



Safeguarding & Online Safety Whole School Policy (Including Early Years)

Designated Safeguarding Lead: Ross Underwood (Assistant Head, Safeguarding)

Head: Edward O'Connor

Published date: September 2024

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

Date written: September 2024

Date agreed and ratified by Governing Body Sept 2024

Date of next review: September 2025

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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Emma Pennington	Canterbury Cathedral Safeguarding Lead	emma.pennington@canterbury-cathedral.org	01227 762862

Key External Safeguarding contacts:

For advice on safeguarding issues please call your area office on the numbers listed below.

If a child may be at risk of imminent harm, you should call the Integrated Front Door on 03000 411111 or the Police on 999

Canterbury 03000 423 157

LADO Team contact number: 03000 410888

If your call is urgent i.e. a child is in immediate danger and you cannot be connected to the team you should call the Integrated Front Door on 03000 41 11 11

Area Education Officer

East Kent – Marisa White 03000 418794

Email: kentchildrenslado@kent.gov.uk

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What to do if you have a welfare concern at St Edmund's School

Why are you concerned?

For example:

- Something a child has said - e.g. an allegation of harm.
- Child's appearance - may include unexplained marks as well as dress.
- Behaviour change
- Witnessed concerning behaviour (either by the young person or behaviour directed toward the young person).

Inform the Designated Safeguarding Lead

- Ross Underwood

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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
- Refer to other agencies as appropriate e.g. Early Help, LADO, Police, Request for Support through the Front Door at Integrated Children's Services.
- Consult with the local area safeguarding advisor: 03301 651140 or Local Authority Social Worker at the Front Door: <https://www.kscmp.org.uk/>

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If you are unhappy with the response:

Staff:

- Follow local exaction procedures
- Follow Whistleblowing procedures

Child and Parents:

- Follow School Complaints Procedures (link on school website)

Record decision making and action being taken on Cpoms as a safeguarding incident

Monitor

- Follow Vulnerable Pupil monitoring
- Record updates on Cpoms

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. Introduction and Ethos

- At St Edmund's we recognise 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 pupils) 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.
- Staff working with children at St Edmund's are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.
- St Edmund's recognises the importance of providing an inclusive ethos and environment within St Edmund's that will help children to be safe and feel safe. In our St Edmund's children are respected and encouraged to talk openly. All our staff understand safe professional practice and adhere to our safeguarding policies.
- 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 pupils, 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.
- St Edmund's expects that if any member of our community has a safeguarding concern about any child or adult, they should act and act immediately.
- 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 procedures contained in this policy apply to all staff, including governors, temporary or third-party agency staff and volunteers, and are consistent with those outlined within KCSIE 2024.

2. Policy Context

- This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes:
 - DfE Keeping Children Safe in Education 2024 (KCSIE)
https://assets.publishing.service.gov.uk/media/6650a1967b792ffff71a83e8/Keeping_children_safe_in_education_2024.pdf
 - Working Together to Safeguard Children 2023 (WTSC)
https://assets.publishing.service.gov.uk/media/669e7501ab418ab055592a7b/Working_together_to_safeguard_children_2023.pdf
 - Ofsted: Education Inspection Framework' 2019
 - Framework for the Assessment of Children in Need and their Families 2000)
 - Kent and Medway Safeguarding Children Procedures (Online)
 - Early Years and Foundation Stage Framework 2023 (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.

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:
 - Providing help and support to meet the needs of children as soon as problems emerge
 - protecting children from maltreatment, whether that is within or outside the home, including online
 - preventing impairment of children's mental and physical health or development
 - ensuring that children grow up in circumstances consistent with the provision of safe and effective care
 - taking action to enable all children to have the best outcomes
- St Edmund's acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):
 - Abuse, neglect and exploitation
 - Bullying (including cyberbullying)
 - Children with family members in prison
 - Children Missing Education (CME) (including unexplainable and/or persistent absences from education).
 - Child missing from home or care
 - Child Sexual Exploitation (CSE)
 - Child Criminal Exploitation
 - Contextual Safeguarding (Risks outside the family home)
 - County Lines
 - Domestic abuse
 - Drugs and alcohol misuse

- Fabricated or induced illness
- Faith abuse
- Female Genital Mutilation (FGM)
- Forced marriage
- Gangs and youth violence
- Gender based abuse and violence against women and girls
- Hate
- Homelessness
- Honour based abuse
- Human trafficking and modern slavery
- Mental health
- Missing children and adults
- Online safety
- Child on child abuse
- Preventing radicalisation and extremism
- Private fostering
- Relationship abuse
- Serious Violence
- Sexual Violence and Sexual Harassment
- Upskirting
- Youth produced sexual imagery or “Sharing nude and semi-nude images”

(Also see Annex B within ‘Keeping Children Safe in Education’ 2024)

4. Related Safeguarding Policies

- This policy is one of a series in the St Edmund's integrated safeguarding portfolio and should be read and actioned in conjunction with the policies as listed below:
 - Acceptable Use of Technology Policies
 - Anti-Bullying
 - Attendance
 - Behaviour management, linked to the use of physical intervention
 - First Aid and Accidents
 - Health and Safety
 - Image use
 - Low Level Concerns Policy
 - Managing allegations against staff
 - Personal and intimate care
 - Privacy Notice (Data Protection & Information Sharing)
 - Relationship and Sex Education (RSE)
 - Risk assessments (e.g. school trips, use of technology, re-opening)
 - Safer Recruitment
 - Searching, screening and confiscation
 - Staff behaviour policy and Code of Conduct, Staff Handbook and Staff Duty of Care including (AUP)
 - Whistleblowing

5. Policy Compliance, Monitoring and Review

- St Edmund's will review this policy at least annually. The policy will be revised following any national or local policy updates, any local child protection concerns and/or any changes to our procedures.
- All staff (including temporary staff and volunteers) will be digitally provided with a copy of this policy, Part One and/or Annex A of KCSIE 2024 as appropriate. Teaching staff and staff who have regular direct contact with children will receive Part One and Annex B. Non-teaching staff will receive Annex A.
- Parents/carers can obtain a copy of the St Edmund's Safeguarding policy and other related policies on request. Additionally, our policies can be viewed via the St Edmund's website and on the staff portal and parent portal.
- The policy forms part of our St Edmund's strategic and development plans and will be reviewed annually by the governing body/Senior Leadership team which has responsibility for oversight of safeguarding and child protection systems. The policy will be updated also whenever needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt.
- The Designated Safeguarding Lead and Head will ensure regular reporting on safeguarding activity and systems to the governing body. The governing body will not receive details of individual pupil situations or identifying features of families as part of their oversight responsibility.

6. Key Responsibilities

- The Governing Body have read and will follow KCSIE 2024.
- The designated governor for safeguarding is Jane Billing. The nominated governor will support the DSL and have oversight in ensuring that the St Edmund's 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 Designated Safeguarding Lead is supported in their role.
- The Governing Body will undertake regular safeguarding training as advised by the DSL and/or the Head.
- The Governing Body maintain a rigorous oversight of safeguarding matters through a range of information including: Annual Safeguarding Review by DSL, termly Heads' reports, regular training and ongoing feedback from the DSL and Head on incidents and/or patterns of concern and updates on serious cases.

6.1 Designated Safeguarding Lead (DSL)

- St Edmund's has appointed a member of the leadership team (Ross Underwood, Assistant Head) as the Designated Safeguarding Lead (DSL). Additionally, the School has appointed Deputy DSLs (Kelly French, Head of Pastoral Care, Junior School, Sharon Scally (Safeguarding Officer) Sarah Bartholomew, Head of Pre-Prep) who will have delegated responsibilities and act in the DSLs absence.

- The DSL has overall responsibility for the day-to-day oversight of safeguarding and child protection systems in St Edmund's. Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.
- The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. Deputy DSLs are trained to the same standard as the DSL. The DSL and any deputy DSLs' training will be updated formally every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.
- The Head will be kept informed of any significant issues by the DSL.
- The DSL (and deputies) will be provided with sufficient time so they can provide appropriate support to staff and children regarding any new safeguarding and welfare concerns. This may include handling of referrals to integrated social care and working with other agencies where appropriate. A key aspect of the role is the oversight of online safety.
- The DSL role will follow that which is outlined in Annex C of KCSIE 2024.

Key aspects of this will include:

- Act as the central contact point for all staff to discuss any safeguarding concerns
- Maintain a confidential recording system for safeguarding and child protection concerns
- Coordinate 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)
- Liaise with other agencies and professionals in line with KCSIE 2024 and WTSC 2023
- Ensure that locally established procedures as put in place by the three safeguarding partners (KSCMP), including referrals, are followed, as necessary.
- Represent, or ensure that, St Edmund's is appropriately represented at multi-agency safeguarding meetings (including Child Protection conferences)
- Manage and monitor the school's role in any multi-agency plan for a child.
- Understand and evaluate the filtering and monitoring systems and processes by means of weekly reports from the IT Support Officer (who is DSL trained) on network usage and matters of concern related to pupil and staff online activity
- Be available during term time for staff in the school to discuss any safeguarding concerns.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and St Edmund's leadership staff.
- Oversee and respond to children who have unexplainable and/or persistent absences from education by means of a weekly report from the Attendance Officer and liaison with key pastoral staff where additional information and/or interventions may be necessary
- Ensure adequate and appropriate DSL cover arrangements in response to any closures and out of hours and/or out of term activities.
- Ensure all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE (2024)

6.2 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, neglect and exploitation so that they can identify cases of children who may need help or protection.
- Know what to do if a child tells them that he or she is being abused or neglected and understand the impact abuse, neglect and exploitation can have upon a child.
- Maintain a high level of vigilance regarding pupil attendance, liaising with key pastoral staff and the DSL as necessary.
- 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 (paragraphs 122-124 of WTSC 2023).
- Understand the early help process and their role in it.
- Understand the school/college 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.

6.3 Children and Young People

Children and young people (pupils) 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 school/college safeguarding policies.
- Receive help from a trusted adult.
- Learn how to keep themselves safe, including online.

6.4 Parents and Carers

Parents/carers have a responsibility to:

- Understand and adhere to the relevant St Edmund's policies and procedures.
- Talk to their children about safeguarding issues with their children and support the school in their safeguarding approaches.
- Identify behaviours which could indicate that their child is at risk of harm including online and seek help and support from the St Edmund's or other agencies.

7. Recognising Indicators of Abuse, neglect and exploitation

- All staff at St Edmund's are made aware of the definitions and indicators of abuse, neglect and exploitation as identified by Working Together to Safeguard Children (2023) and Keeping Children

Safe in Education 2024. This is outlined locally within the Kent Support Levels Guidance (<https://www.kscmp.org.uk/guidance/kent-support-levels-guidance>)

- St Edmund's School 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
- Exploitation is a form of abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into any activity
 - in 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.
- Exploitation is included in KCSIE 2024 to remind us that abuse might not just occur in the home, but it may also occur outside of the home environment, even online. Exploitation can include instances where a child or young person may be groomed to become involved in sexual or criminal activity.

For further information, see Appendix 1 of this policy

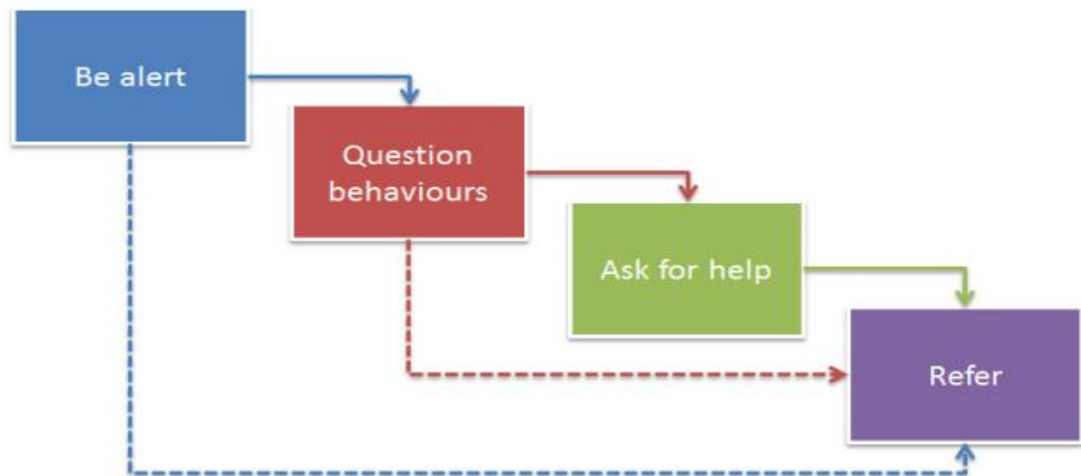
- Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This is particularly relevant when children see, hear or experience domestic abuse and its effects.
- St Edmund's recognises that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of child abuse, neglect and exploitation can vary from child to child. Children develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child. It is important to recognise that indicators of abuse, neglect and exploitation do not automatically mean a child is being abused however all concerns should be taken seriously and will be explored by the DSL on a case-by-case basis.

St Edmund's recognises abuse, neglect, exploitation 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, neglect or exploitation, 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, neglect and exploitation, we can respond to problems as early as possible and provide the right support and services for the child and their family.
- All members of staff are expected to be aware of and follow 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 must always speak to the DSL or Deputy.**
- Members of staff are aware that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of child abuse, neglect and exploitation can vary from child to child. Children develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child.
- It is important to recognise that indicators of abuse, neglect and exploitation (including children who have unexplainable and/or persistent absences from education) do not automatically mean a child is being abused however all concerns should be taken seriously and explored by the DSL on a case-by-case basis.
- Parental behaviours’ may also indicate child abuse, neglect or exploitation so staff should also 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.
- Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children offsite. 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, and serious youth violence.

- By understanding the indicators of abuse, neglect and exploitation, we can respond to problems as early as possible and provide the right support and services for the child and their family.
- All staff should be aware 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 harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

8. Child Protection Procedures

- **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 ask leading questions
 - 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 school/college 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.
- St Edmund's 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
 - 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 a child is suffering, or is likely to suffer from significant harm, or is in immediate danger, a 'request for support' will be always be made immediately to Integrated Children's Services (via the 'Front Door') also to the police if a crime may have been committed.
 - St Edmund's recognise that in situations where there are immediate child protection concerns for a child as identified in line with Support Level Guidance, it is NOT to investigate as a single agency, but to act in line with KSCMP guidance which may involve multi-agency decision making.

- 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.
 - St Edmund's is an [Operation Encompass School](#). This means we work in partnership with Kent Police to provide support to children experiencing domestic abuse.

9. Record Keeping

- All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child. These records will be stored on CPOMs with original copies of notes given to the DSL.
- Records should include:
 - a clear and comprehensive summary of the concern;
 - details of how the concern was followed up and resolved;
 - a note of any action taken, decisions reached, rationale behind decisions and the outcome.
- If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy).
- All safeguarding concerns, discussions and decisions, and reasons for those decisions, will be recorded in writing on the St Edmund's safeguarding system, CPOMs.

- A body map will be completed on CPOMs if injuries have been observed. In some cases, a photograph may be used with permission from Head or DSL.
- Records will be completed as soon as possible after the incident/event, using the child's words and will be signed and dated by the member of staff, and/or uploaded as an incident onto CPOMs. If there is an immediate concern the member of staff should consult with a DSL before updating CPOMs as reporting urgent concerns takes priority.
- Safeguarding records are kept for individual children and are maintained separately from all other records relating to the child in the St Edmund's. Safeguarding records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL on CPOMs. Safeguarding records are shared with staff on a 'need to know' basis only.
- Keeping Children Safe in Education 2024 now also requires that those working with children and young people should record "all concerns, discussions and decisions made including the rationale for those decisions. These recordings should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc."
- All safeguarding records will be transferred in accordance with data protection legislation to the child's subsequent school, under confidential and separate cover, or via Cpoms transfer.
- 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.
- If a child is identified as being susceptible to harm, tracking and record keeping will take place through Cpoms.

10. Multi-Agency Working

- St Edmund's 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.
- St Edmund's 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.

11. Confidentiality and Information Sharing

- St Edmund's 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.

- All staff must be aware that they cannot promise confidentiality in situations which might compromise a child's safety or wellbeing.
- The Head or DSL will disclose information about a pupil on a 'need to know' basis.
- All members of staff must be aware that whilst they have duties to keep any information confidential, they also have a professional responsibility to share information with other agencies to safeguard children.
- St Edmund's has an appropriately trained Data Protection Officer (DPO) as required by the General Data Protection Regulations (GDPR) to ensure that St Edmund's is compliant with all matters relating to confidentiality and information sharing requirements. Nick Scott Kilvert (Bursar) is the St Edmund's Data Protection Officer – ncsk@stedmunds.org.uk. In the Bursar's absence, this responsibility passes to the Head Edward O'Connor eoc@stedmunds.org.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 2024).
- Staff should read and follow the guidance contained within Data Protection Guidance for schools (DfE 2024): <https://www.gov.uk/guidance/data-protection-in-schools>
- **DfE** Guidance on Information Sharing (May 2024) provides further detail: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf
- Medical staff are especially well-placed to recognise indicators of abuse and, because of their pastoral role, may well receive safeguarding disclosures from pupils. In providing medical and nursing care for a pupil (in line with professional obligations regarding patient confidentiality), it is recognised that when potential safeguarding issues arise, school medical staff must liaise with the DSL or the Head and that relevant information, ideally with the pupil's prior consent, will be passed on as necessary. If Medical Staff consider that it is in the pupil's best interests or necessary for the protection of the wider school community, to breach confidence and pass information to a relevant person or body (for example the school DSL or Area Safeguarding) they must do so.

12. Complaints

- St Edmund's has a Complaints Procedure available to parents, pupils and members of staff and visitors who wish to report concerns. This can be found on the staff intranet and school website: <https://www.stedmunds.org.uk/about-us/policies-inspection-reports/>
- All reported concerns will be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation against a member of staff or volunteer will be dealt with under the specific Procedures for Managing Allegations against Staff policy. This can be found on the staff portal.
- Complaints about the Head go to Chair of Governors, Chris Nickols cmn@stedmunds.org.uk

13. Staff Induction, Awareness and Training

- All members of staff will be given information about the identity and contact details of the DSL (Ross Underwood) and deputies.
- All staff (including temporary staff and volunteers) will be digitally provided with a copy of this policy, Part One and/or Annex A of KCSIE 2024 as directed. Teaching staff and staff who have regular direct contact with children will receive Part One and Annex B. Non-teaching staff will receive Annex A.
- All members of staff have signed to confirm that they have read and understood KCSIE. For teaching staff, this is completed via Safeguarding Network and kept with the DSL.
- All new staff and volunteers will be provided with induction training that includes:
 - the school's child protection policy, including the policy and procedures to deal with child-on-child abuse and information about the identity and role of the DSL and any deputies;
 - the staff code of conduct/behaviour policy including the whistleblowing procedure and the acceptable use of technologies policy
 - the pupil behaviour policy
 - the school's safeguarding response to children who are absent from education
 - on-line safety;
 - a copy of Part 1 of KCSIE or Annex A if appropriate (and, in effect, Annex B also, for those who work directly with children)
- All staff members (including agency and third-party staff) will receive appropriate child protection training to ensure they are aware of a range of safeguarding issues. The HR Manager will maintain a record. This training will include online safety and will take place at least annually.
- Induction training will cover the Acceptable Use of Technologies, Behaviour Management policy, and the school's safeguarding response to pupils absent from education.
- In addition to specific child protection training, all staff will receive regular safeguarding and child protection updates through pastoral/safeguarding meetings, emails and inset training at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- All staff members (including agency and third-party staff) will be made aware of the St Edmund's expectations regarding safe and professional practice via the staff behaviour policy/code of conduct and Acceptable Use Policy (AUP).
- Staff will be encouraged to contribute to and shape St Edmund's safeguarding arrangements and child protection policies: this will be achieved via safeguarding/pastoral meetings and inset.
- The DSL and Head 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 school has a nominated lead for the governing body (Jane Billing), all members of the governing body will access appropriate safeguarding training which covers their specific strategic responsibilities on a regular basis.

Guidelines for Staff (see the school's Staff Code of Conduct)

- Avoid any physical contact with pupils which is not in accordance with DfE guidance on handling pupils (available in the Policies section of the school's intranet) and which is open to misinterpretation.
- All adults working with pupils in education settings are in positions of trust in relation to the young people in their care. There is potential for exploitation and harm of vulnerable young people. Staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.
- Staff should always maintain appropriate professionalism and wherever possible, they should avoid behaviour which might be misinterpreted by others, and report and record any incident with this potential.
- **Where a person aged 18 or over is in a position of trust with a child under 18, or a pupil still at school even if they are over 18, it is an offence for that person to engage in sexual activity with or in the presence of that child, or to cause or incite that child to engage in or watch sexual activity.**
- **Where a person aged 18 or over is in a position of trust established with a person who has only recently left the school, any attempt to engage in sexual activity with that person will be a cause for concern and will be treated as a breach of trust established in that prior relationship.**
- This means that staff should not use their position to gain access to information for their own advantage and/or a pupil's or family's detriment, use their power to intimidate, threaten, coerce or undermine pupils, use their status and standing to form or promote a relationship with a pupil which is of a sexual nature or attempt to initiate a relationship of a sexual nature with a recent ex-pupil
- One-to-one tuition should only take place where both parties are visible e.g. through a window, or vision panel. Doors should not be secured.
- Care must be taken in one-to-one sports coaching, such that no action/comment might be misconstrued. Also, in specialist music lessons (eg. with one-to-one lessons conducted by peripatetics) and in teaching, due care should be taken to ensure that a child or adult does not find themselves in a situation which might cause awkwardness or misinterpretation, and care should be taken when there are movements of location.
- It is inappropriate for adults to offer lifts to a child or young person outside their normal working duties, unless this has been brought to the attention of the line manager and has been agreed with the parents/carers.
- There may be occasions where the child or young person requires transport in an emergency situation or where not to give a lift may place a child at risk. Such circumstances must always be recorded and reported to a senior manager and parents/carers.
- **Staff must only use official school systems for electronic communication with pupils. Any inappropriate communications contravenes the Staff Code of Conduct and is a serious disciplinary offence. Staff should not establish or seek to establish social contact with pupils, or their families, for the purpose of securing a friendship or to pursue or strengthen a relationship.** Even if a young person seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise her/his professional judgement in making a response but should always discuss this with a member of SMT. Staff must be aware that social contact, in certain situations, could be misconstrued as grooming.

- **Staff must not give their personal details such as their home or e-mail address; social network sites, gamer tags or web pages to students unless the need to do so is agreed with senior leadership. Staff must not give lessons from their own residence. Where an online lesson must take place, it will do so with the permission from the Head and DSL and with a safeguarding risk assessment in place.**
- Mobile phones will not be used when staff are in contact with children except in an emergency e.g. on a trip, at Forest school or in Late Stay when it is the only way of communicating. Only official school electronic devices can be used to take photographs and these photographs are not transferred to home computers. These devices are monitored.
- In exceptional circumstances, where there is immediate risk of injury, a member of staff may need to take any necessary action that is consistent with the concept of 'reasonable force' to safeguard a pupil or others. Examples could be guiding a child to safety by the arm, or in more extreme circumstances, intervening to break up a fight or prevent physical injury.
- Before intervening physically, staff should, wherever practicable, tell the pupil who is misbehaving to stop, and what will happen if he or she does not. The staff member should continue to attempt to communicate with the pupil throughout the incident and should make it clear that physical contact or restraint will stop as soon as it ceases to be necessary. In such cases only the minimum force necessary will be used whilst maintaining a calm and measured approach. Staff should be particularly aware of children with SEND given the additional vulnerability of the group.
- Staff should read the details provided in the Behaviour Management policy on this issue which provides more detail and also information on how such incidents should be recorded (found in the policies area of Teams).
- And the DFE advice on the use of reasonable force in schools:
<https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>
- Staff should read the Safeguarding, and associated policies and offer feedback to the Head and DSL in a timely manner.

14. Safer Working Practice

- All members of staff are required to work within our clear guidelines on safer working practice as outlined in the St Edmund's Code of Conduct.
- Staff will be made aware of the St Edmund's behaviour management and physical intervention policies, and any physical interventions/use of reasonable force must be in line with 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 St Edmund's policies including staff behaviour policy, Acceptable Use Policies, and Social Media.

15. Staff Supervision and Support

- Any member of staff affected by issues arising from concerns for children’s welfare or safety can seek support from the DSL.
- 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 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 formal and informal reviews of their own practice and personal wellbeing to ensure they improve over time.
- 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.
- The school will ensure that members of staff who are working within the foundation stage are provided with appropriate supervision in accordance with the statutory requirements of Early Years Foundation Stage (EYFS) 2023.

16. Safer Recruitment

- St Edmund's 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 pupils and staff.
- St Edmund's will follow relevant guidance in Keeping Children Safe in Education 2024 (Part 3 ‘Safer Recruitment’) and from The Disclosure and Barring Service (DBS). The KCSIE guidance is incorporated within our Recruitment Policy.
- The Governing Body and leadership team are responsible for ensuring that the school follows safer recruitment processes outlined within guidance.
- The School maintains an accurate Single Central Record (SCR) in line with statutory guidance.
- The Single Central Record (SCR) is managed by **Sarah Hudson**, Head of HR and reviewed half-termly by the SCR steering group.
- The Governing Body/Head will ensure that there is at least one of the persons who conducts an interview has completed safer recruitment training.
- St Edmund's is 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.

- We will ensure that all staff and volunteers have read the staff behaviour policy/code of conduct and understand that their behaviour and practice must be in line with it.
- Online checks will be made of candidates after shortlisting. These checks will be made by the Head of HR, Sarah Hudson in order to ensure consistency of process.
- From 1st January 2021 (following BREXIT) the TRA Teachers Services system will no longer maintain a list of those teachers who have been sanctioned in European Economic Area member states. The school will therefore follow the procedures outlined in KCSIE 2024 to ensure that individuals who have lived outside the UK undergo the same pre-appointment checks as all other staff at the school. These include obtaining (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity) and where available criminal records checks for overseas applicants and obtaining a letter of professional standing from the professional regulating authority in the country in which the applicant has worked.

17. Allegations Against Members of Staff (including teachers, supply teachers, volunteers, contractors and governors)

St Edmund's will respond to allegations in line with the local Kent allegations arrangements and Part Four of KCSIE 2024.

Any concerns or allegations about staff, including those which do not meet the allegation/harm threshold 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.

Advice will be sought via the Local Authority Designated Officer (LADO) Enquiry Line and/or the Education Safeguarding Service as necessary.

St Edmund's 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 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 Head, staff are advised that allegations should be reported to the chair of governors who will contact the LADO. If there is a conflict of interest in reporting the allegation to the Head, the matter should be referred directly to the LADO. Where the

allegation is against the Head, the Head must not be informed of the allegation prior to contact with the Chairman and the LADO.

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the St Edmund's safeguarding regime. The leadership team at St Edmund's will take all concerns or allegations received seriously.

All members of staff are made aware of the St Edmund'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.

In some circumstances St Edmund's will have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply because agencies will have their own policies and procedures; for example, supply teachers or contracted staff provided by an employment agency or business. St Edmund's will ensure allegations are dealt with properly and liaise with the LADO to determine a suitable outcome. Governing bodies and proprietors should discuss with the supply agency where the supply teacher is working across a number of schools or colleges, whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school or college, whilst they carry out their investigation. St Edmund's will act as required by the LADO and investigate when informed to do so.

When using a supply agency, St Edmund's will inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

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.

St Edmund's 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 Schools Personnel Service.

The School will also abide by its duty to consider making a referral to the Teaching Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate.

The reasons such an order would be considered are: 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'.

All policies can be found here: <https://www.stedmunds.org.uk/about-us/policies-inspection-reports/> and on the staff area of Teams.

18. Safeguarding Children with Special Educational Needs and Disabilities

- St Edmund's acknowledges that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges as they may have an impaired capacity to resist or avoid abuse. The DSL will work closely with the Head of Learning Enhancement to plan support as required.
- St Edmund's will ensure that children with SEN and disabilities, specifically those with communication difficulties will be supported to ensure that their voice is heard and acted upon.
- Members of staff are encouraged to be aware that children with SEN and disabilities can be disproportionately impacted by safeguarding concerns, such as bullying and exploitation.
- All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour/mood change or injuries and not to assume that they are related to the child's disability and be aware that children with SEN and disabilities may not always outwardly display indicators of abuse. To address these additional challenges, our school will always consider extra pastoral support for children with SEN and disabilities.
- St Edmund's recognises that if a pupil with complex needs is accessing alternative educational provision, we will make the alternative setting aware of the additional risk of harm that the pupil may be vulnerable to. Additionally, St Edmund's will continue to be responsible for the safeguarding of that pupil as KCSIE 2024.

19. Boarding and Chorister Matters

- As a boarding school we closely monitor the presence of pupils to ensure their safety. In the event of the apparent disappearance of a pupil, school staff should consult the Missing Pupil Policy. All boarding staff will be made aware of action in the event of a missing pupil.
- Arrangements are made to ensure the safeguarding and promotion of the welfare of boarders while they are accommodated at the school. These arrangements have regard to the National Minimum Standards for Boarding Schools.
- In a senior boarding setting, personal relationships are a certainty. The role of boarding staff is not to become involved in these relationships, though, of course, their counsel will be sought by the young people in question. Staff must observe discreetly and notify the DSL or their Deputies if any relationship issues are having a negative impact upon a boarder's wellbeing or safety. It is important not to create an environment where young people feel the need to hide their emotions, but, at the same time, the school has a duty to individuals and to the wider community to know that our boarders are not encouraged to engage in risky behaviour as a result of lack of supervision or attention. An important part of our securing and patrolling the main building is to send the reassuring message that staff are alert and attentive and will report on.
- The school is responsible for the welfare and safeguarding of the St Edmund's boy Cathedral Choristers when in residence at Choir House. The Cathedral will take sole responsibility for Boarder Choir. Choir House staff will be able to take part in Boarder Choir in a volunteer capacity if they so

wish. Any safeguarding concerns must be reported immediately to Deputy DSL for Junior School (Kelly French). They will be progressed in line with our school's safeguarding procedures.

- When the Choristers are in the Cathedral, in transit from Choir House to the Cathedral, or away on Cathedral business, such as on overseas singing trips, the responsibility for their welfare and safeguarding is with the Cathedral. Any safeguarding issue in that context will be progressed through the Cathedral's safeguarding procedures. **However, the DSL (Ross Underwood) MUST be informed of any concerns about pupils. The Head must be informed of any allegations against members of the Cathedral staff or volunteers who have contact with pupils.**
- We have a close working relationship with the Cathedral and its safeguarding team to ensure the wellbeing of the Choristers. This includes an agreement that if a Chorister safeguarding matter comes to our attention we shall immediately contact the Cathedral and work closely with their Safeguarding Lead, **Emma Pennington** (emma.pennington@canterbury-cathedral.org - +44 (0) 1227 762862). Likewise the Cathedral will immediately contact the Head of the Junior School or the Junior School DSL, if a Chorister safeguarding issue comes to their attention. This is to ensure that a joint strategy is put in place between us from the outset over clarifying: the lines of respective safeguarding responsibility; how the matter will be investigated; and what the ongoing liaison arrangements should be on the case. The Cathedral's Safeguarding Lead and the Head of the Junior School hold regular scheduled liaison meetings as well as maintaining ad hoc communications as above. Mary Morley, the Choir House Houseparent, is also DSL trained.
- Those in the school with a connection with the Choristers, including all staff at Choir House, have access to the Cathedral safeguarding policy and procedures with key staff receiving safeguarding training delivered by the Cathedral. Likewise those with connections with the Choristers at the Cathedral have access to our school safeguarding procedures. School and Cathedral have each had an input in the drawing up of each other's safeguarding procedures.
- See appendix 6 for St Edmund's and Canterbury Cathedral Safeguarding bridging policy.

20. Child on Child Abuse

- All members of staff at St Edmund's recognise that children are capable of abusing their peers and challenge any abusive behaviour. St Edmund's believes that abuse is abuse and it will never be tolerated. All children who may have been harmed will be taken seriously and offered appropriate support, regardless of where the abuse takes place.
- St Edmund's recognises that child on child abuse can take many forms, including but not limited to:
 - bullying (including cyberbullying)
 - physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
 - sexual violence and sexual harassment
 - 'upskirting', which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the child who may have been harmed humiliation, distress or alarm
 - sharing nude and semi-nude images (also known as "youth produced sexual imagery")
 - initiation/hazing type violence and rituals

- St Edmund’s recognises that disclosures of concern may come through channels other than direct disclosures; all concerns, no matter how they were disclosed will be reported to the DSL.
- St Edmund’s recognises that child on child abuse can take place between children (under 18) of any ages.
- St Edmund's recognises youth produced sexual imagery (also known as “sharing nude and semi-nude images”) as a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).
 - We will follow the advice as set out in the non-statutory UKCIS guidance: ‘Sharing nude and semi-nude images in schools and colleges: responding to incidents and safeguarding young people’ and the local KSCMP guidance: “Responding to youth produced sexual imagery”.
- When responding to concerns relating to child-on-child sexual violence or harassment, St Edmund's will follow guidance outlined in part five of KCSIE 2024.
- Staff and leadership are mindful that some child on child abuse issues may be affected by gender, age, ability and culture of those involved.
- The School recognizes it is more likely that girls will be children who may have been harmed and boys children who may have harmed, but that all child on child abuse is unacceptable and will be taken seriously.
- The School recognizes that two of the forms child on child abuse can take are abuse in intimate relationships between peers, and 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.
- All allegations of child on child abuse will be recorded, investigated, and dealt with in line with associated St Edmund's policies, including child protection, anti-bullying and behaviour.
- Systems exist for all children to confidently report abuse, knowing that their concerns will be taken seriously.
- Children who may have been harmed, children who may have harmed and any other child affected by child on child abuse will be supported by:
 - providing pastoral support, working with parents/carers, and in cases of sexual assault, referring to the police and KSCMP via the Front Door.
 - St Edmund’s School is committed to minimising the risk of child on child abuse. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.
- The School recognises that even if there are no reported cases of child on child abuse, such abuse may still be taking place and is simply not being reported.

More information can be found in Appendix 1 of this policy

21. Gangs, County Lines, Serious violence, Crime and Exploitation

- St Edmund's recognises the impact of gangs, county lines, serious violence, crime and exploitation. It is recognised that the initial response to child victims is important and that staff will take any allegation seriously and work in ways that support children and keep them safe.
- All staff have been trained and recognise the need to be vigilant for the signs that may include, but not exclusively:
 - Unexplained gifts/new possessions – these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs.
 - Children who go missing for periods of time or regularly come home late
 - Children who have unexplainable and/or persistent absences from education
 - Change in friendships/relationships with others/groups
 - Children who associate with other young people involved in exploitation
 - Children who suffer from changes in emotional well-being
 - Significant decline in performance
 - Signs of self-harm/significant change in wellbeing
 - Signs of assault/unexplained injuries

22. Prevent

The Issue of Radicalisation

The [Counter-Terrorism and Security Act 2015](#), places a legal responsibility on schools to take every effort to protect members of their community from the threat of political radicalisation.

The school will take all reasonable precautions to ensure that children are safe from terrorist and extremist material when accessing the internet in school.

If the school is concerned that a child or parent/carer may be at risk of radicalisation online, the Designated Safeguarding Lead will be informed immediately and action will be taken in line with the school Safeguarding Policy.

If the school is concerned that member of staff may be at risk of radicalisation online, the Head will be informed immediately and action will be taken in line with the Staff Grievance and Disciplinary Procedures and the Staff Code of Conduct

We approach this issue in four ways:

Providing a safe online environment

- The School has strong filters in place to block pupil access to violent or otherwise inappropriate materials. Pupils are required to sign up to an Acceptable Use of ICT policy that specifically prohibits them from seeking to access such sites. Internet usage is monitored on a weekly basis and pastoral and/or disciplinary responses may follow if a pupil's usage breaches our rules or raises concerns. The School will also seek to block specific sites and search terms too if they appear to pose a risk to our pupils. Furthermore, pupils receive advice and instruction from teaching and pastoral staff on safe internet usage.

Assessment of Pupil Behaviours

- The pastoral monitoring systems of the School have a vital role to play in preventing radicalisation of pupils. At St Edmund's pupils are monitored closely by tutors and Housemasters and issues of concern are discussed at the weekly pastoral meeting and whole staff meeting on Tuesdays at 8am and Fridays at 11am respectively. Where necessary a pastoral intervention or even counselling may be provided. The School will also seek advice and support from the local authority when concerns regarding pupil radicalisation arise.

Staff Training and Information

- The School recognises that it has a responsibility to provide INSET to staff on the issue of radicalisation to ensure that they remain vigilant and informed on the issue. It will also ensure staff are aware of how to respond appropriately if concerned about the possible radicalisation of a pupil.

Promoting Fundamental Values

- The School will vigorously promote fundamental values such as fairness, democracy, tolerance and the rule of law through its PSHEE Programme, its Tutorial Programme, Chapels and Assemblies, the curriculum and all other daily interactions between pupils and staff.

Contacts and Resources

Government advice to schools on this issue can be accessed here:

<https://www.gov.uk/government/publications/preventing-extremism-in-schools-and-childrens-services>

The Government also provides contact details for alerting authorities to suspected terrorist activity. These include the DfE dedicated telephone helpline and mailbox for non-emergency advice for staff and governors: 020 7340 7264 and counter-extremism@education.gsi.gov.uk in addition to the local police and 101.

Where a Prevent referral is made, it will be done so with the consent of the child before any support is provided by channel as in KCSIE 2024.

23. Mental Health

- 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 of how children's 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
- The School's Mental Health Policy can be found here: [Teams](#)

24. Online Safety

It is recognised by St Edmund's that the use of technology presents challenges and risks to children and adults both inside and outside of St Edmund's. St Edmund's will empower, protect and educate the community in their use of technology and establish mechanisms to identify, intervene in, and escalate any incident where appropriate.

Roles and Responsibilities

Online Safety Co-ordinator

The school's Online Safety Co-ordinator is Mr Ross Underwood (DSL)

The IT Support Officer is Mr Luke Sutton. The school requires the incumbent of this role to be DSL trained. The IT Support Officer provides a weekly network usage review to the DSL that encompasses the activities of all pupils and staff across the 2-18 school, highlighting potential breaches of the ICT Code of Conduct, attempts to access inappropriate material and any other matters of potential concern. This report is then reviewed by the DSL and interventions put in place in accordance with the relevant school policies (such as Safeguarding and Behaviour Management).

Board of Governors

The Board of Governors is responsible for the approval of the Safeguarding & Online Safety Policy and for reviewing the effectiveness of the policy. At St Edmund's the Online Safety Governor is Mrs Jane Billing who has overall responsibility for Safeguarding. This Safeguarding & Online Safety policy and its implementation will be reviewed annually and approved by Governors.

Head

The Head, Mr Edward O'Connor, has a duty of care for ensuring the safety (including Online Safety) of all members of the school community, though the day-to-day responsibility for Online Safety is delegated to the Online Safety Co-ordinator

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: child to child 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; and

Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>)

- St Edmund's recognises that child on child abuse can take place wholly or partly online; in many cases abuse will take place concurrently via online channels and in daily life. Staff will pass on concerns to the DSL immediately, including what might appear to be minor concerns; we have a zero tolerance approach to child on child abuse, will take all concerns seriously and investigate/report as necessary.
- The School follows guidance provided by Kent County Council's "Kent Online Safety Guidance for Educational Settings (KELSI)" and subscribes to the Kent Online Safety blog. We also seek advice when necessary from the Education Safeguarding Officer (Online Protection) for Kent at **03000 415797**.
- The School will deal with Online Safety incidents with regard to this policy and other relevant policies and seek to keep Parents and Guardians fully informed of any Online Safety incidents or threats.
- The DSL has overall responsibility for online safeguarding within the school, but will liaise as necessary with other members of staff.
- There will be yearly training on online safety for staff and be included within new staff induction.
- St Edmund's uses a wide range of technology. This includes computers, laptops, tablets and other digital devices, the internet, our learning platform Microsoft 365 and Teams, intranet and email systems.
- All St Edmund's owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.
- St Edmund's recognises the specific risks that can be posed by mobile technology, including mobile phones and cameras. In accordance with KCSIE 2024 and EYFS 2023 St Edmund's has appropriate policies in place that are shared and understood by all members of the community. The Early Years Mobile Phone policy can be found in the policies area of Teams.
- Further information reading the specific approaches relating to this can be found in our acceptable use and image use policies which can be found on the staff intranet/ website etc
- St Edmund's will do all we reasonably can to limit pupil exposure to online risks through our St Edmund's IT systems and will ensure that appropriate filtering and monitoring systems are in place.
- St Edmund's uses Fortigate Firewall in order to appropriately filter and monitor web use. IT department and DSL meet to discuss filter settings.
 - St Edmund's uses <https://www.saferinternet.org.uk/advice-centre/teachers-and-school-staff/appropriate-filtering-and-monitoring> in order to test our filtering and apply appropriate filters.
 - Internet use is monitored and Internet logs checked by the DSL and trained IT specialists, concerns are acted on by the DSL and Deputy DSLs
- If pupils or staff discover unsuitable sites or material, they are required to:
 - Click the Be ESafe link on their desktop in order to quickly leave a site and report it.
 - Report it to the DSL, Ross Underwood

- The School is mindful of the potential threat posed by harmful online challenges and hoaxes, recognising that young people can be especially vulnerable to such activity. We teach how to recognise and respond through staff training, safer internet day, ICT lessons and PSHEE. If pupils or staff discover such content, they are required to:
 - Click the Be ESafe link on their desktop in order to report it.
 - Report it to the DSL, Ross Underwood
 - The School will then respond in accordance with government guidance available here: https://www.gov.uk/government/publications/harmful-online-challenges-and-online-hoaxes/harmful-online-challenges-and-online-hoaxes?utm_source=Safeguarding+Network+membership&utm_campaign=5ae1e31c59-EMAIL_CAMPAIGN_6_10_2020_23_31_COPY_01&utm_medium=email&utm_term=0_6b3d26a8ba-5ae1e31c59-369339153

- The School recognises that misogynist and misandrist comments online (and offline) could be an indicator of radicalisation; all comments will be referred to the DSL via CPOMs.

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

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

- Any access to material believed to be illegal will be reported immediately to the appropriate agencies, such as the Internet Watch Foundation and the police.

- When implementing appropriate filtering and monitoring, St Edmund's 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.

- St Edmund's acknowledges that whilst filtering and monitoring is an important part of St Edmund's online safety responsibilities, it is only one part of our approach to online safety.

- Pupils will use appropriate search tools, apps and online resources as identified following an informed risk assessment.
 - Pupils internet use will be supervised by staff according to their age and ability.
 - Pupils will be directed to use age appropriate online resources and tools by staff.

- St Edmund's will ensure a comprehensive whole school curriculum response is in place to enable all pupils to learn about and manage online risks effectively as part of providing a broad and balanced curriculum.

- St Edmund's will build a partnership approach to online safety and will support parents/carers to become aware and alert by:
 - School newsletters, online safety webinar events, parent mails and surveys

- St Edmund's will ensure that online safety training for all staff is integrated, aligned and considered as part of our overarching safeguarding approach.
- The DSL will respond to online safety concerns in line with the child protection and other associated policies such as anti-bullying and behaviour.
 - Internal sanctions and/or support will be implemented as appropriate.
 - Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.
- Escalation procedure for online safety concerns will follow our internal sanction policy, additional and appropriate education for the young person and their parents/carers, taking further advice from the Local Education Safeguarding Service and Kent Police, dependent on the escalation required.

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

- St Edmund's 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 pupils and parents/carers will take place using St Edmund's provided or approved communication channels; for example, St Edmund's provided email accounts and phone numbers and/or agreed systems My School Portal and Microsoft 365/Teams.
- Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.
- Staff and pupils will engage with remote teaching and learning in line with existing behaviour principles as set out in our St Edmund's behaviour policy/code of conduct and Acceptable Use Policies.
- Staff and pupils will be encouraged to report issues experienced at home and concerns will be responded to in line with our child protection and other relevant policies.
- When delivering remote learning, staff will follow our 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. St Edmund's will continue to be clear who from the school their child is going to be interacting with online.
- Parents/carers will be encouraged to ensure children are appropriately supervised online and that appropriate parent controls are implemented at home.

Additional information on home learning can be found in the Pandemic Response addendum to this policy

24.1 Mobile Phones and Other Electronic devices

All use of personal devices and mobile phones will take place in accordance with the law and other appropriate school policies, including, but not limited to: Anti-bullying, Behaviour and Safeguarding & E Safety.

The School recognises that mobile phones and other electronic devices can present a number of problems when not used appropriately:

- Mobile phones with integrated cameras could lead to child protection, bullying and data protection issues with regard to inappropriate capture, use or distribution of images of pupils or staff
- Their use can render pupils or staff subject to cyberbullying

- Internet access on phones and personal devices could potentially allow pupils to bypass school security settings and filtering
- They are valuable items which may be stolen or damaged
- They can undermine classroom discipline as they can be used on “silent” mode
- The sending of abusive or inappropriate messages or content via mobile phones or personal devices is forbidden by any member of the school community and any breaches will be dealt with as disciplinary matters in conjunction with relevant school policies.

Staff

Members of staff will ensure that use of personal phones and devices takes place in accordance with the law, as well as, relevant school policy and procedures: for example, Safeguarding, the Staff Code of Conduct and Acceptable Use of ICT policies.

- Staff must not give their mobile phone numbers to pupils or seek to contact pupils by non-school messaging systems
- Members of staff are not permitted to use their own personal phones or devices for contacting pupils or parents and carers.
- Staff will not use personal devices, such as: mobile phones, tablets or cameras:
 - To take photos or videos of pupils and will only use work-provided equipment for this purpose.
 - Directly with pupils, and will only use work-provided equipment during lessons/educational activities.
- In the Pre-Prep (including EYFS) the use of personal electronic devices by staff (Including EYFS), volunteers, students or visitors for any purpose when in the company of children is prohibited. This applies to situations both on-site and off-site (e.g. on trips). When in the presence of children, personal electronic devices should be kept out of sight of pupils and set to silent. In an emergency, personal calls can be directed to the school’s landline number so that a message can be relayed to the member of staff.
- If a member of staff is thought to have illegal content saved or stored on a mobile phone or personal device or have committed a criminal offence, the police will be contacted.
- Use of School Mobile phones will be professional at all times and in strict accordance with the Staff Acceptable Use Policy.

Pupils

- Pupils will be educated regarding the safe and appropriate use of personal devices and mobile phones and will be made aware of boundaries and consequences.
- St Edmund’s School expects pupil’s personal devices and mobile phones to be switched off and kept out of sight during the normal school working day.

- If a pupil needs to contact his/her parents or carers they will be allowed to use a school phone.
- Mobile phones or personal devices will not be used by pupils during lessons or formal school time unless as part of an approved and directed curriculum based activity with consent from a member of staff.
- Mobile phones and personal devices must not be taken into examinations.
- Pupils found in possession of a mobile phone or personal device during an exam will be reported to the appropriate examining body. This may result in the pupil's withdrawal from either that examination or all examinations.
- If a pupil breaches the school policy, the phone or device will be confiscated and will be held in a secure place
- School staff may confiscate a pupil's mobile phone or device if they believe it is being used to contravene the school's Behaviour or Bullying policy, or could contain inappropriate imagery.
- Searches of mobile phone or personal devices will only be carried out in accordance with the school's Search policy.
- Pupils' mobile phones or devices may be searched by a member of the leadership team, with the consent of the pupil or a parent/ carer. Content may be deleted or requested to be deleted, if it contravenes school policies.
- Mobile phones and devices that have been confiscated will be released to parents or carers
- If there is suspicion that material on a pupil's personal device or mobile phone may be illegal or may provide evidence relating to a criminal offence, the device will be handed over to the police for further investigation.
- Detailed rules and guidance for staff on mobile phones and electronic devices can be found in the Staff and Pupils Acceptable Use of ICT policies.

24.2 Managing Social Media

Staff:

- The safe and responsible use of social networking, social media and personal publishing sites will be discussed with all members of staff as part of staff induction and will be revisited and communicated via regular staff training opportunities
- Teachers wishing to use social media tools with pupils as part of the curriculum should risk-assess the sites before use and check sites' terms and conditions to ensure the site is age-appropriate. If in any doubt, they should consult the DSL.
- Staff must not accept current school pupils as friends, followers or connections on any social media sites. Nor should they discuss the school or pupils of the school on any social media platform. Staff who use professional networking services such as LinkedIn should not accept any requests from current pupils. Staff should not accept any requests from former students under the age of 21 and

must only accept requests with express permission from the Head or DSL. Failure to highlight requests could be seen to be a low-level concern.

- School social media accounts should be agreed with the DSL or Head,
- Use of school social media accounts will be monitored by the External Relations department, DSL and Head
- All members of staff are advised to safeguard themselves and their privacy when using social media sites. This will include (but is not limited to):
 - Setting the privacy levels of their personal sites as strictly as they can
 - Being aware of location sharing services
 - Opting out of public listings on social networking sites
 - Logging out of accounts after use
 - Keeping passwords safe and confidential
 - Ensuring staff do not represent their personal views as that of the school
 - Members of staff are encouraged not to identify themselves as employees of St Edmund's School on their personal social networking accounts. This is to prevent information on these sites from being linked with the school and also to safeguard the privacy of staff members.

Pupils:

- Safe and appropriate use of social media will be taught to pupils as part of an embedded and progressive education approach, via age-appropriate sites and resources.
- Any concerns regarding pupils' use of social media, both at home and at school, will be dealt with in accordance with existing school policies including anti-bullying and behaviour management. Concerns will also be raised with parents/carers as appropriate, particularly when concerning underage use of social media sites or tools.

Pupils will be advised:

- To consider the benefits and risks of sharing personal details on social media sites which could identify them and/or their location. Examples could include real/full name, address, mobile or landline phone numbers, school attended, other social media contact details, email addresses, full names of friends/family, specific interests and clubs.
- To only approve and invite known friends on social media sites and to deny access to others by making profiles private/protected.
- Not to meet any online friends without a parent/carer or other responsible adult's permission and only when a trusted adult is present.

- To use safe passwords.
- To use social media sites which are appropriate for their age and abilities.
- How to block and report unwanted communications and report concerns both within school and externally.

24.3 Response to Incidents of Concern

- All members of the school community will be informed about the procedures for reporting Online Safety concerns, such as breaches of filtering, cyberbullying, accessing illegal content.
- The DSL will record all reported incidents and all actions taken.
- The School will manage Online Safety incidents in accordance with the school disciplinary policies where appropriate.
- The School will inform parents and/or guardians of any incidents of concern as appropriate.
- Where there is a cause for concern that illegal activity has taken place then the DSL will report the concern to the police.
- If the School is unsure how to proceed with any incidents of concern, then the advice of the Kent County Council's Education Safeguarding Adviser (Online Protection) will be sought.
- Pupils and parents will be informed of the complaints procedure. Any complaint about staff misuse will be referred to the Head. Any complaint about misuse by the Head will be referred to the Chair of Governors.

24.4 Reviewing Online Safety

- Network Security is a repeat agenda item at Online Safety Steering Group Meetings
- DSL and IT Support Officer to discuss system security at Online Safety Steering Group meetings
- The DSL and members of the Online Safety Steering Group will have an understanding of the filtering and monitoring systems in place.
- The School conducts a weekly review of internet usage and follows up immediately where there is cause for concern
- Staff must report Online safety concerns to the DSL using CPOMs
- Online safety will form part of the safeguarding report and policy review to the Board of Governors (at least annually and more regularly if necessary)

24. Curriculum and Staying Safe

- St Edmund's will ensure that children are taught about safeguarding, including online safety, as part of providing a broad and balanced curriculum.
- We recognise that the school play an essential role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour; what is 'safe'; to recognise when they and others close to them are not safe; and how to seek advice and support when they are concerned.
- Our curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that pupils have a range of age appropriate contacts and strategies to ensure their own protection and that of others.
- St Edmund's is aware of the most recent communication from the DfE on the mandatory implementation of Relationships Education, Relationships and Sex and Health Education and will ensure that this is embedded into the curriculum.
- 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.

25. The Use of Premises by Other Organisations

- When services or activities are provided by the St Edmund's School, under the direct supervision or management of school staff, our safeguarding arrangements will apply. However, where services or activities are provided separately by another body this is not necessarily the case. St Edmund's will, via the Lettings Manager, seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school or college on these matters where appropriate. St Edmund's will also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.
- Allegations with regard to a third party individual or organisation providing activities for children on school premises will be responded to using our Safeguarding procedures and will be reported to the LADO/Police as appropriate.
- If this assurance is not achieved, an application to use premises will be refused.
- Marie Rollison, Operations Manager can be contacted here: mer@stedmunds.org.uk

26. 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 St Edmund's as outlined within guidance. Visitors will be expected to, sign in and out via the office visitor log and to display a visitor's badge whilst on site.
- Any individual who is not known or identifiable on site should be challenged for clarification and reassurance.
- The school will not accept the behaviour of any individual (parent or other) that threatens St Edmund'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 St Edmund's site.

27. Useful contacts:

- **Kent Police: Canterbury Police Station** - Old Dover Road, Canterbury, CT1 3JQ – Tel.101
- **Children's Social Services** – Tel. 0300 041 11 11
- **Disclosure and Barring Service** – Disclosure helpline – customerservices@db.s.gsi.gov.uk – Tel 0870 909 0811
- **Kent County Council Safeguarding Contacts:**
- <https://www.theeducationpeople.org/our-expertise/partner-providers/kent-county-council-providers/safeguarding/safeguarding-contacts/>

Kent Safeguarding Children Multi-Agency Partnership
Room 2.71 Sessions House County Road Maidstone ME14 1XQ Tel: 03000 42 11 26 Email: kscb@kent.gov.uk www.kscb.org.uk
Kent Front Door
Kroner House Eurogate Business Park Ashford TN24 8XU Tel: 03000 41 11 11 Email: frontdoor@kent.gov.uk Out of Hours Tel: 03000 41 91 91
Education Safeguarding Service Contacts

Head of Service	Tel: 03000 423169
Training and Development Manager	Tel: 03000 423168
Education Safeguarding Advisor - Online Protection	Tel: 03000 423164
East Kent Area Area Safeguarding Adviser (Education)	Tel: 03000 423157
Additional Contacts NHS England: Kent and Medway Area Team Tel: 01732 375 200 Kent and Medway Fire and Rescue Service Tel: 01622 692 121 Kent and Medway Police Tel: 101 and ask to speak to someone in the Child Abuse Investigation Unit National Probation Service Tel: 03000 47 63 25 Kent, Surrey & Sussex Community Rehabilitation Company Tel: 03000 47 30 00 LADO Tel: 03000 41 08 88 Designated Nurse for Safeguarding Tel: 01634 335 043 (Safeguarding Team Secretary) CXK Tel: 01233 224 244	

Key contacts:

East Kent

Safeguarding Team and Area Safeguarding (Education) –Tel 03000 418764

If a child is in immediate danger and the call cannot go through to the officer on duty, call:

Tel: 03000 41 11 11 OR OUT OF HOURS Tel: 03000 41 91 91

Early Help: Canterbury 03000 416222 or email CanterburyEarlyHelp@kent.gov.uk

NSPCC whistle blowing helpline – 0800 028 0285 / Email: help@nspcc.org.uk

Ofsted – 08456 404045 (reporting child welfare concerns in the context of boarding)

08456 404046 (Whistleblowing hotline, Mon-Fri 8am – 6pm), also via email:

whistleblowing@ofsted.gov.uk and by texting 60086

Prevent - DfE dedicated telephone helpline and mailbox for non-emergency advice for staff and governors: 020 7340 7264 and counter-extremism@education.gsi.gov.uk. See also: police contact details and Channel support through our local authority (Kent) - [0800 789 321](tel:0800789321)

Multi Agency Risk Assessment Conferences (MARAC) – socialservices@rbkc.gov.uk – Tel 020 7361 3013

Appendix 1: Categories of Abuse, Neglect and Exploitation

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, neglect or exploit 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. Harm can include children witnessing the ill-treatment of others and this is particularly relevant when children **see, hear or experience domestic abuse and its effects.**

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

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

Exploitation is a form of abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into any activity

- in 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.

Exploitation is included in KCSIE 2024 to remind us that abuse might not just occur in the home, but it may also occur outside of the home environment, even online. Exploitation can include instances where a child or young person may be groomed to become involved in sexual or criminal activity.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation - where this is the case, it is important that the child perpetrator is also recognised as a victim.

CSE and CCE can affect children of any sex and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

The victim may have been exploited even if the activity appears consensual. CCE can include children being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of both, including children who:

- (a) appear with unexplained gifts, money or new possessions;
- (b) associate with other young people involved in exploitation;
- (c) suffer from changes in emotional wellbeing;
- (d) misuse drugs or alcohol;
- (e) go missing for periods of time or regularly come home late; and
- (f) regularly miss school or education or do not take part in education.

Child Sexual Exploitation: Child sexual exploitation, including violence and harassment, is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

No school is immune to the risk of child sexual exploitation including online and it can affect both boys and girls. Children can be children who harm as well as children who may have been harmed.

Signs of Child Sexual Exploitation may include:-

- unexplained gifts and new possessions
- association with young people involved in exploitation
- having much older boyfriends or girlfriends
- suffering from sexually transmitted infections

- suffering changes in emotional well-being
- drug and alcohol misuse
- being absent for periods of time and regularly reaching home late missing education (including unexplainable and/or persistent absences from education).

The same indicators may suggest that children have been approached by or are involved with individuals associated with criminal networks or gangs. These children are at risk of involvement in serious violent crime. Further advice can be found in the DfE publications Preventing youth violence and gang involvement and Criminal exploitation of children and vulnerable adults, county lines.

The School will provide sensitive education on all aspects of abuse appropriate to the age on these issues in PSHE lessons, in ICT lessons and through tutor periods, Assemblies and Chapel services. The staff in the Medical Centre are also available to help raise awareness and provide guidance on issues surrounding sexual exploitation. These themes are also shared with parents so that they can support the School.

Female Genital Mutilation: Staff must be aware of the requirement for teachers to report to the police where they discover, either through disclosure by the child who may have been harmed or through visual evidence, that female genital mutilation appears to have been carried out on a girl under the age of 18. It will be rare to see evidence of it, as staff should not be routinely examining pupils. Unless there is good reason not to, the case should be discussed with the Designated Safeguarding Lead so that involvement of external agencies can be sought. Failing to report such cases is a criminal offence. Further useful information can be found in Mandatory Reporting of Female Genital Mutilation – procedural information, published by The Home Office in October 2015, updated December 2016.

Sharing nude and semi-nude images: Sharing nude and semi-nude images is the generation of images by or of children under the age of 18 of a sexual, indecent nature. Young people who share such images may be committing a criminal offence, as it is a crime to:-

- take an indecent photograph or to allow an indecent photograph to be taken
- make an indecent photograph, including downloading or opening an image that has been sent by e-mail
- distribute or show such an e-mail
- possess with the intention of distributing images
- possess such images

Any disclosure relating to sharing nude and semi-nude images should be treated as any other safeguarding disclosure. Staff may:

- confiscate an electronic device if they have good reason so to do, **but must not view, copy or print any such imagery**
- Material should not be removed from one device to another, printed or saved
- The necessary referrals to the police or social care will be made
- Support for the child who may have been harmed, including counselling will be offered
- Parents and carers will be informed about the incident and the way in which it is being managed

Criminal Exploitation

Child Criminal Exploitation is common in county lines and occurs where an individual, or group, takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child

Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology.

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas within the UK, using dedicated mobile phone lines or other form of “deal line”.

They are likely to exploit children and vulnerable adults to move, store and sell drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons. Children are increasingly being targeted and recruited online using social media.

Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Useful information can be accessed at <https://eyes-open.co.uk/>

Child on child abuse: child abuse can and does happen anywhere. Abuse may also be inflicted on another pupil by one or more pupils and **must never be tolerated**. Child on child abuse is not tolerated. Children who are victims of sexual violence and sexual harassment are likely to find the situation stressful in a way that will adversely impact on their education attainment as well as their emotional well-being. Sexual violence and sexual harassment exist on a continuum and may overlap; they occur online and offline, both physically and verbally. Upskirting typically involves taking a picture under a person’s clothing without them knowing to view their genitals or buttocks for sexual gratification or for humiliation, distress or alarm for the victim. child on child abuse may take place online and/or in person. Any incidents of upskirting will be reported to the police.

Children who may have been harmed must be taken seriously and offered full support to avoid disruption to their education. Other children and staff should also be supported and protected as appropriate. The School’s response will be risk assessed on a case-by-case basis by the Designated Safeguarding Lead or one of the Deputies. The options include managing the matter internally, seeking Early Help intervention, referring through the Front Door to Integrated Children’s Services and reporting to the police.

The School provides a clear set of values and standards, as outlined in the Behaviour Management policy, pastoral support and a planned programme of evidence-based content delivered through the curriculum. There is not a one size fits all approach to the teaching of such issues; pastoral leaders, medical and the SEND departments are liaised with in order to tailor RSHE curriculum to vulnerable individuals.

The matter could constitute a serious breach of the behaviour policy and lead to permanent exclusion. Staff are appropriately trained to deal with child on child abuse and will be mindful to the indicators, which include:

- absence from school or disengagement from school activities
- physical injuries
- mental or emotional health issues
- becoming withdrawn – lack of self esteem
- lack of sleep
- alcohol or substance misuse

- changes in behaviour
- inappropriate behaviour for age
- abusive towards others

In order to try to prevent child on child abuse we will:

- **Create an environment based on equality and informed choice** allowing children and young people to know their rights, what to do if they are unhappy with something and what it means to give true consent.
- **Ensure young people know the risks** – talk about child on child abuse in an age appropriate way. Create opportunities for young people to weigh up risks and recognise that sometimes this means they will take risks we as adults and professionals disagree with. Our role is to be influencing young people to be making the healthiest long-term choices and keeping them safe from harm in the short-term.
- **Check young people have safe relationships** – in their family, with their peers and with staff. Create the environment where it is OK to talk, even about the most difficult things.
- **Spot the signs and know what to do** – use our safeguarding procedures and be confident to raise child on child as a possibility.

Further details can be found in KCSIE 2024

Domestic abuse: 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. Children can be victims of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long term impact on their health, well-being, development, and ability to learn (Domestic Abuse Act 2021).

Children who witness domestic abuse are at risk of significant harm to their wellbeing and understanding of healthy, positive relationships. The School is enrolled onto the Operation Encompass scheme and is alerted every day to all domestic abuse incidents that have been reported to Kent Police so that the right support can be put in place at the right time for children who are experiencing domestic abuse.

What to do if you become aware of abuse

Care must be taken when recognising abuse, neglect and exploitation in pupils with special educational needs or disabilities as they can be disproportionately impacted by things such as bullying. Additional barriers could be the assumption that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.

In a boarding environment especially, there is likely to be an enhanced risk that inappropriate relationships could develop. The School will be alert to any potential abuse by peers and may consider some aspects of bullying as a child protection matter. There may be reasonable cause to suspect that a child is suffering or is likely to suffer significant harm. In such cases it is probable that House Staff will be in the best position to assess the situation; House Prefects and Mediators will also be well-placed.

If you (or a pupil) have any worries or concerns share them immediately with one of the Safeguarding Leads. Early help in identifying emerging problems and sharing information is crucial. If you do not, you could be allowing the child to be put at further risk, and vital information may not come to light. Staff **MUST NOT** keep secrets or make promises to the pupil that other appropriate adults (e.g. social care or police) will not be involved. Even if a pupil later retracts their statement, the referral could still be made. Particular attention to the potential need for early help should be given to a child who:

- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;

- is at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;

- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child; and is persistently absent from education, including persistent absences for part of the school day.
- is frequently missing/goes missing from education, home or care
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit
- has a parent or carer in custody or is affected by parental offending

Ensure that the pupil is in a safe place, for example the Medical Centre or the boarding house. If a day pupil is involved encourage him/her to stay in School until all the information has been collected.

At all times when information is being gathered the Safeguarding Leads will be present, to support the pupil and explain what is taking place.

One of the Safeguarding Leads will liaise with the Head and telephone the appropriate services for advice; such contact will be made within 24 hours especially in the case of those who have suffered or who are likely to suffer significant harm. Children in need will be referred to the child's social care by one of the Safeguarding Leads, but this will be done immediately in the case of children at risk so that inter-agency assessments can take place. The police will be contacted if a crime has been committed. Contact may also need to be made if the case involves one of abuse perpetrated by one or more pupils against another.

If it is thought that there is a case to pursue, the police or other agency will come to the School and interview the pupil where the pupil feels safe. It is most important that the House Staff member is present, acting as guardian.

Designated teachers for Looked After Children are Ross Underwood and Kelly French.

Staff **MUST** remember:-

- that the priority is to protect the child
- to take the matter seriously in a supportive way
- when initially talking to the child not to ask leading questions or “put words in their mouth”
- to gather information on a “need to know” basis; you do not need the whole story, just sufficient to take the next step
- that the child is very vulnerable and to reassure the child that you have taken what they had to say seriously
- keep a record of the facts of the matter to pass on to the Designated Safeguarding Lead

Staff **MUST NOT**:-

- contact the parents any further
- interrogate the child or ask leading questions
- speak to anyone about whom the allegations are made
- promise to keep secrets or maintain confidentiality
- ask the child outright if they have suffered abuse

One of the most important things to do is to LISTEN to what a young person is telling you. They may want to tell you about abuse and your reaction to this is vital. Remain non-judgmental and reassure the child that we are taking them seriously.

Appendix 2: National Support Organisations

Support for staff

- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline
- Government Safeguarding Resource page: [Safeguarding resources](#)

Support for Pupils

- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- The Mix: www.themix.org.uk
- Shout: www.giveusashout.org
- Fearless: www.fearless.org

Support for adults

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

Support for Learning Disabilities

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

Domestic Abuse

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

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-procedural-information

Contextual Safeguarding, child on child abuse, Sexual Exploitation and Criminal Exploitation:

- Contextual Safeguarding Network: <https://contextualsafeguarding.org.uk>

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

Substance Misuse

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

Mental Health

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

Online Safety

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

Radicalisation and hate

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

Courts and Tribunals

- KCSIE 2024 directs schools to two guides that support children in the court system, one for 5 to 11 year olds (HM Courts and Tribunals Service, 2017) <https://www.gov.uk/government/publications/young-witness-booklet-for-5-to-11-year-olds>
- and the other for 12 to 17 year olds (HM Courts and Tribunals Service, 2017b) <https://www.gov.uk/government/publications/young-witness-booklet-for-12-to-17-year-olds>

Appendix 3: Inclusivity

St Edmund's School has a zero-tolerance to any type of prejudice.

This is principally embodied in our Equality Policy which can be located here:

<https://www.stedmunds.org.uk/about-us/policies-inspection-reports/>

This policy has its legal basis in the Equality Act (2010)

<https://www.legislation.gov.uk/ukpga/2010/15/contents>

The following characteristics are protected characteristics in this legislation—

- age;
- disability;
- gender reassignment;
- marriage and civil partnership;
- pregnancy and maternity;
- race;
- religion or belief;
- sex;
- sexual orientation.

The School will not permit discrimination on the basis of any of these characteristics within its community.

All our school policies are predicated on the principles of tolerance and inclusivity.

To achieve this we

- Prioritise pupil and staff welfare and safety above all things
- Do not tolerate any forms of prejudicial behavior such as racism
- Promote tolerance and understanding of others through our curriculum and PSHEE programmes
- Encourage all members of our community to discuss ways we can eradicate prejudicial behaviours
- Promote listening, reasoned engagement, and positive action in response to injustice, while condemning aggression and violence in all its forms
- Are an Equal Opportunities employer and do not tolerate any form of discrimination or harassment in our workplace
- Recognise that some pupils can potentially be more vulnerable to harm or to being targeted by other children: for example, children who are lesbian, gay, bisexual, or gender questioning (KCSIE 2024, Part 2, Paragraphs 205-209).

We will:

- Consider ways in which we can further educate our community so that its members are empowered to act against discrimination in all its forms
- Engage further with those inside and beyond our community to understand their views and those of others on this topic
- Consider how we can amend our approach to further reflect our support for eradicating prejudicial behaviours

- We ask everyone in the St Edmund's community to join us in challenging discriminatory behavior and ideas and holding ourselves and others to account.

Appendix 4: Low Level Concerns Policy (Including Early Years)

1. Aims

“Having clear procedures for responding to low-level concerns is part of creating a school culture of openness and trust. It helps ensure that adults consistently model the school’s values and helps keep children safe. It will also protect adults working in school from potential false allegations or misunderstandings.”

<https://learning.nspcc.org.uk/news/2021/october/responding-low-level-concerns-in-education>

St Edmund's School understands the importance of acknowledging, recording and reporting all safeguarding concerns, regardless of their perceived severity. We also understand that, while a concern may be low-level, that concern can escalate over time to become much more serious. Our school prides itself on creating a safe environment for pupils, and our staff are expected to adhere to high standards of behaviour when it comes to professional conduct regarding pupils. The school has clear professional boundaries which all staff are made aware of and will adhere to. We are committed to ensuring that any safeguarding concerns are dealt with as soon as they arise and before they have had a chance to become more severe, to minimise the risk of harm posed to our pupils and other children.

2. Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- DfE (2024) 'Keeping Children Safe in Education'
- DfE (2023) 'Working Together to Safeguard Children'
- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018

This policy also operates in conjunction with the following school policies:

- Safeguarding & E Safety
- Staff Handbook
- Staff Code of Conduct
- Whistleblowing Policy
- Privacy Notice

These can be found here: [Staff Policies](#)

3. Definitions

For the purposes of this policy, a low-level concern is defined as any concern had about an adult's behaviour towards, or concerning, a child that does not meet the harms threshold (see below), or is otherwise not serious enough to consider a referral at the time of its reporting. Low-level concerns refer to behaviour on the part of a staff member towards pupils that is considered inappropriate in line with statutory safeguarding advice, the Staff Code of Conduct, and the Appropriate and Inappropriate behaviour subsection of this policy.

The harms threshold is the point at which a concern is no longer low-level and constitutes a threat of harm to a child. This threshold is defined as accusations that an adult has:

- Behaved in a way that has harmed a child or may have harmed a child.
- Possibly committed a criminal offence against, or related to, a child.
- Behaved towards a child in a way that indicates they may pose a risk of harm to children.
- Behaved in a way that indicates they may not be suitable to work with children, including behaviour that has happened outside of school.

While low-level concerns are, by their nature, less serious than concerns which meet the harms threshold, the School understands that many serious safeguarding concerns, e.g. child sexual abuse, often begin with low-level concerns, e.g. being overly friendly with children. The School will ensure that all staff are aware of the importance of recognising concerns before they escalate from low-level to serious, wherever possible.

4. Appropriate and Inappropriate Behaviour

The School will ensure that all staff members are aware of the standards of appropriate behaviour expected towards pupils. Staff will ensure that they pay due regard to the fact that:

- They are in a unique position of trust, care, responsibility, authority and influence in relation to pupils.
- There is a significant power imbalance in the pupil-staff dynamic.
- There are more stringent expectations on their behaviour with regard to pupils due to their position as a public professional.

Staff will remain aware of the fact that all pupils under the age of 18, regardless of the phase and year group they are at within the school, are children by law – resultantly, staff will ensure that they do not assume maturity on behalf of a pupil and do not engage with pupils as they would with their own peers.

Staff will be aware that where there is any doubt regarding whether the behaviour of another adult is appropriate, this should be reported to the Head immediately. Inappropriate behaviour can exist on a wide spectrum, from inadvertent or thoughtless behaviour to that which is ultimately intended to enable abuse. Examples of inappropriate behavior on the part of a member of staff that would constitute a low-level concern that should be reported to the Head include:

- Being overly friendly with children – this could include, but is not limited to, communicating

with a child through personal social media or allowing inappropriate conversations or enquiries to occur with pupils, e.g. conversations that are about a staff member's personal life or are of a sexual nature.

- Having favourites – this could include, but is not limited to, calling pupils by pet names or terms of endearment or buying pupils gifts.
- Taking photographs of children on their personal mobile phones or devices.
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
- Humiliating children.
- Using inappropriate, sexualised, intimidating or offensive language. Staff will be aware that some of the above low-level concerns may meet the harms threshold depending on certain factors, e.g. the age or needs of the child or the content of exchanged messages, and that some of the above incidents may not be concerns in context, e.g. a pre-approved, one-to-one meeting with a child behind a closed door between the child and a school counsellor who has received all appropriate safety checks.

Staff will also be made aware that behaviour which raises concerns may not be intentionally inappropriate, and that this does not negate the need to report the behaviour. Staff members who engage in low-level inappropriate behaviour in relation to pupils inadvertently will be made aware and supported correct this behaviour in line with the Staff Code of Conduct. The Head will also evaluate whether additional training would be beneficial for any staff members exhibiting concerning behaviour, or the staff cohort as a whole where low-level concerning behaviour is seen more widely.

The School understands that spotting the early signs of harmful behaviour towards children can be difficult, and that many will be hesitant to report concerns they have about their colleagues' behaviour, particularly the behaviour of their superiors. Staff are encouraged to maintain an attitude that recognises that abuse can happen anywhere, in any setting, and that anyone can be a perpetrator regardless of their age, sex, level of authority, personality, etc.

The School will ensure that all staff members have received training as part of their induction that outlines appropriate behaviour towards pupils for staff members. All staff will read, understand and adhere to the Safeguarding & Online Safety Policy, the Staff Handbook and the Staff Code of Conduct. Staff will address any questions they have regarding Safeguarding to the DSL.

The School will work to foster an environment where personal and professional boundaries are clearly set and respected for all individuals in the school community, e.g. pupils are not treated as friends and an appropriate professional distance is maintained by staff. The School will ensure that all staff are sufficiently trained surrounding the reporting of safeguarding concerns as part of their induction, and that refresher training is conducted as necessary. The School will ensure that all staff understand how to recognise and report safeguarding concerns. Staff will be trained to identify concerning or problematic behaviour towards pupils that may indicate a safeguarding concern, and how to identify signs of abuse or harm in pupils

5. Reporting Concerns

The school will promote a culture in which safeguarding pupils is the uppermost priority, beyond any perceived professional loyalties to colleagues, ensuring that staff are actively encouraged to report concerns, regardless of their relationship with the staff member. Staff will report all safeguarding concerns they have to the Head immediately in line with the procedures laid out in the Child Protection and Safeguarding Policy. Staff members will report concerns without undue delay. Where the report

concerns a specific incident, staff members will report their concerns no later than 24 hours after the incident where possible. Staff members will be aware that concerns are still worth reporting even if they do not seem serious.

Staff members will report their concerns to the Head verbally, or by submitting a Low-level Concern Reporting Form to eoc@stedmunds.org.uk.

When submitting concerns, staff will take care to ensure that they observe the Confidentiality Policy and the Allegations of Abuse Against Staff Policy, and protect the identity of all individuals to which the concern pertains as far as possible. Staff members may request anonymity when reporting a concern, and the school will endeavour to respect this as far as possible. The school will not, however, promise anonymity to staff members who report concerns in case the situation arises where they must be named, e.g. where it is necessary for a fair disciplinary hearing. In line with the Whistleblowing Policy, staff will be protected from potential repercussions caused by reporting a genuine concern.

Where a low-level concern relates to the Head, it should be reported to the Chair of Governors (cmn@stedmunds.org.uk)

Where a low-level concern relates to a person employed by a supply agency or a contractor to work in the school, staff will also be required to report this to the Head, who will, in turn, inform the employer of the subject of the concern.

6. Self-reporting

On occasion, a member of staff may feel as though they have acted in a way that:

- Could be misinterpreted.
- Could appear compromising to others.
- They realise, upon reflection, falls below the standards set out in the Staff Code of Conduct

The School will ensure that an environment is maintained that encourages staff members to self-report if they feel as though they have acted inappropriately or in a way that could be construed as inappropriate upon reflection. The Head and DSL will, to the best of their abilities, maintain a culture of approachability for staff members, and will be understanding and sensitive towards those who self-report.

Staff members who self-report will not be treated more favourably during any resulting investigations than staff members who were reported by someone else; however, their self-awareness and intentions will be taken into consideration.

7. Evaluating Concerns

Where the Head is notified of a safeguarding concern, they will ensure the issue is scheduled for review at the weekly Senior Leadership Team meeting. At the end of that meeting, a Low Level Concerns Sub-Committee will meet to discuss the concern. This group will include the Head, Senior Deputy Head, DSL and Head of HR. They will use their professional judgement to determine if the concern is low-level or if it must be immediately escalated, e.g. where a child is at immediate risk of harm. If the low level concern may reach a harms threshold, the School will seek LADO advice before the SLT meeting. A record will be kept of the discussion and decision and if necessary, an investigating officer appointed. When deciding if a concern is low-level, the Head will discuss the concern with the DSL, and will seek advice from external agencies where there is any doubt about how seriously to take the concern. When seeking external advice, the Head will ensure they adhere to the Privacy Notice, and the information

sharing principles outlined in the Safeguarding Policy & Online Safety Policy, at all times. To evaluate a concern, the investigating officer will:

- Speak to the individual who raised the concern to determine the facts and obtain any relevant additional information.
- Review the information and determine whether the behaviour displayed by the individual about whom the concern was reported is consistent with the Staff Code of Conduct and the law.
- Determine whether the concern, when considered alongside any other low-level concerns previously made about the same individual, should be reclassified as an allegation investigated in accordance with School policy.
- Consult with, and seek advice from, external agencies when in doubt over the course of action to follow.
- Speak to the individual about whom the concern has been raised to inform them of the concern and to give them an opportunity to respond to it.
- Ensure that accurate and detailed records are kept of all internal and external conversations regarding evaluating the concern, and any actions or decisions taken.

8. Possible Responses:

It may be necessary for the member of staff to be suspended from duties if it is considered that the young person's safety or any investigation could be compromised. In any case of suspension, the member of staff will be offered support via the Chaplain and/or school counsellor.

8.1 Concern Unfounded:

If it is discovered upon evaluation by the Investigating Officer that the low-level concern refers to behaviour that was not considered to be in breach of the Staff Code of Conduct and the law, the Head will speak to the individual about whom the concern was made to discuss their behaviour, why and how the behaviour may have been misconstrued, and what they can do to avoid such misunderstandings in the future. The Head will also speak to the individual who shared the concern, outlining why the behaviour reported is consistent with school standards and the law. The Head will take care to ensure that conversations with individuals who reported concerns that transpired to be unfounded do not deter that individual from reporting concerns in the future.

8.2 Low Level Concern:

If, on the basis of the Investigating Officer's evaluation, the Head determines that a concern is low-level, the school will respond to this in a sensitive and proportionate manner. The DSL will hold a meeting with the individual about whom the concern was reported, during which they will:

- Talk to the individual in a non-accusatory and sympathetic manner.
- Inform them of how their behaviour was perceived by the individual who reported the concern (without naming them, where possible).
- Clearly state what about their behaviour was inappropriate and problematic.
- Discuss the reasons for the behaviour with the individual.
- Inform the individual clearly what about their behaviour needs to change.
- Discuss any support that the individual may require in order to achieve the proper standards

of behaviour.

- Allow the individual the opportunity to respond to the concern in their own words.
- The DSL will also ask the individual to re-read the Staff Code of Conduct and/or the Staff Handbook, depending on the nature of the concern.
- The DSL and the Head will consider whether the individual should receive guidance, supervision or any further training.

Where considered appropriate in the circumstances, the Head will develop an action plan, with input from the individual, that outlines ongoing and transparent monitoring of the individual's behaviour and any other support measures implemented to ensure the staff member's behaviour improves.

Where it is necessary to undergo an investigation into the behaviour, this will be done discreetly, and information will only be disclosed to individuals on a need-to-know basis.

Where any pupil or other individual has been made to feel uncomfortable by the individual's behaviour, they will be offered pastoral support, where appropriate. The Head will ensure that all details of the low-level concern, including any resultant actions taken, are recorded and securely stored in line the Privacy Notice.

8.3 Serious Concern:

Where the concern is serious The Head may decide upon evaluation (and consultation with the DSL and possibly external agencies) that a concern is more serious than the reporter originally thought, e.g. when viewed in conjunction with other evidence or other concerns made about the same individual. Where this decision is made, the concern will be escalated, and dealt with as an allegation. The Head will then follow the procedures laid out in the Safeguarding and Online Safety Policy.

9. Record keeping

The school will retain all records of low-level concerns, including those that were found to be unfounded.

The Head will ensure that all records include the most accurate and up to date information and will store them in an electronic low-level concerns file which will be administered by the Human Resources Manager. The Human Resources Manager will ensure that all low-level concerns are stored together, in an organised and consistent manner, to ensure they can be easily reviewed and analysed where necessary. 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.
- The name of the individual sharing concerns – if the individual wishes to remain anonymous, this will be respected as far as reasonably possible.

The DSL will periodically review the recent low-level concerns made to ensure that they are being appropriately dealt with and to check for any concerning behaviour patterns amongst the staff cohort as a whole. The DSL will keep records of these reviews. Where any concerning patterns of behaviour have been identified with regard to a member of staff, the DSL will consult with the Head to decide on a course

of action. Where a pattern of behaviour has become so concerning that it meets the harms threshold, this will be referred to the LADO as soon as practicable.

Records of low-level concerns will not be kept in the personnel file of the individuals to whom the concerns pertain, unless there have been multiple low-level concerns made about the same individual. Where a concern is thought to be serious and is processed as an allegation, records of this will be kept in staff personnel files. Where multiple low-level concerns have been made about the same individual, these will be kept together, and in chronological order.

Where an allegation is made about an individual who has previously been subject to such allegations, or where a low-level concern is reclassified as a serious concern after meeting the harms threshold, all records of low-level concerns about that individual will be moved to the staff personnel file and kept alongside records of the allegation. The DSL will ensure that all records are kept in a manner that is consistent with the Privacy Notice. Records will be confidential, kept password-protected, and securely destroyed after the staff member to whom the concerns pertain has left the school.

The School will only refer to concerns about a staff member in employment references where they have amounted to a substantiated safeguarding allegation.

There will be lessons learned discussions with relevant members of staff, the Head, Head of HR and DSL after every Low-Level Concern, regardless of its outcome. Where the allegation concluded to be either, unfounded, false, malicious or unsubstantiated, the case manager (and if they have been involved the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

10. Low Level Concern Form

Please use this form to share any concern – no matter how small, and even if no more than a ‘nagging doubt’ – that an adult may have acted in a manner which: is not consistent with St Edmund’s School Staff Code of Conduct, and/or relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult’s suitability to work with children.

Your Details	
Name	
Role	
Date (when completing this form)	
Details of individual whom this concern is about	
Name	
Role	
Relationship to the individual reporting the concern (manager, colleague etc.)	
Details of Concern	

Please include as much detail as possible. Think about the following: What behaviour and/or incident are you reporting? What exactly happened? Why does the behaviour and/or incident worry you? Why do you believe the behaviour and/or incident is not consistent with our Staff Code of Conduct?

--

Details of any children or young people involved

Name (s)	
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Do you believe there is a risk of harm to the above children or young people, either now or in the future?

--

Next Steps

What would you like to see happen in response to your concern?	
--	--

Are you willing to meet with the Head and DSL to discuss your concern? Please circle as appropriate.	Yes	No
--	------------	-----------

Please state any other information that you believe is relevant to the processing of this concern	
---	--

--	--

Signature	
------------------	--

For use by safeguarding team upon receipt of concern

Date and time concern received:	
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Signature of Head (or DSL)	
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Actions to be taken, e.g. no action, investigation, reclassification as allegation meeting the harms threshold.	
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This record will be held securely in accordance with St Edmund’s low-level concerns policy. Please note that low-level concerns will be treated in confidence as far as possible, but St Edmund’s School may in certain circumstances be subject to legal reporting requirements or other legal obligations to share information with appropriate persons, including legal claims and formal investigations.

Appendix 5

Procedures for the transfer and safeguarding of the Canterbury Cathedral Boy Choristers between St Edmund’s School, Canterbury and Canterbury Cathedral

Procedures for the transfer and safeguarding of the St Edmund’s pupils who are members of the Canterbury Cathedral Choir between St Edmund’s School, Canterbury and Canterbury Cathedral

Safeguarding

The welfare and safety of the St Edmund’s pupils is of paramount importance and at the centre of our decision making. The guidance is underpinned by the Children Act 1989 and supporting legislation and guidance (including KCSIE 2024 and Working Together to Safeguard Children 2023) and reflects the 5 key principles of child protection (the 5 P’s)

- Prevention
- Paramountcy
- Partnership
- Protection
- Parental Responsibility

[Keeping Children Safe in Education](#) (2024) and [Working Together to Safeguard Children](#) (2023) form the basis of policy and practice. The partnership between Canterbury Cathedral and St Edmund’s adheres to the statutory guidance of inter-agency working and principles; a coordinated approach is key to this – safeguarding is everyone’s responsibility.

Both organisations discuss the welfare of the St Edmund’s pupils who are members of the Cathedral Choir regularly in the formal settings of fortnightly Keeping In Touch (KIT) meetings and termly Safeguarding Meetings. Whilst the agenda for the regular KIT meetings involves procedural and operational matters, Safeguarding – including live cases – is discussed so that the organisations (together with the parents if appropriate) can share information to provide the child with the necessary support and intervention.

Safeguarding Liaison and Oversight

The Cathedral Safeguarding Lead and the St Edmund’s Designated Safeguarding Lead are the principal officers responsible for the oversight of our joint work in safeguarding. They are the primary channel of communication about safeguarding matters between the institutions. If contact is needed in the absence of either Lead, their Deputies should act for them.

The Junior School DSL acts as the main point of contact during fortnightly KIT meetings.

Inter-Agency Thresholds

Specific concerns are discussed according to [Kent County Council's Inter-Agency Threshold Criteria for Children and Young People](#).

Each quartile refers to a specific Level:

Level 1: Universal
All children and families have core needs such as parenting, health and education. Children are supported by their family and in universal services to meet all their needs. Services are provided to all children and families who live in the area.
Level 2: Additional
Children and families with additional needs who would benefit from or who require extra help to improve education, parenting and/or behaviour or to meet specific health or emotional needs or to improve their material welfare. Child's needs can be met by universal services working together or with the addition of some targeted services. Services are provided on a voluntary basis
Level 3: Intensive
Vulnerable children and their families with multiple needs or whose needs are more complex. Life chances would be impaired without coordinated support. A multi-agency plan is developed with the family coordinated by a lead professional or family worker. A wide range of services, including Early Help Units or/and Children in Need services, might be involved Services are provided on a voluntary basis
Level 4: Specialist
Children and/or family members are likely to suffer significant harm/ removal from home/serious and lasting impairment without the intervention of statutory specialist services. Referral is to services with the power to undertake statutory non voluntary intervention and services with specialist skills

Level 2 – For those receiving additional support (Level 2), both organisations will communicate concerns in the KIT meetings, including strategies to support the child.

When a concern about a St Edmund's pupil enters Level 3, both St Edmund's School and the Cathedral will appoint a Key Worker – one for each setting. They will work together to monitor progress on the case and ensure that necessary actions are taken. If there is uncertainty about whether a key worker should be appointed in a particular case, guidance will be taken from the Cathedral's Safeguarding Advisors and the School's DSL.

When there are concerns regarding members of the Cathedral Staff relating to a St Edmund's pupil, the School's DSL will be invited to meet with the Cathedral's Safeguarding Core Group. Similarly, if there are concerns about St Edmund's School staff, these will be passed onto the Cathedral's Safeguarding Lead. This will be done to establish if any transferrable risks exist and how they should best be managed. All information will be shared in compliance with relevant data protection and GDPR regulations, on the understanding that the safeguarding of a child or vulnerable adult will always take priority if it conflicts with these regulations.

When a safeguarding concern with regard to a St Edmund's pupil and another member of the Cathedral choir is highlighted, this will be passed on to the Cathedral Safeguarding Lead (Emma Pennington) as soon as possible.

Transfer of information regarding training and DBS

All Cathedral and St Edmund's School staff involved in regulated activity involving the Boy Choristers and in their transfer from the school site (including Choir House) to the Cathedral and vice versa, should have the necessary safeguarding checks including an enhanced DBS check. These should include the following (the following list is not exhaustive):

- Cathedral Director of Music & Assistant Director of Music
- Assistant Organists;
- The Precentor;
- Chorister Chaperones;
- Minibus drivers;
- Choir House Staff

Policies and Procedures

Both organisations must be familiar with (and abide by) the Statutory Guidance Keeping Children Safe in Education (2024) and Working Together to Safeguard Children (2024). Both organisations must also be familiar with each other's Child Protection and Safeguarding policies and procedures, Anti-Bullying policies and other relevant documents.

Both organisations should acknowledge receipt and the reading of the policies and procedures.

Information sharing between Chorister Chaperones and Choir House Staff

To protect the wellbeing and safeguarding of St Edmund's pupils on a day-to-day basis, basic welfare information is exchanged directly between the Cathedral's Chorister Chaperones and the Choir House Staff who are employed at St Edmund's School. Chaperone forms, which log behaviour and welfare issues, are handed to the Precentor on a weekly basis and any welfare concerns will be shared at the KIT meetings. These forms are reviewed with the CSL (Cathedral Safeguarding Lead), DSL (St Edmund's Safeguarding Lead) and CSAs (Cathedral Safeguarding Advisors) on a regular basis. If a Chaperone has a non-urgent safeguarding concern about a Chorister, this should be passed to the Precentor (line-manager) in the first instance, who will refer it to the Cathedral Safeguarding Lead, they will then take the lead on any necessary liaison with the School. Urgent safeguarding concerns, where a child is under imminent threat, should be reported to the Close Constables (Cathedral Security) or directly to the Police (St Edmund's). Followed by an immediate referral to Kent Integrated Children's Services through the CSA/St Edmund's DSL.

Any concerns about the behaviour of an adult toward a child will be reported in line with the institution's Safeguarding Policy.

The CSL and DSL will keep each informed.

Staff who work for both the Cathedral and St Edmund's School

Individuals who are employed by both St Edmund's School and the Cathedral hold separate contracts of employment for their separate roles. If a safeguarding concern arises, they should follow the policies and procedures of the institution employing them in the context in which the concern arose. However, if there is

any doubt as to the right course of action, the staff member should report the concern to both institutions to ensure that it is not missed.

Chorister trips and tours

Responsibility for all Cathedral trips involving the St Edmund's pupils, including overseas tours, resides with the Cathedral Chapter. It is the responsibility of the Cathedral to produce suitable planning documentation and risk assessments which include the safeguarding arrangements for the St Edmund's pupils and to provide, pay, train, and manage the necessary staff to ensure the safety of the trip. For trips which take place during term time/boarder choir, the documentation must be shared in advance with St Edmund's School. This documentation (and any subsequent discussion) should be exchanged between the Director of Music and the Head of St Edmund's Junior School. Such trips are to follow expectations set in the school's Educational visits policy, which is applied to all external trips.

In the case of trips and tours *outside* times when the St Edmund's pupils would usually board (when the boys are released for the activity directly by their parents), the Cathedral will communicate details to parents directly.

As a matter of good practice, the Cathedral will inform St Edmund's school of any impending major commitments for the St Edmund's pupils away from the Cathedral during the holidays (such as an international tour), even in circumstances where the parents are directly responsible for releasing their children on the trip. Likewise, if a St Edmund's School term-time trip takes place at a time which will impact on the St Edmund's pupils' duties in the Cathedral Choir, permission will be sought in advance from the Cathedral (via the Director of Music) for the trip to take place.

Cathedral Choir Activities

Any Cathedral Chorister activity that incorporates pupils and/or parents of both St Edmund's and Cathedral Choristers will take place in a Cathedral setting with Cathedral staff responsible for safeguarding arrangements.

Concerns and Advice

If there is a concern that someone is at risk of, or is being abused, or presents a risk to others, it should be reported without delay. If a child, young person or adult is in immediate need of protection the Close Constables/Police should be called.

Education Safeguarding Advisors in Kent can also be contacted to advise on safeguarding concerns: **03000 418503**

Allegations about members of staff: LADO (Local Authority Designated Officer) **03000 410888**

The National Society for the Protection of Cruelty to Children operates two 24-hour helplines:

Help for children and young people – **Childline 0800 1111**

Help for adults concerned about a child – **0808 800 5000**

For victims of domestic abuse National Domestic Violence Helpline – **0808 2000 247**

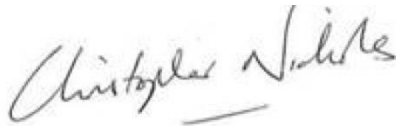
The Church of England National Safeguarding Team have also published an interactive guide to safeguarding which provides a useful overview of safeguarding in the Church of England:

<https://www.churchofengland.org/safeguarding/policy-and-practice-guidance>

Links to [St Edmund's School](#) and [Canterbury Cathedral](#) Safeguarding policies.

Contact information for key School and Cathedral personnel are as follows:

Cathedral Safeguarding Lead	Emma Pennington	emma.pennington@canterbury-cathedral.org
St Edmund's DSL	Ross Underwood	safeguarding@stedmunds.org.uk
Cathedral Safeguarding Advisors	Paul Brightwell Fiona Coombs	pbrightwell@diocant.org fcoombs@diocant.org
St Edmund's Junior School (Deputy) DSL	Kelly French	safeguarding@stedmunds.org.uk
Director of Music	David Newsholme	david.newsholme@canterbury-cathedral.org
Assistant Director of Music	Jamie Rogers	jamie.rogers@canterbury-cathedral.org
Head of St Edmund's Junior School	Ross Comfort	rac@stedmunds.org.uk
Head of St Edmund's School Canterbury	Ed O'Connor	Head@stedmunds.org.uk



Signed:
Christopher Nickols
Chairman of Governors

Signed:
Jane Billing
Governor with responsibility for Safeguarding and Online Safety

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11	February 2018	LJM
12	September 2018	EOC
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15	September 2020	EOC
16	February 2021	EOC
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