated Safeguarding Lead:
Mrs Julia Head, Headteacher

Deputy Designated Safeguarding Lead(s):
Mrs Ellie Warner, Deputy Head, Dan Langford and Mrs Gill Morrissey, SENCO

Named Safeguarding Governor:
Jan Burgess

This is a core policy that forms part of the induction for all staff. 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.

Date written: **September 2026**
Date agreed and ratified by Governing Body: **October 2026**
Date of next review: **September 2027**

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

Key Contacts

	Name	Egerton CEP School contact information
Designated Safeguarding Lead (DSL)	Julia Head	01233 756274
Deputy Designated Safeguarding Leads	Dan Langford Gill Morrissey	01233 756274
Headteacher	Julia Head	01233 756274
Safeguarding Governor	Jan Burgess	jacqueline.underwood@theeducationpeople.org
Other key staff	N/A	

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What to do if you have a welfare concern at Egerton

Why are you concerned?

For example:

- something a child has said, such as an allegation, disclosure or comment that causes concern
- changes in appearance, presentation, behaviour, emotional wellbeing or attendance
- unexplained injuries, marks or bruises
- witnessed or reported concerning, harmful or inappropriate behaviour, including online
- concerns linked to family circumstances, peer relationships or wider community context

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

Follow the Egerton CEP School's procedure:

- Reassure the child and listen carefully; do not promise confidentiality
- Use open questions if needed, for example, **TED**: **T**ell, **E**xplain, **D**escribe
- Record facts and not opinions, using the child's own words where possible
- Sign and date your record and report to the DSL: seek support for yourself as required

Inform the school Designated Safeguarding Lead(s), Julia Head

- If a child is at risk of immediate harm, is unsafe to go home, or requires urgent protection, make an urgent Request for Support to the Front Door Service via the Kent Children's Portal and/or call the Police on 999.
- If there is no immediate risk of harm, consider what support is needed in line with the Kent Support Level Guidance and KSCMP procedures. This may include internal support, signposting to community based early help services, contacting the Police, reporting allegations against staff to the LADO, or making a Request for Support to the Front Door Service via the Kent Children's Portal.
- If the school believes a child may need support but is unclear whether a Request for Support is required, advice can be sought through a consultation from the Front Door Service via **03000 411 111**
- If support is required out of working hours, contact the Out of Hours Service via **03000 41 91 91**.

If you are unhappy with the response:

DSLs/Staff:

- Follow school whistleblowing procedures, see policy on SharePoint/staff room notice board
- Follow Kent safeguarding partnership escalation procedures.

Pupils or Parents:

- Follow school complaints procedures – school website/SharePoint

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

Monitor

Be clear about:

- What you are monitoring, for example, behaviour trends, appearance.
- How long you will monitor for
- 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

- Egerton CEP School recognises our statutory responsibility to safeguard and promote the welfare of all children. Safeguarding 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.
- Egerton CEP School believes 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.
- All children have equal rights to protection, regardless of age, sex, ability, culture, race, language, religion, belief, sexual orientation or identity. Egerton CEP School is committed to creating and maintaining an inclusive, anti-discriminatory safeguarding culture. Staff are expected to recognise and challenge racism, discrimination and prejudice, and to consider how these experiences may affect children's safety, welfare and access to support.
- Staff working with children at Egerton CEP 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, or younger members of staff (under 18) or children on student/work placements.
- Egerton CEP 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.
- Egerton CEP School recognises that children's behaviour, presentation and experiences should be understood in context. Staff will take a trauma-informed and child-centred approach, considering the possible root causes of behaviour and the impact of abuse, neglect, exploitation, discrimination, adversity and wider contextual or extra-familial harm.
- 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' 2026.

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 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) 2026
- Working Together to Safeguard Children (WTSC) 2026
- Ofsted: Education Inspection Framework 2026
- Framework for the Assessment of Children in Need and their Families 2000
- Kent and Medway Safeguarding Children Procedures
- Early Years and Foundation Stage Framework (EYFS) 2026
- 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)
- Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), and the Data (Use and Access) Act 2025

- 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. Such arrangements will have regard to any guidance issued by the Secretary of State.
- Egerton CEP 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 children. It refers to the activity 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.
- Egerton CEP School understands that significant harm is the threshold used to determine when statutory child protection intervention may be required. Under the Children Act 1989, "Harm" is the "ill treatment or the impairment of the health or development of the child". Harm can be determined "significant" by "comparing a child's health and development with what might be reasonably expected of a similar child". There are no absolute criteria for determining significant harm. Significant harm may arise from a single serious incident or from a pattern of acute, longstanding, chronic or cumulative concerns which impair a child's health or development.
- Egerton CEP School recognises that safeguarding concerns are rarely isolated. Children may experience multiple and overlapping harms, including abuse, neglect, exploitation, online harms and extra-familial harm. Our safeguarding response will consider the full context of a child's lived experience, including their relationships, family circumstances, peer groups, community, online activity and wider environment.
- 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
- Making or sharing of nudes or semi-nudes (including AI-generated images)
- 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 A 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 as listed below:
  - Anti-bullying
  - Attendance
  - Behaviour, including behaviour management and use of physical intervention
  - Complaints
  - 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
  - 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
  - Social media
  - 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" – DfE, March 2015
- Early Years Foundation Stage 2026 Welfare Requirements
- These documents can be found on SharePoint in the 'School Policies' folder

1.5 Policy compliance, monitoring and review

- Egerton CEP School will review this policy at least annually (as a minimum) and will update it as needed, so that it remains 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 of KCSIE as appropriate. This policy can be found in the staff room, on SharePoint and on the school website.
- Parents/carers can obtain a copy of the school Child Protection Policy and other related policies on request. Additionally, our policies can be viewed via the school website.
- The policy forms part of our school development plan and will be reviewed annually by the governing body who has responsibility for oversight of safeguarding and child protection systems.
- The Designated Safeguarding Lead (DSL) (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' policies and website.
- The governing body and leadership team will promote an inclusive, anti-discriminatory safeguarding culture and ensure staff are supported to identify, understand and challenge racism, discrimination and disproportionality in safeguarding practice.
- 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 a nominated governor for safeguarding: **Janine Burgess**. The nominated governor 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.
- The school has a nominated governor for cyber security: **Dan Langford**. The cyber security governor will work with the headteacher and DSL to ensure the school meets the DfE cyber security standards for schools.

2.2 Designated Safeguarding Lead (DSL)

- The school has appointed **Julia Head, 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. 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 school has also appointed Deputy DSLs who will have delegated responsibilities and act in the DSLs absence:
    - **Ellie Warner, Deputy Headteacher**
    - **Gill Morrissey, SENCO**
    - **Dan Langford**
- 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 B 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)

- During term time, the DSL will be available during school hours for staff to discuss safeguarding concerns. Where the DSL is not available, deputy DSL cover is in place to ensure safeguarding concerns can be raised, received, monitored and acted on without delay. Staff should be clear that urgent concerns must be reported immediately to the DSL, a deputy DSL, or senior leader.
- The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. Deputy DSLs will be trained to the same standard as the DSL. The DSLs' training will be updated formally at least every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.

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
    - 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 Egerton CEP 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 Egerton CEP 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 code of conduct and 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

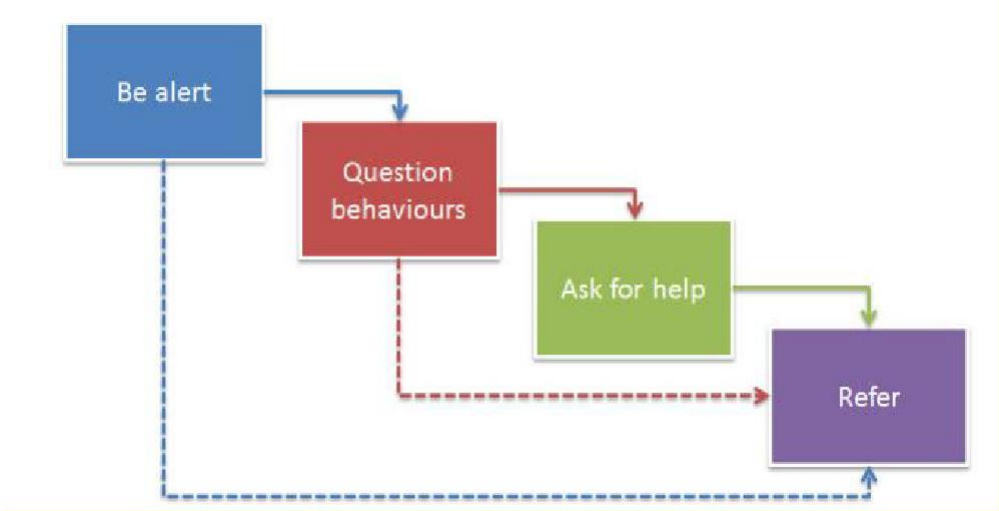
2.5 Parents and carers

- 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.
- 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.



- Egerton CEP School recognises 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.
- Egerton CEP 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.

- Egerton CEP 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 behaviours 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.
- Egerton CEP School recognises that technology can be a significant component in many safeguarding and wellbeing issues; children are at risk of abuse, neglect 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.
- Egerton CEP School recognises that some children have additional or complex needs and may require access to intensive or specialist services to support them.
- All staff will be alert to the potential need for additional support for children who may be more vulnerable or whose circumstances may indicate emerging, escalating or unmet needs. Staff will be particularly alert to the potential need for additional support for a child who:
    - is disabled or has certain health conditions and has specific additional needs
    - has special educational needs, whether or not they have a statutory Education, Health and Care plan
    - has a mental health need
    - is a young carer
    - is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement, association with organised crime groups or county lines
    - is frequently missing or goes missing from education, home or care
    - is at risk of exploitation, modern slavery or trafficking, including criminal or sexual exploitation
    - is at risk of being radicalised into terrorism
    - 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 or domestic abuse
    - is misusing alcohol or other drugs themselves
    - is at risk of honour or faith-based abuse, such as Female Genital Mutilation or Forced Marriage
    - is privately fostered
- 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 was in possession of a prohibited item as listed in our behaviour policy. The DSL (or deputy) will then consider the circumstances of the pupil who has been searched to assess the incident against any potential wider safeguarding concerns.
    - Staff will involve the DSL (or deputy) without delay if they believe that a search has revealed a safeguarding risk.

3.2 Responding to child protection concerns

- If staff are made aware of a child protection concern, they are expected to:
    - listen carefully to child, reflecting back the concern
    - use the child's language
    - be non-judgmental

    - avoid leading questions; only prompting the child where necessary with open questions to clarify information where necessary. For example, who, what, where, when or Tell, Explain, Describe (TED)
    - not promise confidentiality as concerns will have to be shared further, for example, with the DSL and potentially Integrated Children's Services
    - be clear about boundaries and how the report will be progressed
    - record the concern using the facts as the child presents them, in line with school record keeping requirements
    - inform the DSL (or deputy), as soon as practically possible
- If staff have any concerns about a child's welfare, they are expected to act on them immediately. If staff are unsure if something is a safeguarding issue, they will speak to the DSL (or deputy).

The DSL or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, a DSL is not available, this should not delay appropriate action being taken by staff. Staff should speak to a member of the senior leadership team, take advice from the Education Safeguarding Service or a consultation with a social worker from the Front Door (for contact information, see flowchart on page 3). In these circumstances, any action taken will be shared with a DSL as soon as is 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.
- Egerton CEP School recognises that children should not be seen or relied upon as protective factors for adults. When considering family circumstances, adult vulnerabilities or parental needs, staff will remain focused on the child's needs, safety, welfare and lived experience. Staff will not assume that a child's presence, behaviour, affection, resilience or relationship with a parent/carer reduces risk, prevents harm, or means that an adult's needs are safely managed.
- Egerton CEP 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
- 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.
- All staff will be made aware of the process for identifying, assessing and responding to children's needs in line with the Kent Support Levels Guidance. This includes understanding the criteria, including the level of need, for when children and families may be supported through:
    - **universal services and community-based Early Help** - support for children with emerging needs (Level 2)
    - **the targeted early help level of Family Help**, under sections 10 and 11 of the Children Act 2004 - for children with multiple and/or complex needs (Level 3)
    - **statutory services under section 17 of the Children Act 1989**, including children in need and disabled children
    - **statutory child protection processes under section 47 of the Children Act 1989**, where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm (Level 4)
- **Community-based Early Help** is support for children of all ages that improves a family's resilience, improves outcomes or reduces the chance of a problem getting worse. It is not a single service, but a system of support delivered by local authorities and their partners, including education providers.

    - Children at this level are usually best supported by professionals who already work with them, such as health professionals, early years settings, schools or through community resources such as Family Hubs or voluntary services.
    - A Request for Support via Front Door Service is not required for support at this level.
    - Where community-based Early Help is appropriate, the DSL will lead on exploring internal resources available and liaising with other universal or additional services available via local agencies.
    - Where the need of a child/family escalates, becomes persistent, or cannot be met by universal or community-based Early Help alone, the DSL will consider whether a Request for Support to Family Help is required in line with the Kent Support Levels Guidance.
- **Where children and families have multiple and/or complex needs**, or persistent needs, which cannot be met by universal or community-based early help support alone, they may require coordinated, multi-disciplinary support through the targeted early help level of **Family Help**.
    - 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.
    - Egerton CEP School recognises 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 Egerton CEP 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 3.
    - 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 Egerton CEP 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 Egerton CEP School to ensure any activity or support implemented to support children and/or families is recorded. Support provided by the Egerton CEP 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 Multi-agency working

- Egerton CEP School recognises the pivotal role we have to play in multi-agency safeguarding arrangements and is committed to its responsibility to work within the KSCMP multi-agency safeguarding arrangements as identified within 'Working Together to Safeguard Children'.
- The School leadership team, governing body and DSL will work to establish strong and co-operative local relationships with professionals in other agencies, including the safeguarding partners in line with local and national guidance. 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.
- Egerton CEP School recognises the importance of multi-agency working and is committed to working alongside partner agencies to provide a coordinated response to promote children's welfare and protect them from harm. This includes contributing to KSCMP processes as required, such as, participation in relevant safeguarding multi-agency plans and meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.
- The School will allow access for Kent Children's Social Work Service and, where appropriate, from a placing local authority, to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.
- The 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 behaviour policy, which is informed by the DfE 'Searching, screening and confiscation at school' guidance.

3.4 Child Protection Records

- All safeguarding concerns, discussions and decisions, and reasons for those decisions, will be recorded in writing on the school online safeguarding system, **CPOMS**, https://apps.cpoms.net and passed without delay to the DSL.
- All incidents and concerns are saved on CPOMS which requires staff logins and unique passwords. DSLs only have access to all children's files and will need to use an authentication code as well as login and password.
- 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.
- 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.

- 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.
- 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.

3.5 Transferring and receiving child protection files and safeguarding information

- 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-Ordinator (SENCO), 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.
- Where information shared during transition indicates that a child may present a risk to others and/or may be at risk themselves, Egerton CEP School will consider what safeguarding action is required before, or as soon as possible after, the child starts. This may include completing or reviewing a safeguarding risk assessment and putting in place an appropriate safety and support plan.

3.6 Confidentiality and information sharing

- Egerton CEP 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.
- Egerton CEP School has an appropriately trained Data Protection Officer (DPO) as required by data protection laws to ensure that our setting is compliant with all matters relating to confidentiality and information sharing requirements.
    - **DPO contact telephone number:** 01622 392051
    - **DPO contact email address:** dpo@invicta.law
- 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.
    - Egerton CEP 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, the UK General Data Protection Regulation (UK GDPR) and the Data (Use and Access) Act 2025 place duties on schools and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. Data protection laws do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.
    - 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. This is done at the beginning of the academic year as part of safeguarding training.
    - 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 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 in the staff room, on SharePoint and on the school website.
- Whilst we encourage members of our community to report concerns and complaints directly to us, we recognise this may not always be possible. Children 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 Egerton CEP 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 Forms of Abuse and Other Safeguarding Issues

- Egerton CEP 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 A of KCSIE which contains important additional information about specific forms of abuse and safeguarding issues.
- Where staff are unsure how to respond to specific safeguarding issues, they should follow the processes as identified in part 3 of this policy and speak with the DSL or a deputy.

4.1 Child-on-child abuse (including harassment and violence)

- All members of staff at Egerton CEP 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.
- Egerton CEP 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
    - Making or sharing of nudes or semi-nudes (including images digitally altered or wholly generated by artificial intelligence)
    - 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
- Egerton CEP School recognises that harmful sexual behaviour exists on a continuum, from developmentally inappropriate or problematic sexual behaviour through to abusive behaviour and sexual violence.
- 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).
- Egerton CEP 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.
- Egerton CEP 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.
- Egerton CEP 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, behaviour and child protection policies.
- When a concern of child-on-child abuse is reported, a DSL will consider whether an immediate risk and needs assessment is required. This will be considered on a case-by-case basis in line with part five of KCSIE and may include:
    - the wishes and feelings of the child who has been harmed
    - the nature of the concern or alleged incident
    - whether a crime may have been committed
    - whether harmful sexual behaviour may have been displayed
    - the ages and developmental stages of the children involved
    - any power imbalance, coercion, intimidation or exploitation
    - whether the concern appears to be a one-off incident or part of a pattern of behaviour
    - any vulnerability, SEND or additional needs affecting the children involved
    - any online elements or wider contextual factors
    - any ongoing risks to the child who has been harmed, other children, staff or the wider school community
- The risk and needs assessment, where completed, will be recorded and kept under review. Actions will be taken to protect and support all children involved and to address any wider safeguarding risks within the school environment.
- To minimise the risk of child-on-child abuse, Egerton CEP School will:

    - implement a robust anti-bullying policy
    - provide an age/ability appropriate PSHE and RSE curriculum
    - provide a range of reporting mechanisms e.g. worry boxes, school council representatives, trusted adults
- Alleged victims, alleged perpetrators and any other child affected by child-on-child abuse will be supported by:
    - taking reports seriously
    - listening carefully
    - avoiding victim blaming
    - providing appropriate pastoral support
    - working with parents/carers
    - reviewing educational approaches
    - following procedures as identified in other policies e.g. the school anti-bullying, behaviour and child protection policy
    - where necessary and appropriate, informing the police and/or ICS
- 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 child-on-child abuse. 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.

4.2 Making or sharing nudes and/or semi-nudes

- Egerton CEP School recognises that all incidents involving the making or sharing of nudes or semi-nudes, whether consensual or non-consensual, will require a safeguarding response.
- For the purpose of this policy, nudes and semi-nudes means nude or semi-nude images, videos or livestreams of children under the age of 18. This includes imagery that is taken/created by a child, taken/created by a child and shared by another person, digitally altered, or generated using artificial intelligence (AI).
- Creating, possessing or sharing nudes and semi-nudes of children under 18, including where this has happened with consent, is illegal and can present complex safeguarding issues. However, Egerton CEP School recognises that the law is in place to protect children rather than unnecessarily criminalise them.
- When made aware of concerns involving making or sharing of nudes and semi-nudes, 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
    - not to 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 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 making or sharing of nudes and semi-nudes:
    - 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, 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

4.3 Exploitation, including child sexual exploitation (CSE), child criminal exploitation (CCE), county lines, serious violence and modern slavery

- Egerton CEP School recognises that Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), county lines, serious violence and modern slavery are safeguarding issues and may overlap. Children may also experience exploitation alongside other forms of abuse, neglect or harm.
- Egerton CEP 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.
- Egerton CEP 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).
- Egerton CEP 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.
- **County lines** is a form of criminal exploitation involving gangs or organised criminal networks using dedicated mobile phone lines or other forms of "deal line" to export illegal drugs. This activity can happen locally as well as across the UK. Children may be exploited to move, store or sell drugs or money and may be controlled through coercion, intimidation, violence, threats, debt bondage, online activity or exploitation of their family circumstances.
- **Serious violence** includes violence and exploitation involving weapons, gangs, criminal networks or serious physical harm. 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.
- **Modern slavery** includes human trafficking, slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, criminal exploitation, forced labour, domestic servitude and the removal of organs.
- Staff will be alert to indicators that a child may be at risk of, or experiencing, exploitation, county lines or serious violence. These may include:
    - unexplained gifts, money or new possessions

    - increased absence from school or regularly missing education
    - going missing from home or care, or regularly returning home late
    - changes in friendship groups or relationships with older individuals or groups
    - a significant decline in educational performance
    - signs of assault, unexplained injuries, self-harm or changes in wellbeing
    - drug or alcohol misuse
    - association with others involved in exploitation, gangs or criminal networks
- 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.
- The DSL will consider use of the Kent and Medway Child Exploitation Identification Tool where there are concerns that a child may be experiencing, or be vulnerable to, exploitation.

4.4 Domestic abuse

- Egerton CEP 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
    - 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.
- Egerton CEP 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

4.5 Honour or Faith-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
- **Female Genital Mutilation (FGM)** comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and is a form of child abuse with long-lasting harmful consequences.
- 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

4.6 Preventing radicalisation

- Egerton CEP School recognises that children may be susceptible to radicalisation into terrorism.
- Egerton CEP 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, so support can be put in place for when the child arrives.
- The DSL and senior leaders will be familiar with the Prevent duty guidance and local procedures for making a Prevent referral. The school's approach to Prevent will be considered as part of wider safeguarding arrangements.
- Egerton CEP School will ensure that staff receive appropriate Prevent training so they understand the Prevent duty, can recognise concerns, know how to report them internally, and understand the local Prevent referral process. This is delivered as part of annual safeguarding training and updates.

4.7 Cybercrime

- Egerton CEP 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.

4.8 Bruising in non-mobile children

- 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 Front Door Service 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 the Front Door Service, 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

4.9 Child abduction and community safety incidents

- Egerton CEP School recognises that child abduction is the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members, by people known to the child, or by strangers.
- Egerton CEP School also recognises that community safety incidents in the vicinity of the school can raise safeguarding concerns for children, parents/carers and staff.
- Staff will report any concerns about child abduction or community safety incidents to the headteacher and/or DSL immediately. Where there is an immediate risk to a child, emergency services will be contacted using 999.
- Egerton CEP School will support children to develop age-appropriate personal safety awareness through the curriculum and wider safeguarding education. This will focus on building children's confidence, judgement and ability to seek help, rather than simply warning them about strangers.

4.10 Children and the court system, including children affected by parental separation, court orders or family disputes

- Egerton CEP School recognises that children may be affected by the court system in different ways, including where they are required to give evidence in criminal proceedings or where they are affected by private or public family law proceedings, child arrangements or parental disputes.
- Where staff are aware that a child is involved in, or affected by, court proceedings, they will share relevant information with the DSL so that appropriate support can be considered. This may include pastoral support, adjustments within school, liaison with parents/carers where appropriate, and working with partner agencies where this is needed to safeguard and promote the child's welfare.
- Egerton CEP School recognises that parental separation, child arrangements and family court processes can be stressful for children and may contribute to conflict, anxiety or safeguarding concerns. The welfare and best interests of the child will remain central to the school's decision-making.
- Where parents/carers disagree about arrangements, decisions or the exercise of parental responsibility, the school will act in line with statutory guidance, relevant court orders, education law, safeguarding duties and data protection requirements. Where necessary, parents/carers may be advised to seek independent legal advice or resolve disputes through the appropriate legal route.
- Egerton CEP School will consider any court orders or legal restrictions that are shared with the setting and relevant to the child's education, welfare or safety. Parents/carers may be asked to provide the most recent court order where this is appropriate and/or necessary to help the school understand arrangements or restrictions.
- Staff will remain alert to any safeguarding concerns arising from parental disputes, child arrangements or court proceedings. Concerns will be reported to the DSL and responded to in line with this policy.

4.11 Homelessness

- Egerton CEP School recognises that being homeless, or being at risk of homelessness, can present a real risk to a child's welfare.
- The DSL will be aware of local contact details and referral routes into the Local Housing Authority so that concerns can be raised or progressed at the earliest opportunity. Discussion with, or referral to, the Local Housing Authority does not replace safeguarding action where a child has been harmed or is at risk of harm.
- Where Egerton CEP School receives information that a child has been placed in temporary accommodation, the DSL will consider what support may be required to safeguard and promote the child's welfare. This may include considering the impact on attendance, wellbeing, learning, transport, access to resources and family support needs.

4.12 Children with family members in prison or affected by parental offending

- Egerton CEP School recognises that children with family members in prison, or who are otherwise affected by parental offending, may experience additional emotional, practical and safeguarding needs. This may include stigma, isolation, poverty, poor mental health, disrupted family relationships, attendance concerns or changes in behaviour.
- Staff will share any concerns with the DSL so that appropriate support can be considered. This may include pastoral support, safe adult support, signposting to specialist services, liaison with parents/carers where appropriate, and consideration of early help or wider multi-agency support.

- Egerton CEP School will respond to children affected by parental imprisonment or offending in a sensitive and trauma-informed way, recognising the potential impact on the child's safety, wellbeing, attendance, learning and relationships.

5. Supporting Children Potentially at Greater Risk of Harm

- Whilst **all** children should be protected, Egerton CEP School acknowledge that some groups of children are potentially at greater risk of harm.
- Egerton CEP School will take a child-centred, trauma-informed and contextual approach, considering the child's voice, lived experience, individual circumstances and any barriers they may face in accessing help or support.

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

- Egerton CEP 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.
- Egerton CEP 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 or 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 (**Gill Morrissey**) 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 Intimate Care policy on SharePoint.

5.2 Safeguarding children with medical conditions

- Egerton CEP School recognises that children with medical conditions, including allergies, should be properly supported so they can access education safely and fully. Further information can be found in our medical conditions policy and allergy safety arrangements.
- An incident relating to the management of a child's medical condition, including allergies, will not automatically require safeguarding actions. However, staff will report concerns to the DSL where an incident, pattern of incidents or wider information suggests that a child may be at increased risk of abuse, neglect or exploitation because of their medical condition.
- The DSL will consider concerns in line with this policy, national and local guidance and relevant school medical or allergy arrangements. Where appropriate, this may include considering whether a Request for Support should be made.

5.3 Children requiring mental health support

- Egerton CEP 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.
- Only appropriately trained professionals should diagnose a mental health problem. However, Egerton CEP School recognises our staff are well placed to observe children day-to-day and identify those whose behaviour, presentation or circumstances suggest that they may be experiencing a mental health problem or be at risk of developing one.
- Staff will be alert to potential warning signs that a child may be struggling with their mental health. These may include significant changes in behaviour, ongoing difficulty sleeping, withdrawing from social situations, not wanting to do things they usually enjoy, physical signs of self-harm, neglecting themselves, suicidal ideation, changes in attendance, engagement, relationships or emotional wellbeing.
- If staff have a concern about a child's mental health or wellbeing, they will report this to the DSL or headteacher who are both Mental Health First Aiders and who can escalate concerns to the appropriate outside agencies.
- If staff have a mental health concern that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or a deputy.
- Where mental health support is needed, parents/carers will be informed to support the child's wellbeing, unless doing so would place the child at additional risk.
- If staff believe that a child is in immediate danger, emergency services will be contacted using 999 or arrangements will be made for the child to be taken to A&E immediately by a parent/carer or other suitable person. If a child needs urgent help for their mental health but it is not an emergency, help will be sought through NHS 111.
- Age/ability appropriate education will be provided to our pupils to help promote positive health, wellbeing, and resilience. This will be covered in PSHE and RSE lessons. If deemed appropriate, some children (usually those with SEND) may receive this education 1:1 or receive some pre-teaching before whole class input.

5.4 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 Children's 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 make contact with 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 has 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, Inclusion and Attendance Service (KPIAS).

- Where there are concerns that a child may be missing from education, including where the school becomes aware that a child has moved out of area or their whereabouts are unknown, the school will make a referral to KPIAS promptly so that appropriate checks can be undertaken. The school will not delay referral while completing local enquiries where this may prevent timely action by the local authority.

5.5 Children attending alternative provision

- Where the school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil. This includes the school:
    1. having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend
    2. 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.
- Before a placement is agreed, Egerton CEP School will obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the provision. This includes confirmation that the provider will inform the school of any arrangements that may affect the child's safety, including relevant staffing changes.

5.6 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, the School Attendance (Pupil Registration) (England) Regulations 2024 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.
- Where possible, Egerton CEP School will work with the local authority, parents/carers and other key professionals to ensure that the implications of elective home education have been considered before a final decision is made and that decisions are made in the best interests of the child. This will be particularly important where the child has SEND, an Education, Health and Care plan, is known to partner agencies, or is otherwise vulnerable.
- Egerton CEP School will consider local guidance and tools, including the KSCMP EHE Leavers Checklist, to support proportionate safeguarding checks, information sharing and decision-making before a child is removed from roll.
- Where there are safeguarding or welfare concerns, the DSL will consider whether a Request for Support is required.

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

- Egerton CEP 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' **Julia Head, Headteacher**, 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 Young carers

- Egerton CEP School recognises that young carers may have caring responsibilities for a family member with a long-term illness, disability, mental health need, substance misuse issue or other care need.
- Egerton CEP School will be alert to the needs of young carers, recognising that caring responsibilities can impact on a child's attendance, attainment, behaviour, emotional wellbeing, relationships and ability to participate fully in school life.
- Early identification is important to ensure young carers receive support at the right time and from the appropriate services. Staff will remain alert to indicators that a child may be a young carer. If staff are concerned that a child may be a young carer, or that caring responsibilities may be affecting their safety, welfare or wellbeing, they will report this to the DSL.
- The DSL will consider what support may be required, including pastoral support within school, reasonable adjustments, support with attendance or learning, and whether advice or support should be sought from external partners, local authority services, health services or young carers services.
- Where caring responsibilities appear to be inappropriate, excessive, unsafe, or are having a significant impact on the child's welfare, the DSL will consider whether a Request for Support should be made.

5.10 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 Children's 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.

5.11 Children who are Lesbian, Gay or Bisexual (LGB)

- Egerton CEP School recognises that a child being lesbian, gay or bisexual is not in itself a risk factor for harm. However, children who are lesbian, gay or bisexual can sometimes be vulnerable to discriminatory bullying, prejudice, harassment or child-on-child abuse.
- Egerton CEP School also recognises that children who are perceived by others to be lesbian, gay or bisexual, whether they are or not, can be just as vulnerable as children who are.
- Staff will be alert to the possibility that children who are lesbian, gay or bisexual, or perceived to be, may face additional barriers to sharing concerns, particularly where they do not have a trusted adult they can speak to openly.
- Egerton CEP School will take steps to prevent and respond to discriminatory bullying, prejudice and harmful behaviour, including through our safeguarding, behaviour, anti-bullying, curriculum and pastoral arrangements. Where appropriate, sanctions and support will be considered in line with relevant school policies.
- Egerton CEP School will provide a safe, inclusive and trusted environment where children can speak openly, share concerns and be taken seriously. Concerns will be reported to the DSL in line with this policy.
- Appropriate education will be provided through our Relationships Education and Health Education curriculum to support respectful relationships, inclusion and the prevention of prejudice-based bullying.

5.12 Children who are questioning their gender

- Egerton CEP School recognises that some children may question the way they feel about being a boy or a girl, including the physical attributes of their sex and the related ways in which they fit into society.
- Egerton CEP School recognises that children may express themselves in ways that are less typically associated with their sex, and this is not in itself a safeguarding concern. Staff will avoid making assumptions based on appearance, behaviour, interests or presentation.
- Egerton CEP School will be a respectful environment where bullying, harassment, discrimination and harmful behaviour are not tolerated. Staff will be alert to the potential vulnerabilities of children who are questioning their gender, including bullying, family difficulties, online harm, mental health concerns, psychosocial needs or wider safeguarding concerns.
- Staff will take time to listen to and understand the child's thoughts, feelings and experiences. Staff will remain professionally curious and consider the full context of the child's lived experience, including relationships with family, peers and the wider school environment.
- Egerton CEP School will respond to children who are questioning their gender in line with KCSIE, ensuring that any support is considered as part of the school's wider safeguarding responsibilities and with the child's welfare and best interests as a central consideration. The school will take a careful, considered and recorded approach, recognising that children's individual circumstances, needs and experiences will vary.
- Egerton CEP School will not make assumptions or initiate action regarding social transition. Where a child is questioning their gender, staff will respond sensitively, listen to the child's views and experiences, and consider any support needs or safeguarding concerns in line with this policy.
- Where a child speaks to a member of staff about questioning their gender but does not ask the school to make changes to how they are treated, staff will not normally break confidence unless there is a related safeguarding concern. Where a conversation raises concerns about the child's wellbeing or safety, staff will follow this policy and speak to the DSL.
- Parents/carers will usually be involved as a matter of priority where a child requests support relating to social transition. Their views will be treated with importance and properly

considered. In the rare circumstances where involving parents/carers may place the child at greater risk of harm, the DSL will be involved before parents/carers are contacted or any decisions are made.

- Where a child and their parents/carers requests support or changes in relation to social transition, the school will follow an agreed decision-making process, taking account of KCSIE, safeguarding duties, equality and human rights obligations, and relevant school policies. This will involve consultation with the headteacher and DSL.
- When considering any requests for support with social transition, the school will ensure our decision-making process is documented and records are kept.
- Egerton CEP School will be particularly alert to the vulnerabilities of children who have socially transitioned from an early age, including where their biological sex may not be known to peers or some staff. The DSL will be involved in these cases, particularly where support, safeguarding or wellbeing concerns arise as the child approaches or experiences puberty.
- Any decision-making will be child-centred and safeguarding-led. The school will consider what is in the best interests of the child, while also taking account of the safety, welfare, rights and needs of other children who may be affected. The child's voice and lived experience will always be carefully considered, however any agreed response may not always be the same as the child's wishes.
- The DSL and relevant senior leaders will be involved in considering any request for support relating to social transition. The school may also consider relevant advice from parents/carers, clinical professionals, the SENCO, mental health lead, pastoral staff or other appropriate professionals, depending on the child's circumstances.
- Egerton CEP School will take a careful approach when considering any request relating to social transition, recognising that such decisions may have significant implications for the child and others affected, and that arrangements may need to remain flexible and open to review.
- Any requests or issues relating to names, pronouns, uniform, toilets, changing rooms, showers, sport, residential accommodation, trips or other school arrangements will be considered through the school's agreed process and in line with KCSIE, safeguarding duties, equality and human rights obligations, and relevant school policies.
- Egerton CEP School will ensure that records are accurate and that relevant staff have the information they need to safeguard and support the child. Information will be shared on a need-to-know basis and managed in line with confidentiality, data protection and safeguarding requirements.
- The school will keep any agreed arrangements under review, recognising that a child's circumstances, wishes or needs may change over time. This includes where new safeguarding information becomes known, where a child wishes to change or reverse previous arrangements, or where arrangements may no longer be meeting the child's needs or the needs of others affected.
- If staff have any concerns about a child who is questioning their gender, including concerns about bullying, mental health, family response, online harm, self-harm, exploitation or any other safeguarding issue, they will report these to the DSL in line with this policy.
- Where a safeguarding or welfare concern is identified, the DSL will consider whether a Request for Support should be made.

6. Online Safety

- It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. Egerton CEP 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.

- Online safety is considered 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.
- Egerton CEP 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
- Egerton CEP 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 (also DSL) will be informed of any online safety concerns by the DDSLs or staff, 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, Social Media policy and behaviour policies.
    - Internal sanctions and/or support will be implemented as appropriate
    - Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures
- Egerton CEP School uses a wide range of technology. This includes computers, laptops, tablets and other digital devices, the internet, 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)

- Egerton CEP School recognises that when 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
- Egerton CEP School only permits the use of generative AI tools which have been approved and provided by the school for work and/or educational purposes, following the senior leadership team undertaking risk assessments and/or data protection impact assessments prior to use. This includes:
    - The KeyGPT

    - ChatGPT and M365 Copilot (for generic use only – do not enter any school, pupil or staff personal data into these platforms)
- Staff and pupils will be made aware of the benefits and risks of using generative AI tools and the school expectations by:
    - through specific lessons
    - acceptable use policies
    - staff training
- Egerton CEP School will respond to any misuse of AI in line with relevant policies, 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 4.2 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.
- Where the School believe that AI tools may have facilitated deep fake abuse of adults, advice and support will be provided to individuals affected, such as via Unions, Professionals Online Safety Helpline or Report Harmful Content and/or if a crime has been committed, via the police. Action will be taken in line with relevant School policies, including but not limited to, anti-bullying, behaviour and complaints.

6.2 Mobile and Smart Technology

- Egerton CEP 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 and EYFS, Egerton CEP 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 in the School Policies folder on SharePoint.
- Egerton CEP School will operate in line with the expectation that schools are mobile phone-free environments by default. Pupils will not have access to mobile phones during the school day, including during lessons, transition times, breaktimes and lunchtimes, except where an agreed exception applies.
- Egerton CEP School recognises that while restrictions on mobile phone use, including operating mobile-free environments, can help to manage safeguarding risks, such measures are most effective when embedded within a wider safeguarding and behaviour framework.

6.3 Appropriate filtering and monitoring on school devices and networks

- Egerton CEP School will do all we reasonably can to limit children's exposure to online harms through school provided devices, systems, platforms and networks and 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.
- When implementing appropriate filtering and monitoring, Egerton CEP 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.

- Pupils will use appropriate search tools, a child friendly search engine, adapted keyboards if necessary, apps and online resources as identified by staff, following an informed risk assessment and/or a data privacy impact assessment as relevant
- Internet use will be supervised by staff as appropriate to pupils' age, ability and potential risk of harm:
  - EYFS and KS1 children will be directly supervised by members of staff
  - KS2 children will sit in rows facing the back of the classroom so that staff can see all pupils' screens
  - All year groups, pupils identified as being at potentially greater risk of harm will always be directly supervised by an adult

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.
- **Julia Head**, a member of the senior leadership team and **Dan Langford**, governor (Cyber Security Governor), are responsible for ensuring that our school has met the DfE Filtering and monitoring standards for schools.
- 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 provider has 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
- The IT service provider has 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 (including DSLs) works closely with the IT service provider.
- 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 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.
    - These checks are achieved by:
        - Termly, the DSL and the IT technician will undertake checks in a location where confidentiality can be achieved, during working hours, when pupils are not present (e.g. headteacher's office)
        - Checks are logged/recorded by the IT technician and discussed at the DSL meeting if necessary. Any technical concerns are flagged to the IT service provider and safeguarding concerns are actioned by the DSL in line with this policy

6.3.3 Appropriate filtering

- Egerton CEP School's education broadband connectivity is provided through **RM Connectivity Services** and Egerton CEP School uses **RM SafetyNet + UBF - Primary**.
    - RM Connectivity Services is a member of Internet Watch Foundation (IWF)
    - RM Connectivity Services has signed up to Counter-Terrorism Internet Referral Unit list (CTIRU)
    - RM Connectivity Services is blocking access to illegal content including child sexual abuse material (CSAM)
    - RM Connectivity Services blocks access to sites which could promote or include harmful and/or inappropriate behaviour or material. This includes content which promotes discrimination or extremism, drugs/substance misuse, malware/hacking, gambling, piracy and copyright theft, pro-self-harm, eating disorder and/or suicide content, pornographic content and violent material
    - fully compliant with DfE requirements
    - ISO27001 Certified (Information security)
    - ISO22301 Certified (Business continuity)
- We filter internet use on all school owned, or provided, internet enabled devices and networks. This is achieved by:
    - RM SafetyNet via Active Directory Group and User Filtering – there is currently no access from offsite
    - Filtering is maintained via IP Address authentication – each BYOD is assigned an IP address when connecting to Egerton network
    - Filtering systems can identify user access attempts by name if School owned device and supply IP address information via IP address for BYOD – attempts are dated and time-stamped and the search term or content being blocked
- RM SafetyNet 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

- 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 RM Connectivity Services and JKM Solutions Ltd 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:
    - turn off monitor/screen
    - report the concern immediately to a member of staff
    - report the URL of the site to technical staff
- 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, code of conduct 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.

6.3.4 Appropriate monitoring

- We will appropriately monitor the use of all school provided devices and networks to detect safeguarding risks in real or near-real time, including accessing or attempting to access, or engaging with or attempting to engage with illegal and/or harmful/inappropriate content or activity by any user. This is achieved by:
    - Physical monitoring (supervision), monitoring internet and web access (reviewing logfile information) and/or active/pro-active technology monitoring services
    - Tablets will be collected by the School Business Manager annually and wiped clean of class photos and pupils' videos
- In accordance with our Mobile and Smart Technology Policy, Egerton CEP School does allow use of personal devices by staff. As such, we will ensure they are appropriately monitored in accordance with safeguarding and data protection legislation.
- All users will be informed that use of our devices and networks will be monitored and that all monitoring is in line with data protection, human rights and privacy legislation. Please see staff code of conduct and behaviour policy.
- If a concern is identified via our monitoring approaches:
    - Where the concern relates to pupils, it will be reported to the DSL and will be recorded and responded to in line with relevant policies, such as child protection
    - 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
- Parents/carers will be informed of safeguarding concerns involving their child identified through our monitoring approaches, unless to do so would put a child at risk of harm or compromise a criminal investigation.
- 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

- Egerton CEP School is responsible for ensuring an appropriate level of security protection procedures are in place, in order to safeguard our systems as well as staff and pupils. Further information can be found in the online safety policy.
- Egerton CEP School will review the effectiveness of our procedures periodically to keep up with evolving cyber-crime technologies.
- **Julia Head, headteacher** and **Dan Langford, governor**, are responsible for ensuring that our school has met the DfE cyber security standards for schools.

6.5 Remote learning

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

6.6 Online Safety Training for Staff

- Egerton CEP 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 approach. See section 7 for more information.

6.7 Educating pupils

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

6.8 Working with parents/carers

- Egerton CEP School will build a partnership approach to online safety and will support parents/carers to become aware and alert of the potential online benefits and risks for children by:
    - providing information on our school website and through existing communication channels (such as official social media, newsletters etc.)
    - offering specific online safety events for parents/carers or highlighting online safety at existing events
- Egerton CEP 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
    - Providing information through relevant policies such as social media policy, Headteacher's fortnightly newsletter 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.

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 of the current version of 'Keeping Children Safe in Education' which covers safeguarding information for staff.
    - School leaders, including the DSL and governors will read KCSIE in its entirety
    - School leaders and all members of staff who work directly with children will read annex A of KCSIE
    - All members of staff have signed to confirm that they have read and understood the national guidance shared with them. This information is kept on the school single central record
- 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. This will be achieved via specific training from the DSL and/or e-Learning.
- 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. This will be achieved at the annual inset and updates provided throughout the year at twilight training.
- 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. This will be achieved at specific online safety training and through annual updates.
- In addition to specific child protection training, all staff will receive regular safeguarding and child protection updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. This will be achieved via email, e-bulletins, staff meetings.
- Egerton CEP 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. This will be achieved via input from knowledgeable and experienced staff and inviting input at staff meetings.
- All governors 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 annually through an online training course.

- The Headteacher (DSL) will provide an annual report to the governing body detailing safeguarding training undertaken by all staff and will maintain an up-to-date record of who has been trained.

7.2 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 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 code of conduct.
- 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 code of conduct and social media policy.

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

- Egerton CEP 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.
    - Egerton CEP 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 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.
- Egerton CEP 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 Egerton CEP School places a pupil 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 code of conduct policy. This can be found in the school policies folder on SharePoint
- Any concerns or allegations about staff will be recorded and dealt with appropriately in line with Part four of KCSIE and local guidance. Ensuring concerns are dealt with effectively will protect those working in or on behalf of the school from potential false allegations or misunderstandings.
- Where headteachers are unsure how to respond, for example if the school is unsure if a concern meets 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 for children (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'

- Egerton CEP 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. 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 (**Ed Schryver**) who will contact 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'

- Egerton CEP School may also need to take action in response to 'low-level' concerns about staff. Additional information regarding low-level concerns is contained within our 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.
    - Egerton CEP 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 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 to **Julia Head, 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 via the LADO Enquiry Line
    - Low-level concerns shared about supply staff and contractors will be shared with their employers so any potential patterns of inappropriate behaviour can be identified
    - If the school is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, we will consult with the LADO
- Low-level concerns will be recorded in writing and reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified.
    - Records will be kept confidential and will be held securely and retained and in compliance with the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), the Data (Use and Access) Act 2025 and other relevant policies and procedures (for example data retention policies)
    - Where a pattern is identified, the school will implement appropriate action, for example consulting with the LADO enquiry line and following our disciplinary procedures

8.3 Safe Culture

- As part of our approach to safeguarding, the School has created and embedded a culture of openness, trust and transparency in which our values and expected behaviour as set out in our code of conduct are constantly lived, monitored and reinforced by all staff (including supply

teachers, volunteers and contractors) and where all concerns are dealt with promptly and appropriately.

- Staff are encouraged and should feel confident to self-refer, if they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards. This includes where concerns may be felt to be deliberately invented or malicious; such allegations are extremely rare and as such all concerns should be reported and recorded.
- All staff and volunteers should feel able to raise any concerns about poor or unsafe practice and potential failures in the school safeguarding regime. The leadership team at Egerton CEP School will take all concerns or allegations received seriously.
- All members of staff are made aware of the school Whistleblowing procedure, a copy of the policy can be found in the staff room and on SharePoint. 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.
- Egerton CEP School has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person.
    - If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR Connect.

9. Opportunities to Teach Safeguarding

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

- Egerton CEP School recognises 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.
- Egerton CEP School recognises the value of external organisations and/or speakers visiting to provide useful information or to help enrich children's education. However, the 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 Restrictive Interventions, including the Use of 'Reasonable Force'

- There may be circumstances when it is necessary for school staff to use restrictive interventions to safeguard children, staff or others from harm. This approach is informed by the DfE guidance 'Restrictive interventions, including the use of reasonable force in schools'.
- 'Restrictive interventions' is an umbrella term that refers to any action, planned or reactive, that limits a pupil's movement, liberty or freedom. This includes, but is not limited to:
    - the use of reasonable force
    - physical restraint
    - non force restrictive practices
    - seclusion, where a pupil is prevented from leaving a space for safety reasons
- The school is committed to minimising the need for restrictive interventions through positive behaviour support, early intervention and de-escalation strategies.
- Restrictive interventions will only be used when necessary, never as a punishment, and only where there is a real risk of harm.
- Any use of reasonable force will be lawful, necessary and proportionate. It will involve no more force than is necessary, will be used for the shortest possible time, and will depend on the individual circumstances.
- Particular care will be taken when supporting pupils with SEND or other vulnerabilities, recognising that these pupils may be disproportionately affected. Reasonable adjustments and preventative approaches will be considered where appropriate.
- In line with the DfE statutory guidance, all significant incidents involving restrictive interventions, including the use of reasonable force, restraint or seclusion, will be recorded in writing as soon as practicable and reported to parents/carers as soon as practicable, unless doing so would place a child at risk of harm or compromise a safeguarding or criminal investigation.
- Records will be reviewed by school leaders and governors to support safeguarding oversight, identify patterns, consider any disproportionate impact and inform staff training, support and policy development.
- Further detail regarding behaviour management, de-escalation strategies, staff training and physical intervention can be found in the Behaviour Policy and Staff Code of Conduct.

10.2 Safeguarding in physical spaces, sport and residential arrangements

- Egerton CEP School recognises that safeguarding children includes ensuring that physical spaces, activities and accommodation arrangements are safe, appropriate and protect children's privacy, dignity and wellbeing.

- Egerton CEP School will consider its safeguarding duties alongside its obligations under equality and human rights legislation when making decisions about toilets, changing rooms, showers, sport, physical education, residential accommodation, educational visits and other physical arrangements.
- Toilets, changing rooms, showers and other intimate or private spaces will be managed in line with KCSIE, relevant premises requirements, safeguarding duties and the school's local arrangements. The school will ensure that arrangements do not compromise the safety, comfort, privacy or dignity of any child.
- Where a child requires an alternative arrangement in relation to toilets, changing rooms, showers, sport, residential accommodation or similar provision, the school will consider this through a careful, recorded and safeguarding-led process. This will include consideration of the child's needs and wishes, the safety and welfare of other children, relevant legal duties, practical arrangements and any relevant guidance. Where the request relates to a child who is questioning their gender, this will be considered in line with section 5.12 of this policy.
- Sport, PE and other physical activities will be organised with due regard to children's safety, fairness, supervision, privacy and individual needs. Where activities are organised by sex for reasons of safety, fairness or safeguarding, arrangements will be made in line with KCSIE, the Equality Act and relevant school policies.

10.3 The use of school premises by other organisations

- Where school facilities or premises are rented or 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 child protection and safeguarding arrangements, including this policy, will apply.
- Where services or activities are provided separately by another organisation using the school facilities or premises, the headteacher and governing body will seek assurance that the provider has appropriate safeguarding and child protection policies and procedures in place. This may include inspecting policies and procedures as needed.
- The headteacher and governing body will ensure that arrangements are in place for the provider to liaise with the school on safeguarding matters where appropriate.
- If appropriate safeguarding assurance is not achieved, an application to use the 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 safeguarding requirements may lead to termination of the agreement.
- Where Egerton CEP School receives an allegation relating to an incident that happened when an individual or organisation was using our premises for activities with children, we will follow our safeguarding policies and procedures and inform the LADO as appropriate.

10.4 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. Expectations include:
    - Ensure main school gate is closed between 8.30am and 3.30pm
    - Padlock codes not shared
    - Staff/visitors wear badges/lanyards
    - All visitors are greeted by a member of staff. Children are taught to not allow anyone into reception, even if they know the person at the door

- 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 had the appropriate DBS check or their employers have confirmed that their staff have appropriate checks.
- Appropriate checks will be undertaken in respect of visitors and volunteers coming into school as outlined within national guidance. Visitors will be expected to sign in and out via the office iPad signing in/out system and to display a visitor's badge whilst on site.
- 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 Egerton CEP 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

- 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 and Medway Safeguarding Adults Board: https://kmsab.org.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, 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 PE
- Sexually transmitted disease
- 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
- Aggressive behaviour or severe temper outbursts
- Injuries need to be accounted for. Inadequate, inconsistent, or excessively plausible explanations or a delay in seeking treatment should signal concern.

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

Signs that MAY INDICATE emotional abuse

- Over reaction to mistakes
- Lack of self-confidence/esteem
- Sudden speech disorders
- Self-harming
- Eating Disorders
- Extremes of passivity and/or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse

- Fear of parents being contacted
- Unwillingness or inability to play
- Excessive need for approval, attention, and affection

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

Signs that MAY INDICATE neglect

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

Appendix 2: Support Organisations

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

- 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
- 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
- Disrespect Nobody: www.disrespectnobody.co.uk
- Upskirting – know your rights: www.gov.uk/government/news/upskirting-know-your-rights
- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Stop it Now! www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- Anti-Bullying Alliance: www.anti-bullyingalliance.org.uk
- Diana Award: www.antibullyingpro.com
- 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.thinkuknow.co.uk

- Internet Watch Foundation (IWF): www.iwf.org.uk
- Childnet: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Report Harmful Content: https://reportharmfulcontent.com
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Matters: www.internetmatters.org
- NSPCC: www.nspcc.org.uk/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/

END OF POLICY