

# TONBRIDGE FEDERATION POLICY

Policy name	Safeguarding (Child Protection)
School in which policy applies	Long Mead and Hugh Christie
Date written	September 2022
Date agreed by Governing Body	September 2022
Date of renewal	March 2023
Senior member of staff with oversight	Mark Fenn and Lizzie Alexander
Governor with oversight	Sue Mason



**This is a core policy that forms part of the induction for all staff. It is a requirement that all members of staff have access to this policy and sign to say they have read and understood its contents.**

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

## **Key Contacts**

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# What to do if you have a welfare concern in **Tonbridge Federation**

## Why are you concerned?

For example

- Something a child has said – e.g. allegation of harm
- Child's appearance – may include unexplained marks as well as dress
- Behaviour change
- Witnessed concerning behaviour

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

Follow the school procedure ([use the Edukey System to report concerns](#))

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

**Inform the Designated Safeguarding Lead** ([Jeanette Ingram \(HCS\)](#) [Nicola Wilson at LM](#))

### Designated Safeguarding Lead

- Consider whether the child is at immediate risk of harm e.g. unsafe to go home
- Access the Kent Safeguarding Support Level Guidance document and procedures: [www.kscmp.org.uk](http://www.kscmp.org.uk)
- Refer to other agencies as appropriate e.g. Internal or community services, early help open access, LADO, Police or Request for Support for integrated children's services
- If unsure then consult with Area Education Safeguarding Advisor ([insert local phone number](#)) or Local Authority Social Worker at the Front Door.

### If you are unhappy with the response

#### Staff:

- Follow local escalation procedures
- Follow whistleblowing procedures

#### Learners and Parents:

- Follow school complaints procedures  
[These can be found on the school website](#)

**Record decision making and action taken in the learner's child protection file**

## Monitor

Be clear about:

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

**Review and request further support if necessary**

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

# 1. Child Focused Approach to Safeguarding

## 1.1 Introduction

- **Tonbridge Federation** 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, 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.
- **We** believe that the best interests of children always come first. All children (defined as those up to the age of 18) have a right to be heard and to have their wishes and feelings taken into account and all children regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- Staff working with children in Tonbridge Federation Schools 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.
- **The Tonbridge Federation** recognises the importance of providing an ethos and environment within **our schools** that will help children to be safe and to feel safe. In our **schools** children are respected and are encouraged to talk openly. We will ensure children's wishes and feelings are taken into account when determining what safeguarding action to take and what services to provide.
- Our core safeguarding principles are:
  - **Prevention**
    - positive, supportive, safe culture, curriculum and pastoral opportunities for children, safer recruitment procedures.
  - **Protection**
    - following the agreed procedures, ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns.
  - **Support**
    - for all 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 and governors, temporary or third-party agency staff and volunteers) and are consistent with those outlined within KCSIE 2021.

## 1.2 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' 2021 (KCSIE) which requires individual schools and colleges to have an effective child protection policy.
- This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes but is not limited to:
  - Keeping Children Safe in Education 2021 (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)
  - The Education Act 2002
  - The Education (Independent School Standards) Regulations 2014
  - The Non-Maintained Special Schools (England) Regulations 2015
- 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.
  - **Our schools are** currently operating in response to coronavirus (Covid-19), however, our safeguarding principles, remain the same. We will continue to follow government guidance and 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.

### 1.3 Definition of Safeguarding

- In line with KCSIE 2021, 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 **Tonbridge Federation** acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):
  - Abuse and neglect
  - Bullying, including cyberbullying
  - Children with family members in prison
  - Children Missing Education (CME)
  - Child missing from home or care
  - Child Sexual Exploitation (CSE)
  - Child Criminal Exploitation (CCE)
  - Contextual safeguarding (risks outside the family home)
  - County lines and gangs
  - Domestic abuse
  - Drugs and alcohol misuse
  - Fabricated or induced illness
  - Faith abuse
  - Gender based abuse and violence against women and girls
  - Hate
  - Homelessness
  - Human trafficking and modern slavery
  - Mental health
  - Nude or semi-nude image sharing, aka youth produced/involved sexual imagery or "Sexting"
  - Online safety

- 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

(Also see Part One and Annex B within 'Keeping Children Safe in Education' 2021)

## 1.4 Related Safeguarding Policies

- This policy is one of a series in the [Tonbridge Federation](#) integrated safeguarding portfolio and should be read and actioned in conjunction with the policies as listed below
  - Behaviour management and use of physical intervention
  - Code of conduct/Behaviour policy
  - Searching, screening and confiscation
  - Online safety
  - Social media
  - Mobile and smart technology
  - Anti-bullying
  - Data protection and information sharing
  - Image use
  - Relationship and Sex Education (RSE)
  - Health and safety, including plans for [school](#) reopening
  - Attendance
  - Risk assessments (e.g. school trips, use of technology, [school/college](#) re-opening)
  - First aid and accidents
  - Managing allegations against staff
  - Staff behaviour policy/code of conduct, including Acceptable Use of Technology Policies (AUP)
  - Safer recruitment
  - Whistleblowing

## 1.5 Policy Compliance, Monitoring and Review

- [The Tonbridge Federation](#) will review this policy at least annually (as a minimum) and will update it as needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. The policy will also be revised following any national or local updates, significant local or national safeguarding events and/or learning, and/or any changes to our own procedures.
- All staff (including temporary staff and volunteers) will be provided with a copy of this policy and [Part One](#) of KCSIE 2021 as appropriate. This will be sent to them alongside their Safeguarding Assessment.
- Parents/carers can obtain a copy of the [Tonbridge Federation](#) Child Protection Policy and other related policies on request. Additionally, our policies can be viewed via our websites: [www.hughchristie.kent.sch.uk](http://www.hughchristie.kent.sch.uk) and [www.long-mead.kent.sch.uk/](http://www.long-mead.kent.sch.uk/)
- The policy forms part of our development plan and will be reviewed annually by the [governing body](#) who has responsibility for oversight of safeguarding and child protection systems.

- The Designated Safeguarding Lead and [Executive Principal, Heads of School](#) 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.

## 2. Key Responsibilities

### 2.1 Governance and Leadership

- The [governing body](#) and leadership team have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation.
- The [governing body](#) have regard to the KCSIE 2021 guidance and will ensure our policies, procedures and training is effective and complies with the law at all times.
- The [school/college](#) has a nominated governor for safeguarding. The nominated governor will support the DSL and have oversight in ensuring that the [Federation](#) has an effective policy which interlinks with other related policies, that locally agreed procedures are in place and being followed, and that the policies are reviewed at least annually and when required.
- The [governing body](#) and leadership team will ensure that the DSL is supported in their role and is provided with sufficient time so they can provide appropriate support to staff and children regarding any safeguarding and welfare concerns.
- The [Executive Principal and Heads of School](#) will ensure that our child protection and safeguarding policies and procedures adopted by the [governing body](#), are understood, and followed by all staff.

### 2.2 Designated Safeguarding Lead (DSL)

- The [Tonbridge Federation](#) has appointed ([Paul Bargery, Deputy Principal and SENCO](#)) a member of the senior leadership team as the Designated Safeguarding Lead (DSL).
- The DSL has overall responsibility for the day-to-day oversight of safeguarding and child protection systems (including online safety) across our schools. 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 [Tonbridge Federation](#) has also appointed Deputy DSLs who will have delegated responsibilities and act in the DSLs absence.
  - [Jeanette Ingram, Director of Safeguarding](#)
  - [Elizabeth Alexander, DSL](#)
  - [Laura Allen, DSL](#)
  - [Theresa Clement DSL](#)
  - [Karen Follows, DSL](#)
  - [Nicola Wilson, DSL](#)
- It is the role of the DSL to carry out their functions as identified in Annex C of KCISE 2021. 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 2021 and WTSC 2018
    - Ensuring that locally established procedures as put in place by the three safeguarding partners as part of the Kent Safeguarding Children Multi-Agency Partnership procedures (KSCMP), including referrals, are followed, as necessary.
    - Representing, or ensure the [Federation](#) is appropriately represented at multi-agency safeguarding meetings (including child protection conferences)
    - Managing and monitoring our 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 leadership staff.
    - Ensuring adequate and appropriate DSL cover arrangements in response to any closures and out of hours and/or out of term activities.
    - Ensuring all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE.
    - Informing the [Executive Principal and Heads of School](#) of any significant safeguarding issues.
- The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. Deputy DSLs will be trained to the same standard as the DSL. The DSLs training will be updated formally at least every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.

## 2.3 Members of Staff

- All members of staff have a responsibility to:
  - Provide a safe environment in which children can learn.
  - Be aware of the indicators of abuse and neglect so that they can identify cases of children who may need help or protection.
  - Know what to do if a child tells them that he or she is being abused or neglected and understand the impact abuse and neglect can have upon a child.
  - Be able to identify and act upon indicators that children are, or at risk of developing mental health issues.
  - Be prepared to identify children who may benefit from early help.
  - Understand the early help process and their role in it.
  - Understand the [Federation](#) safeguarding policies and systems.
  - Undertake regular and appropriate training which is regularly updated.
  - Be aware of the local process of making referrals to children's social care and statutory assessment under the Children Act 1989.
  - Know how to maintain an appropriate level of confidentiality.
  - Reassure children who report concerns that they are being taken seriously and that they will be supported and kept safe.

## 2.4 Children and Young People

- Children and young people (learners) have a right to:
  - Feel safe, be listened to, and have their wishes and feelings taken into account.
  - Confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

- Contribute to the development of [Federation](#) safeguarding policies.
- Receive help from a trusted adult.
- Learn how to keep themselves safe, including online.

## 2.5 Parents and Carers

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

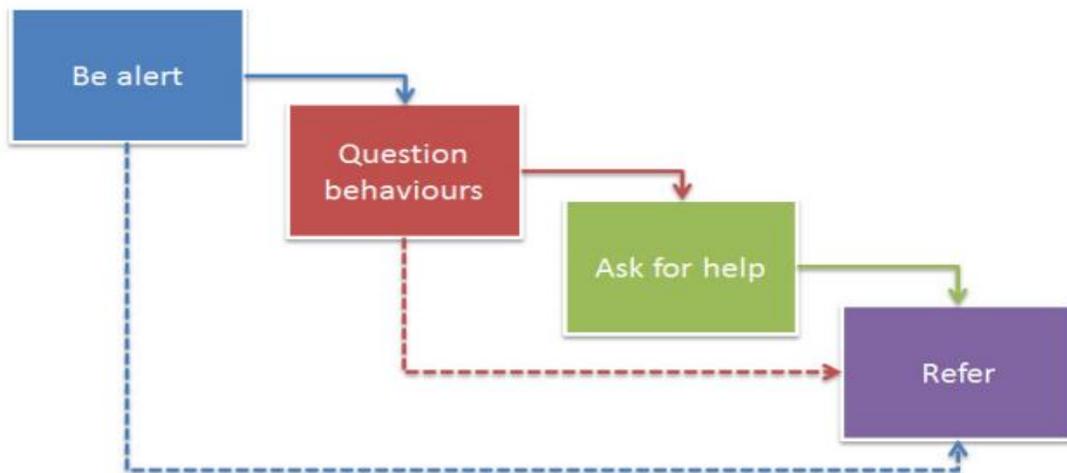
## 3. Child Protection Procedures

### 3.1 Recognising Indicators of Abuse and Neglect

- 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 2021. This is outlined locally within the [Kent Support Levels Guidance](#).
- [The Tonbridge Federation](#) recognises that when assessing whether a child may be suffering actual or potential harm there are four categories of abuse:
  - Physical abuse
  - Sexual abuse
  - Emotional abuse
  - Neglect
    - For further information see Appendix 1.
- [Tonbridge Federation](#) recognises that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of child abuse and neglect can vary from child to child. Children develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child. It is important to recognise that indicators of abuse and neglect do not automatically mean a child is being abused however all concerns should be taken seriously and will be explored by the DSL on a case-by-case basis.
- [Tonbridge Federation](#) recognises abuse, neglect, and safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label alone. In many cases, multiple issues will overlap with one another, therefore staff will always be vigilant and always raise concerns with a DSL.
- Parental behaviors can indicate child abuse or neglect, so staff will be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.
- Children may report abuse happening to themselves, their peers or their family members. All reports made by children to staff will be taken seriously and will be responded to in line with this policy.
- Safeguarding incidents and/or behaviours can be associated with factors and risks outside the [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 vulnerable to multiple harms

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

- Technology can be a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face and in many cases, abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online.
- By understanding the indicators of abuse and neglect, we can respond to problems as early as possible and provide the right support and services for the child and their family.
- All members of staff are expected to be aware of and follow this approach if they are concerned about a child:



[‘What to do if you are worried a child is being abused’](#) 2015

- In all cases, if staff are unsure, they will always speak to the DSL (or deputy).
- [Tonbridge Federation](#) recognises that some children have additional or complex needs and may require access to intensive or specialist services to support them.
- If deemed necessary by the headteacher or by staff authorised by the headteacher following a concern about a child’s safety or welfare, the searching and screening of children and confiscation of any items, including electronic devices, will be managed in line with the [Federation](#) ‘Searching, Screening and Confiscation’ policy and behaviour policy, which is informed by the DfE [‘Searching, screening and confiscation at school’](#) guidance.

### 3.2 Responding to Child Protection Concerns

- If staff are made aware of a child protection concern, they are expected to:
  - listen carefully to the concern and be non-judgmental.
  - only use open questions to clarify information where necessary, e.g. who, what, where, when or Tell, Explain, Describe (TED).
  - not promise confidentiality as concerns will have to be shared further, for example, with the DSL and potentially Integrated Children’s Services.
  - be clear about boundaries and how the report will be progressed.

- record the concern in line with [Federation](#) record keeping requirements.
  - inform the DSL (or deputy), as soon as practically possible.
- The DSL or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, a DSL is not available, this should not delay appropriate action being taken. Staff should speak to a member of the senior leadership team and/or take advice from Education Safeguarding Service or via consultation with a social worker from the Front Door. In these circumstances, any action taken will be shared with a DSL as soon as is practically possible. In the event that all of our DSLs are unavailable, staff will be directed to contact Mrs Tarrant-Blick, Safeguarding Lead at Woodlands Primary School.
  - [\[The Tonbridge Federation\]](#) will respond to concerns in line with the Kent Safeguarding Children Multi-Agency Partnership procedures (KSCMP).
    - The full KSCMP procedures and additional guidance relating to reporting concerns and specific safeguarding issues can be found on their website: [www.kscmp.org.uk](http://www.kscmp.org.uk)
    - 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](http://www.kelsi.org.uk/support-for-children-and-young-people/integrated-childrens-services)
  - Where a child is suffering, or is likely to suffer from harm, or is in immediate danger, 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.
    - [Tonbridge Federations](#) 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 Education Safeguarding Service before deciding next steps.
    - They may also seek advice or guidance from a social worker at the Front Door service who are the first point of contact for Integrated Children's Services (ICS).
  - In the event of a request for support to the Front Door being necessary, parents/carers will be informed and consent to this will be sought by the DSL in line with guidance provided by KSCMP and ICS. Parents/carers will be informed of this, unless there is a valid reason not to do so, for example, if to do so would put a child at risk of harm or would undermine a criminal investigation.
  - 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 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 there is a concern regarding decisions made, the DSL will consider following [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.

- [\[Hugh Christie and Long Mead are Operation Encompass Schools\]](#). This means we work in partnership with Kent Police to provide support to children experiencing domestic abuse.

### 3.3 Recording Concerns

- All safeguarding concerns, discussions and decisions, and reasons for those decisions, will be recorded in writing on the [Federation safeguarding system \(Edukey\)](#) and passed without delay to the DSL.
- [Staff have access to our online Safeguarding reporting system. We also have Green Forms available in the staff room in the event that the system is not available.](#)
- Records will be completed as soon as possible after the incident/event, using the child's words and will be signed and dated by the member of staff. Child protection records will record facts and not personal opinions. A body map will be completed if injuries have been observed.
- If there is an immediate safeguarding concern the member of staff will consult with a DSL before completing the form as reporting urgent concerns takes priority.
- If members of staff are in any doubt about recording requirements, they will discuss their concerns with the DSL.
- Child protection records will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and details regarding any action taken, decisions reached and the outcome.
- Child protection records will be kept confidential and stored securely. Child protection records will be kept for individual children and will be maintained separately from all other records relating to the child in the [school](#). Child protection records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL.
- All child protection records will be transferred in accordance with data protection legislation to the child's subsequent [school](#), under confidential and separate cover as soon as possible. Child Protection files will be transferred securely to the new DSL, separately to the child's main file, and a confirmation of receipt will be obtained.
- In addition to the child protection file, the DSL will also consider if it would be appropriate to share any information with the DSL at the new school or college in advance of a child leaving, for example, information that would allow the new school or college to continue to provide support.
- Where the [school](#) receives child protection files, the DSL will ensure key staff such as the special [educational needs co-ordinators](#) will be made aware of relevant information as required.

### 3.4 Multi-Agency Working

- [The Tonbridge Federation](#) recognises and is committed to its responsibility to work within the KSCMP multi-agency safeguarding arrangements. The leadership team and DSL will work to establish strong and co-operative local relationships with professionals in other agencies in line with statutory guidance.
- [The Tonbridge Federation](#) recognises the importance of multi-agency working and is committed to working alongside partner agencies to provide a coordinated response to promote children's welfare and protect them from harm. This includes contributing to KSCMP processes as required, such as, participation in relevant safeguarding multi-agency plans and meetings, including Child Protection

Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.

### 3.5 Confidentiality and Information Sharing

- [The Tonbridge Federation](#) recognises our duty and powers to hold, use and share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE 2021.
- [The Tonbridge Federation](#) has an appropriately trained Data Protection Officer (DPO) as required by the General Data Protection Regulations (GDPR) to ensure that our [school/college](#) is compliant with all matters relating to confidentiality and information sharing requirements. **Our DPO is Palak Shah, Senior Deputy Principal, [pshah@tonbridgefederation.co.uk](mailto:pshah@tonbridgefederation.co.uk)**
- 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 2021). DfE "[Information sharing advice for safeguarding practitioners](#)" (2018) provides further detail. [This is available in the staff room.](#)
- The [Head of School](#) and 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 confidentiality policy, they also have a professional responsibility to be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children; this may include sharing information with the DSL and with other agencies as appropriate. All staff are aware they cannot promise confidentiality in situations which might compromise a child's safety or wellbeing.

### 3.6 Complaints

- All members of the [Tonbridge Federation](#) community should feel able to raise or report any concerns about children's safety or potential failures in the [Federation](#) safeguarding regime. The [Federation](#) has a complaints procedure available to parents, learners and members of staff and visitors who wish to report concerns or complaints. This can be found [on our website or from reception upon request](#).
- 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](mailto: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](mailto:help@nspcc.org.uk).
- The leadership team at [The Tonbridge Federation](#) will take all concerns reported seriously and all complaints will be considered and responded to in line with the relevant and appropriate process.
  - Anything that constitutes an allegation against a member of staff or volunteer will be dealt with in line with section 8 of this policy.

## 4. Specific Safeguarding Issues

- **Tonbridge Federation** is aware of a 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 2021 which contains important additional information about specific forms of abuse and safeguarding issues.
- Where staff are unsure how to respond to specific safeguarding issues, they should follow the processes as identified in part 3 of this policy and speak with the DSL or a deputy.

### 4.1 Peer on Peer Abuse

- All members of staff recognise that children are capable of abusing their peers, and that it can happen both inside and outside of **school** and online.
- **Tonbridge Federation]** recognises that peer on peer abuse can take many forms, including but not limited to:
  - Bullying, including cyberbullying, prejudice-based and discriminatory bullying
  - abuse in intimate personal relationships between peers
  - physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
  - sexual violence and sexual harassment
  - consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
  - causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
  - upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
  - initiation/hazing type violence and rituals
- **Tonbridge Federation** believes that abuse is abuse and it will never be tolerated or dismissed as “banter”, “just having a laugh”, “part of growing up” or “boys being boys” as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.
- **Tonbridge Federation** recognises that even if there are no reported cases of peer on peer abuse, such abuse is still likely to be taking place.
- All staff have a role to play in challenging inappropriate behaviours between peers. Staff recognise that that some peer on peer abuse issues may be affected by gender, age, ability and culture of those involved, i.e. for gender based abuse, girls are more likely to be victims and boys more likely to be perpetrators.
- Concerns about learner's behaviour, including peer on peer 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 and child protection policies. **Section 89(5) of the Education and Inspections Act 2006 gives headteachers a statutory power to discipline pupils for poor behaviour outside of the school premises e.g. when children are not under the lawful control or charge of a member of school staff, to such extent as is reasonable.**

- In order to minimise the risk of peer-on-peer abuse, we will:
  - **implementing a robust anti-bullying policy.**
  - **providing an age/ability appropriate PSHE and RSE curriculum.**
  - **providing a range of reporting mechanisms e.g. worry boxes, dedicated reporting emails monitored by DSLs, online report forms.**
- We] want children to feel able to confidently report abuse and know their concerns will be treated seriously. All allegations of peer on peer 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. Learners who experience abuse will be offered appropriate support, regardless of where the abuse takes place.
- Alleged victims, perpetrators and any other child affected by peer on peer abuse will be supported by:
  - **taking reports seriously,**
  - **listening carefully,**
  - **avoiding victim blaming,**
  - **providing appropriate pastoral support, working with parents/carers,**
  - **reviewing educational approaches, following procedures as identified in other policies e.g. the school/college anti-bullying, behaviour and child protection policy**
  - **where necessary and appropriate, informing the police and/or other appropriate agencies.**

## 4.2 Child on Child Sexual Violence or Harassment

- When responding to concerns relating to child on child sexual violence or harassment, [Tonbridge Federation](#) will follow the guidance outlined in Part Five of KCSIE 2021 and the DfE '[Sexual Violence and Sexual Harassment Between Children in Schools and Colleges](#)' guidance.
- [Tonbridge Federation](#) recognises sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children and can occur online and face to face (both physically and verbally). Sexual violence and sexual harassment is never acceptable.
- All victims of sexual violence or sexual harassment will be reassured that they are being taken seriously 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 be made to feel ashamed for making a report.
- When there has been a report of sexual violence or harassment, 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).
  - 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.
- Reports will initially be managed internally by the [Tonbridge Federation](#) and where necessary will be referred to Integrated Children's Services and/or the Police.
  - The decision making and required action taken will vary on a case by case basis, but will be informed by the wishes of the victim, the nature of the alleged incident (including whether a crime may have been committed), the ages and developmental stages of the children involved, any power imbalance, if the alleged incident is a one-off or a sustained pattern of abuse, if there are any ongoing risks to the victim, other children, [school](#) staff, and, any other related issues or wider context.

- If at any stage the DSL is unsure how to proceed, advice will be sought from the Education Safeguarding Service.

### 4.3 Nude and/or Semi-Nude Image Sharing by Children

The term 'sharing nudes and semi-nudes' is used to mean the sending or posting of nude or semi-nude images, videos or live streams of/by young people under the age of 18. Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents complex.

The [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) guidance outlines how schools and colleges should respond to all incidents of consensual and non-consensual image sharing, and should be read and understood by DSLs working with all age groups, not just older learners.

- [Tonbridge Federation](#) recognises that consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as youth produced/involved sexual imagery or "sexting") can be a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).
- When made aware of concerns involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos by children, staff are advised to:
  - Report any concerns to the DSL immediately.
  - Never view, copy, print, share, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already viewed the imagery by accident, 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.
- DSLs will respond to concerns as set out in the non-statutory UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) and the local [KSCMP](#) guidance. When made aware of a concern involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos:
  - the DSL will hold an initial review meeting to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child involved. This may mean speaking with relevant staff and the children involved as appropriate.
  - parents and carers will be informed at an early stage and be involved in the process to best support children, unless there is good reason to believe that involving them would put a child at risk of harm.
  - All decisions and action taken will be recorded in line with our child protection procedures.
  - a referral will be made to ICS and/or the police immediately if:
    - the incident involves an adult (over 18).
    - there is reason to believe that a child has been coerced, blackmailed, or groomed, or there are concerns about their capacity to consent, for example, age of the child or they have special educational needs.
    - the image/videos involve sexual acts and a child under the age of 13, depict sexual acts which are unusual for the child's developmental stage, or are violent.
    - a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes.

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

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

- [\[Tonbridge Federation\]](#) recognises that 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.
- If staff are concerned that a child may be at risk of CSE or CCE, immediate action should be taken by speaking to the DSL or a deputy.

#### 4.5 Serious Violence

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

#### 4.6 So-called honour based abuse

So-called ‘honour’-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.

All forms of HBA are abuse (regardless of the motivation) and concerns should be responded to in line with section 3 of this policy. Staff will report any concerns about HBA to the DSL (or a deputy).

- Whilst all staff will speak to the DSL (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers.
  - If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

#### 4.7 Preventing radicalisation

- [\[Tonbridge Federation\]](#) is aware of our duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), to have “due regard to the need to prevent people from being drawn into terrorism”, also known as the Prevent duty and the [specific obligations](#) placed upon us as an education provider regarding risk assessments, working in partnership, staff training, and IT policies.

- [Tonbridge Federation](#) recognises that children are vulnerable to extremist ideology and radicalisation and staff will be alert to changes in children's behaviour which could indicate that they may be in need of help or protection.
- Staff will report any concerns to the DSL (or a deputy), who is aware of the [local procedures](#) to follow.

#### 4.8 Cybercrime

- [Tonbridge Federation](#) recognises that children with particular skill and interest in computing and technology may inadvertently or deliberately stray into 'cyber-enabled' (crimes that can happen offline but are enabled at scale and at speed online) or 'cyber dependent' (crimes that can be committed only by using a computer/internet enabled device) cybercrime.
- If staff are concerned that a child may be at risk of becoming involved in cyber-dependent cybercrime, the DSL will be informed, and consideration will be given to accessing local support and/or referring into the [Cyber Choices](#) programme, which aims to intervene when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.
- 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 this and other appropriate policies.

### 5. Supporting Children Potentially at Greater Risk of Harm New section

- Whilst all children should be protected, some groups of children are potentially at greater risk of harm.

#### 5.1 Safeguarding Children with Special Educational Needs or Disabilities (SEND)

- [Tonbridge Federation](#) acknowledges that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges and barriers for recognising abuse and neglect.
- [Tonbridge Federation](#) recognises that children with SEND may face additional communication barriers and experience difficulties in managing or reporting abuse or challenges. Children with SEND will be appropriately supported to communicate and ensure that their voice is heard and acted upon.
- All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour, mood changes or injuries and not to assume that they are related to the child's disability. Staff will be mindful that children with SEND or certain medical conditions may be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Members of staff are encouraged to be aware that children with SEND can be disproportionately impacted by safeguarding concerns, such as exploitation, peer group isolation or bullying including prejudice-based bullying.
- To address these additional challenges, our [schools](#) will always consider implementing extra pastoral support and attention for children with SEND. The DSL will work closely with the SENDco to plan support as required.

## 5.2 Children Requiring Mental Health Support

- All staff will be made aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect 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, can impact on their mental health, behaviour and education.
- Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or a deputy.

## 5.3 Children Missing from Education

- Children missing from education, particularly persistently, can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse, and child sexual and criminal exploitation.
- Where the school/college have concerns that a child is missing from education, we will respond in line with our statutory duties and local policies. Local support is available via the [PRU, Inclusion and Attendance Service \(PIAS\)](#).

## 5.4 Elective Home Education

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

## 5.5 Children who need a Social Worker

- The DSL will hold details of social workers working with children in the [school](#) so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes.
- Where children have a social worker, this will inform [school](#) decisions about their safety and promoting their welfare, for example, responding to unauthorised absence and provision of pastoral and/or academic support.

## 5.6 Looked after children, previously looked after children and care leavers

- [Tonbridge Federation](#) recognises the common reason for children becoming looked after is as a result of abuse and/or neglect and a previously looked after child also potentially remains vulnerable.
- The school has appointed a '[designated teacher](#)' ([Paul Bargery, Deputy Principal, SENCO](#)) who works with local authorities to promote the educational achievement of registered pupils who are looked after or who have been previously looked after.

- The designated teacher will work with the DSL to ensure appropriate staff have the information they need in relation to a child's looked after legal status, contact arrangements with birth parents or those with parental responsibility, care arrangements and the levels of authority delegated to the carer by the authority looking after them.
- Where a child is looked after, the DSL will hold details of the social worker and the name of the virtual school head in the authority that looks after the child.
- Where the [school](#) believe a child is being cared for as part of a private fostering arrangement (occurs when a child under 16 or 18 if the child is disabled is cared for and lives with an adult who is not a relative for 28 days or more) there is a duty to recognise these arrangements and inform the Local Authority via the front door.
- Where a child is leaving care, the DSL will hold details of the local authority Personal Advisor appointed to guide and support them and will liaise with them as necessary regarding any issues of concern.

## 6. Online Safety

- It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. [\[Tonbridge Federation\]](#) will adopt a whole [school](#) approach to online safety which will empower, protect, and educate our learners and staff in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.
- [\[Tonbridge Federation\]](#) will ensure online 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.
- [Tonbridge Federation](#) identifies that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
  - Content: being exposed to illegal, inappropriate or harmful content. For example pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
  - Contact: being subjected to harmful online interaction with other users. For example peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
  - Conduct: personal online behaviour that increases the likelihood of, or causes, harm. For example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying.
  - Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.
- [Tonbridge Federation](#) 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 [Executive Principal/Head of School](#) will be informed of online safety concerns by the DSL, as appropriate. The named governor for safeguarding will report on online safety practice and incidents, including outcomes, on a regular basis to the wider governing body.

- **Policies and Procedures**

- The DSL has overall responsibility for online safety within the [Federation](#) but will liaise with other members of staff, for example IT technicians, curriculum leads etc. as necessary.
- The DSL will respond to online safety concerns reported in line with our child protection and other associated policies, including our [anti-bullying, social media and behaviour policies](#).
  - Internal sanctions and/or support will be implemented as appropriate.
  - Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.
- [The Tonbridge Federation](#) uses a wide range of technology. This includes computers, laptops, tablets and other digital devices, the internet, our learning platform, intranet and email systems.
  - All [school](#) owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.
- [Tonbridge Federation](#)] recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras and wearable technology. In accordance with KCSIE 2021 and EYFS 2021 [Tonbridge Federation](#) has appropriate mobile and smart technology and image use policies in place, which are shared and understood by all members of the community.

- **Appropriate Filtering and Monitoring**

- [\[Tonbridge Federation\]](#) will do all we reasonably can to limit children’s exposure to online risks through [school](#) provided IT systems and will ensure that appropriate filtering and monitoring systems are in place.
  - If learners or staff discover unsuitable sites or material, they are required to **report the concern immediately to a member of staff, report the URL of the site to technical staff/services**.
    - All users will be informed that use of our systems can be monitored, and that monitoring will be in line with data protection, human rights, and privacy legislation.
    - Filtering breaches or concerns identified through our monitoring approaches will be recorded and reported to the DSL who will respond as appropriate.
    - Any access to material believed to be illegal will be reported immediately to the appropriate agencies, such as the [Internet Watch Foundation](#) and the police.
    - When implementing appropriate filtering and monitoring, [Tonbridge Federation](#) will ensure that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.
- [\[Tonbridge Federation\]](#) acknowledges that whilst filtering and monitoring is an important part of [school/college](#) online safety responsibilities, it is only one part of our approach to online safety.
  - Learners will use appropriate search tools, apps and online resources as identified following an informed risk assessment.
  - Learners internet use will be supervised by staff according to their age and ability.
  - Learners will be directed to use age appropriate online resources and tools by staff.

## 6.1 Information Security and Access Management

- [Tonbridge Federation](#) is responsible for ensuring an appropriate level of security protection procedures are in place, in order to safeguard our systems as well as staff and learners. Further information can be found in [in our Acceptable Use Policy and Online Safety Policy](#)

- [Tonbridge Federation](#) will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

## 6.2 Staff Training

- [Tonbridge Federation](#) will ensure that all staff receive online safety training as part of induction and that ongoing online safety training and update for all staff will be integrated, aligned and considered as part of our overarching safeguarding approach.

## 6.3 Educating Learners

- [Tonbridge Federation](#) 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.

## 6.4 Working with Parents/Carers

- [Tonbridge Federation](#) will build a partnership approach to online safety and will support parents/carers to become aware and alert of the potential online benefits and risks for children by:
  - **providing information on our school/college website and through existing communication channels.**
  - **offering specific online safety events for parents/carers or highlighting online safety at existing events.**

## 6.5 Remote Learning

- [Tonbridge Federation](#) will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements.
- All communication with learners and parents/carers will take place using [school](#) provided or approved communication channels; for example, [school](#) provided email accounts and phone numbers **and/** agreed systems **such as Microsoft 365**
  - Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.
- Staff and learners will engage with remote teaching and learning in line with existing behaviour principles as set out in our [school behaviour policy/code of conduct](#) and [Acceptable Use Policies](#).
- Staff and learners will be encouraged to report issues experienced at home and concerns will be responded to in line with our child protection and other relevant policies.
- When delivering remote learning, staff will follow our Remote Learning Acceptable Use Policy (AUP)
  - Parents/carers will be made aware of what their children are being asked to do online, including the sites they will be asked to access. [Tonbridge Federation](#) will continue to be clear who from the [school/college](#) their child is going to be interacting with online.
  - Parents/carers will be encouraged to ensure children are appropriately supervised online and that appropriate parent controls are implemented at home.

## 7. Staff Engagement and Expectations

### 7.1 Awareness, Induction and Training

- All members of staff have been provided with a [copy of part one or annex A](#) of 'Keeping Children Safe in Education' 2021 which covers safeguarding information for staff.
  - [School/college](#) leaders, including the DSL will read KCSIE in its entirety.
  - [School/college](#) leaders and all members of staff who work directly with children will read annex B.
  - All members of staff have signed to confirm that they have read and understood the national guidance shared with them. **This will be recorded via the SCR**
- The DSL will ensure that all new staff and volunteers (including agency and third-party staff) receive safeguarding and child protection training (including online safety), including information to ensure they are aware of the [Federation](#) internal safeguarding processes, as part of their induction through training from a DSL
- All staff members (including agency and third-party staff) will receive appropriate child protection training (including online safety) to ensure they are aware of a range of safeguarding issues; this training will be updated at least annually.
- Safeguarding training for staff, including online safety training, will be integrated, aligned and considered as part of the whole [school](#) safeguarding approach and wider staff training and curriculum planning.
- In addition to specific child protection training, all staff will receive regular safeguarding and child protection updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. This will be done through ongoing training, staff meetings and our weekly Safeguarding Shorts information
- Staff will be encouraged to contribute to and shape [school](#) safeguarding arrangements and child protection policies.
- The DSL and [Executive Principal/ Head of School](#) will provide an annual report to the [governing body](#) detailing safeguarding training undertaken by all staff and will maintain an up to date register of who has been trained.
- Although the [Federation](#) has a nominated lead for the [governing body \(Sue Mason\)](#) all members of the [governing body](#) will access appropriate safeguarding training which covers their specific strategic responsibilities on a regular basis.

### 7.2 Safer Working Practice

- All members of staff are required to work within our clear guidelines on safer working practice as outlined in the [school behaviour policy/code of conduct](#).
- The DSL will ensure that all staff and volunteers (including agency and third-party staff) have read the child protection policy and are aware of the [school/college](#) expectations regarding safe and professional practice via the staff [behaviour policy/code of conduct and Acceptable Use Policy \(AUP\)](#).
- Staff will be made aware of the [school](#) behaviour management and physical intervention policies. Staff will manage behaviour effectively to ensure a good and safe educational environment and will

have a clear understanding of the needs of all children. Physical interventions and/or use of reasonable force will be in line with our agreed policy and procedures and national guidance.

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

### 7.3 Supervision and Support

- The induction process will include familiarisation with child protection responsibilities and procedures to be followed if members of staff have any concerns about a child's safety or welfare.
- The [Federation](#) will ensure that members of staff who are working within the foundation stage are provided with appropriate supervision in accordance with the statutory requirements of Early Years Foundation Stage (EYFS) 2021.
- The [Federation](#) will provide appropriate supervision and support for all members of staff to ensure that:
  - All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children
  - All staff are supported by the DSL in their safeguarding role.
  - All members of staff have regular reviews of their own practice to ensure they improve over time.
- Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL.
- The DSL will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union, the Education Support Partnership or other similar organisations directly.

## 8. Safer Recruitment and Allegations

### 8.1 Safer Recruitment and Safeguarding Checks

- [Tonbridge Federation](#) is committed to ensure that develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our learners and staff.
  - [Tonbridge Federation](#) will follow relevant guidance in Keeping Children Safe in Education 2021 (Part Three, 'Safer Recruitment') and from The Disclosure and Barring Service (DBS)
  - The [governing body](#) and leadership team are responsible for ensuring that the [schools](#) follow safe recruitment processes as outlined within guidance.
  - The [governing body](#) will ensure that there is at least one of the persons who conducts an interview has completed safer recruitment training.
- The [schools](#) maintains an accurate Single Central Record (SCR) in line with statutory guidance.
- [\[Tonbridge Federation\]](#) are committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools.
- We advise all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands, and warnings.

- Where the [school](#) places a learners 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 2021
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## 8.2 Allegations/concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors

- Our Schools will respond to allegations in line with the [local Kent allegations arrangements](#) and [Part Four of KCSIE 2021](#). In depth information can be found within our 'Managing Allegations against Staff' and [staff behaviour policy/code of conduct](#) policy. This can be found [in the staff room and has been sent to all staff](#).
- Any concerns or allegations about staff, including those which do not meet the allegation/harm threshold (8.2.1) will be recorded and dealt with appropriately in line with national 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/principals](#) are unsure how to respond, for example if the [school](#) is unsure if a concern meet the harm 'thresholds', advice will be sought via the [Local Authority Designated Officer \(LADO\) Enquiry Line](#) and/or the [Education Safeguarding Service](#).

### 8.2.1 Concerns that meet the 'harm threshold'

- [Tonbridge Federation](#) recognises that it is possible for any member of staff, including volunteers, governors, contractors, agency and third-party staff (including supply teachers) and visitors to behave in a way that indicates a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college. This includes when someone has
  - behaved in a way that has harmed a child, or may have harmed a child and/or
  - 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 referred immediately to the [head of School or DSL](#) who will contact the [LADO](#) to agree further action to be taken in respect of the child and staff member. In the event of allegations of abuse being made against the [headteacher/principal](#), 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'

- [Tonbridge Federation](#) may also need to take action in response to 'low-level' concerns about staff, which typically would be behaviours which are inconsistent with our staff code of conduct, including inappropriate conduct outside of work and concerns that do not meet the allegations threshold.

- Where low-level concerns are reported to the [school](#), the [Head of School or DSL](#) will share or liaise with the LADO enquiries officer via the [LADO Enquiry Line](#).
- Low-level concerns will be recorded in writing and reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern is identified, the [school](#) will implement appropriate action, for example consulting with [the LADO enquiry line](#) and following our disciplinary procedures.
- Additional information regarding low-level concerns is contained with our [staff behaviour policy/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 [Tonbridge Federation](#) has created and embedded a culture of openness, trust and transparency in which our values and expected behaviour as set out in our [staff behaviour policy/code of conduct](#) are constantly lived, monitored and reinforced by all staff (including supply teachers, volunteers and contractors) and where all concerns are dealt with promptly and appropriately.
- All staff and volunteers should feel able to raise any concerns about poor or unsafe practice and potential failures in the [school/college](#) safeguarding regime. The leadership team at [\[Tonbridge Federation\]](#) will take all concerns or allegations received seriously.
- All members of staff are made aware of the [school](#) Whistleblowing procedure. It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk.
- Staff can access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).
- [\[Tonbridge Federation\]](#) has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person.
  - If these circumstances arise in relation to a member of staff at our [schools](#), a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the [LADO](#)

## 9. Opportunities to teach safeguarding

- [Tonbridge Federation](#) will ensure that children are taught about safeguarding, including online safety, as part of providing a broad and balanced curriculum. This will include covering relevant issues through [Relationships Education \(primary schools\)/Relationships and Sex Education \(secondary schools\)](#) and [Health Education](#).
- We recognise that [school](#) plays an essential role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour, what is 'safe', to recognise when they and others close to them are not safe, and how to seek advice and support when they are concerned. Our curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that learners have a range of age appropriate contacts and strategies to ensure their own protection and that of others.

- [Tonbridge Federation](#) recognises that a one size fits all approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.
- Our [school](#) systems support children to talk to a range of staff. Children will be listened to and heard, and their concerns will be taken seriously and acted upon as appropriate.

## 10. Physical Safety

### 10.1 Use of 'reasonable force'

- There may be circumstances when it is appropriate for staff to use reasonable force in order to safeguard children from harm. Further information regarding our approach and expectations can be found in our [behaviour policy](#).

### 10.2 The Use of Premises by Other Organisations

- Where services or activities are provided separately by another body using the [school/college](#) facilities/premises, the [Executive Principal](#) and [governing body](#) will seek written assurance that the organisation concerned has appropriate policies and procedures in place regarding safeguarding children and child protection, and that relevant safeguarding checks have been made in respect of staff and volunteers. If this assurance is not achieved, an application to use premises will be refused.
- Safeguarding requirements will be included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises. Failure to comply with this will lead to termination of the agreement.

### 10.3 Site Security

- All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light.
- 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 because of Covid-19 restrictions.
- Any individual who is not known or identifiable on site should be challenged for clarification and reassurance. **Children should report any concerns to a member of staff.**
- The [Federation](#) will not accept the behaviour of any individual (parent or other) that threatens [school](#) security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the [school](#) site.

## 11. Local Support

- All members of staff in [Tonbridge Federation](#) are made aware of local support available.

- **Education Safeguarding Service**
  - **Area Safeguarding Advisor West Kent Advisor - Kuldip Sohal 03000 412284**
  - **Online Safety in the Education Safeguarding Service**
    - 03000 415797
    - [esafetyofficer@theeducationpeople.org](mailto:esafetyofficer@theeducationpeople.org) (non-urgent issues only)
- **LADO Service**
  - Telephone: 03000 410888
  - Email: [kentchildrenslado@kent.gov.uk](mailto:kentchildrenslado@kent.gov.uk)
- **Integrated Children's Services**
  - Front door: 03000 411111
  - Out of Hours Number: 03000 419191
- **Kent Police**
  - 101 or 999 if there is an immediate risk of harm
- **Kent Safeguarding Children Multi-Agency Partnership (KSCMP)**
  - [kscmp@kent.gov.uk](mailto:kscmp@kent.gov.uk)
  - 03000 421126
- **Adult Safeguarding**
  - Adult Social Care via 03000 41 61 61 (text relay 18001 03000 41 61 61) or email [social.services@kent.gov.uk](mailto:social.services@kent.gov.uk)

# Appendix 1: Categories of Abuse

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

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

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

## **Signs that MAY INDICATE Sexual Abuse**

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

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

## **Signs that MAY INDICATE physical abuse**

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

- Injuries need to be accounted for. Inadequate, inconsistent, or excessively plausible explanations or a delay in seeking treatment should signal concern.

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

#### **Signs that MAY INDICATE emotional abuse**

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

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

#### **Signs that MAY INDICATE neglect.**

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

# Appendix 2: Support Organisations

## NSPCC 'Report Abuse in Education' Helpline

- [0800 136 663](tel:0800136663) or [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## National Organisations

- NSPCC: [www.nspcc.org.uk](http://www.nspcc.org.uk)
- Barnardo's: [www.barnardos.org.uk](http://www.barnardos.org.uk)
- Action for Children: [www.actionforchildren.org.uk](http://www.actionforchildren.org.uk)
- Children's Society: [www.childrenssociety.org.uk](http://www.childrenssociety.org.uk)

## Support for Staff

- Education Support Partnership: [www.educationsupportpartnership.org.uk](http://www.educationsupportpartnership.org.uk)
- Professional Online Safety Helpline: [www.saferinternet.org.uk/helpline](http://www.saferinternet.org.uk/helpline)

## Support for Learners

- ChildLine: [www.childline.org.uk](http://www.childline.org.uk)
- Papyrus: [www.papyrus-uk.org](http://www.papyrus-uk.org)
- The Mix: [www.themix.org.uk](http://www.themix.org.uk)
- Shout: [www.giveusashout.org](http://www.giveusashout.org)
- Fearless: [www.fearless.org](http://www.fearless.org)
- Victim Support: [www.victimsupport.org.uk](http://www.victimsupport.org.uk)

## Support for Adults

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

## Support for Learning Disabilities

- Respond: [www.respond.org.uk](http://www.respond.org.uk)
- Mencap: [www.mencap.org.uk](http://www.mencap.org.uk)
- Council for Disabled Children: <https://councilfordisabledchildren.org.uk>

## Contextual Safeguarding Network

- <https://contextualsafeguarding.org.uk/>

## Kent Resilience Hub

- <https://kentresiliencehub.org.uk/>

## Substance Misuse

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

## Domestic Abuse

- Domestic abuse services: [www.domesticabuseservices.org.uk](http://www.domesticabuseservices.org.uk)

- Refuge: [www.refuge.org.uk](http://www.refuge.org.uk)
- Women's Aid: [www.womensaid.org.uk](http://www.womensaid.org.uk)
- Men's Advice Line: [www.mensadvice.org.uk](http://www.mensadvice.org.uk)
- Mankind: [www.mankindcounselling.org.uk](http://www.mankindcounselling.org.uk)
- National Domestic Abuse Helpline: [www.nationaldahelpline.org.uk](http://www.nationaldahelpline.org.uk)
- Respect Phonenumber: <https://respectphonenumber.org.uk>

### **Criminal and Sexual Exploitation**

- National Crime Agency: [www.nationalcrimeagency.gov.uk/who-we-are](http://www.nationalcrimeagency.gov.uk/who-we-are)
- It's not okay: [www.itsnotokay.co.uk](http://www.itsnotokay.co.uk)
- NWG Network: [www.nwgnetwork.org](http://www.nwgnetwork.org)

### **Honour Based Abuse**

- Forced Marriage Unit: [www.gov.uk/guidance/forced-marriage](http://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](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf)
- Mandatory reporting of female genital mutilation: procedural information:  
[www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information](http://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information)

### **Peer on Peer abuse, including bullying, sexual violence and harassment**

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

### **Online Safety**

- CEOP: [www.ceop.police.uk](http://www.ceop.police.uk)
- Internet Watch Foundation (IWF): [www.iwf.org.uk](http://www.iwf.org.uk)
- Think U Know: [www.thinkuknow.co.uk](http://www.thinkuknow.co.uk)
- Childnet: [www.childnet.com](http://www.childnet.com)
- UK Safer Internet Centre: [www.saferinternet.org.uk](http://www.saferinternet.org.uk)
- Report Harmful Content: <https://reportharmfulcontent.com>
- Marie Collins Foundation: [www.mariecollinsfoundation.org.uk](http://www.mariecollinsfoundation.org.uk)
- Internet Matters: [www.internetmatters.org](http://www.internetmatters.org)
- NSPCC: [www.nspcc.org.uk/onlinesafety](http://www.nspcc.org.uk/onlinesafety) and [www.net-aware.org.uk](http://www.net-aware.org.uk)
- Get Safe Online: [www.getsafeonline.org](http://www.getsafeonline.org)
- Parents Protect: [www.parentsprotect.co.uk](http://www.parentsprotect.co.uk)
- Cyber Choices: <https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices>
- National Cyber Security Centre (NCSC): [www.ncsc.gov.uk](http://www.ncsc.gov.uk)

### **Mental Health**

- Mind: [www.mind.org.uk](http://www.mind.org.uk)

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

#### **Radicalisation and hate**

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

#### **Children with Family Members in Prison**

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