

SAFEGUARDING AND CHILD PROTECTION POLICY

REVIEWING AND UPDATING THE POLICY

Date	Version	Notes/Changes Made	Reviewed by	Approved by
September 2020	1.0	Policy reviewed	Trust DSL	Board of Trustees
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March 2022		Updated contacts		
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November 2022		Updated contacts		
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This policy will be reviewed annually or before if significant changes take place and amended as necessary

SAFEGUARDING AND CHILD PROTECTION POLICY

Introduction

Turner Schools fully recognises its responsibilities for safeguarding and child protection. It is understood that safeguarding is broader than child protection, and includes protecting children from maltreatment, preventing impairment of children's mental and physical health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes. Staff recognise the crucial role they play in promoting the welfare of every child.

Our policy applies to all staff (including volunteers) and governors working in the school. There are five main elements to our policy:

- Practising safer recruitment in checking the suitability of staff and volunteers to work with children;
- Raising awareness of safeguarding and equipping children with the skills needed to keep them safe;
- Developing and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse;
- Supporting pupils who have been abused in accordance with their agreed child protection plan;
- Establishing a safe environment in which children can learn and develop.

We recognise that because of the day-to-day contact with children, school staff are well placed to observe the outward signs of abuse. The school will therefore:

- Strive to establish and maintain an environment where children feel secure, are encouraged to talk, and are listened to;
- Let children know that there are adults in the school who they can approach if they are worried;
- Include opportunities in the Religious, Sex and Health Education (RSHE) curriculum for children to develop the skills they need to recognise and stay safe from abuse;
- Ensure a child-centred approach, where staff consider at all times what is in the best interests of the child, acting upon concerns about a child's welfare immediately.

Our Core Safeguarding Principles are:

- We acknowledge that we at Turner Schools are an important part of a wider safeguarding system for children.
- It is the whole Trust's responsibility to safeguard and promote the welfare of children
- All children (defined up to those of the age of 18) regardless of age, gender, ability, culture, race, language, religion or sexual identity, or orientation, have equal rights to protection.
- All children have a right to be heard and to have their wishes and feelings taken into account .
- All staff understand safe professional practice and adhere to safeguarding policies.

We will follow the procedures set out by the Area Safeguarding Advisor for South Kent and the Kent Safeguarding Children Multi-Agency Partnership (KSCMP) and will have regard to statutory guidance issued by the Department for Education to achieve the following objectives:

- Ensuring we have a designated safeguarding lead and Deputy DSL appointed from the school's Leadership Team, who have received appropriate training and support for this role. This person will

provide support to staff members to carry out their safeguarding duties and will liaise closely with other services. The Principal advises, supports and monitors the work of the DSL's.

- Ensuring all staff, especially the DSL or deputy, consider the context within which such safeguarding incidents and/or behaviour occur in line with contextual safeguarding.
- Staff induction will include the school's pupil behaviour policy, the child protection policy, staff code of conduct and the safeguarding response to children who go missing from education.
- Ensuring governors understand their role in appropriately monitoring safeguarding. The Board of Trustees will approve this policy at each review, ensuring it complies with the law. All governors will read Keeping Children Safe in Education.
- Ensuring every member of staff, volunteer and governor knows the name of the DSL and Deputy DSL and their role.
- Giving appropriate information so that all staff and volunteers understand their responsibilities in relation to safeguarding.
- Giving appropriate information so that parents and visitors understand the school's roles and responsibilities relating to safeguarding.
- Allocating resources to enable the school to discharge its safeguarding responsibilities properly.
- Ensuring that all staff and volunteers are able to raise any concerns about poor or unsafe practice.
- Developing effective links with relevant agencies and co-operate as appropriate with their enquiries regarding child protection matters including attendance at case conferences.
- Acting upon concerns immediately and ensuring that staff are aware that in exceptional circumstances staff should consider speaking to a member of the Senior Leadership Team and/or Children's Social Care to discuss safeguarding concerns in the absence of the DSL or their Deputy.
- Keeping written records of concerns about children, even where there is no need to refer the matter immediately.
- Keeping all records securely, separate from the main pupil file, and in locked locations.
- Developing and then following procedures where an allegation is made against a member of staff or volunteer.
- Always following safer recruitment practices.
- Ensure that all our schools undertake an annual safeguarding audit and have a safeguarding action plan.
- Provide an annual report to the Board of Trustees that summarises safeguarding incidents and highlights areas of strength as well as identifying where further training or support may be needed.
- Ensure that one member of the board has an overview of safeguarding and regularly updates the board on any issues.

We will continue to follow government guidance in response to the coronavirus (Covid-19) pandemic; regardless of the action required, our safeguarding principles will always remain the same. We will amend this policy and our approaches, as necessary. We recognise that as a result of the Covid-19 pandemic, some members of our community may have been exposed to a range of adversity and trauma including bereavement, anxiety and in some cases experienced increased welfare and/or safeguarding risks. We will work with local services, such as health and the local authority, to ensure necessary support is in place.

The relevant statutory guidance 'Keeping Children Safe in Education (2022)' can be found in the staff room notice boards of all Turner Schools. The full document is available on the KELSI and the Government website.

All staff will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.

This policy reflects the following Legislation and Statutory Guidance:

- Update Covid-19 KCSIE 2020 remains in force throughout the response to Coronavirus
- [Children Acts 1989](#) and [2004 amendment](#)
- [Non-Maintained Special Schools \(England\) Regulations 2015](#)
- [Education \(Independent School Standards\) Regulations 2014](#)

- [Education Act 2002, Sections 175 and 157](#)
- [Working Together to Safeguard Children 2018](#)
- [Keeping Children Safe in Education 2022](#)
- [Education and Training \(Welfare of Children\) Act 2021](#)
- [What to do if you are worried a child is being abused 2015](#)
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#)
- [EYFS 2017](#)
- [The Rehabilitation of Offenders Act 1974](#)
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#)
- <https://www.gov.uk/government/publications/county-lines-exploitation>
- [Statutory guidance on the Prevent duty](#)
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the “2018 Childcare Disqualification Regulations”) and [Childcare Act 2006](#), which set out who is disqualified from working with children
- Kent and Medway Safeguarding Children procedures 2014 www.kscb.org.uk
- The Human Rights Act 1998
- The Equality Act 2020 (including the Public Sector Equality Duty)

This policy also complies with our funding agreement and articles of association.

Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL (or deputy DSL)”.

Governance and Leadership

The governing body and school leadership teams 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](#)).

The governing body and school leadership teams 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 Principal or Head of School will ensure that our child protection and safeguarding policies and procedures adopted by the governing body, are understood, and followed by all staff.

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

At Turner Schools, we have a nominated governor for safeguarding at Trust-level, as well as nominated safeguarding governors at each school. 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 governing body will receive appropriate safeguarding training, on at least an annual basis.

Confidentiality

Our approach to confidentiality and data protection with respect to safeguarding is covered in our Data Protection & Information Policy.

Please note that:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)
- Confidentiality is also addressed in this policy with respect to record-keeping, and allegations of abuse against staff

Identifying abuse

Staff should maintain an approach of 'it could happen here' and always focus on what is in the best interests of the child. All school staff should be prepared to identify children who may benefit from early help. This means providing support as soon as a problem emerges at any point in a child's life. Staff should discuss early help requirements with the DSL/Deputy DSL in the first instance. If early help is required, staff should liaise with external agencies and consider setting up a multi-agency working assessment.

All school staff should be aware of the signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation. The descriptions below are taken from the DfE guidance 'Keeping children safe in education (2022)'. Additional guidance can be found in 'What to do if you're worried a child is being abused'. All staff should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

All staff should be able to reassure victims of abuse that they are being taken seriously and will be supported. Children and young people should never be made to feel ashamed or that they are creating a problem by reporting abuse, sexual violence or sexual harassment.

Staff should also be aware that behaviours linked to the likes of drug taking, alcohol abuse, truancy and sexting put children in danger.

Types of Abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

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

Physical abuse

Physical abuse 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 may include:

- Unexplained injuries or burns
- Untreated injuries
- Bruises/abrasion around the face
- Bi-lateral injuries e.g. two bruised eyes
- Bite marks
- Bruising abrasions to lips, cheeks, outer ear

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children.

These may include interactions that are beyond the 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, though it may occur alone. Indicators include:

- Excessive overreaction to mistakes
- Continual self-deprecation
- Excessive rocking, thumb sucking, hair twisting
- Extreme compliance/aggression
- Drug, alcohol and substance misuse
- Significant peer relationship difficulties

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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. Indicators include:

- Sexual awareness inappropriate to child's age, including provocative sexual behaviour
- Self-harm
- Pregnancy
- Sexually transmitted diseases
- Sudden changes in behaviour or school performance
- Fear of undressing for gym
- Depression/withdrawal
- Drug, alcohol, substance abuse

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. 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. Indicators include:

- Constant hunger, tiredness, and/or poor personal hygiene
- Untreated medical problems
- Destructive tendencies
- Social isolation
- Poor self-esteem and/or relationship with peers
- Excessive rocking, hair twisting, thumb sucking

Bullying

While bullying between children is not a discrete category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. All incidences of bullying should be reported and will be managed through our anti-bullying procedures and will be investigated using our Turner Schools Anti-bullying policy. All pupils and parents receive a copy of the anti-bullying procedures on joining the school and the subject of bullying is addressed at regular intervals in the personal, social and health education (PSHE) curriculum. If the bullying is particularly serious, or the anti-bullying procedures are deemed to be ineffective, the head teacher and the Designated Safeguarding Lead will consider implementing child protection procedures.

DfE advice on Cyberbullying can be found here:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/374850/Cyberbullying_Advice_for_Headteachers_and_School_Staff_121114.pdf

Child Sexual Exploitation (CSE)

CSE involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly

'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops.

Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse. Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- Children who suffer from changes in emotional well-being;
- Significant change in well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or do not take part in education;
- Signs of assault/unexplained injuries.

CSE: definition and guide for practitioners

All staff should have an awareness of children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery).

The vulnerability of children involved in criminal exploitation is not always recognised by adults and professionals and that the indicators of exploitation are different for boys and girls. Child sexual exploitation is a form of sexual abuse and can be a one-off occurrence or might happen over time. All children and young people, including 16 and 17-year-olds, can experience child sexual exploitation.

Child Criminal Exploitation (CCE)

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources;
- Signs of assault/unexplained injuries;
- Signs of self harm/significant change in well-being.

Turner Schools recognises the impact of gangs, county lines, serious crime and exploitation.

Turner Schools also 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).

Turner Schools acknowledges that children may be vulnerable to multiple extra familial harms and remain vigilant.

All school staff should be aware that safeguarding incidents can be associated outside of school and/or occur between children outside of these environments. All staff and DSL should consider whether children are at risk of abuse outside their families.

Child Trafficking and Modern Slavery

All school staff and public authorities who come into contact with children in their everyday work need to be able to identify children who have been trafficked and be able to act to protect these children from potential or actual harm. Child trafficking is child abuse. It's defined as recruiting, moving, receiving and harbouring children for the purpose of exploitation (HM Department for Education (DfE) and Home Office. Child trafficking is a form of modern slavery (HM Government, 2014). Many children are trafficked into the UK from overseas, but children can also be trafficked from one part of the UK to another. Children are trafficked for activity, including: child sexual exploitation and criminal activities. Types of modern slavery:

- Sex Trafficking
- Child Sex Trafficking
- Forced Labour
- Bonded Labour or Debt Bondage
- Domestic Servitude
- Forced Child Labour
- Unlawful Recruitment and Use of Child Soldiers.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and deputies will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

So called 'honour-based' abuse (HBA)

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' (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the DSL. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

If a teacher discovers that an act of FGM appears to have been carried out on a girl under 18, they must report this to the police. All teachers should raise any FGM related concerns with the DSL (or deputy) and involve children's social care as appropriate.

The government guidance on FGM and the reporting is set out [here](#)

Breast Ironing

Much like FGM, Breast Ironing is a harmful cultural practice and is child abuse. Professionals working with children and young people must be able to identify the signs and symptoms of girls who are at risk of or have undergone breast ironing. Similarly to FGM, breast ironing is classified as physical abuse therefore professionals must follow their Local Safeguarding Children's Board Procedures.

Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any form of coercion is used to cause a person to enter into a marriage.

Radicalisation and Extremism

We recognise that we must have regard to the Prevent Duty "to prevent people from being drawn into terrorism". Protecting children from the risk of radicalisation is part of schools' wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways.

As with managing 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. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a referral to the Channel programme.

If a member of staff has a concern about a particular pupil they should follow the school's normal safeguarding procedures, including discussing the matter with the school's DSL, and where deemed necessary, with children's social care.

Staff should familiarise themselves with the Department for Education's guidance on the Prevent Duty which is found [here](#)

Child-on-child abuse

Turner Schools recognises that children are capable of abusing their peers and we operate a zero-tolerance approach to child-on-child abuse. All staff should understand the importance of challenging inappropriate behaviour between children and young people.

Safeguarding issues can manifest themselves via child-on-child abuse. This is most likely to include, but may not be limited to, bullying (including cyber-bullying), physical abuse, sexual violence, sexual harassment, hazing type violence, upskirting, gender based violence and sexting. Such cases of abuse will not be tolerated or passed off as "banter" or "part of growing up". Downplaying such behaviours can lead to a

culture of unacceptable behaviour, an unsafe environment for children and young people and a culture that normalises abuse.

At Turner Schools we continue to ensure that any form of abuse or harmful behaviour is dealt with immediately and consistently to reduce the extent of harm to the young person, with full consideration to impact on that individual child's emotional and mental health and well-being. Staff understand that even if there are no reports of child-on-child abuse in their school, this doesn't mean it is not happening. If staff have any concerns about child-on-child abuse, they should speak to the designated safeguarding lead (DSL)

Procedures have been put in place to ensure that all staff are trained in dealing with such incidents and to minimise the risk of child-on-child abuse. These include:-

- procedures to minimise the risk of child-on-child abuse;
- how allegations of child-on-child abuse will be recorded, investigated and dealt with;
- clear processes as to how victims, perpetrators and any other child affected by child-on-child abuse will be supported;
- a clear statement that abuse is abuse and should never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up";
- recognition of the gendered nature of child-on-child abuse (i.e. that it is more likely that girls will be victims and boys perpetrators), but that all child-on-child abuse is unacceptable and will be taken seriously; and
- the different forms child-on-child abuse can take, such as:
 - sexual violence and sexual harassment. Part 5 of Keeping Children Safe In Education (2022) sets out how schools and colleges should respond to reports of sexual violence and sexual harassment;
 - upskirting typically involving taking a picture under a person's clothing without them knowing to obtain sexual gratification or cause humiliation;
 - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
 - sexting (also known as youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams; the policy should include the school or college's approach to it. The department provides searching screening and confiscation advice for schools. The UK Council for Child Internet Safety (UKCIS) Education Group has published advice for schools and colleges on responding to sexting incidents; and
- initiation/hazing type violence and rituals.

Any allegations of child-on-child abuse will be recorded, investigated, and dealt with in line with this child protection policy and KCSIE 2022 (in particular, part two and five).

Child-on-child sexual violence and sexual harassment

When responding to concerns relating to child-on-child sexual violence or harassment, we will follow the guidance outlined in Part five of KCSIE 2022.

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

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

Abuse that occurs online or outside of the school will not be dismissed or downplayed and will be treated equally seriously and in line with relevant policies/procedures.

We recognise that the law is in place to protect children and young people rather than criminalise them, and this will be explained in such a way to pupils/students that avoids alarming or distressing them.

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

The DSL (or deputy) is likely to have a complete safeguarding picture and will be the most appropriate person to advise on the initial response. The DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator, and any other children involved/impacted, in line with part five of KCSIE 2022 and relevant local/national guidance and support, for example [KSCMP](#) procedures and support from the [Education Safeguarding Service](#). The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children, adult students (if appropriate), and staff and any actions that are required to protect them.

Any concerns involving an online element will take place in accordance with relevant local/national guidance and advice.

Reports will initially be managed internally by the school and where necessary will be referred to [Integrated Children's Services](#) (Early Help and/or Children's Social Work Service) and/or the police. Important considerations which may influence this decision include:

- the wishes of the victim in terms of how they want to proceed.
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether Harmful Sexual Behavior has been displayed.
- the ages of the children involved.
- the developmental stages of the children involved.
- any power imbalance between the children.
- if the alleged incident is a one-off or a sustained pattern of abuse - sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature.
- that sexual violence and sexual harassment can take place within intimate personal relationships between children.
- understanding intra familial harms and any necessary support for siblings following incidents.
- whether there are any ongoing risks to the victim, other children, adult students, or school staff.
- any other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

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

If at any stage the DSL is unsure how to proceed, advice will be sought from the [Education Safeguarding Service](#).

For further advice about how to prevent and respond to reports of sexual violence and harassment between children, please see the latest DfE guidance [here](#)

Prejudiced Behaviour

The term prejudice-related bullying refers to a range of hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society - in particular, prejudices to do with disabilities and special educational needs, ethnic, cultural and religious backgrounds, gender, home life, (for example in relation to issues of care, parental occupation, are at risk due to either their own or a family member's mental health needs, poverty and social class) and sexual identity (homosexual, bisexual, transsexual).

Sexting

Sexting is a child protection issue. Even if explicit material is sent or elicited without malicious intent the consequences can be serious and put those involved at risk of serious harm. Having or sending explicit material on digital devices is also a criminal offence for those under 18. Turner Schools takes incidences of sexting extremely seriously, and deals with them in accordance with its safeguarding procedures.

The UK Council for Child Internet Safety (UKCCIS) Education Group has recently published sexting advice for schools and colleges which can be found [here](#).

Domestic Abuse

The cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological
- physical
- sexual
- financial and
- emotional

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

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

Advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

[NSPCC- UK domestic-abuse Signs Symptoms Effects](#)

[Refuge what is domestic violence/effects of domestic violence on children](#)

[Safelives: young people and domestic abuse](#)

[Operation Encompass](#): This means we work in partnership with Kent Police to provide support to children experiencing domestic abuse.

Mental Health

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. Children who have suffered abuse or neglect or other traumatic childhood experiences can have a lasting impact through childhood and into their adult life. Staff are well placed to observe children day to day to help identify those at risk.

Advice and guidance is available at:

[Preventing and tackling bullying](#)

[Mental Health and Behaviour in Schools](#)

[Promoting children and young people's emotional health and wellbeing](#)

[Rise Above](#)

Children Missing Education

A child going missing from education is a vital warning sign of a range of safeguarding possibilities. These may include: abuse or neglect, criminal exploitation - including involvement in County Lines, mental health problems, risk of substance abuse or radicalisation. All children, regardless of their circumstances, are entitled to a full time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area.

The School's policy and procedure for dealing with children that go missing from education, particularly on repeat occasions, is set out in the Attendance Policy. It is important that the procedure is followed in all circumstances so as to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future. If a member of staff is in any doubt at all he/she should contact the DSL.

Where possible, the school will hold more than one emergency contact number for each pupil/student so we have additional options to make contact with a responsible adult if a child missing education is also identified as being a welfare and/or safeguarding concern.

Further information can be found in ['Children missing from education: statutory guidance for local authorities' \(September 2016\)](#).

Children with Special Educational Needs and Disabilities

Children with special educational needs and disabilities can face additional safeguarding challenges. Staff must be alert to the fact that additional barriers can exist when recognising abuse and neglect in this group of children. These may include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further explanation;
- Children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these barriers.

Turner Schools acknowledge that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges as they may have an impaired capacity to resist or avoid abuse. Turner Schools will ensure that children with SEN and disabilities, specifically those with communication difficulties will be supported to ensure that their voices are heard and acted upon.

Turner Schools staff are encouraged to be aware that children with SEN and disabilities can be disproportionately impacted by safeguarding concerns such as bullying. All staff at Turner Schools will be encouraged to appropriately explore possible indicators of abuse such as behavioural, mood change or injuries and not assume they are related to a child's disability. Staff to be aware that children with SEN and disabilities may not always outwardly display indicators of abuse.

Children who need a social worker (CiN, CPP)

Turner Schools will use the information given by the Local Authority to make decisions in the best interests of the child's safety, welfare and outcomes. In addition it will inform decisions about safeguarding and promoting welfare, pastoral and academic support.

Children requiring mental health support

Turner Schools is uniquely placed to identify mental health issues that may be an indicator of abuse. It will ensure there are clear routes to escalate and clear referral and accountability systems. Turner Schools will use advice from external agencies to support the child. Age/ability appropriate education will be provided to our pupils/students to help promote positive health, wellbeing, and resilience.

Children who are Lesbian, Gay, Bi, or Trans (LGBT)

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm, however, Turner Schools recognises that children who are LGBT or are perceived by other children to be LGBT (whether they are or not) can be targeted by other children or others within the wider community.

Turner Schools recognises risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. LGBT is included within our Relationship, Sex and Health Education (RSHE) curriculum and our staff will endeavour to reduce the additional barriers faced and provide a safe space for children to speak out or share any concerns.

Homestay during exchange visits

Should Turner Schools make arrangements for children to have learning experiences where, for short periods, the children may be provided with care and accommodation by a host family, either in the UK or abroad, to whom they are not related. Turner Schools will consider their safety and how best to minimise risk of harm to those children during the exchange visit. Arrangements for such visits will be undertaken in accordance with Annex E of Keeping Children Safe in Education (2022).

Looked After/Previously Looked After Children

The most common reason for children becoming looked after is as a result of abuse and/or neglect. Turner Schools will ensure that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after or previously looked after by the local authority. This includes ensuring that a designated member of staff has responsibility for their welfare and progress, has up to date assessment information from the local authority, the most recent care plan and contact arrangements. The designated member of staff will liaise closely with the appropriate Virtual School.

Private Fostering

Private fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or a 'close relative'. This is a private arrangement made between a parent and a carer, for 28 days or more. Close relatives are defined as step-parents, grandparents, brothers, sisters, uncles or aunts

(whether of full blood, half blood or marriage/affinity). Where the school becomes aware of a private fostering arrangement it must inform the local authority.

The role of the Designated Safeguarding Lead

Turner Schools recognises and is committed to its responsibility to work with other professionals and agencies in line with statutory guidance: [Working Together to Safeguard Children 2018](#).

Multi-agency Working

Schools are not the investigating agency when there are child protection concerns. Turner Schools will however contribute to the investigation and assessment processes as required. Turner Schools recognises the importance of multi-agency working and will support attendance at relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.

The School Leadership Team and DSL will work to establish strong and co-operative relationships with relevant professionals in other agencies in line with statutory guidance: Working Together to Safeguard Children 2018.

As a Trust, our key staff have a pivotal role in multi-agency safeguarding working in line with statutory guidance: Working Together to Safeguard Children. New safeguarding partners and child death review partner arrangements are now in place. Locally, the three safeguarding partners are the local authority, commissioning group for an area within the local authority and the Chief of Police <https://www.npcc.police.uk/>

Each school within the Trust has appointed a DSL and deputy DSL(s) to contact in his/her absence. The DSL is a member of the school's senior leadership team with the necessary status and authority to take responsibility for child protection matters.

The DSL will take lead responsibility for safeguarding and child protection. This responsibility cannot be delegated. This will be explicit in the role holder's job description. The DSL will provide advice and support to other staff on child welfare and child protection matters, take part in strategy discussions and interagency meetings, and/or support other staff to do so, and contribute to the assessment of children.

The DSL will ensure that there is always cover for their role, including for any out of hours, out of term activities, and that arrangements for cover are communicated clearly to staff.

If there is a risk of immediate harm, a referral should be made immediately. If a child's situation does not appear to be improving, the DSL should press for the case to be escalated following LSCB procedures.

For looked after children, the DSL will have the details of the child's social worker and name of the virtual school head in the authority that looks after the child.

For further information about the role of the DSL, please see Annex B of Keeping Children Safe in Education (2022).

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

Taking Action

Safeguarding is everyone's responsibility. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. Everyone who works with our pupils should make

sure that their approach is child-centred, that is that they consider at all times what is in the best interests of the child.

Any concerns about pupils must be discussed with the DSL (or Deputy in their absence) as soon as possible, and latest by the end of the day and the Child Protection Policy must be followed. Wherever practicable, the DSL (or Deputy DSL in their absence) will decide whether to make a referral to children's social care. However, anyone can make a referral, and **if a child is in immediate danger or at risk of harm, a referral should be made to children's social care and/or the police immediately**. Where a referral is made by someone other than the DSL, the DSL should be informed as soon as possible. Turner Schools will try to follow the best practice of a Trauma based approach due to Adverse Childhood Experiences (ACEs) including COVID-19.

If staff members have concerns about a child they must raise these with the school's DSL as a matter of urgency and follow the local child protection procedure for each school. Verbal conversations are not encouraged unless written up beforehand.

The Use of Reasonable Force

In certain circumstances, it is appropriate for staff to use reasonable force to safeguard children and young people:- this covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. In more extreme circumstances such as breaking up a fight or restraining a young person to prevent violence or injury, reasonable, in these circumstances means using no more force than is needed. The decision on whether or not to use reasonable force to control or restrain a child is down to the professional judgement of the staff concerned depending on individual circumstances.

When using reasonable force in response to risks presented by incidents involving children with SEN, disabilities or with medical conditions, consideration of the risks will be given to the additional vulnerability of these groups. Consideration will be given to their duties under the Equality Act 2010 in relation to making reasonable adjustments, non-discrimination and their public sector equality duty. Turner Schools aims to reduce the occurrence of challenging behaviour and the need to use reasonable force through planning positive and proactive behaviour support.

Early Help

All staff have a duty to identify children who may benefit from Early Help with particular consideration for those who have a specific need as outlined in Paragraph 18 of Keeping Children Safe In Education (2022). Action will also be taken to promote the welfare of a child in need of additional support, even if they are not suffering or at immediate risk. Staff should be mindful 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 local authority children's social care. The school recognises the importance of children receiving the right help at the right time to address risks and prevent issues escalating, the importance of acting on and referring the early signs of abuse and neglect, keeping clear records, listening to the views of the child, reassessing concerns when situations do not improve, sharing information quickly and challenging inaction. Where it is considered that a child would benefit from coordinated support from more than one agency there should be a multi agency working assessment for early help. All staff are aware of their local Early Help process and understand their role in it; the DSLs of each school will take the lead on Early Help cases. Schools should provide as much information as possible as part of the referral process to help social care assessments consider contexts outside the home and enable a contextual approach to harm.

Information sharing

As part of meeting children's needs, governors and leaders recognise the importance of information sharing between professionals and local agencies. Further information can be found in Chapter one of Working

Together to Safeguard Children, and in Information Sharing: Advice for practitioners. Concerns about sharing information cannot stand in the way of the need to promote the welfare and protect safety of children. GDPR does not prevent the sharing of information for the purpose of keeping children safe but information sharing must be with the right people between and within agencies.

Online safety

Children will receive education in relation to online safety as part of the curriculum and Pastoral Care. The school will also ensure that appropriate filters and monitoring systems are in place for online safety. Further information can be found at Annex C of Keeping Children Safe in Education (2022).

Detailed information about the school's approach to online safety and acceptable use of technologies can be found in the school's Online Safety and Acceptable Use Policy. Schools will review their online safety policies and information annually to keep up with developments in technology, risks and harms.

It is recognised that the use of technology presents challenges and risks to children and adults both inside and outside of school/college. Turner Schools will empower, protect and educate the community in their use of technology and establish mechanisms to identify, intervene in, and escalate any incident where appropriate. Staff must acknowledge that young people can be both victims and perpetrators of online abuse.

Turner Schools identifies that the breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- content: being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racist or radical and extremist views;
- contact: being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults; and
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, or online bullying.

The DSL has overall responsibility for online safeguarding within the school but will liaise as necessary with other members of staff. Training for all staff on online safety is integrated within the whole Trust's approach to safeguarding.

Turner Schools uses a wide range of technology. This includes computers, laptops, tablets and other digital devices, the internet, our learning platform, intranet and email systems. Turner Schools owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.

Turner Schools recognises the specific risks that can be posed by mobile technology, including mobile phones and cameras. In accordance with Keeping Children Safe in Education (2022), Turner Schools has appropriate policies in place that are shared and understood by all members of the community.

Turner Schools will do all it reasonably can to limit children's exposure to online risks throughout our schools IT systems and will ensure that appropriate filtering and monitoring systems are in place.

If learners or staff discover unsuitable sites or material, they are required to turn off monitor/screen, use a screen cover widget, report the concern immediately to a member of staff/DSL, and then report the site to the IT team.

All users will be informed that use of our systems can be monitored, and that monitoring will be in line with data protection, human rights and privacy legislation.

Filtering breaches or concerns identified through our monitoring approaches will be recorded and reported to the DSL and technical staff, as appropriate.

Any access to material believed to be illegal will be reported immediately to the appropriate agencies, such as the [Internet Watch Foundation](#) and the police.

When implementing appropriate filtering and monitoring, Turner Schools ensure that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.

Turner Schools acknowledges that whilst filtering and monitoring is an important part of school/college online safety responsibilities, it is only one part of our approach to online safety.

Learners will use appropriate search tools, apps and online resources as identified following an informed risk assessment.

Learners internet use will be supervised by staff according to their age and ability.

Learners will be directed to use age appropriate online resources and tools by staff.

Turner Schools will ensure a comprehensive whole school curriculum response is in place to enable all learners to learn about and manage online risks effectively as part of providing a broad and balanced curriculum. **DSLs and SLT may find it helpful to access UK Council for Internet Safety (UKCIS) ‘[Education for a Connected World Framework](#)’ and DfE ‘[Teaching online safety in school](#)’ guidance.**

Turner Schools will build a partnership approach to online safety and will support parents/carers to become aware and alert by ensuring that online safety training for all staff is integrated, aligned and considered as part of our overarching safeguarding approach.

The DSL will respond to online safety concerns in line with the child protection and other associated policies such as anti-bullying and behaviour.

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.

Where children are asked to learn online at home in response to a full or partial closure:

Turner Schools 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. All communication with learners and parents/carers will take place using Turner Schools provided or approved communication channels.

Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.

Staff and learners will engage with remote teaching and learning in line with existing behaviour principles as set out in the Trust’s behaviour policy/code of conduct and Acceptable Use Policies.

Staff and learners at Turner Schools will be encouraged to report issues experienced at home and concerns will be responded to in line with our child protection and other relevant policies.

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

Parents/carers will be made aware of what their children are being asked to do online, including the sites they will be asked to access. Turner Schools will continue to be clear who from the schools their child is going to be interacting with online.

Parents/carers will be encouraged to ensure children are appropriately supervised online and that appropriate parent controls are implemented at home.

Additional guidance for DSLs and SLT regarding remote learning is available at DfE: [Safeguarding and remote education during coronavirus \(COVID-19\)](#)

RSHE Curriculum

Relationships and Sex Education is statutory. Health Education is also taught. Parents have the right to withdraw their child from part or all of the Sex Education curriculum by request to the Principal. There are several key aspects that will relate to safeguarding such as:

- Issues related to [consent](#)
- Definitions/choices
- Grooming, [CSE](#), [domestic abuse](#), [FGM](#)
- [Honour based abuse](#)
- Unhealthy/abusive family relationships
- Internet/[online safety](#) – a much enhanced curriculum theme
- [Contextual safeguarding](#)
- Abusive intimate relationships.

Leaders recognise the importance of good communication with the DSL and teachers delivering the content. Additionally leaders are aware of the need for raising awareness of the potential impact this may have on some pupils/students.

Listening to children

When a child approaches a member of staff or other adult about a child protection issue that adult must follow these rules:

- Do not promise complete confidentiality. Explain you might have to tell other people to help keep the child or other children safe.
- Listen positively and reassure the child that speaking to you is the right thing to do.
- Do not jump to conclusions, put words in the child's mouth, or ask questions that point towards a particular answer. 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).
- Write a record of the conversation as soon as possible, also noting any action taken.
- Do not try to investigate or take any action beyond the agreed procedures.
- Always act in the best interests of the child.
- Record the concern using the facts as the child presents them, in line with the school's record keeping requirements.

The member of staff should explain that they need to share the information with the DSL and reassure the child that the information will only be disclosed to other people who need to know. All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

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.

Allegations against staff

Any concerns or allegations about staff will be recorded and dealt with appropriately in line with national (Part four of KCSIE 2022) and the [local Kent allegations arrangements](#), and will also be managed under the Managing Allegations against Staff Policy.

The case manager for dealing with allegations of abuse made against school staff members is the Principal. The case manager for dealing with allegations against the Principal is the CEO of Turner Schools.

Whilst Turner Schools is not the direct employer of supply staff, it must ensure that allegations against supply staff are dealt with properly.

Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistleblowing channels are available, and the NSPCC whistleblowing helpline is available on 0800 028 0285 or by email to help@nspcc.org.uk.

If there is a risk of immediate serious harm to a child a referral should be made immediately to children's social services.

Turner Schools will work with other agencies and the LADO where staff have behaved or may have behaved in a way that indicates they may not be suitable to work with children. This transferrable risk assessment will make up part of the information shared with LADO and other agencies.

Any allegations will be referred to the LADO within 24 hours for advice before any investigation takes place.

In all cases where allegations are made against staff or low-level concerns are reported, once proceedings have been concluded, the Principal/CEO (and if they have been involved the LADO) will consider the facts and determine whether any lessons can be learned and if any improvements can be made.

Recording

When you receive any report of a child protection related matter, make a written record of what happened and what action was taken. Notes should include the date, time, place and context of any disclosure or concern, set out where possible the exact words used, and the note signed and dated. Such notes should distinguish between fact and opinion, record any injuries or bruises, and include reference to any 'non-verbal' behaviour.

These must be stored by the DSL, separate from the child's main school file with a note on that file to indicate the existence of a separate child protection file for that pupil.

Any minutes from a child protection conference should also be put in that separate file.

Staff will record any welfare concern that they have about a child on the school's safeguarding incident/concern form (with a body map if injuries have been observed) and pass them without delay to the DSL. 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. If there is an immediate concern the member of staff should consult with a DSL as this needs to take priority. All safeguarding concerns, discussions and decisions (and

justifications for those decisions) will be recorded in writing. If members of staff are in any doubt about recording requirements, they should discuss their concerns with DSL.

Safeguarding records are kept for individual children and are maintained separately from all other records relating to the child in the school. Safeguarding records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL. Safeguarding records are shared with staff on a 'need to know' basis only. Safeguarding records should include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached and the outcome.

All safeguarding records will be transferred in accordance with data protection legislation to the child's subsequent school/setting, under confidential and separate cover. These will be given to the new DSL, within 5 days for an in-year transfer or within the first 5 days of the start of a new term and a receipt of delivery will be obtained.

Where a pupil/student 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/student, and if so, if the files have been sent.

Detailed guidance on Record Keeping is found in a separate document "Guidelines for Safeguarding Record Keeping in Schools".

The Principal will be kept informed of any significant issues by the DSL.

Ongoing Pupil Support

We recognise that children who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. The school may be the only stable, secure and predictable element in the lives of children at risk. When at school their behaviour may be challenging and defiant or they may be withdrawn. The school will endeavour to support the pupil through:

- The content of the curriculum.
- The school ethos which promotes a positive, supportive and secure environment and gives pupils a sense of being valued.
- The school behaviour policy which is aimed at supporting vulnerable pupils in the school. The school will ensure that the pupil knows that some behaviour is unacceptable but they are valued and not to be blamed for any abuse which has occurred.
- Liaison with other agencies that support the pupil such as social services, Child and Adult Mental Health Service, education welfare service and educational psychology service.
- Where a pupil on the child protection register leaves, transferring their information to the new school immediately and informing the child's social worker. When children leave the school the DSL will consider if it is appropriate to share information with a new school in advance of a pupil leaving. When children join the school the DSL and SENDCo are aware of the requirements set out in Keeping Children Safe In Education (2022) about transferring a child protection file to a new school.

Safer Recruitment

We are committed to ensure that all steps are taken to recruit staff and volunteers who are safe to work with our pupils and have their welfare and protection as the highest priority. The Trustees, Challenge & Community Committee and School Leadership Team are responsible for ensuring that the school follows safe recruitment processes outlined within Guidance, including accurate maintenance of the Single Central

Record; and an application, vetting and recruitment process for internal and external recruitment which places safeguarding at its centre, regardless of employee or voluntary role.

The Trustees, Challenge & Community Committee and Principals will ensure that the Vice Principals and other senior staff responsible for recruitment and one member of the Challenge & Community Committee complete accredited Safer Recruitment Training in line with government requirements.

We 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. Schools and local authorities must have regard to it when carrying out their duties to safeguard and promote the welfare of children under section 175, of the Education Act 2002, paragraph 79(b) of Schedule 1 to the Education (Independent School Standards) Regulations 2014 and paragraph 3 of the Schedule to the Education (Non-Maintained Special Schools)(England) Regulations 2011.

The use of school premises by other organisations

Where services or activities are provided separately by another body using the school's premises, a representative of the Board of Trustees and Principals or Vice Principals will seek assurance that the organisation concerned has appropriate policies and procedures in place with regard to safeguarding children and child protection and that relevant safeguarding checks have been made in respect of staff and volunteers. If assurance is not achieved, an application to use premises will be refused.

Staff Training

The school will ensure that all staff receive adequate training in child protection, including online safety and peer on peer abuse, at least annually and are aware of systems within the school which support safeguarding. The school's induction programme for new staff includes child protection training. All staff are required to familiarise themselves with Part 1 of the Keeping Children Safe in Education Guidance (2022).

The DSL and deputy DSL will undergo child DSL training every two years. The DSL will receive additional updates to their formal training at regular intervals to keep up to date with any developments relevant to their role.

The Principals and all staff members will undergo child protection training which is updated regularly, in line with advice from the LSCB. The wealth of knowledge developed by staff in dealing with safeguarding issues is recognised, and staff will have the opportunity to contribute to shaping the school's safeguarding arrangements.

The Principals are responsible for ensuring that safeguarding training is kept up to date.

Linked School Policies

The following policies and procedures are relevant for the child protection and safeguarding policy and procedures:

- Code of Conduct/Staff Behaviour Policy
- Safer Recruitment procedures
- Managing Allegations against Staff Policy
- Acceptable Use Policy
- Online Safety Policy
- Reasonable Force Policy
- Whistleblowing Policy
- External Visitors/Contractors Policy

- Attendance Policy
- Child-on-Child Abuse Procedures
- Equality and Diversity Policy
- Data Protection & Information Policy
- Mobile phone policy (secondary)

Legislation

Turner Schools practices the advice and guidance set out in the Sexual Violence & Sexual Harassment between Children in Schools & Colleges 2018 document, as part of our approach to protect children from sexual violence and sexual harassment. This includes:

- Keeping Children Safe in Education (2022)
- Working Together to Safeguard Children
- Sex & Relationship Educations and the Equality Act 2010
- Guidance for Safer Working Practice for Those Working With Young People in Educational Settings
- The Prevent Duty
- Sexual Offences Act 2003
- Protection of Children Act

Local Support

Area Safeguarding Advisor (Education Safeguarding Service):

www.kelsi.org.uk/support-for-children-and-young-people/child-protection-and-safeguarding/safeguarding-contacts

Online Safety in the Education Safeguarding Service - Education Safeguarding Advisor (Online Protection):
 Safety Development Officer 03000 415797
 esafetyofficer@kent.gov.uk (non-urgent issues only)

LADO

Telephone: 03000 410888
 Email: kentchildrenslado@kent.gov.uk

Children's Social Work Services:

Front door: 03000 411111
 Out of Hours Number: 03000 419191

Kent Police:

101 (or 999 if there is an immediate risk of harm)

Kent Safeguarding Children Multi-Agency Partnership (KSCMP):

www.kscmp.org.uk
 Telephone: 03000 421126 kscmp@kent.gov.uk

Adult safeguarding

Adult Social Care via 03000416161 or email: social.services@kent.gov.uk

National Support Organisations

Support for staff:

- Education Support Partnership: www.educationsupportpartnership.org.uk

- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline

Support for learners:

- NSPCC: www.nspcc.org.uk
- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- Young Minds: www.youngminds.org.uk
- The Mix: www.themix.org.uk
- Shout: www.giveusashout.org

Support for adults:

- Family Lives: www.familylives.org.uk
- Crime Stoppers: www.crimestoppers-uk.org
- Victim Support: www.victimsupport.org.uk
- Kidscape: www.kidscape.org.uk
- The Samaritans: www.samaritans.org
- Mind: www.mind.org.uk
- NAPAC (National Association for People Abused in Childhood): napac.org.uk
- MOSAC: www.mosac.org.uk
- Action Fraud: www.actionfraud.police.uk

Support for Learning Disabilities:

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk

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://resectphoneline.org.uk>

Honour Based Violence:

- Forced Marriage Unit: <https://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

Sexual Abuse and CSE:

- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Stop it Now!: www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- CEOP: www.ceop.police.uk
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk

- Internet Watch Foundation (IWF): www.iwf.org.uk

Contextual Safeguarding, Child-on-Child abuse, Sexual Exploitation and Criminal Exploitation:

- Contextual Safeguarding Network: <https://contextualsafeguarding.org.uk>
- National Crime Agency: www.nationalcrimeagency.gov.uk/who-we-are
- Rape Crisis: <https://rapecrisis.org.uk>
- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Brook: www.brook.org.uk
- Victim Support: www.victimsupport.org.uk
- Anti-Bullying Alliance: www.anti-bullyingalliance.org.uk
- Disrespect Nobody: www.disrespectnobody.co.uk
- Upskirting – know your rights: www.gov.uk/government/news/upskirting-know-your-rights

Substance Misuse

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

Mental Health

- Mind: www.mind.org.uk
- Moodspark: <https://moodspark.org.uk>
- Young Minds: www.youngminds.org.uk
- We are with you (formerly Addaction): www.wearewithyou.org.uk/services/kent-for-young-people/

Online Safety

- CEOP: www.ceop.police.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk
- Think U Know: www.thinkuknow.co.uk
- Childnet: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Report Harmful Content: <https://reportharmfulcontent.com>
- Parents Info: www.parentinfo.org
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Matters: www.internetmatters.org
- NSPCC/ Net Aware: www.nspcc.org.uk/online-safety and www.net-aware.org.uk
- Get safe Online: www.getsafeonline.org
- Stop it Now!: www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk

Radicalisation and Hate

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

Monitoring arrangements

This policy will be reviewed annually by the Trust's DSL and approved by the Board of Trustees.

Appendix 1

FOLKESTONE PRIMARY		
Designated Safeguard Lead Early Years Lead	Miss Gaind	01303 842400
Deputy Designated Safeguarding Leads Principal Vice Principal Family Liaison Officer	Miss Feaver Mrs Huntley Miss Cunningham	01303 842400
Other Members of Safeguarding Team SENDCo Kindergarten Teacher Kindergarten Administration Officer Senior Administration Officer	Miss Clifton Mrs Sammonds Mrs Groombridge Mrs Pepper	01303 842400
Nominated Governor for Safeguarding and Child Protection	Mrs Shah	arti.shah@turnerschools.com
Acting Chair of Governors	Mrs Shah	arti.shah@turnerschools.com

FOLKESTONE ACADEMY		
Designated Safeguard Lead Raising Standards Leader	Mrs Williams	01303 842400
Deputy Designated Safeguarding Lead Senior Safeguarding Officer Raising Standards Leader Raising Standards Leader	Ms Hogben Miss Vik Mr Fountain	01303 842400
Nominated Governor for Safeguarding and Child Protection	Mr Pearce	michael.pearce@turnerschools.com
Chair of Governors	Mr G Hunter	Greg.hunter@turnerschools.com

MARTELLO PRIMARY		
Designated Safeguarding Lead SENDCo	Mrs Palmer	01303 847540
Deputy Designated Safeguarding Lead Family Liaison Officer Director of Primary Improvement	Mrs Prescott Mrs Lythgoe	01303 847540 01303 847540
Nominated Governor for Safeguarding and Child Protection	Mr Williams	benjamin.williams@turnerschools.com
Chair of Governors Martello Primary and Morehall Primary	Miss Fox	Jenny.Fox@turnerschools.com

MOREHALL PRIMARY		
Designated Safeguarding Lead Family Liaison Officer	Mrs Buckle	01303 275128
Deputy Designated Safeguarding Lead Principal	Mrs Moris	01303 275128
Other Members of Safeguarding Team Vice Principal SENDCo	Miss Barrow Mrs Palmer	01303 275128
Nominated Governor for Safeguarding and Child Protection	Mr Williams	benjamin.williams@turnerschools.com
Chair of Governors Martello Primary and Morehall Primary	Miss Fox	Jenny.Fox@turnerschools.com

TURNER FREE SCHOOL		
Designated Safeguarding Lead Head of School	Ms Van Deelen	01303 842400
Deputy Designated Safeguarding Leads Senior Safeguarding Officer Vice Principal Senior Pastoral Leader	Mr Brooks Mr Chapman Miss Brown	01303 842400
Other Members of Safeguarding Team KS3 Raising Standards Leader KS4 Raising Standards Leader	Mr Badrick Dr Barnes	01303 842400
Nominated Governor for Safeguarding and Child Protection	Mrs Cooke	cally.cooke@turnerschools.com
Chair of Governors	Mrs Luke	tracy.luke@turnerschools.com

Any concerns relating to a Principal or member of the Central Team should be escalated to the Senior DSL, Mr S Murphy.

Concerns about Mr Murphy in respect of safeguarding should be referred to the Lead Safeguarding Trustee, Mr Jones

TURNER SCHOOLS		
Senior Designated Safeguarding Lead Chief Executive Officer & Trust Principal	Mr Murphy	ceo@turnerschools.com 01303 842400
Lead Safeguarding Trustee	Mr Jones	dean.jones@turnerschools.com

Other Contacts

Channel Referral Contact Details Prevent and Channel Strategic Manager nick.wilkinson@kent.gov.uk Prevent Education Officer	Mr Wilkinson Ms Allen	03000 417201 07785 341727 03000 413565
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Jill.Allen@kent.gov.uk		
NSPCC Whistleblowing helpline		0800 028 0285