

Safeguarding and Child Protection Policy

Date Prepared	September 2024
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Checked By (Trustee)	Dr Kerry Jordan-Daus (Trust CEO)
Date ratified	
Review Date	September 2025

Named Designated Safeguarding Leads (DSLs) in each Trust school

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Warden House

School:	Warden House Primary School
DSL / Headteacher	Rob Hackett
Deputy DSL	Adam Atkinson
Deputy DSL	Kerry Mackenzie-Frazer
Deputy DSL	Lynne Moore
Deputy DSL	Wendy Harvey
Safeguarding Governor	Doreen McVeigh
Kent Safeguarding Advisory Service	03000 415648



School:	Pilgrims' Way Primary School
DSL / Headteacher	Richard Minton
Deputy DSL	Emma Campbell
Deputy DSL	Helen Fennell
Safeguarding Governor	Doreen McVeigh
Kent Safeguarding Advisory Service	03000 418503



Mundella

School:	Mundella Primary School
DSL / Co - Headteacher	Lauren Wharmby
DSL / Co - Headteacher	Lisa Paez
DSL	Carol Gretton
DSL	Louise Blunden
Safeguarding Governor	TBC
Kent Safeguarding Advisory Service	03000 415648

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1. Roles and Responsibilities

Schools across Veritas MAT:

The school is responsible for ensuring that all action adheres to Kent Safeguarding Children Multiagency Partnership (KSCMP) Safeguarding procedures and *Working Together to Safeguard Children*.

The role of the school within this procedure is to contribute to the identification, referral and assessment of children in need including children who may have suffered, be suffering, or who are at risk of suffering significant harm. The school may also have a role in the provision of services to children in need and their families.

All adults in school have a role to play in relation to:

- · Protecting children from abuse
- Promoting the welfare of children
- · Preventing children from being harmed

The role of the school in situations where there are safeguarding concerns is NOT to investigate but to recognise and refer.

The Designated Safeguarding Lead (DSL) for each school is responsible for:

- · Coordinating safeguarding action within school
- Ensuring that locally established procedures are followed including reporting and referral processes
- Acting as a consultant for staff to discuss concerns
- · Making referrals as necessary
- Maintaining a confidential recording system
- Representing or ensuring the school is appropriately represented at inter-agency meetings in particular Child Protection Conferences
- Managing and monitoring the school's part in child care / protection plans
- · Organising training for all school staff ensuring refresher training for all every three years
- liaising with other professionals including Early Help
- Ensuring new staff and volunteers have appropriate level of Safeguarding training
- Ensuring DSL and deputy DSLs receive updated training every two years
- Ensuring all staff receive regular Safeguarding updates, as required

The Designated Safeguarding Lead for the Trust is responsible for ensuring each school adheres to the policy and requirements outlined in this policy and may play an operational role in specific cases in support of the DSLs for each school.

2. Child Focused Approach to Safeguarding

2.1 Introduction

 Veritas MAT recognises our statutory responsibility to safeguard and promote the welfare of all children. Safeguarding is everybody's responsibility and all those directly connected (staff, volunteers, Trustees and Local Governors, leaders, parents, families, and learners) are an important part of the wider safeguarding system for children and have an essential role to play in making this community safe and secure.

- Veritas MAT believes that the best interests of children always come first. All children (defined
 as those up to the age of 18) have a right to be heard and to have their wishes and feelings
 taken into account and all children regardless of age, gender, ability, culture, race, language,
 religion or sexual identity, have equal rights to protection.
- Staff working with children at Veritas MAT 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.
- Veritas MAT recognises the importance of providing an ethos and environment within the 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 which services to provide.
- Our core safeguarding principles are:

Prevention

Positive, supportive, safe culture, curriculum and pastoral opportunities for children, safer recruitment procedures.

o Protection

Following the agreed procedures, ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns.

Support

For all learners, parents and staff, and where appropriate specific interventions are required for those who may be at risk of harm.

Working with parents and other agencies

To ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.

 The procedures contained in this policy apply to all staff, (including Trustees/Governors, temporary or third-party agency staff and volunteers) and are consistent with those outlined within KCSIE 2024.

2.2 Policy Context

- This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, 'Keeping Children Safe in Education' 2024 (KCSIE) which requires individual schools and colleges to have an effective child protection policy.
- The policy has been developed in accordance with principles established by the Children Acts 1989 and 2004 and related guidance. This includes but is not limited

to:

- Keeping Children Safe in Education 2024 (KCSIE)
- Working Together to Safeguard Children 2018 (WTSC)
- Ofsted: Education Inspection Framework' 2021
- Framework for the Assessment of Children in Need and their Families 2000 Kent and Medway Safeguarding Children Procedures
- Early Years and Foundation Stage Framework 2021 (EYFS)
- o The Education Act 2002

- Education and Inspections Act 2006
- Section 175 of the Education Act 2002 requires school governing bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are pupils at a school, or who are students under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.
- 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.
- 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 increased welfare and safeguarding risks. We will work with local services, such as health and the local authority, to ensure necessary support is in place.

2.3 **Definition of Safeguarding**

- In line with KCSIE 2024, safeguarding and promoting the welfare of children is defined for the purposes of this policy as:
 - protecting children from maltreatment
 - preventing impairment of children's mental and physical health or development
 - ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and
 - taking action to enable all children to have the best outcomes
- The school acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):

Drugs and alcohol misuse

Abuse and neglect Bullying, including cyberbullying Child on Child Abuse Children with family members in Children Missing Education (CME) Child frequently missing from home. Homelessness care or education Child Sexual Exploitation (CSE) Child Criminal Exploitation (CCE) Contextual safeguarding (risks outside the family home) County lines and gangs

Fabricated or induced illness Faith abuse Gender based abuse and violence against women and girls Hate Human trafficking and modern slavery Mental health Nude or semi-nude image sharing, aka youth produced/involved sexual imagery or "Sexting" Has experienced multiple suspensions and is at risk of, or has been permanently excluded from schools

Online safety Peer on peer abuse 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 Discrimination linked to one or more

protected characteristics such as race/gender/disability etc.

(Also, see Part 1 and Annex B within 'Keeping Children Safe in Education' 2024)

2.4 **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 Trust policies and national guidance as listed below:

Behaviour Policy

Domestic abuse

Searching, screening and confiscation

- Mobile and Smart Technology
- Staff Code of Conduct
- Anti-Bullying Policy
- · Data protection and Information sharing
- Relationship and Sex Education (RSE)
- Education of Looked After / Previously Looked After Children Policy
- Children with Health Needs Policy
- Intimate care Policy
- Health and safety Policy
- Attendance Policy
- First aid and accidents
- Managing allegations against staff
- · Discipline and Conduct Policy,
- Acceptable Use of Technology Policies (AUP)
- Safer recruitment
- Whistleblowing Policy
- Specific Risk assessments

2.5 Policy Compliance, Monitoring and Review

- Veritas MAT will review this policy at least annually (as a minimum) and will update it as needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. The policy will also be revised following any national or local updates, significant local or national safeguarding events and/or learning, and/or any changes to our own procedures.
- All staff (including temporary staff and volunteers) will be provided with a copy of this policy and Part One of KCSIE 2024 as appropriate. These documents can be found in Safeguarding files kept in the staffroom and Headteacher's Office or on Staff Shared Drive.
- Parents/carers can obtain a copy of the school Child Protection Policy and other related policies on request. Additionally, our policies can be viewed on the trust website: http://www.veritasmat.co.uk/
- The policy forms part of our school development plan and will be reviewed annually by the Governing Body who has responsibility for oversight of safeguarding and child protection systems.
- The Designated Safeguarding Lead and Headteacher will ensure regular reporting on safeguarding activity and systems to the Governing Body. The Governing Body will not receive details of individual learner situations or identifying features of families as part of their oversight responsibility.

3. Key Responsibilities

3.1 Governance and Leadership

 The Trust Board, Local Academy Committees and school leadership teams have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation.

- The Trust Board and Local Academy Committees 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 Trust Board and Local Academy Committees 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 Trust Board, Local Academy Committees 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 Headteachers will ensure that our child protection and safeguarding policies and procedures adopted by the Trust are understood and followed by all staff.

3.2 Designated Safeguarding Lead (DSL)

- Whilst the Headteachers have oversight for Safeguarding, the schools have appointed their Designated Safeguarding Leads (DSL) as outlined in the table at the beginning of this policy.
- The DSLs have overall responsibility for the day-to-day oversight of safeguarding and child protection systems (including online safety) 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.
- The DSL (and any deputies) will be more likely to have a complete safeguarding picture and will be the most appropriate person to advise staff on the response to any safeguarding concerns.
- It is the role of the DSL to carry out their functions as identified in Annex C of KCSIE 2024. 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 2024 and WTSC 2018
- Ensuring that locally established procedures as put in place by the three safeguarding partners as part of the Kent Safeguarding Children Multi-Agency Partnership procedures (KSCMP), including referrals, are followed, as necessary
- Representing, or ensuring that 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.
- Helping promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff.
- Ensuring adequate and appropriate DSL cover arrangements in response to any closures and out of hours and/or out of term activities.
- Ensuring all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE.
- Informing the Headteacher of any significant safeguarding issues.

- Liaising with the headteacher to inform them of any safeguarding issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- This includes being aware of the requirement for children to have an Appropriate Adult (PACE Code C 2019)
 - The DSL will undergo appropriate and specific training to provide them with the knowledge
 and skills required to carry out their role. Deputy DSLs will be trained to the same standard
 as the DSL. The DSL's 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.

3.3 Members of Staff

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

- · All members of staff have a responsibility to:
 - o Provide a safe environment in which children can learn.
 - Be aware of the indicators of abuse and neglect so that they can identify cases of children who may need help or protection.
 - o Know what to do if a child tells them that he or she is being abused, neglected or exploited and understand the impact abuse and neglect can have upon a child.
 - Be able to identify and act upon indicators that children are, or at risk of developing mental health issues.
 - Be prepared to identify children who may benefit from early help.
 - o Understand the early help process and their role in it.
 - Understand the school safeguarding policies and systems.
 - o Undertake regular and appropriate training which is regularly updated.
 - Be aware of the local process of making referrals to children's social care and statutory assessment under the Children Act 1989.
 - o Know how to maintain an appropriate level of confidentiality.
 - Reassure children who report concerns that they are being taken seriously and that they will be supported and kept safe.
 - Act in line with Teachers' Standards 2012, which state that teachers (including headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
 - Staff 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 will determine how best to build trusted relationships with children, young people and parents/carers which facilitate appropriate professional communication in line with existing and relevant policies

3.4 Children and Young People

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

3.5 Parents and Carers

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

4. Child Protection Procedures

4.1 Recognising Indicators of Abuse and Neglect

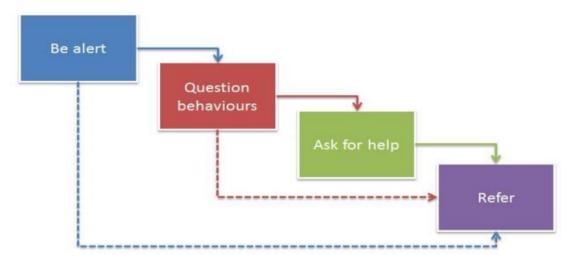
- Staff will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child.
- All staff are made aware of the definitions and indicators of abuse and neglect as identified by Working Together to Safeguard Children (2018) and Keeping Children Safe in Education 2024.
 This is outlined locally within the Kent Support Levels Guidance.
- Veritas MAT recognises that when assessing whether a child may be suffering actual or potential harm there are four categories of abuse:
 - o Physical abuse o Sexual abuse o Emotional abuse o Neglect

For further information, see Appendix 1.

- Veritas MAT recognises that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of child abuse and neglect can vary from child to child. Children develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child. It is important to recognise that indicators of abuse and neglect do not automatically mean a child is being abused however all concerns should be taken seriously and will be explored by the DSL on a case-by-case basis.
- Veritas MAT recognises abuse, neglect, and safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label alone. In many cases, multiple issues will overlap with one another; therefore staff will always be vigilant and always raise concerns with a DSL.
- Parental behaviours can indicate child abuse or neglect, so staff will be alert to parent-child
 interactions or concerning parental behaviours; this could include parents who are under the
 influence of drugs or alcohol or if there is a sudden change in their mental health.
- Children may report abuse happening to themselves, their peers or their family members. All
 reports made by children to staff will be taken seriously and will be responded to in line with this
 policy.
- Safeguarding incidents and/or behaviours can be associated with factors and risks outside the school. Children can be at risk of abuse or exploitation in situations outside their families; extra familial harms take a variety of different forms and children can be susceptible to multiple harms

including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.

- Veritas MAT recognise that technology can be a significant component in many safeguarding and wellbeing issues; children are at risk of abuse online from people they know (including other children) and from people they do not know; in many cases, abuse will take place concurrently via online channels and in daily life.
- By understanding the indicators or abuse and neglect, we can respond to problems as early as possible and provide the right support and services for the child and their family.
- All members of staff are expected to be aware of and follow this approach if they are concerned about a child:



'What to do if you are worried a child is being abused' 2015

- In all cases, if staff are unsure, they will always speak to the DSL.
- Veritas MAT recognises that some children have additional or complex needs and may require access to intensive or specialist services to support them.
- Following a concern about a child's safety or welfare, the searching and screening of children and confiscation of any items, including any electronic devices, will be managed in line with the school behaviour policy and <u>'Searching, screening and confiscation at school'</u> guidance. The DSL (or deputy) will be informed of any searching incidents where there were reasonable grounds to suspect a child was in possession of a prohibited item as listed in our behaviour policy. The DSL (or deputy) will then consider the circumstances of the child 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.

4.2 Responding to Child Protection Concerns

- If staff are made aware of a child protection concern, they are expected to:
 - o listen carefully to the child,
 - o reflecting back the concern
 - o use the child's language
 - be non-judgmental
 - o 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.
- o Be clear about boundaries and how the report will be progressed.
- o Record the concern using the facts as the child presents them on My Concern.
- o 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, a DSL from another Trust school; take advice from the Education Safeguarding Service or a consultation with a social worker from the Front Door (for contact information, see flowchart). In these circumstances, any action taken will be shared with a DSL as soon as is practically possible.
- All staff are made aware that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to other agencies. Staff will not assume a colleague, or another professional will act and share information that might be critical in keeping children safe.
- Veritas MAT will respond to concerns in line with the Kent Safeguarding Children Multi-Agency Partnership procedures (KSCMP).
- The full KSCMP procedures and additional guidance relating to reporting concerns and specific safeguarding issues can be found on their website: www.kscmp.org.uk
- In Kent, Early Help and Preventative Services and Children's Social Work Services are part
 of Integrated Children's Services (ICS). Specific information and guidance to follow with
 regards to accessing Early Help and Preventative Services and/or Children's Social Work
 Services as part of Integrated Children's Services (ICS) in Kent can be found here:
 www.kelsi.org.uk/support-for-children-and-young-people/integrated-childrens-services
- Where it is identified a child may benefit from Early Help support (as provided by ICS), the DSL (or deputy) will generally lead as appropriate and make a request for support via the Front Door.
- The DSL will keep all Early Help cases under constant review and consideration will be given to escalating concerns to the Front Door or seeking advice via the <u>Education</u> <u>Safeguarding Service</u> if the situation does not appear to be improving or is getting worse
- All staff are made aware of the process for making referrals to Integrated Children's
 Services and for statutory assessments under the Children Act 1989, especially section 17
 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that
 may follow a referral, along with the role they might be expected to play in such
 assessments.
- Where a child is suffering, or is likely to suffer from harm, or is in immediate danger (for example, under section 17 or 47 of the Children Act), a 'request for support' will be made immediately to Integrated Children's Services (via the 'Front Door') and/or the police, in line with KSCMP procedures
- Veritas MAT 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.
- The DSL may seek advice or guidance from their Area Education Safeguarding Advisor from the <u>Education Safeguarding Service</u> before deciding next steps
- They may also seek advice or guidance from a social worker at the Front Door service who are the first point of contact for Integrated Children's Services (ICS).

- In the event of a request for support to the Front Door being necessary, parents/carers will be informed and consent to this will be sought by the DSL in line with guidance provided by KSCMP and ICS. Parents/carers will be informed of this, unless there is a valid reason not to do so, for example, if to do so would put a child at risk of harm or would undermine a criminal investigation.
- All staff are aware of the process for making request for support referrals for statutory assessments under the Children Act 1989, along with the role they might be expected to play in such assessments.
- Where is it is identified a child may benefit from Early Help support (as provided by ICS), the DSL (or deputy) will generally lead as appropriate and make a request for support via the Front Door.
- The DSL will keep all early help cases under constant review and consideration will be given to escalating concerns to the Front Door or seeking advice via the Education Safeguarding Service if the situation does not appear to be improving or is getting worse
- If, after a request for support or any other planned external intervention, a child's situation
 does not appear to be improving or concerns regarding receiving a decision or the
 decisions made, staff or the DSL will re-refer (if appropriate) and/or DSLs will follow the
 KSCMP escalation procedures to ensure their concerns have been addressed and, most
 importantly, that the child's situation improves. DSLs may request support with this via the
 Education Safeguarding Service.
- Veritas MAT support <u>Operation Encompass</u>. This means we work in partnership with Kent Police to provide support to children experiencing domestic abuse.

4.3 Recording Concerns

- All safeguarding concerns, discussions and decisions, and reasons for those decisions, will be
 recorded on My Concern. This system automatically informs the DSL of any concerns that have
 been raised. Safeguarding records will include a clear and comprehensive summary of any
 concerns, details of how concerns were followed up and resolved, and a note of any action
 taken, decisions reached and outcomes.
- Records will be completed as soon as possible after the incident/event, using the child's words.
 Child protection records will record facts and not personal opinions. A body map will be completed if visible injuries have been observed.
- If there is an immediate safeguarding concern, the member of staff will consult with a DSL before completing the form as reporting urgent concerns takes priority.
- If members of staff are in any doubt about recording requirements, they will discuss their concerns with the DSL.
- Child protection records will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and details regarding any action taken, decisions reached and the outcome.
- Child protection records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL.
- All child protection records will be transferred in accordance with data protection legislation to
 the child's subsequent school, under confidential and separate cover as soon as possible; within
 5 days for an in-year transfer or within the first 5 days of the start of a new term. Child Protection
 files will be transferred securely to the new DSL, separately to the child's main file, and a
 confirmation of receipt will be obtained.
- In addition to the child protection file, the DSL will also consider if it would be appropriate to share any information with the DSL at the new school in advance of a child leaving, for example, information that would allow the new school to continue to provide support.
- Where the school receives child protection files from another setting, the DSL will ensure key staff, such as the special educational needs co-ordinators (SENCOs), will be made aware of relevant information as required.

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

4.4 Multi-Agency Working

- Veritas MAT 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.
- The Trust leadership teams, RGBs and DSLs will work to establish strong and co-operative local relationships with professionals in other agencies, including the safeguarding partners in line with local and national guidance.
- Veritas MAT 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 multiagency 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 headteachers 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 the DfE (Searching, screening and confiscation at school) guidance.

4.5 Confidentiality and Information Sharing

- Veritas MAT 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 2024.
- The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children (KCSIE 2024). DfE "Information sharing advice for safeguarding practitioners" (2018) provides further detail. This document can be found in Safeguarding files kept in the staffroom and Headteacher's Office or on the Staff Shared Drive.
- Staff will have due regard to the relevant data protection principles, which allow them to share and withhold personal information. The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children (KCSIE 2024). KCSIE 2024, the Information Commissioner's Office (ICO) and the DfE "Information sharing advice for safeguarding practitioners" (2018) guidance provides further details regarding information sharing principles and expectations.
- The Headteacher/DSL will disclose relevant safeguarding information about a learner with staff on a 'need to know' basis.

- All members of staff must be aware that whilst they have duties to keep information confidential, in line with our Staff Code of Conduct which can be found on SharePoint. Staff also have a professional responsibility to be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children; this may include sharing information with the DSL and with other agencies as appropriate.
- In regard to confidentiality and information sharing staff will only involve those who need to be involved, such as the DSL (or a deputy) and Kent Integrated Children's Services. All staff are aware they cannot promise a child that they will not tell anyone about a report of any form of abuse as this may not be in the best interests of the child.

4.6 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, learners and members of staff and visitors who wish to report concerns or complaints. This can be on the trust web-site:
 http://www.veritasmat.co.uk/page/?title=Policies&pid=24
- Whilst we encourage members of our community to report concerns and complaints directly to
 us, we recognise this may not always be possible. Children, young people, and adults who have
 experienced abuse at school can contact the NSPCC 'Report Abuse in Education' helpline on
 0800 136 663 or via email: help@nspcc.org.uk
- Staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally.
 - Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.
- The leadership team at Veritas MAT will take all concerns reported to the school seriously and all complaints will be considered and responded to in line with the relevant and appropriate process.
- Anything that constitutes an allegation against a member of staff or volunteer will be dealt with in line with this policy.

5. Specific Safeguarding Issues

- Veritas MAT is aware of the range of specific safeguarding issues and situations that can put children at greater risk of harm. In addition to Part one, DSLs, school leaders and staff who work directly with children will read Annex B of KCSIE 2024, 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.

5.1 Child on Child Abuse

All members of staff at Veritas MAT recognise that children can abuse other children (referred
to as child-on-child abuse, previously known as 'peer-on-peer' abuse), and that it can happen
both inside and outside of school and online.

- Veritas MAT recognises that child on child abuse can take many forms, including but not limited to:
 - o bullying, including cyberbullying, prejudice-based and discriminatory bullying
 - o abuse in intimate personal relationships between children
 - physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
 - sexual violence and sexual harassment
 - consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
 - o 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
 - o upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
 - initiation/hazing type violence and rituals
- Any allegations of child-on-child abuse will be recorded, investigated, and dealt with in line with this child protection policy and KCSIE 2024 (in particular, parts two and five).
- At Veritas MAT, we adopt 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.
- At Veritas MAT, we recognise 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.
- Concerns about learner's behaviour, including child-on-child abuse taking place offsite will be
 responded to as part of a partnership approach with learners and parents/carers. Offsite
 behaviour concerns will be recorded and responded to in line with existing appropriate policies,
 for example Anti-bullying, Acceptable Use, Behaviour for Learning and Child Protection policies.
 Section 89(5) of the Education and Inspections Act 2006 gives headteachers a statutory power
 to sanction pupils for poor behaviour outside of the school premises to such extent as is
 reasonable.
- In order to minimise the risk of child-on-child abuse, Veritas MAT implement a robust antibullying policy, provide an age/ability appropriate PSHE and RSE curriculum and provide online safety advice and guidelines.
- Veritas MAT want children to feel able to confidently report abuse and know their concerns will be treated seriously. All allegations of child-on-child abuse will be reported to the DSL and will be recorded, investigated, and dealt with in line with associated school policies, including child protection, anti-bullying and behaviour. Children who experience abuse will be offered appropriate support, regardless of where the abuse takes place.

- Alleged victims, alleged perpetrators and any other child affected by peer-on-peer abuse will be supported as appropriate by:
 - taking reports seriously
 - listening carefully
 - o abuse in intimate personal relationships between children
 - o avoiding victim blaming,
 - o providing appropriate pastoral support,
 - o working with parents/carers,
 - o reviewing educational approaches,
 - o where necessary and appropriate, informing the police and/or ICS.

5.2 Child on Child Sexual Violence and Sexual Harassment

- When responding to concerns relating to child-on-child sexual violence or harassment, at Veritas MAT, we will follow the guidance outlined in part five of KCSIE 2024.
- At Veritas MAT, we recognise that sexual violence and sexual abuse can happen anywhere, and all staff will maintain an attitude of 'it could happen here.' At Veritas MAT, we recognise 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 are never acceptable.
- All victims of sexual violence or sexual harassment will be reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, or ever be made to feel ashamed for making a report.
- Abuse that occurs online or outside of the school will not be dismissed or downplayed and will be treated equally seriously and in line with relevant policies/procedures, for example antibullying, behaviour, child protection, online safety.
- At Veritas MAT, 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 children that avoids alarming
 or distressing them.
- At Veritas MAT, 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 2024 and relevant local/national guidance and support, for example KSCMP procedures and support from the Education Safeguarding Service.
 - The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children, and staff and any actions that are required to protect them.

- Any concerns involving an online element will take place in accordance with relevant local/national guidance and advice.
- Reports will initially be managed internally by the school and where necessary will be referred to Integrated Children's Services (Early Help and/or Children's Social Work Service) and/or the police. Important considerations which may influence this decision include:
 - o The wishes of the victim in terms of how they want to proceed.
 - o The nature of the alleged incident(s), including whether a crime may have been committed and/or whether Harmful Sexual Behaviour has been displayed.
 - The ages of the children involved.
 - o The developmental stages of the children involved.
 - o 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.
- If deemed necessary, a 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 o the wishes of the victim in terms of how they want to proceed.
 - o the nature of the alleged incident(s), including whether a crime may have been committed and/or whether Harmful Sexual Behaviour has been displayed.
 - The ages of the children involved.
 - o 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.
 - o Any other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

5.3 Nude and/or Semi Nude Image Sharing by Children

- Veritas MAT recognises that consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as youth produced/involved sexual imagery or "sexting") can be a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).
- When made aware of concerns involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos by children, staff are advised to:
 - o Report any concerns to the DSL immediately.
 - Never view, copy, print, share, forward, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already inadvertently viewed imagery, this will be immediately reported to the DSL.
 - Not delete the imagery or ask the child to delete it.
 - Not say or do anything to blame or shame any children involved.
 - Explain to child (ren) involved that they will report the issue to the DSL and reassure them that they will receive appropriate support and help.
 - Not ask the child or children involved in the incident to disclose information regarding the imagery and not share information about the incident with other members of staff, the child(ren) involved or their, or other, parents and/or carers. This is the responsibility of the DSL.

5.4 Assessing adult-involved nude and semi-nude sharing incidents

- All adult-involved nude and semi-nude image-sharing incidents are child sexual abuse offences and must immediately be referred to police/social care. However, as adult-involved incidents can present as child-on-child nude/semi-nude sharing, it may be difficult to initially assess adult involvement.
- There are two types of common adult-involved incidents: sexually motivated incidents and financially motivated incidents.
- DSLs will respond to concerns in line with the non-statutory UKCIS guidance: <u>Sharing nudes</u> and <u>semi-nudes</u>: <u>advice for education settings working with children and young people</u>' and the local <u>KSCMP</u> guidance. When made aware of a concern involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos:
 - The DSL will hold an initial review meeting to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child involved. This may mean speaking with relevant staff and the children involved as appropriate.
 - Parents and carers will be informed at an early stage and be involved in the process to best support children, unless there is good reason to believe that involving them would put a child at risk of harm.
 - All decisions and action taken will be recorded in line with our child protection procedures.
 - A referral will be made to ICS and/or the police immediately if:
 - The incident involves an adult (over 18).
 - There is reason to believe that a child has been coerced, blackmailed, or groomed, or there are concerns about their capacity to consent, for example, age of the child or they have special educational needs.
 - The image/videos involve sexual acts and a child under the age of 13, depict sexual acts, which are unusual for the child's developmental stage, or are violent.
 - A child is at immediate risk of harm owing to the sharing of nudes and seminudes. This includes the sharing of any computer (AI) generated imagery of this

type, including pseudo-images which are computer-generated images that otherwise appear to be a photograph or video.

- o The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date.
- If DSLs are unsure how to proceed, advice will be sought from the Education Safeguarding Service.

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

- Veritas MAT 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.
- Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence
- Child criminal exploitation (CCE) is a form of abuse where an individual or group takes
 advantage of an imbalance of power to coerce, control, manipulate or deceive a child into
 criminal activity. It may involve an exchange for something the victim needs or wants, and/or for
 the financial or other advantage of the perpetrator or facilitator, and/or through violence or the
 threat of violence.
- At Veritas MAT, we recognise 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).
- At Veritas MAT, we recognise that CSE can occur over time or be a one-off occurrence and may
 happen without the child's immediate knowledge, for example through others sharing videos or
 images of them on social media. CSE can affect any child who has been coerced into engaging
 in sexual activities and includes 16 and 17 year olds who can legally consent to have sex. Some
 children may not realise they are being exploited, for example they may believe they are in a
 genuine romantic relationship.
- If staff are concerned that a child may be at risk of CSE or CCE, immediate action should be taken by speaking to the DSL.

5.6 Serious Violence

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

is important and staff will take any allegations seriously and work in ways that support children and keep them safe the nature of the alleged incident(s), including whether a crime.

5.7 So-called honour-based abuse (HBA)

- So-called 'honour'-based abuse (HBA) encompasses incidents or crimes, which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.
- All forms of HBA are abuse (regardless of the motivation) and concerns should be responded to in line with section 3 of this policy. Staff will report any concerns about HBA to the DSL.
- Whilst all staff will speak to the DSL with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers
- If a teacher, in the course of their work in the profession, discovers that a forced marriage or an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

5.8 If you have concerns about extremism

- Veritas MAT 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 becoming involved with or supporting terrorism", also known as the Prevent duty and the <u>specific obligations</u> placed upon us as an education provider regarding risk assessments, working in partnership, staff training, and IT policies.
- Veritas MAT recognises that children are susceptible to extremist ideology and radicalisation
 and staff will be alert to changes in children's behaviour, which could indicate that they may
 be in need of help or protection.
- Staff will report any concerns to the DSL (or a deputy), who is aware of the <u>local procedures</u> to follow. If there is an immediate threat, the police will be contacted via 999.
- If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.
- If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.
- Where there is a concern, the DSL will consider the level of risk and decide which agency to
 make a referral to. This could include the police or <u>Channel</u>, the government's programme
 for identifying and supporting individuals at risk of becoming involved with or supporting
 terrorism, or the local authority children's social care team.
- The DfE also has a dedicated telephone helpline, 020 7340 7264, which school staff and Trustees / Governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.
- In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

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

5.9 Cybercrime

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

5.10 Domestic Abuse

- At Veritas MAT, we recognise 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.
- Children can witness and be adversely affected by domestic abuse and/or violence at home
 where it occurs between family members. In some cases, a child may blame themselves for
 the abuse or may have had to leave the family home as a result.
- Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.
- Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.
- Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.
- At Veritas MAT, our schools engage with Operation Encompass. This means we work in partnership with Kent Police who immediately inform us when one of our families are involved in an incident where domestic abuse is suspected. Schools are then best placed to provide swift support to children experiencing domestic abuse.
- If staff are concerned that a child may be at risk of seeing, hearing, or experiencing domestic abuse in their home or in their own intimate relationships, immediate action should be taken by speaking to the DSL or a deputy.

5.11 Mental Health

- All staff recognise that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Staff are aware that children's experiences, for example where children have suffered abuse and neglect, or other potentially traumatic Adverse Childhood Experiences (ACEs), can impact on their mental health, behaviour, education and attendance.
- Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or a deputy.

6. Supporting Children Potentially at Greater Risk of Harm

Whilst all children should be protected, at Veritas MAT, we acknowledge that some groups of children are potentially at greater risk of harm. This can include the following groups:

- Children with a parent or family member in custody
- Children with SEND
- Children living in households where there are mental health issues
- Children living in households with poor economic circumstances
- Children living with domestic violence.
- Children with any other protected characteristics.

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

- Veritas MAT recognises that pupils with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group.
- Veritas MAT recognises that children with SEND may face additional communication barriers and experience difficulties in managing or reporting abuse or challenges due to limited cognitive understanding. Children with SEND will be appropriately supported to communicate and ensure that their voice is heard and acted upon.
- All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour, mood changes or injuries and not to assume that they are related to the child's disability. Staff will be mindful that children with SEND or certain medical conditions may be disproportionally impacted by behaviours such as bullying, without outwardly showing any signs.
- Members of staff are encouraged to be aware that children with SEND can be disproportionally impacted by safeguarding concerns, such as exploitation, peer group isolation or bullying including prejudice-based bullying.
- To address these additional challenges, our school will always consider implementing extra pastoral support and attention for children with SEND.

6.2 Children Requiring Mental Health Support

- At Veritas MAT, we have an important role to play in supporting the mental health and wellbeing
 of our children. 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.
- Age/ability appropriate education will be provided to our children to help promote positive health, wellbeing, and resilience.

6.3 Children who are absent from education (Previously children missing from education (CME))

- All staff should be aware that children being absent from school, particularly repeatedly, and/or for prolonged periods, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school's unauthorised absence procedures and children missing from education procedures.
- For updated guidance on school attendance, and children being absent from education for prolonged periods and/or on repeat occasions see <u>Working together to improve school</u> attendance.
- Children missing from education, particularly persistently, can act as a vital warning sign to a
 range of safeguarding issues including mental health, neglect, sexual abuse, and child sexual
 and criminal exploitation particularly county lines. A robust response to children missing from
 education will support the identification of such abuse and may help prevent the risk of children
 going missing in the future.
- Where possible, the schools will hold more than one emergency contact number for each child so we have additional options to make contact with a responsible adult if a child missing education is also identified as being a welfare and/or safeguarding concern.
- Where the school has concerns that a child is missing from education, we will respond in line
 with our statutory duties (<u>DfE: Children missing education</u>) and local policies. Local support is
 available via the <u>PRU, Inclusion and Attendance Service (PIAS).</u>
- The Headteacher should seek CEO approval if a child has been reported to KELSI Digital Front Door (CME) and they are advised to off-roll the pupil.

6.4 Elective Home Education (EHE)

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

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

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

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

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

- Veritas MAT recognises the common reason for children becoming looked after is as a result of abuse and/or neglect and a previously looked after child also potentially remains vulnerable.
- Designated teachers (usually the Family Liaison Officers) will work with the DSL to ensure appropriate staff have the information they need in relation to a child's looked after legal status, contact arrangements with birth parents or those with parental responsibility, care arrangements and the levels of authority delegated to the carer by the authority looking after them.
- Where a child is looked after, the DSL will hold details of the social worker and the name of the virtual school head in the authority that looks after the child.
- Where the school believes a child is being cared for as part of a private fostering arrangement (which occurs when a child under 16 (or 18 if the child is disabled) is cared for and lives with an adult who is not a relative for 28 days or more) there is a duty to recognise these arrangements and inform the Local Authority via the Front Door.
- Where a child is leaving care, the DSL will hold details of the local authority Personal Advisor appointed to guide and support them and will liaise with them as necessary regarding any issues of concern

6.7 Children who are Lesbian, Gay, Bi or Gender-Questioning

The section of KCSIE 2024 on gender questioning children remains under review, pending the outcome of the gender questioning children guidance consultation, and final gender questioning guidance documents being published.

- We recognise that pupils who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning (LGBTQ+) can be targeted by other children. See our behaviour policy for more detail on how we prevent bullying based on gender or sexuality.
- We also recognise that LGBTQ+ children are more likely to experience poor mental health. Any
 concerns should be reported to the DSL who will work with the school's pastoral team to explore
 avenues of support.
- When families/carers are making decisions about support for gender questioning pupils, they
 should be encouraged to seek clinical help and advice. This should be done as early as possible
 when supporting pre-pubertal children.
- When supporting a gender-questioning pupil, we will take a cautious approach as there are still
 unknowns around the impact of social transition, and a pupil may have wider vulnerability, such
 as complex mental health and psychosocial needs, and in some cases, autism spectrum
 disorder (ASD) and/or attention deficit hyperactivity disorder (ADHD).
- We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.
- Risks can be compounded where children lack trusted adults with whom they can be open. We
 therefore aim to reduce the additional barriers faced and create a culture where pupils can speak
 out or share their concerns with members of staff.

6.8 Other Groups of Children who may be at risk of harm

At Veritas MAT, we recognise that some pupils may be disproportionately vulnerable to an
increased risk of abuse, both online and offline. For example, some may be at more risk of
harm from specific issues such as sexual violence; homophobic, biphobic or transphobic
bullying; or racial discrimination.

7. Online Safety

- It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. Veritas MAT will adopt a Trust-wide approach to online safety, which will empower, protect and educate our children and staff within its schools in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.
- Veritas MAT will ensure online safety is safety is reflected as required in all relevant policies. Online safety is considered as a running and interrelated theme when devising and implementing our policies and procedures and when planning our curriculum, staff training, the role and responsibilities of the DSL and parental engagement.
- Veritas MAT identifies that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
 - Content: being exposed to illegal, inappropriate or harmful content. For example pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
 - Contact: being subjected to harmful online interaction with other users. For example, peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
 - Conduct: personal online behaviour that increases the likelihood of, or causes, harm. For example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying. This includes the sharing of any computer (AI) generated imagery of this type, including pseudo-images which are computer-generated images that otherwise appear to be a photograph or video.
 - o Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.
- Veritas MAT recognises that technology, and the risks and harms related to it, evolve and change rapidly. The school will carry out an annual review of our approaches to online safety, supported by an annual risk assessment, which considers and reflects the risks our children face.
- The Headteacher/DSL will be informed of online safety concerns. The named governor for safeguarding will report on online safety practice and incidents, including outcomes, on a regular basis to the wider Governing Body.
- All Veritas MAT schools ensure that online safety teaching follows best practice in delivering safe and effective education.

7.1 Policies and Procedures

• The DSL has overall responsibility for online safety within each school but will liaise with other members of staff, for example Primary Technologies, curriculum leads etc. as necessary.

- The DSL will respond to online safety concerns reported in line with our safeguarding and other associated policies, including, but not limited to, our Anti-bullying, Staff Code of Conduct, Online Safety and Behaviour policies.
- o 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.
- Veritas MAT schools use a wide range of technology. This includes computers, laptops, tablets and other digital devices, the internet, intranet and email systems.
- All school/trust-owned devices and systems will be used in accordance with our Acceptable Use Policies and with appropriate safety and security measures in place.
- Veritas MAT recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras and wearable technology. In accordance with KCSIE 2024, Veritas MAT has appropriate on-line safety and image use policies in place, which are shared and understood by all members of the community. These policies can be found on the Veritas MAT website

7.2 Appropriate filtering and monitoring on school/college devices and networks

- All schools within Veritas MAT will do all they reasonably can to limit children's exposure to online harms through school-provided devices and networks. In-line with the requirements of the Prevent Duty and KCSIE, we will ensure that appropriate filtering and monitoring systems are in place.
- When implementing appropriate filtering and monitoring, schools 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 to online safety. We recognise that we cannot rely on filtering and monitoring
 alone to safeguard our Children/students; effective safeguarding practice, robust policies,
 appropriate classroom/behaviour management and regular education/training about safe and
 responsible use is essential and expected. These practices are delegated to the Headteachers of
 our schools to effectively manage and maintain.
- At Veritas MAT, we recognise that the first part of effective monitoring is undertaken by the roles
 of all adults supervising the children within their care. Children should not use technology in an
 unsupervised environment and all adults will do all that can be reasonably expected of them to
 ensure that pupil use of the internet is safe and appropriate for their age. Internet use will always
 be supervised by staff as appropriate to children's age, ability and potential risk of harm.
- Children will use appropriate search tools, apps and online resources as identified by staff, following an informed dynamic risk assessment. For example, using a child friendly search engine, using child friendly tools is standard practice rather than allowing Children the use of Google or other fully functional search providers.

7.2.1 Responsibilities

 Our Trust board 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 teams within schools and all relevant staff have an awareness and understanding of the appropriate filtering and monitoring provisions in place, manage them effectively and know how to escalate concerns when identified.

A member of the senior leadership team in each school (usually the headteacher) and the safeguarding governor for each Local Academy Committee, are responsible for ensuring that their school has met the DfE Filtering and monitoring standards for schools and colleges.

- Our Trust business team supported by the Trust Safeguarding Lead and the senior leadership teams in each school are responsible for:
 - o Procuring filtering and monitoring systems.
 - o Documenting decisions on what is blocked or allowed and why.
 - o Reviewing the effectiveness of our provision.
 - Overseeing reports.
 - o Ensuring that all staff understand their role, are appropriately trained, follow policies, processes and procedures and act on reports and concerns.
 - Ensuring the DSL and IT service providers/staff have sufficient time and support to manage their filtering and monitoring responsibilities.

The lead DSL in each school has responsibility for overseeing and acting on:

- o Any filtering and monitoring reports.
- o Any child protection or safeguarding concerns identified.
- o Checks to filtering and monitoring system.

The IT service providers/staff have technical responsibility for:

- Maintaining filtering and monitoring systems.
 Providing filtering and monitoring reports.
- o 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, children and parents/carers have a responsibility to follow this policy to report and record any filtering or monitoring concerns.
- As part of monitoring carried our annually, each Local Academy Committee's safeguarding
 governor undertakes an at least annual review of our filtering and monitoring systems to ensure we
 understand the changing needs and potential risks posed to our community. These are also
 reviewed annually by the Trust Safeguarding Lead in line with any relevant changes to national
 safeguarding guidance in particular changes to "Keeping Children Safe in Education".
- In addition, our school/college undertakes regular checks on our filtering and monitoring systems, which are logged and recorded, to ensure our approaches are effective and can provide assurance to the governing body/proprietor that we are meeting our safeguarding obligations.
 These checks are achieved by: The use of dedicated "Test Filtering Services" such as those provided by The South West Grid for Learning. Test Your Internet Filter | SWGfL Test Filtering (KCSIE signposts to Test Filtering to check filtering systems).
- Staff members must not put themselves at risk by attempting to access unsuitable material for the purposes of testing the school's online filtering systems. Test filtering services such as the one detailed above must always be used.
- The Trust Safeguarding Lead, along with the Headteachers within each school are responsible for ensuring that our filtering systems are operational, up to date and applied to all users, including guest accounts, all school-owned devices and networks, and all devices using the schools' broadband connections.
- Filtering breaches will be reported to a DSL and the Trust IT provider Primary Technologies where
 these will be recorded and escalated as appropriate to the school's Broadband provider and
 managed in line with relevant policies, including our Safeguarding and Child Protection, acceptable
 use, Discipline and Conduct, Staff Code of Conduct, Whistleblowing and Online Safety 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 Integrated Children's Services Portal.

• If staff are teaching topics that 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 lead DSL and/or leadership team.

7.2.2 Appropriate monitoring

- We recognise that no monitoring system can be 100% effective. Veritas MAT recognises that its schools need to understand the coverage of their monitoring approaches system, any limitations, and mitigate accordingly to minimise harm and meet their statutory requirements as identified in KCSIE and the Prevent duty.
- Schools are responsible for appropriately monitoring internet use on all school/college provided devices and networks. This is achieved by:
 - o Physical monitoring (supervision),
 - Monitoring internet and web access through the use of "WatchGuard" provided by Primary Technologies broadband service
 - All visitors using the schools' Wi-Fi networks are required to sign the Acceptable Use Agreement before being granted access.
 - All users will be informed that use of school devices and networks can and will be monitored and that all monitoring is in line with data protection, human rights and privacy legislation.
- If a concern is identified via our monitoring approaches:
 - Where the concern relates to Children/students, it will be reported to the DSL and will be recorded and responded to in line with relevant policies, such as Safeguarding and child protection, acceptable use, and behaviour policies alongside the Staff Code of Conduct. The incident will be recorded on MyConcern.
 - Where the concern relates to staff, it will be reported to the headteacher (or the CEO if the concern relates to the headteacher), in line with our Whistleblowing Policy and our Discipline and Conduct policy. Any low level concerns regarding a member of staff will be recorded separately in line with existing policy and national guidance.
- 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, <u>Kent Police</u> via 101, <u>NCA-CEOP</u>, LADO or <u>Kent Integrated Children's</u> <u>Services via the Kent Integrated Children's Services Portal</u>.

7.3 Information Security and Access Management

- Veritas MAT 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 learners. Further information can be found in our Acceptable Use, Mobile and Smart Technology and Social Media Policies.
- Veritas MAT will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.
- All staff, Trustees and governors are required to undertake accredited cyber security training

7.4 Remote/Online Learning

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

- o DfE: <u>Safeguarding and remote education during coronavirus (COVID-19)</u> o NSPCC: <u>Undertaking remote teaching safely</u>
- o The Education People: Remote Learning Guidance for SLT
- At Veritas MAT, we 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 children and parents/carers will take place using school provided or approved communication channels; for example, school provided email accounts and phone numbers and/or agreed systems: Microsoft 365, Tapestry or Class Dojo.
- Staff and children will engage with remote teaching and learning in line with existing behaviour principles as set out in our school behaviour policy, Staff Code of Conduct and Acceptable Use Policies.
- Staff and children 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.

7.5 Staff Training

 Veritas MAT will ensure that all staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect. This training is provided by The National College and provides each staff member, governor and trustee with accredited, certificated training based on the most up to date guidelines and national safeguarding expectations.

This training is regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- Will be personalised to include school-specific contextual safeguarding information under the guidance of the lead DSL / Headteacher

Have regard to the Teachers' Standards to support the expectation that all teachers:

- Manage behaviour effectively to ensure a good and safe environment
- · Have a clear understanding of the needs of all pupils
- All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them
 to identify children at risk of becoming involved with or supporting terrorism, and to challenge
 extremist ideas.
- Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).
- Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.
- · Volunteers will receive appropriate training, if applicable.
- See section 7 for more information.

7.6 Educating Learners

 Veritas MAT 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.

7.7 Working with Parents and Carers

- Veritas MAT 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 updates through email, newsletters and providing information on the school website. See section 9 for more information.
- All Veritas MAT schools provide a monthly Online Safety newsletter that is shared with all parents, carers, staff and local governors. This provides updates on new and emerging risks, key, easy to understand advice around popular and regularly used software, apps and devices.
- At Veritas MAT, we 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 ensuring that parents/carers have
 information about any specific projects, including information on our website, newsletters and
 induction packs.
- Where the Schools are 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.

8. Staff Engagement and Expectations

8.1 Awareness, Induction and Training

- All members of staff have been provided with a copy of part one or Annex A (as appropriate) of 'Keeping Children Safe in Education' 2024 which covers safeguarding information for staff.
 - School DSLs will read KCSIE in its entirety.
 - 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's single central record.
- All new staff and volunteers (including agency and third-party staff) receive safeguarding and child
 protection training (including online safety); including information to ensure they are aware of the
 school internal safeguarding processes, as part of their induction with their line manager. This
 training is regularly updated and is in line with advice from the safeguarding partners.
- All Trustees and 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 test and assure that our safeguarding policies and procedures are effective and support the delivery of a robust whole school approach to safeguarding. This training is regularly updated via governor services and online updates.

- All staff members (including agency and third-party staff) will receive appropriate child protection training (including online safety) to ensure they are aware of a range of safeguarding issues. This training will be updated at least annually. Staff joining the school at other times are trained as part of their induction.
- 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.
 - o 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. There is a safeguarding noticeboard next to the photocopier. It is updated regularly and includes the safeguarding newsletter.
 - At Veritas MAT, we recognise 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.
 - The DSL and headteacher will provide an annual report to the governing body detailing safeguarding training undertaken by all staff and will maintain an up-to-date record of who has been trained.

8.2 Safer Working Practice

- All members of staff are required to work within our clear guidelines on safer working practice as outlined in the Trust's Staff Code of Conduct.
- The DSL will ensure that all staff and volunteers (including agency and third-party staff) have read
 the Safeguarding policy and are aware of the school's expectations regarding safe and professional
 practice via the Staff Code of Conduct and Acceptable Use Policy (AUP).
- Staff will be made aware of the school's behaviour management and physical intervention policies. Only members of the Senior Leadership Team will engage in physical intervention when absolutely necessary in line with the agreed Positive Handling policy and procedures and national guidance. Parents/Carers will be informed as soon as possible after the incident.
- 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, Acceptable Use, and Online Safety Policies.

8.3 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 EYFS are provided with appropriate supervision in accordance with the statutory requirements of Early Years Foundation Stage (EYFS) 2021.
- The school will provide appropriate supervision and support for all members of staff to ensure that:
 - All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children.

- o 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.

9. Safer Recruitment and Allegations

9.1 Safer Recruitment and Safeguarding Checks

- Veritas MAT is committed to ensure that develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our learners and staff.
 - Veritas MAT will follow relevant guidance in Keeping Children Safe in Education 2024 (Part 3, 'Safer Recruitment') and from The Disclosure and Barring Service (DBS).
 - The Governing Body and leadership team are responsible for ensuring that the school follows safe recruitment processes as outlined within guidance.
 - The Trust/Governing Body will ensure that at least one of the people who conducts an interview has completed safer recruitment training.
- The school maintains an accurate Single Central Record (SCR) in line with statutory guidance. This is stored on the "Every" HR and Personnel website.
- Veritas MAT 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 existing and prospective staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands, and warnings; and inform them that we may conduct an online search as part of due diligence checks.
- Where the school places a child with an alternative provision provider, the school will continue to be responsible for the safeguarding of that child.
 - The school will undertake appropriate checks to ensure the provider meets the needs of the pupil, including written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment.
- Where the school organises work experience placements, we will follow the advice and guidance as identified in part three of KCSIE 2024.
- **9.2** Allegations/concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors
- Any concerns or allegations about staff will be recorded and dealt with appropriately in line with national (Part four of KCSIE 2024) and the <u>local Kent allegations arrangements</u>. In depth, information can be found within our Managing Allegations against Staff and Staff Code of Conduct. These are available from the school office.
- Any concerns or allegations about staff will be recorded and dealt with appropriately in line with national (Part four of KCSIE 2024) 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', advice will be sought via the <u>Local Authority Designated Officer</u> (LADO) Enquiry Line and/or the <u>Education Safeguarding Service.</u>
- In all cases where allegations are made against staff or low-level concerns are reported, once proceedings have been concluded, the headteacher (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.

8.2.1 Concerns that meet the 'harm threshold'

- Veritas MAT recognises that it is possible for any member of staff, including volunteers, trustees and governors, contractors, agency and third-party staff (including supply teachers) and visitors to behave in a way that indicates a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college. This includes when someone has:
 - o behaved in a way that has harmed a child, or may have harmed a child and/or,
 - o possibly committed a criminal offence against or related to a child and/or,
 - behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or,
 - behaved or may have behaved in a way that indicates they may not be suitable to work with children
- Allegations against staff which meet this threshold will be responded to and managed in line
 with part four of KCSIE 2024. Allegations that meet the harm threshold will be referred
 immediately to the Headteacher who will contact the <u>LADO</u> 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 who will contact the LADO.

8.2.2 Concerns that do not meet the 'harm threshold'

- At Veritas MAT, we may also need to take action in response to 'low-level' concerns about staff. Additional information regarding low-level concerns is contained with our Code of Conduct and Staff Handbook – this includes what a low-level concern is, the importance of sharing them and the confidential procedure to follow when sharing them. More detailed guidance and case studies on low-level concerns can be found in <u>Developing and</u> <u>implementing a low level concerns policy</u>
 - At Veritas MAT, we have an open and transparent culture in which all concerns about all adults working in or on behalf of the school are dealt with promptly and appropriately; this enables us to identify inappropriate, problematic or concerning behaviour early, minimise the risk of abuse and ensure that adults working in or on behalf of the school are clear about and act within appropriate professional boundaries, and in accordance with our ethos and values.
 - A 'low-level' concern does not mean that it is insignificant; a low-level concern is any concern that an adult working in or on behalf of the school may have acted in a way that is inconsistent with our staff behaviour policy/code of conduct, including inappropriate conduct outside of work and does not meet the 'harm threshold' or is otherwise not serious enough to consider a referral to the LADO.

- Low-level concerns may arise in several ways and from a number of sources. For example, suspicion, complaints, or allegations made by a child, parent or other adult within or outside of the organisation, or as a result of vetting checks.
- It is crucial that all low-level concerns are shared responsibly, recorded and dealt with appropriately to protect staff from becoming the subject of potential false low-level concerns or misunderstandings.
- Where low-level concerns should be shared confidentially with the Headteachers.
 - 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 and the UK General Data Protection Regulation (UK GDPR) and other relevant policies and procedures (for example data retention policies).
 - Where a pattern is identified, the school will implement appropriate action, for example consulting with <u>the LADO enquiry line</u> and following our disciplinary procedures.
- Additional information regarding low-level concerns is contained with our staff Code of Conduct
 this includes what a low-level concern is and the importance of sharing them.

8.2.3 Safe Culture

- As part of our approach to safeguarding, the school has created and embedded a culture of openness, trust and transparency in which our values and expected behaviour as set out in our staff 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 Veritas MAT
 will take all concerns or allegations received, seriously.
- All members of staff are made aware of the school's Whistleblowing procedure. It is a
 disciplinary offence not to report concerns about the conduct of a colleague that could place a
 child at risk.

- Staff can access the **NSPCC whistleblowing helpline** if they do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.
 - Staff should report concerning behaviour or actions regarding anyone in any position, or working in any capacity with children in a school or college. This includes when someone has:
 - behaved in a way that has harmed a child, or may have harmed a child and/or.
 - o possibly committed a criminal offence against or related to a child and/or,
 - behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or,
 - behaved or may have behaved in a way that indicates they may not be suitable to work with children
- Veritas MAT 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 the Schools' Personnel Service (SPS).

10. Opportunities to Teach Safeguarding

- Veritas MAT 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, Sex and Health Education.
- We recognise that our 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 learners have a range of age appropriate contacts and strategies to ensure their own protection and that of others.
- At Veritas MAT, we recognise 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
 children for life in modern Britain and creates a culture of zero tolerance for sexism,
 misogyny/misandry, homophobia, biphobic and sexual violence/harassment.
- At Veritas MAT, we have a clear set of values and standards, upheld and demonstrated throughout
 all aspects of school life, which are underpinned by our behaviour policies and pastoral support
 systems, as well as by planned programmes of evidence-based PHSE delivered in regularly
 timetabled lessons and reinforced throughout the whole curriculum. Our programmes are fully
 inclusive and developed to be age and stage of development appropriate.
- At Veritas MAT, we recognise that a one size fits all approach will not be appropriate for all children, and a more personalised or contextualised approach, tailored to the specific needs and vulnerabilities of individual children might be needed, for example children who are victims of abuse and children with SEND. We recognise that pupils with SEND or certain health conditions can face

additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group.

• 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.

11. Physical Safety

11.1 Use of 'reasonable force'

- There may be circumstances when it is appropriate for staff to use reasonable force in order to safeguard children from harm. Further information regarding our approach and expectations can be found in our behaviour policy and is in line with the DfE <u>'Use of reasonable force in schools'</u> guidance.
- Further information regarding our approach and expectations can be found in our "Use of Reasonable Force" policy contained on the Trust website alongside our "Staff Code of Conduct".

11.2 The Use of Premises by Other Organisations

- Where services or activities are provided separately by another body using the school facilities/premises, the Headteachers, Governing Bodies and Trust Estates team will seek written assurance that the organisation concerned has appropriate policies and procedures in place regarding safeguarding children and child protection, and that relevant safeguarding checks have been made in respect of staff and volunteers. If this assurance is not achieved, an application to use premises will be refused.
- Safeguarding requirements will be included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises. Failure to comply with this will lead to termination of the agreement
- The Headteacher will share concerns and liaise with the LADO enquiries officer via the LADO Enquiry Line should the school receive an allegation relating to an incident where an individual or organisation was using school premises for running an activity for children.

11.3 Site Security

- All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light.
- Appropriate checks will be undertaken in respect of visitors and volunteers coming into school as outlined within national guidance. Visitors will be expected to, sign in and out via the office visitors log and to display a visitor's badge whilst on site.
- Staff and visitors will be expected to adhere to any safety arrangements implemented in response to any health concerns such as Covid-19 restrictions.
- Any individual who is not known or identifiable on site should be challenged by staff for clarification and reassurance.
- The school will not accept the behaviour of any individual (parent or other) that threatens school's 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.

12. Local Support

All members of staff in Veritas MAT are made aware of local support available.

Education Safeguarding Service

- Area Safeguarding Advisor
 - www.kelsi.org.uk/support-for-children-and-young-people/child-protectionandhttp://www.kelsi.org.uk/support-for-children-and-young-people/child-protectionand-safeguarding/safeguarding-contactssafeguarding/safeguarding-contacts
 South Kent: Kroner House, Eurogate Business Park, Ashford, Kent, TN24 8XU 03000 415648 / 07917 602413
- Online Safety in the Education Safeguarding Service
 - □ 03000 41579
 - esafetyofficer@theeducationpeople.org (non-urgent issues only)

LADO Service

o Telephone: 03000 410888

o Email: <u>kentchildrenslado@kent.gov.uk</u>

Early Help o <a href="www.kelsi.org.uk/special-education-needs/integrated-childrens-services/early-help-and-ttp://www.kelsi.org.uk/special-education-needs/integrated-childrens-services/early-help-and-preventative-servicespreventative-services and www.kelsi.org.uk/special-education-needs/integrated-childrens-services/early-help-contacts

Integrated Children's Services

o Front door: 03000 411111

Out of Hours Number: 03000 419191

Kent Police

o 101 or 999 if there is an immediate risk of harm

Kent Safeguarding Children Multi-Agency Partnership (KSCMP)

- o kscmp@kent.gov.uk
- o www.kscmp.org.uk
- o 03000 421126

Adult Safeguarding

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

13. Record Keeping

We will hold records in line with our records retention schedule.

 All safeguarding concerns, discussions, decisions made and the rationale for those decisions, must be recorded in writing using our MyConcern online system. This should include instances where referrals were or were not made to another agency such as local authority children's social care or

- the Prevent programme, etc. If you are in any doubt about whether to record something, discuss it with the DSL.
- Visitors / volunteers who may not have access to MyConcern should be directed to our blue safeguarding forms where they should hand-write the full details of any concern raised. This should then be passed in person to a DSL who will ensure that this is uploaded to the relevant child's MyConcern profile.

Records will 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
- Concerns and referrals will be kept in a separate child protection file for each child.
- Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.
- Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.
- If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.
- To allow the new school to have support in place when the child arrives, this should be within:
 - o 5 days for an in-year transfer, or within
 - o The first 5 days of the start of a new term
- In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Appendix 1: Categories of Abuse

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

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

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

Signs that MAY INDICATE Sexual Abuse

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

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

Signs that MAY INDICATE physical abuse

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

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

Signs that MAY INDICATE emotional abuse

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

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

Signs that MAY INDICATE neglect.

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

Appendix 2: Support Organisations

NSPCC 'Report Abuse in Education' Helpline

0800 136 663 or email <u>help@nspcc.org.uk</u>

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

Support for Learners

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

Support for Adults

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

Support for Learning Disabilities

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

Contextual Safeguarding Network

https://contextualsafeguarding.org.uk/

Kent Resilience Hub

https://kentresiliencehub.org.uk/

Substance Misuse

- We are with you (formerly Addaction): www.wearewithyou.org.uk/services/kent-for-young-people/
- Talk to Frank: www.talktofrank.com Domestic Abuse
- Domestic abuse services: <u>www.domesticabuseservices.org.uk</u>
- Refuge: www.refuge.org.uk
- Women's Aid: www.womensaid.org.uk
- Men's Advice Line: <u>www.mensadviceline.org.uk</u>
- Mankind: www.mankindcounselling.org.uk
- National Domestic Abuse Helpline: www.nationaldahelpline.org.uk
- Respect Phoneline: https://respectphoneline.org.uk

Criminal and Sexual Exploitation

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

https://www.childrenssociety.org.uk/information/professionals/resources/countyhttps://www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkitlines-toolkit

Honour Based Abuse

- 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-proceduralhttp://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-informationinformation

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

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

Online Safety

- CEOP: <u>www.ceop.police.uk</u>
- 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
- Marie Collins Foundation: <u>www.mariecollinsfoundation.org.uk</u>
- Internet Matters: <u>www.internetmatters.org</u>
- NSPCC: www.nspcc.org.uk/onlinesafety
- Get Safe Online: www.getsafeonline.org
- Parents Protect: <u>www.parentsprotect.co.uk</u>
- Cyber Choices: https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-

crime/cyberchoices

National Cyber Security Centre (NCSC): www.ncsc.gov.uk

Mental Health

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

Radicalisation and hate

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

Children with Family Members in Prison

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

LGBT Support

LGBT Foundation https://lgbt.foundation/