King's Reach Education

SAFEGUARDING & CHILD PROTECTION POLICY (INCLUDING SAFER RECRUITMENT, ALLEGATIONS AGAINST STAFF & LOW-LEVEL CONCERN)

Authorisation by:	Board of Trustees
Last reviewed on:	September 2026
Next review due by:	September 2027
Presented at Governance meeting:	7th October 2026

King's Reach Education

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Child protection is of the highest priority at King's Reach Education, and the purpose of this document is to assist all staff, volunteers and visitors to our school to safeguard and protect all the children and young people in our care and promote their well-being.

All the children and young people who are referred to and attend King's Reach Education are vulnerable and have multifaceted complex needs. They often come to the school having experienced exclusion, trauma and historical social, emotional, behavioural and environmental complexities, and are (in the main) already known to professional services (social care; CAMHS; YOS; Attendance Advisory; Educational Psychology; FAP etc.) Child protection is a fundamental aspect of our work and as such is rooted in our ethos to ensure that the school, its activities, staffing and procedures provide an environment in which all children and young people in our care feel safe, secure, happy, cared for and above all, valued as individuals in their own right.

King's Reach Education is committed to providing a safe, secure and nurturing environment for all our children, young people, staff and visitors and we actively promote a climate where children, young people and adults feel confident about sharing any concerns which they may have about their own safety or the well-being of others. We aim to safeguard and promote the welfare of children and young people in our care by protecting them from maltreatment; preventing impairment of their mental and physical health or development; ensuring that they grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children and young people at King's Reach Education to have the best possible outcomes.

Staff at King's Reach Education understand that children and young people may not feel ready or know how to tell someone that they are being abused, exploited, or neglected. Children and/or young people at King's Reach may also not always recognise that their experiences are harmful. Factors for ALL staff to be aware of include: vulnerability, disability, sexual orientation and language barriers. Building trusted relationships between staff and children or young people is critical in facilitating conversation and at King's Reach Education we place significant emphasis on building positive relationships with all staff but particularly between mentors and their mentees.

This policy draws upon duties conferred by the Children Acts 1989 and 2004, The Children and Families Act 2014, S175 of the 2002 Education Act, The Education (Independent School Standards) Regulations 2014 (for independent schools), The Non-Maintained Special Schools (England) Regulations 2015 (for non-maintained special schools), the Education and Training (Welfare of Children) Act 2021, The Equalities Act 2010, The Human Rights Act 2010 and the guidance contained in "*Working Together to Safeguard Children*", the DfE's statutory guidance "*Keeping children safe in education September 2025,* and Ofsted Guidance. We also have regard to the advice contained in DfE's "*What to do if you're worried a child is being abused*" and "*Information Sharing –*

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Advice for practitioners". The policy is applicable to all on and off-site activities undertaken by our pupils whilst they are the responsibility of the School.

We will ensure that ALL staff at King's Reach Education read and understand at least Part one of DfE guidance "*Keeping children safe in education September 2025*". We will also ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part One of the guidance.

Policy Aims

The purpose of this policy is to:

- Identify the names of responsible persons in the school and explain the purpose of their role
- Outline the role of the King's Reach Education trustee body
- Describe what should be done if anyone in the school has a concern about the safety and welfare of a child or young person who attends our provision
- Identify the particular attention that should be paid to those children and young people who fall into a category that might be deemed "vulnerable"
- Set out expectations in respect of professional training
- Ensure that those responsible for recruitment are aware of how to apply safeguarding principles in employing staff
- Set out expectations of how to ensure children and young people are safeguarded when there is potential to come into contact with non-school staff, e.g. volunteers, contractors etc.
- Outline how allegations against/concerns raised in relation to staff will be handled
- Set out expectations regarding record keeping
- Clarify how children will be kept safe through the everyday life at King's Reach Education
- Outline how the implementation of this policy will be monitored.

This policy is consistent with all other policies adopted by the Trustees and should in particular be read in conjunction with the following policies relevant to the safety and welfare of children:

- *Confidentiality Policy*
- *Anti Bullying Policy*
- *Relationships and Sex Education Policy*
- *Safer Recruitment Policy*
- *Staff Code of Conduct*

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Definitions

Safeguarding and promoting the welfare of children and young people means:

- Providing help and support to meet the needs of children as soon as problems emerge (this bullet point is new)
- Protecting children from maltreatment, **whether that is within or outside the home, including online** (this last part has been added)
- Preventing the impairment of children's mental and physical health or development
- Making sure 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

    - **Child protection** is part of this definition and refers to activities undertaken to prevent children and young people in our care suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child or young person and may involve inflicting harm or failing to act to prevent harm.

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

Making or sharing of nudes or semi-nudes is where children share nude or semi-nude images, such as photographs, videos or live streams. This also includes images that are digitally altered or wholly AI-generated (sometimes called 'deepfakes' or 'deep nudes') that otherwise appear to be a photograph or video. The sharing of nude or semi-nude images requires a safeguarding response whether they are consensual or non-consensual.

Sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

Children includes everyone under the age of 18.

The following 3 safeguarding partners are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

The local authority (LA)

A clinical commissioning group for an area within the LA

The chief officer of police for a police area in the LA area

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Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and perpetrator(s) are widely used and recognised terms. However, at King's Reach Education we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

The following behaviours and indicators that can overlap can be signs that children are at risk:

• drug taking and/or alcohol misuse

• unexplainable and/or persistent absences from education

• serious violence, criminal exploitation (including that linked to county lines), radicalisation, and

• consensual and non-consensual making or sharing of nudes or semi nudes.

Staff Responsibilities: What you need to know

Safeguarding and child protection is **everyone's** responsibility. **All adults** working at King's Reach Education (including visiting staff and volunteers) are required to report instances of actual or suspected child abuse or neglect to the Designated Safeguarding Lead (DSL) or to our Deputy Designated Safeguarding Leads(DDSL).

This policy applies to all staff, volunteers and trustees in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

All staff will:

- Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education , and review this guidance at least annually
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- Reinforce the importance of online safety when communicating with parents/carers. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff [code of conduct], the role and identity of the designated safeguarding leads(DSL) and [deputy/deputies], the behaviour

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expectations and the safeguarding response to children who go missing from education

- The early help assessment process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as Radicalisation, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The awareness that children may experience prejudice-based harm
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by other children
- What to look for to identify children who need help or protection

School plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing our boys for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour expectations
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE) and healthy masculinity, which is inclusive and delivered regularly, tackling issues such as:
    - Healthy and respectful relationships
    - Boundaries and consent
    - Stereotyping, prejudice and equality
    - Body confidence and self-esteem
    - How to recognise an abusive relationship (including coercive and controlling behaviour)
    - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support

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- What constitutes sexual harassment and sexual violence and why they're always unacceptable.

Confidentiality (See school confidentiality Policy)

We put every child at young person at King's Reach Education at the heart of everything we do and intentionally provide a safe and secure learning environment. We take 'confidentiality' about children, young people and their families seriously. We are committed to developing creative and positive ways for the child's voice to be heard whilst recognising our responsibility to use, hold and safeguard information. ***Sharing information inappropriately, or unnecessarily, is an erosion of trust.***
We are mindful that staff are placed in a position of trust by all stakeholders and there is a general expectation that a professional approach will be used in all matters of confidentiality when safeguarding the children and young people in our care. The following points provide an important framework for managing confidentiality around matters of child protection and safeguarding:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:

1. There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
2. The DSL will have to balance the victim's wishes against their duty to protect the victim and other children

The DSL should consider that:

- Parents or carers should normally be informed (unless this would put the victim at greater risk)
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care

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- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL's
- Confidentiality is also addressed in this policy with respect to record-keeping in and allegations of abuse against staff

School Safeguarding Leads and Responsibilities

King's Reach Designated Safeguarding Leads are:

Paul Kirrage – Headteacher– paul.kirrage@kingsreach.org.uk

Claire Maudhub – Deputy Headteacher – claire.maudhub@kingsreach.org.uk

Nancy Tugwell – Head of Stage 1 – nancy.tugwell@kingsreach.org.uk

Jonathan Jankowski – Head of Stage 2 - Jonathan. Jankowski@kingsreach.org.uk

Rachel Gosden – Head of Stage 3 – Rachel.gosden@kingsreach.org.uk

All members of staff at King's Reach Education are expected to demonstrate a commitment to student welfare, child protection and safeguarding the children and young people in our care. The Designated Safeguarding Lead 'Paul Kirrage' is the Headteacher and takes the lead responsibility for safeguarding and child protection (including online safety) and works with the student mentors and tutors to monitor student mental health where safeguarding concerns are linked to SEMH; provide advice and support to other staff on child welfare and child protection matters, take part in

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strategy discussions and inter-agency meetings, and/or support other staff to do so, and contribute to the assessment of children and young people at King's Reach Education. Whilst the activities of the DSL can be delegated to our trained deputies, the ultimate lead responsibility for child protection remains with the DSL, this lead responsibility should not be delegated. During term time the DSL (or a deputies) will always be available (during school hours) for staff at King's Reach Education to discuss any safeguarding concerns, which may include availability via phone and/or other media in exceptional circumstances.

The DSL at King's Reach Education is the first point of contact for external agencies that are pursuing Child Protection investigations and as such, co-ordinates the school's representation at CP conferences and Core Group meetings (including the submission of written reports for conferences). When an individual concern/incident is brought to the notice of the Designated Safeguarding Lead, they will be responsible for deciding upon whether or not this should be reported to other agencies as a safeguarding issue. Where there is any doubt as to the seriousness of this concern, or disagreement between the Designated Safeguarding Lead and the member of staff reporting the concern, advice will be sought from the Deputy Designated Safeguarding Lead (DDSL) or the LA's Strategic Lead Officer for safeguarding in education services. If a child is in immediate danger or is at risk of harm, the police will be contacted immediately and a follow-up call to the 'Front-Door' Duty Social Worker.

Although all staff should be aware of the process for making referrals to children's social care and for statutory assessments that may follow a referral, along with the role they might be expected to play in such assessments, the DSL and Deputy DSL at King's Reach Education are most likely to have a complete safeguarding picture and be the most appropriate person/people to advise on the response to safeguarding concerns. The DSL or our deputy will always be available to discuss safeguarding concerns. If in exceptional circumstances, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to another member of the senior leadership team and/or take advice from local children's social care via the Front Door Team Service on: **03000 41 11 11 or 03000 41 91 91 after 5pm or email social.services@kent.gov.uk**
In these circumstances, any action taken should be shared with the DSL (or deputies) as soon as is practically possible.

The Role of the King's Reach Education Trustee Body

The King's Reach Education Trustee Body will ensure that they comply with their duties under legislation and that the policies, procedures and training in the school are effective and comply with the law at all times. Trustees are expected to receive appropriate training on safeguarding at induction that is updated regularly. In addition, they should receive information (for example, via emails, e-bulletins and newsletters)

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on safeguarding and child protection at least annually so that they can demonstrate knowledge of their responsibilities relating to the protection of children, young people and vulnerable adults.

The Trustee Body will ensure that the school contributes to inter-agency working in line with statutory guidance "*Working Together to Safeguard Children*" and that the school's safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the Kent Safeguarding Children Multi-Agency Partnership (KSCMAP).

The King's Reach Education Trustee Body has formally adopted this policy and will review its contents annually or sooner if any legislative or regulatory changes are notified to it by the designated trustee Stewart King or the Headteacher.

The Trustee Body has nominated **Stewart King** as a lead to take leadership responsibility for the school's safeguarding arrangements.

Concerns about and allegations of abuse made against the Headteacher will be referred to the chair of governors who will liaise with the LA's designated officer (LADO) and partner agencies and will attend any strategy meetings called in respect of such an allegation against the Headteacher.

As a good practice, the Headteacher will provide termly report to the Trustee Body outlining details of any safeguarding issues that have arisen during the term and the outcome of any cases identified. These reports will respect all issues of confidentiality and will not therefore identify any person(s) by name.

Also, as a good practice, the nominated trustee will meet on a regular basis with the DSL to monitor the school's safeguarding arrangements and both the volume and progress of cases where a concern has been raised to ensure that the school is meeting its duties in respect of safeguarding. *In keeping with KCSIE September 2024 Part 2: Legislation and the Law Paragraph 123,* the proprietors of King's Reach Education will ensure that all trustees receive appropriate safeguarding and child protection training at induction. This must be regularly updated and equip trustees with the skills to provide strategic challenge to school leaders and to check that all safeguarding policies and procedures are implemented effectively.

The proprietor body of King's Reach Education will understand and be aware of their obligations under the Human Rights Act 1998, the Equalities Act 2010 (including public sector Equality Duty) and their local multi-agency safeguarding arrangements as outlined by **Kent County Council Children's Multi-Agency Partnership (KSCMAP).**

Under the Human Rights Act 1998, King's Reach Trustees understand that it is:

Unlawful for schools to act in a way that is incompatible with the European Convention on Human Rights. The specific rights applying to King's Reach Education are:

Article 3: the right to freedom from inhuman and degrading treatment (an absolute right) Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity

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Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination

Protocol 1 - Article 2: protects the right to education.

According to the Equality Act 2010, King's Reach Education must not unlawfully discriminate against students because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics). The trustees and proprietors should carefully consider how they are supporting students with regard to certain protected characteristics. King's Reach Education is allowed to take positive action to address disadvantages affecting pupils with a protected characteristic. (In the past, this may have been seen as discrimination against those who don't have this protected characteristic.)

Our School Equality Duty

Under the Public Sector Equality Duty (PSED), King's Reach Education trustees and school leaders have a legal duty to eliminate unlawful discrimination, harassment and victimisation. This means that when significant decisions are made or policies developed, lawful equality should be specifically considered. It also underlines the importance of record-keeping for all incidents of abuse and harassment. The PSED helps trustees and school leaders at King's Reach Education to focus on key areas of concern and how we can improve student outcomes. In doing so, there is an expectation that we are conscious and aware of disproportionate vulnerabilities and build this into our safeguarding policies and procedures.

Equality Statement

Some children and young people have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children and young people have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs

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- Are looked after or previously looked after
- Are missing from education
- Whose parent/carer has expressed an intention to remove them from school to be home educated

Types of Child Abuse and Neglect

The signs of different types of abuse, neglect, exploitation and modern slavery, including domestic and sexual abuse (including controlling and coercive behaviour, as well as parental conflict that is frequent, intense, and unresolved), as well as specific safeguarding issues, such as child-on-child abuse, grooming, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)

Abuse

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children

Physical Abuse

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.

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

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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.

Sexual Abuse

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

Neglect

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, for example, 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 13 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

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

Safeguarding incidents and/or behaviours can be associated with factors outside the school and can occur between children and young people outside of our environment.

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All staff at King's Reach Education but especially the DSL and DDSL will be considering whether children are 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. This is known as *Contextual Safeguarding*, which simply means assessments of children and young people at King's Reach Education should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

In addition to these types of abuse and neglect, members of staff at King's Reach Education will also be alert to following specific safeguarding issues:

Mental Health

We are aware that mental health problems can, in some cases, be an indicator that a child or young person in our care has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Our staff members and particularly our mentors are well placed to observe the young people they support day-to-day and identify whether behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that our staff members are aware of how these children's experiences can impact on their mental health, behaviour and education. It is also important to understand that poor mental health can develop into sageguarding issues.If staff have a mental health concern about a child that is also a safeguarding concern, this will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures. We also note the DfE's advice and guidance on *Mental Health and Behaviour in Schools*.

Domestic Abuse

Children and young people can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

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Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

> If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the DSL at King's Reach Education before the child arrives at school as part of their commitment through Operation Encompass, a service that King's Reach Education has signed-up to.

The DSL will provide support according to the child or young person's needs and update records about their circumstances.

Child Criminal Expliotatiom (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person into any criminal 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. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children and young people being forced to work in cannabis factories, 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 indicators of CCE are: children and young people who appear with unexplained gifts or new possessions; children or young people who associate with other young people involved in exploitation; children and young people who suffer from changes in emotional well-being; children and young people who misuse drugs and alcohol; children and young people who go missing for periods of time or regularly come home late; and children and young people who regularly miss school or education or do not take part in education. Any possible CCE case at King's Reach Education will be shared with the DSL with a view to referring to appropriate agencies in Kent following the referral procedures.

The following definitions are helpful in giving clarity to the level of risk and involvement of a young person involved in CCE have been taken from ***'The Kent and Medway Gangs Strategy 2018-2021: Our Approach to Ending the Criminal Exploitation of Vulnerable Children and Adults'.*** These definitions allow a common language and shared understanding at King's Reach Education of what we mean when we talk about 'gangs' in relation to CCE in Kent and Medway:

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Serious Organised Crime Groups (SOCGs)

There is no legal definition of organised crime in England and Wales. For the purposes of this policy and in-line with the Government Serious Organised Crime Strategy 2013, SOCGs are people who work together on a continuing basis in order to plan, coordinate and conduct serious crime. Organised crime is characterised by violence or the threat of violence, and by the use of bribery and corruption.

Gangs

As with SOCGs, there is no single national definition of gangs – though most bodies proscribe to the description presented in the 2009 Centre for Social Justice's report '***Dying to Belong'***, that a gang is ***'a relatively durable, predominantly street-based group of young people who see themselves (or are seen by others) as a discernible group; engage in criminal activity and violence; lay claim over territory; have some form of identifying structural feature and; are in conflict with other, similar gangs.'*** However, in reality the lines between SOCGs and gangs are often blurred as gangs can quickly develop into sophisticated crime networks, trafficking both people and goods (such as drugs) to build resilient and profitable enterprises.

County Lines

County lines crime is a national issue whereby groups extend their drug dealing from their 'home' areas to a new location. This process can often involve the use of mobile phones and almost always involves the exploitation of vulnerable people.

Gang Nominal

A gang nominal is someone who has been identified as being a member of a gang and this is corroborated by intelligence from more than one source (e.g. police, partner agencies or community intelligence).

Gang Associate

A gang associate is defined as someone who offends with gang members; who is associated by the police, partner agencies or community intelligence with gang members; or who has displayed, through conduct or behaviour, a specific desire or intent to become a member of a gang.

Vulnerable Adult

A vulnerable adult is any vulnerable person over the age of 18 with needs requiring care and support, who is at risk of - and who is experiencing - neglect or abuse, including financial abuse. Such individuals may be unable to protect themselves against significant harm or exploitation.

Vulnerable Child

Any child can be vulnerable to gang exploitation. Some young people are at a greater risk of gang involvement than others. For example, Children in Care and care leavers are at an increased risk of gang exploitation, as are children with a disability and those who have recently suffered a loss or trauma. As such, for the purposes of this policy, a

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'vulnerable child' is defined as any child under 18 – but in particular those who are known to social care services; who have a physical or mental impairment; who are in the care of a public authority or are care leavers; or who are provided with accommodation by a public authority in order to secure their wellbeing.

Child Sexual Expliotation (CSE)

CSE is a type of sexual abuse in which children and/or young people are sexually exploited for money, power or status. Children or young people may be tricked into believing they are in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online. Some indicators of children and young people being sexually exploited are: going missing for periods of time or regularly coming home late; regularly missing school or education or not taking part in education; appearing with unexplained gifts or new possessions; associating with other young people involved in exploitation; having older boyfriends or girlfriends; suffering from sexually transmitted infections; mood swings or changes in emotional wellbeing; drug and alcohol misuse and displaying inappropriate sexualised behaviour. A child under the age of 13 is not legally capable of consenting to sex (it is statutory rape) or any other type of sexual touching. Sexual activity with a child under 16 is also an offence. It is an offence for a person to have a sexual relationship with a 16- or 17-year-old if that person holds a position of trust or authority in relation to the young person. Non consensual sex is rape whatever the age of the victim. If the victim is incapacitated through drink or drugs, or the victim or his or her family has been subject to violence or the threat of it, they cannot be considered to have given true consent and therefore offences may have been committed. Child sexual exploitation is therefore potentially a child protection issue for all children under the age of 18. Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: *Child sexual exploitation: guide for practitioners*.

Where it comes to our notice at King's Reach Education that a child under the age of 13 is, or may be, sexually active, whether or not they are a student of this school, this will result in an immediate referral to KCC Children's Services. In the case of a young person between the ages of 13 and 16, an individual risk assessment will be conducted and this will determine how and when information will be shared with parents and the investigating agencies.

Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)

Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) **is illegal.** Sharing nudes and semi-nudes covers the incidents where:

- a person under the age of 18 creates and shares nudes and semi-nudes of themselves with a peer under the age of 18

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- a person under the age of 18 shares nudes and semi-nudes created by another person under the age of 18 with a peer under the age of 18
- a person under the age of 18 is in possession of nudes and semi-nudes created by another person under the age of 18.

When such an incident involving nudes and semi-nudes comes to a member of staff's attention at King's Reach Education, this will be shared with the designated safeguarding lead with a view to referring to appropriate agencies following the referral procedures. Further information and advice on nudes and semi-nudes is available in the non-statutory guidance produced by the UK Council for Internet Safety (UKCIS) *'Sharing nudes and semi-nudes: advice for education settings working with children and young people*'. We also note the DfE's *Searching Screening and Confiscation Advice* for schools.

Serious Violence

All staff at King's Reach Education will be made aware of indicators, which may signal that children and/or young people are at risk from, or are involved with serious crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. We are aware that there is a range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. We are also aware that fear and a need for self-protection is a key motivation for children to carry a weapon – it affords a child a feeling of power. Neighbourhoods in Kent with high levels of deprivation and social exclusion generally have the highest rates of gun and knife crime. Children and/or young people are more likely to carry knives and other weapons than guns. All staff at King's Reach Education will be aware of the associated risks and will share any concerns about or knowledge of such children immediately with the DSL. Further advice on these is available in the Home Office documents *Advice to schools and colleges on gangs and youth violence* and *Criminal exploitation of children and vulnerable adults: county lines*.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line" to move and supply drugs, usually from cities into smaller towns and rural areas. This activity can happen locally in Kent as well as across the UK, but the Medway Towns in Kent have become a national hotspot.

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Children and vulnerable adults are exploited to move, store and sell drugs and money. They exploit vulnerable people, including children and those with mental health or addiction issues, by recruiting them to distribute the drugs, often referred to as 'drug running'.

Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children and young people can be targeted and recruited into county lines in a number of locations including schools (mainstream, independent, special and AP), FE colleges, pupil referral units, children's homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children and/or young people can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. Some specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who: go missing and are subsequently found in areas away from their home; have been the victim or perpetrator of serious violence (e.g. knife crime); are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs; are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection; are found in accommodation that they have no connection with, often called a 'traphouse or cuckooing' or hotel room where there is drug activity; owe a 'debt bond' to their exploiters; have their bank accounts used to facilitate drug dealing.

Signs to look out for:

There are several signs to look out for that may indicate a child, young person or young adult is involved in county lines:

- repeatedly going missing from school or home and being found in other areas
- having money, new clothes or electronic devices and they can't explain how they paid for them
- getting high numbers of texts or phone calls, being secretive about who they're speaking to
- decline in school or work performance/engagement
- significant changes in emotional or physical well-being

Ways Gangs use social media:

- advertising drugs by sharing photos, videos
- statuses showing money, new drugs or when the dealer is open for business
- dealers sharing 'stories' to followers, using social platforms to expand their network with 'suggested' friends
- using hashtags linked to drugs

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- using emojis as code for drug, violence and sexual activities, eg the snowflake ❄️ emoji (for buying cocaine), 8-ball emoji 🎱 for buying an eighth of a gram) or the rocket 🚀 emoji (for purity of drugs)
- Cuckooing

County Line Gangs often use high levels of violence and intimidation to protect the 'county line' and control them. One of these forms of control exploits vulnerable people by using their home as a base for dealing drugs, a process known as cuckooing. Dealers often convince the vulnerable person to let their home be used for drug dealing by giving them free drugs or offering to pay for food or utilities. They often target people who are lonely, isolated, or have addiction issues. It's common for gangs to use a property for a short amount of time, moving address frequently to reduce the chance of being caught.

Child-on-child abuse (Including harassment and violence

Children and young people are capable of abusing each other. This can happen both inside and outside of King's Reach Education and online and take different forms, such as bullying (including cyberbullying, prejudice-based and discriminatory bullying, Discriminatory behaviour (including racism, faith-targeted abuse, and other prejudice-based incidents)); abuse in intimate personal relationships between peers; physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm, which may include an online element that facilitates, threatens and/or encourages physical abuse; violence, particularly pre-planned, forcing other children or young people to use drugs or alcohol, initiation/hazing type violence and rituals), emotional abuse (blackmail or extortion, threats and intimidation), sexual violence, such as rape, assault by penetration and sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, consensual and non-consensual sharing of nudes and semi-nudes images and/or videos (also known as sexting or youth produced sexual imagery), sexual abuse (indecent exposure, indecent touching or serious sexual assaults, forcing other children to watch pornography or take part in sexting) and sexual exploitation (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; having an older boyfriend/girlfriend, associating with unknown adults or other sexually exploited children, staying out overnight, photographing or videoing other children and young people performing indecent acts) and 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 victim humiliation, distress or alarm. **Upskirting is now a criminal offence.** Although it is more likely that girls will be victims and boys perpetrators, all peer on peer abuse is unacceptable and will be taken seriously. **We do not tolerate these or pass them off as "banter", "just having a laugh" or "part of growing up"**, this can lead to a culture of misogyny/misandry.

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Although young people at King's Reach Education are taught 1-1 and have limited social interactions with each other, there are occasions when young people are together and during these periods staff must be extra vigilant and understand their responsibilities to challenge and report any bullying or abusive behaviours. King's Reach Education has a strong commitment to anti-bullying and will consider all coercive acts and child on child abuse within a Child Protection and safeguarding context.

We recognise that on occasions some students will sometimes negatively affect the learning and wellbeing of other pupils and their behaviour will be dealt with under the school's behaviour policy.

As a school, we will minimise the risk of allegations against other pupils by providing a developmentally appropriate PSHE syllabus which develops young peoples' understanding of acceptable behaviour and keeping themselves safe, having systems in place for any young person to raise concerns with staff, knowing that they will be listened to, believed and valued, delivering targeted work on assertiveness and keeping safe to those pupils identified as being at risk, developing robust risk assessments and providing targeted work for pupils identified as being a potential risk to child-on-child abuse. It is important that all our staff recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports. Any possible child on child abuse case will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures. We also note the DfE's advice and guidance on *Preventing and Tackling Bullying* *and will follow the KCSIE September 2025 statutory guidance* to ensure that children and young people at King's Reach Education understand that the law on child-on-child abuse is there to protect them rather than criminalise them.

Sexual harassment, online sexual abuse and sexual violence

Sexual harassment, online sexual abuse and sexual violence (including sexualised language) is unacceptable at King's Reach Education, and we will challenge and address any such behaviour with personalised interventions. Because our children and young people have minimal contact with each other, opportunities to engage in such behaviours are minimised. However we understand that sexual harassment, online sexual abuse and sexual violence could happen at King's Reach Education even when there are no specific reports. We work actively to prevent sexual harassment, online sexual abuse and sexual violence through a whole-school approach that includes an effective behaviour policy, dedicated 1-1 pastoral mentor support and a carefully planned relationships, sex and health education curriculum, which specifically addresses sexual harassment, online abuse, sexual violence and issues of consent. We will ensure that our children and young people are taught about safeguarding risks, including online risks and will support students to understand what constitutes a healthy relationship, both online and offline. Our staff members have been made aware

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and have appropriate knowledge of '*Part 5: Child on child sexual violence and sexual harassment*' of DfE guidance "*Keeping children safe in education September 2025*". All pupils are supported to report concerns about harmful sexual behaviour freely. We will take concerns seriously and deal with them swiftly and appropriately and will ensure pupils are confident that this is case. We will be alert to factors that increase vulnerability or potential vulnerability such as mental ill health, domestic abuse, children with additional needs, and children from groups at greater risk of exploitation and/or of feeling unable to report abuse (for example, LGBTQ+children and young people). We will identify and address any barriers that can prevent a student from making a disclosure, for example communication needs. Staff will share any concerns about or knowledge of such incidents immediately with the DSL with a view to ensuring that support systems are in place for victims. Where necessary, we will work with relevant external agencies to address the issue, which may include a referral to the Children's Multi-Agency Partnership (KSCMAP) Front Door and reporting to the Police. We will keep comprehensive records of all allegations.

Sexual violence and sexual harassment between children

Sexual violence and sexual abuse can happen anywhere, and all staff working with children and young people at King's Reach are advised to maintain an attitude of 'it could happen here'.

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It can occur online and offline (both physically and verbally). Children and young people who are victims of sexual violence and sexual harassment will find the experience stressful and extremely distressing. This will affect their educational engagement and attainment.

At King's Reach Education we will handle reports of sexual violence and harassment between children and young people, both on and outside school premises, in line with '*Part 5: Child on child sexual violence and sexual harassment*' of DfE guidance "*Keeping children safe in education September 2025*" and train our staff members accordingly (including tutors delivering relationships, sex and health education). Staff will share any concerns about or knowledge of such incidents immediately with the DSL with a view to ensuring that support systems are in place for victims (and alleged perpetrators). We take these incidents seriously and ensure that victims are protected, offered appropriate support and every effort is made to ensure their education at King's Reach Education is not disrupted. Where necessary, we will work with relevant external agencies to address the issue, which may include a referral to the KCC Children Multi-Agency Partnership (KSCMAP) via Front Door and reporting to the Police. We acknowledge that multi-agency early help will work best when placed alongside strong policies, preventative education and engagement with parents and carers.

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On one hand, we need to safeguard the victim (and the wider student body) and on the other hand provide the alleged perpetrator with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Harmful sexual behaviours in children and young people may be (and often are) a symptom of either their own abuse or exposure to abusive practices and or materials. We will take advice, as appropriate, from children's social care, specialist sexual violence services and the police. If the alleged perpetrator moves to another educational institution (for any reason), we will make the new educational institution aware of any ongoing support needs and where appropriate, potential risks to other children, young people and staff. The designated safeguarding lead will take responsibility to ensure this happens as well as transferring the child protection file.

KCSIE 2025 advises that as a school we should not feel alone in dealing with sexual violence and sexual harassment. We acknowledge that Local authority children's social care and the police will be important partners where a crime might have been committed. Referrals to the police will often be a natural progression of making a referral to local authority children's social care. The designated safeguarding lead (or a deputy) should lead the school response and should be aware of the local process for referrals to children's social care and making referrals.

The following resources can be accessed to support leaders and staff at King's Reach:

• Child Exploitation and Online Protection command: CEOP is a law enforcement agency which aims to keep children and young people safe from sexual exploitation and abuse. Online sexual abuse can be reported on their website and a report made to one of its Child Protection Advisors

• The NSPCC provides a helpline for professionals at 0808 800 5000 and help@nspcc.org.uk. The helpline provides expert advice and support for school staff and will be especially useful for the designated safeguarding lead (and their deputies)

• Support from specialist sexual violence sector organisations such as Rape Crisis or The Survivors Trust

• The Anti-Bullying Alliance has developed guidance for schools about Sexual and sexist bullying.

Online:

King's Reach Education leaders and staff understand that sexual violence and sexual harassment occurring online (either in isolation or in connection with face-to-face incidents) can introduce a number of complex factors. Amongst other things, this can include widespread abuse or harm across a number of social media platforms that leads to repeat victimisation. Online concerns can be especially complicated and support is available from:

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• The UK Safer Internet Centre provides an online safety helpline for professionals at 0344 381 4772 and helpline@saferinternet.org.uk. The helpline provides expert advice and support for school and college staff with regard to online safety issues

• Internet Watch Foundation: If the incident/report involves sexual images or videos that have been made and circulated online, the victim can be supported to get the images removed by the Internet Watch Foundation (IWF)

• Childline/IWF Report Remove is a free tool that allows children to report nude or sexual images and/or videos of themselves that they think might have been shared online

• UKCIS Sharing nudes and semi-nudes advice: Advice for education settings working with children and young people on responding to reports of children sharing non-consensual nude and semi-nude images and/or videos (also known as sexting and youth produced sexual imagery). Please see footnote 8 for further information

• Thinkuknow from NCA-CEOP provides support for the children's workforce, parents and carers on staying safe online

• LGFL 'Undressed' provided schools advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.

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Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. The designated safeguarding lead (or a deputy) at King's Reach should ensure they are engaging with local authority children's social care and specialist services as required. Any professional assessments should be used to inform our work with and protecting our students and updating risk assessments as required for each individual case.

Homelessness

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

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

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

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Domestic abuse

Domestic violence and abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological, physical, sexual, financial and emotional. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. If members of staff have a concern about or knowledge of any domestic abuse incidents, they will share it immediately with the DSL with a view to referring to appropriate agencies.

Violence Against Women and Girls (VAWG)

VAWG is defined as any act of gender–based violence that results in, or is likely to result in physical, sexual or psychological harm or suffering to women including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or private life. VAWG is the umbrella term which brings together multiple forms of serious violence such as crimes committed in the name of "honour"; domestic abuse; female genital mutilation (FGM); forced marriage; sexual violence, abuse, exploitation and rape; stalking; harassment; trafficking for sexual exploitation; prostitution. If members of staff at King's Reach Education have a concern about or knowledge of any VAWG incidents in relation to a King's Reach Education student being a perpetrator or disclosing concerns about such behaviours occurring at home or in their community, they will share it immediately with the DSL with a view to referring to appropriate agencies.

So-called 'honour-based abuse (HBA) (including Female Genital Mutilation and Forced Marriage)

HBA includes incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBV are abuse (regardless of the motivation) and will be handled and escalated as such. If members of staff have a concern about or knowledge of a child or young person at King's Reach Education that

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might have or been at risk of perpetrating HBA or who has witnessed HBA, they will share it immediately with the DSL with a view to referring to appropriate agencies.

Female Genital Mutilation (FGM)

King's Reach Education is a BOY'S ONLY school. However, we understand our commitment to safeguard families of the children in our care and if members of staff have a concern about or knowledge of a child or young person's sibling that might be at risk of FGM or who has suffered from FGM at the hands of their family or the young person in our care they will share it immediately with the DSL with a view to referring to appropriate agencies including the police and the sibling's school.

FGM is a procedure where the female genital organs are injured or changed and there is no medical reason for this. It is frequently a very traumatic and violent act for the victim and can cause harm in many ways. The practice can cause severe pain and there may be immediate and/or long-term health consequences, including mental health problems, difficulties in childbirth, causing danger to the child and mother; and/or death.

FGM is a deeply embedded social norm, practised by families for a variety of complex reasons. It is often thought to be essential for a girl to become a proper woman, and to be marriageable. The practice is not required by any religion.

FGM is an unacceptable practice for which there is no justification. It is child abuse and a form of violence against women and girls.

FGM is prevalent in 30 countries and is a deeply rooted practice, widely carried out mainly among specific ethnic populations in Africa and parts of the Middle East and Asia. While FGM is concentrated in countries around the Atlantic coast to the Horn of Africa, in areas of the Middle East like Iraq and Yemen, it has also been documented in communities in Colombia, Iran, Israel, Oman, The United Arab Emirates, The Occupied Palestinian Territories, India, Indonesia, Malaysia, Pakistan and Saudi Arabia. It has also been identified in parts of Europe, North America and Australia.

FGM is illegal in the UK. It is estimated that approximately 60,000 girls aged 0-14 were born in England and Wales to mothers who had undergone FGM and approximately 103,000 women aged 15-49 and approximately 24,000 women aged 50 and over who have migrated to England and Wales are living with the consequences of FGM. In addition, approximately 10,000 girls aged under 15 who have migrated to England and Wales are likely to have undergone FGM.

We note a new duty that was introduced on 31 October 2015 that requires teachers, which includes qualified teachers or persons who are employed or engaged to carry out teaching work in schools and other institutions to report 'known' cases of FGM in girls aged under 18 to the police. The duty applies to any teacher who is employed or engaged to carry out 'teaching work', whether or not they have qualified teacher status, in maintained schools, academies, free schools, independent schools, non-maintained special schools, sixth form colleges, 16-19 academies, relevant youth accommodation

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or children's homes in England. The duty does not apply in relation to suspected cases – it is limited to 'known' cases' (i.e. those which are visually identified or disclosed to a professional by the victim). It will be rare for teachers to see visual evidence, and they should not be examining pupils or students. The duty does not apply in cases where the woman is over 18 at the time of the disclosure/discovery of FGM (even if she was under 18 when the FGM was carried out). Further information on this duty can be found in the document "*Mandatory Reporting of Female Genital Mutilation – procedural information*". A useful summary of the FGM mandatory reporting duty is available in *FGM Fact Sheet*.

Because King's Reach Education is a male only school, we will only report to the police cases where we believe a young person has disclosed witnessing the perpetration of FGM. All teaching staff (tutors) at King's Reach Education will discuss any such case with the designated safeguarding lead (or deputy) with a view to involving children's social care and the police as appropriate.

Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. We note The Forced Marriage Unit's *statutory guidance* and especially Chapter 7 on page 32 of the *Multi-agency guidelines*. Any possible forced marriage case will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures.

Preventing Radicalisation: PREVENT

The Counter-Terrorism and Security Act 2015 places a duty on specified authorities, including local authorities and childcare, education and other children's services providers, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty").

Children and young people can be exposed to extremist influences or prejudiced views, in particular those via the internet and other social media. Schools can help to protect children from extremist and violent views in the same ways that they help to safeguard children from drugs, gang violence or alcohol.

Examples of the ways in which people can be vulnerable to radicalisation and the indicators that might suggest that an individual might be vulnerable:

- Example indicators that an individual is engaged with an extremist group, cause or ideology include: spending increasing time in the company of other suspected

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extremists; changing their style of dress or personal appearance to accord with the group; their day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause; loss of interest in other friends and activities not associated with the extremist ideology, group or cause; possession of material or symbols associated with an extremist cause (e.g. the swastika for far right groups); attempts to recruit others to the group/cause/ideology; or communications with others that suggest identification with a group/cause/ideology.

- Example indicators that an individual has an intention to use violence or other illegal means include: clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills; using insulting or derogatory names or labels for another group; speaking about the imminence of harm from the other group and the importance of action now; expressing attitudes that justify offending on behalf of the group, cause or ideology; condoning or supporting violence or harm towards others; or plotting or conspiring with others.
- Example indicators that an individual is capable of contributing directly or indirectly to an act of terrorism include: having a history of violence; being criminally versatile and using criminal networks to support extremist goals; having occupational skills that can enable acts of terrorism (such as civil engineering, pharmacology or construction); or having technical expertise that can be deployed (e.g. IT skills, knowledge of chemicals, military training or survival skills).

The examples above are not exhaustive and vulnerability may manifest itself in other ways. There is no single route to terrorism nor is there a simple profile of those who become involved. For this reason, any attempt to derive a 'profile' can be misleading. It must not be assumed that these characteristics and experiences will necessarily lead to individuals becoming terrorists, or that these indicators are the only source of information required to make an appropriate assessment about vulnerability. We see the Prevent duty as part of King's Reach Education's wider safeguarding obligations and note the revised *Prevent duty guidance: for England and Wales*, especially paragraphs 57-76.

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism that uses existing collaboration between local authorities, the police, statutory partners (such as the education sector, social services, children's and youth services and offender management services) and the local community.

If a member of staff at King's Reach Education raises a concern about the radicalisation of a child or young person or other family members the DSL will refer the case to the County Channel Panel by completing the prevent referral form, or by contacting the Front Door Team on 03000 41 11 11.

You can also find valuable information using the following link to ACT (Action Counter Terrorism)

https://actearly.uk/spot-the-signs-of-radicalisation/what-to-look-for/

We will always refer children at risk of harm as a result of involvement or potential involvement in extremist activity. If there are sufficient concerns, the individual referred will be discussed at the Channel panel to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from King's Reach Education will attend the Channel panel if and when we are asked to help with this assessment.

An overview of Kent's Prevent Strategy and key Prevent Personnel can be accessed via the following link: https://www.kscmp.org.uk/procedures/prevent

The following link provides access to online referral forms to report your concerns:

https://www.kent.gov.uk/about-the-council/strategies-and-policies/community-safety-and-crime-policies/contest/prevent

Private Fostering

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

The law requires that the local authority should be notified if anyone is looking after someone else's child for 28 days or more. The purpose of the council's involvement is to support the child and private foster family (and wherever possible the biological parent/s) with any issues arising. These may be practical issues such as benefits, housing, immigration or emotional issues such as keeping contact with biological family, maintaining cultural identity.

If at King's Reach Education we become aware of a child in a private fostering arrangement within Kent, we will notify the council's Children's Multi-Agency Partnership (KSCMAP) Front Door by emailing: kscmp@kent.gov.uk or calling 03000 42 11 26.

Safeguarding Children and Young People who are lesbian, gay, bi or trans (LGBTQ+)

Being LGBTQ+ is NOT an inherent safeguarding or child protection risk factor for harm. However, children and young people who are LGBTQ+, or those perceived as LGBTQ+ can be more at risk of being targeted by other children and young people. By ensuring that all children and young people at King's Reach have a trusted adult to whom they can talk, King's Reach Education can help reduce this risk.

Supporting pupils who are questioning their gender

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We are aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, such as relating to relationships with family, peers or their broader social environment.

We will take a strong, proactive stance on all forms of bullying based on gender. See our behaviour policy for more detail The school will ensure that children and their families are aware that, while the school will appropriately sanction any cases of bullying or harassment, and take a strong stand against bullying, it must also be conscious of the rights of pupils and staff in relation to their religion or belief.

When supporting a pupil questioning their gender, we will take into account the principle of taking a careful approach.

Considering requests for support with social transition

The school will not initiate any action regarding social transition. However, when a pupil or their parent/carer requests that the school makes changes or puts support in place to facilitate the pupil presenting as the opposite biological sex ("social transition"), we will work together with parents/carers to determine what is in the best interests of the child and other children.

Members of staff will not adopt any changes relating to social transition unless a decision has been made by the school and a child's parents/carers have been involved (as set out in Keeping Children Safe in Education (KCSIE)).

In making decisions about supporting social transition, the school will ensure compliance with its obligations in respect of safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by the school's evaluation of the welfare and best interests of the child and other children. The schools will make decisions in line with the following principles:

The school has statutory duties to safeguard and promote the welfare of all children: the first step when considering a child's request for support with social transition will be to consider what is in the best interests of the child and other children, and a decision relating to social transition may not be the same as a child's wishes

Parents and carers should be actively involved and their views treated with importance: (except in the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them) where a child who is questioning their gender asks for support from the school parents/carers will be engaged as a matter of priority and their views will carry great weight and be properly considered

Accommodating social transition is an active intervention so the school will take a very careful approach: social transition is an active intervention that may have significant effects on the child in terms of their psychological functioning and longer-term outcomes

The school will comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition

The school will ensure that the decision-making process is documented and records are kept.

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The circumstances or needs of a child may change over time, and the school may need to review its original decision and will involve the DSL in doing so.

Referrals

Where there is a safeguarding concern, we take into account the child's wishes and feelings when determining what action to take and what services to provide. We have systems in place for children to express their views and give feedback. We acknowledge that children who are affected by abuse or neglect may demonstrate their needs and distress through their words, actions, behaviour, demeanour, school work or other children. Ultimately, all our systems and processes operate with the best interests of the child at heart.

Referrals to services regarding concerns about a child or family typically fall into three categories:

- Early Help Services;
- Child in need - Section 17 (Children Act 1989) referrals;
- Child protection - Section 47 (Children Act 1989) referrals.

The Kent Safeguarding Board Multi Agency Threshold Guide sets out the different levels of need and detailed guidance about how concerns within these different levels should be responded to by Kent agencies. A copy can be found on our Safeguarding Noticeboard or via the following link:

https://www.proceduresonline.com/kentandmedway/chapters/contents.html

Safeguarding referrals should be made to Kent Safeguarding Children Multi Agency Safeguarding Partnership via FRONT DOOR and and copied to the LA's regional Schools Safeguarding Coordinator. Prior to any written form being sent as a referral to social care, there should be a verbal consultation with the **FRONT DOOR social worker or manager, by calling the duty desk on 03000 41 11 11** to ensure that making a referral is an appropriate action.

Kent Area School Safeguarding Coordinators:

Safeguarding Education Headquarters: Sessions House, County Hall, Maidstone, Kent ME14 1XQ

03000 41 57 88

Online Protection Coordinator: Sessions House, County Hall, Maidstone Kent ME14 1XQ

03000 41 57 97

North Kent Coordinator: Worrall House, 30 Kings Hill Avenue, West Malling, Kent ME19 4AE

03000 41 24 45

South Kent Coordinator: Kroner House, Eurogate Business Park, Ashford, Kent TN24 8XU

03000 41 56 48

East Kent Coordinator: Brook House, Reeves Way, Whitstable, Kent CT5 3SS

03000 41 85 03

West Kent Coordinator: Worrall House, 30 Kings Hill Avenue, West Malling, Kent ME19 4AE

03000 41 22 84

For further safeguarding information, please visit The (Kent) Education People Website

https://www.theeducationpeople.org/our-expertise/safeguarding/

The parent/carer will normally be contacted to obtain their consent before a referral is made. However, if the concern involves, for example alleged or suspected child sexual abuse, Honour Based Abuse, fabricated or induced illness or the Designated Safeguarding Lead has reason to believe that informing the parent at this stage might compromise the safety of the child or a staff member, nothing should be said to the parent/carer ahead of the referral, but a rationale for the decision to progress without consent should be provided with the referral.

When we make a referral, the local authority should make a decision, within one working day of a referral being made, about the type of response that is required and should let us, as the referrer, know the outcome. We will follow up if this information is not forthcoming.

If, after a referral, the child's situation does not appear to be improving, we will consider following local escalation procedures to ensure that the concerns have been addressed and, most importantly, that the child's situation improves.

Early Help

The Kent Early Help Team District Team will be contacted via telephone or email:

Maidstone: 03000 42 23 40 or www.MaidstoneEarlyHelp@kent.gov.uk

They can be contacted to request additional early help for a family when the needs of a child are beyond the level of support that can be provided by King's Reach Education and if the needs of the family sit **below Support Levels 3 or 4 (See Appendix 1).** Any request for advice will be responded to by an Early Help Manager and you will then be able to discuss the needs of a child, young person or family and be provided with advice

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about the most appropriate type of support available within the community at Support Levels 1 and 2.

Unexplained or Suspicious Injury

In circumstances where a child or young person has an unexplained or suspicious injury that requires urgent medical attention, the Child Protection referral process at King's Reach Education should not delay the administration of first aid or emergency medical assistance. **If a student is thought to be at immediate risk because of parental violence, intoxication, substance abuse, mental illness or threats to remove the child during the school day, for example, urgent Police intervention will be requested**.

Where a child/young person sustains a physical injury or is distressed as a result of reported chastisement, or alleges that they have been chastised by the use of an implement or substance, this will immediately be reported to the DSL for investigation.

All parents/carers will be informed of our safeguarding responsibilities and the existence of this policy. In situations where a child or young person sustain injury or are otherwise affected by an accident or incident whilst they are the responsibility of the school, parents will be notified of this as soon as possible.

King's Reach Education recognises the need to be alert to the risks posed by strangers or others (including the parents or carers of other students) who may wish to harm children and will take all reasonable steps to lessen such risks.

Safeguarding Vulnerable Pupils Including Looked After Children

Particular vigilance will be exercised at King's Reach Education in respect of all our students who are subject to a Child Protection Plan and any incidents or concerns involving these children will be reported immediately to the allocated Social Worker (and confirmed in writing; copied to the LA's Schools Safeguarding Coordinator). If the child or young person in question is a Looked-After child, this will also be brought to the notice of the Designated Person with responsibility for Looked After Children at Kent Virtual School. This person is presently:

Tony Doran: Headteacher, Virtual School Kent. Tony or a member of the Virtual School Team can be contacted vis:

North and West Kent & Medway Virtual School

Phone: 03000 412777 or email: vskadmin.Worrall@kent.gov.uk

Address: Worrall House, 30 Kings Hill Avenue, Kings Hill, Kent ME19 4AE

The School's Designated Teacher for Looked-after and Previously Looked-after Children will work with the Kent virtual school head to discuss how funding can be best used to support the progress of any looked after children at King's Reach Education and meet the needs identified in the child's personal education plan (PEP). The designated

teacher will also work with the virtual school head to promote the educational achievement of previously looked after children. We note the DfE's statutory guidance *Designated teacher for looked-after and previously looked-after children*.

Local authorities should share with King's Reach Education the fact a child has a social worker, and the DSL will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This will be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools to safeguard and promote the welfare of children. Where children or young people need a social worker, this will inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Safeguarding Children with SEND and Health Issues

At King's Reach Education, all our students have an EHCP. We acknowledge that all our children and young people with special educational needs or disabilities (SEND) and/or certain health conditions at King's Reach Education face additional safeguarding challenges. They are 3 times more likely to be abused than their peers in mainstream education and additional barriers can exist when recognising abuse and neglect in this group.This can include assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child/young person's condition without further exploration; these children/young people being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children and young people; the potential for children and young people with SEND or certain medical conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs; and communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse, the need for intimate care or that these children are isolated from others, that these children are more likely to be dependent on adults for care. Further information can be found in the DfE's *SEND Code of Practice 0 to 25* and *Supporting Pupils at School with Medical Conditions*.

Pupils with medical conditions

An incident relating to the management of a child's medical condition (including allergies) does not itself warrant a referral to local safeguarding partners.

A safeguarding referral will be made where an incident highlights concern that the child might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family because of their medical condition. For example, information about the child's medical condition might be withheld from the school, or the child may be repeatedly sent to school without essential medication, putting them at risk.

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We absolutely recognise that our students who arrive with often complex additional needs and a neurodiverse portrait can face additional safeguarding challenges. We offer bespoke and highly inclusive pastoral support for all our students. This includes:

- A dedicated 1-1 coach supports them holistically throughout the school day.
- A highly bespoke and personalized curriculum
- 1-1 teaching

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputies) and the SENCO.

If a student at King's Reach Education discloses that they have witnessed domestic abuse or it is suspected that they may be living in a household which is affected by family violence, this will be referred to the Designated Safeguarding Lead as a safeguarding issue.

King's Reach Education also acknowledges the additional need for support and protection of children and young people who are vulnerable by virtue of homelessness, refugee/asylum seeker status, the effects of substance abuse within the family, those who are young carers, and children/young people for whom English is an additional language.

Young carers

The school recognises that caring responsibilities can impact on a child's attendance, attainment, behaviour and wellbeing, and early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health service.

Online Safeguarding

At King's Reach Education we recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues. Whilst at school, students are always supervised by their 1-1 mentor or teacher when accessing any technology. Regardless, we are committed to protecting and educating the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')

To address this, King's Reach aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and trustees
- Set clear guidelines for the use of mobile phones for each student according to their tailored risk assessment.

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- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 Key categories of Risk

Our approach to online safety is based on addressing the following categories of risk:

content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories,

contact: being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes,

conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, including those generated using AI 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/).

To meet our aims and address the risks above we will:

- Educate pupils about online safety as part of our PHSE curriculum and our highly personalized pastoral offer of 1-1 mentorship on:
    - The safe use of social media, the internet and technology
    - Keeping personal information private
    - How to recognise unacceptable behaviour online
    - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
    - Understanding harmful online hoaxes and challenges

We also commit to:

- Training staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year.
- Educating parents/carers about online safety via home/school communications sent directly to them and during meetings/reviews. We will also share information about any new arising concerns regarding apps, online hoaxes and online challenges that may put their child at risk and clear procedures so they know how to raise any concerns directly about online safety.
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

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- Staff are allowed to bring their personal phones to school for their own use, but are expected to use their work phones to take photographs or videos to be uploaded to student Padlets.
- Staff **will not** take pictures or recordings of pupils on their personal phones or cameras

- Make all students, parents/carers, staff, volunteers and governors aware of our community expectations regarding acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology.
- Explain the sanctions we will use if a student is in breach of our expectations on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place with trustee and proprietor support robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems
- Carry out an annual review of our approach to online safety, supported by student risk assessments that consider and reflect the risks faced by our school community.

Artificial intelligence (AI)

Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, students and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Gemini.

King's Reach recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. However, AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

We will treat any use of AI to access harmful content or bully students in line with this policy and our Antibullying Policy.Staff should be aware of the risks of using AI tools while they are still being developed and should carry out risk assessments for any new AI tool being used by the school. Our school's requirements for filtering and monitoring also apply to the use of AI, in line with Keeping Children Safe in Education.

Filtering and Monitoring

King's Reach uses an Omada cloud control fire wall to help eliminate wrongful access to young people whilst online.

In addition to online security, our best monitoring tool as a school is our 1-1 nature with our students whenever they are using equipment that can access the Internet. King's Reach Education manage the use of online access at all times on school's equipment.Remote Education and Learning

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There may be occasions where students at King's Reach are supported to engage in online remote learning with their mentor if they are not able to be on site following a serious behaviour incident or safeguarding matter. This situation is likely to be temporary and extraordinary but in such circumstances,we will always provide 1-1 mentor support whilst online and reinforce the importance of being safe whilst online.

The effectiveness of the filtering and monitoring system will be checked a minimum of once a year. This will be carries out by the facilities Manager currently: Ben Flaherty

Notifying parents or carers about Safeguarding Disclosures/incidents

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL's will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with a member of the DSL team.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

A member of the DSL team will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

Students with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

A member of the DSL team and all members of staff will work with and support social workers to help protect vulnerable children and young people in our care.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the student's safety, welfare and educational outcomes. For example, it will inform decisions about:

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- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

Record-Keeping

All safeguarding concerns, discussions, decisions made and the reasons for those decisions must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL team.

Records will include:

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

Concerns and referrals will be kept in a separate child protection file for each child.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the child arrives, this should be within:

- **5 days** for an in-year transfer, or within
- **The first 5 days** of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

At King's Reach Education our DSL Team use CPOMS to document and upload files pertaining to all matters of safeguarding. All historical paperwork is retained in a secure box within a box that can only be accessed by the DSL team.

The DSL at King's Reach Education will keep accurate written notes of all incidents and child protection or child in need concerns, discussions and decisions made, and the reasons for those decisions, relating to individual children or young people at King's Reach Education. These notes are significant especially if the incident or the concern does not lead to a referral to other agencies. This information may be shared directly

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with other agencies as appropriate. All contact with parents/carers and external agencies will be logged and these will be kept as CP records. The school will take into account the views and wishes of the child who is the subject of the concern but staff will be alert to the dangers of colluding with dangerous "secrets".

Child protection records are not open to students or parents/carers. All CP records are kept securely by the Designated Safeguarding Lead and separately from educational records. They may only be accessed by the Designated Safeguarding Lead, their Deputy and designated senior leaders of King's Reach Education.

The content of Child Protection Conference or Review reports prepared by King's Reach Education will follow the headings recommended by Children's Services and will, wherever possible, be shared with the parents/carers in advance of the meeting.

Child Protection records will be sent to receiving schools separately from the main student file and under a confidential cover when students leave King's Reach Education as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term ensuring secure transit and a confirmation of receipt will be obtained.

In addition to the child protection file, the DSL will also consider if it would be appropriate to share any information with the new school or college in advance of a child or young person leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child/young person arrives.

When we receive child protection records from other schools, we will ensure key staff such as the DSL, Head of house and the child/young person's Student Coach team are aware as required.

If a student is withdrawn from King's Reach Education due to a family move or any other reason, all efforts will be made to identify any new address and the Local Authority and school to which they are being admitted and to ensure that their educational records are sent without delay to the new school or provision. If the parent/carer fails to provide this information, we will liaise with the child/young person's referrer in order that they might make further enquiries, and we will action a CME referral (Children Missing Education).

When a student ceases to be registered at King's Reach Education and becomes a registered student at another school or provision in England or Wales, (and once registered with the DfE) we will send a Common Transfer File (CTF) to the new school via DfE's secure internet system called school2school or through our CPOMS system.

We will upload CTFs of students who have left but their destination or next school is unknown, or the child has moved abroad or transferred to a non-maintained school to a searchable area of the school2school website commonly referred to as the 'Lost Pupil Database'. If a student arrives in our school and the previous school is unknown, we will search the database for any record of the child. The school will require documentary proof as to the identity of students presented for admission. If there is any doubt as to

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the identity of a pupil, advice will be sought from the local authority and other statutory agencies, as appropriate. We will maintain accurate and up to date records of those with Parental Responsibility and emergency contacts. We will hold more than one emergency contact number for each student to make contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern. Students at King's Reach Education will only be released to the care of those with Parental Responsibility or someone acting with their written consent.

Safeguarding Training and Professional Learning

All staff members will receive appropriate safeguarding and child protection training (including online safety) at induction, which is regularly updated. In addition, all staff members will receive safeguarding and child protection updates (for example, via email, via our App, e-bulletins and at staff meetings and INSET), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children and young people at King's Reach Education effectively.

All staff are expected to read and evidence their reading and knowledge derived from 'KCSIE Keeping Children Safe in Education September 2025 – Part 1' and Annex B and staff with DSL Responsibilities and trustees are expected to read the whole document. All staff and trustees of King's Reach Education are required to sign a document that confirms that they have read, understood and agree to work within the professional framework of KCSIE September 2025. These will be retained in personal personnel files and recorded on the school Single Central Record.

All newly recruited staff (teaching and non-teaching) and trustees will be acquainted with this policy and will be required to attend relevant training. In addition, all new staff and temporary staff will be required to attend an induction session with the Designated Safeguarding Lead or their deputy on their first day in the school.

Anyone part of the Designated Safeguarding Lead team will attend the LA's dedicated or another appropriate Level 3 Safeguarding and Child Protection induction course and then refresher training at least every two years. All staff will also undertake 'Prevent 'awareness training, and all staff will be able to understand the unique risks associated with online safety.

In addition to this formal training, their knowledge and skills will be refreshed (for example, via e-bulletins, meeting other designated safeguarding leads or simply taking time to read and digest safeguarding developments in the Kent County Council Safeguarding Children Multi Agency Partnership '5-min Fact Sheets' https://www.kscmp.org.uk/training/factsheets at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role. Designated staff will be encouraged to attend appropriate network meetings organised by the Kent County Council Safeguarding Children Multi Agency Partnership: https://www.kscmp.org.uk/training

A dedicated safeguarding and child protection professional learning resource area has been created in the office area, and a dedicated safeguarding and child protection

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board provides up-to date information, guidance and contact details for all staff to access. Key contact details and referral information is also available to all staff via the school App.

Safer Recruitment

King's Reach Education is committed to the principles of safer recruitment and, as part of that, adopts recruitment procedures that help deter, reject and/or identify people who might abuse children and young people in our care. Safe recruitment processes are followed and all staff recruited to the school will be subject to appropriate identity, qualification and health checks. References will be verified and appropriate criminal record checks [Disclosure and Barring Service (DBS) checks], barred list checks and prohibition checks will be undertaken.

The level of DBS check required, and whether a prohibition check is required, will depend on the role and duties of an applicant to work in our school, as outlined in "*5*". We will also have regard to DfE's statutory guidance for schools about the employment of staff disqualified from childcare "*Disqualification under the Childcare Act 2006*", which also contains information about 'disqualification by association'.

A person will also be in regulated activity if, as a result of their work or volunteering, they:
• will be responsible, on a frequent basis in a school or college, for teaching, training instructing, caring for or supervising children, providing advice or guidance on physical, emotional or educational wellbeing, or driving a vehicle only for children, or

• engage in intimate or personal care or healthcare or any overnight activity, even if this happens only once.

King's Reach Education will inform any shortlisted candidates that online searches may be done as part of pre-recruitment checks from September 2025 as per the guidance outlined in *"Keeping children safe in education September 2025"*

Relevant members of staff and trustees who are involved in recruitment will undertake safer recruitment training. The school will ensure that at least one person on any appointment panel has undertaken safer recruitment training in line with staffing regulations.

King's Reach Education does not use agency staff. However, should the need arise in the forthcoming academic year, we will only use employment agencies which can demonstrate that they positively vet their supply staff and will report the misconduct of temporary or agency staff to the agency concerned and to the LA. Staff and volunteers joining the school on a permanent or temporary basis will be given a copy of this policy.

Volunteers

Any person or organisation engaged by King's Reach Education to work in a voluntary capacity with students at our school will be subject to all reasonable vetting procedures and Criminal Records Checks.

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Under no circumstances will a volunteer in respect of whom no checks have been obtained, will be left unsupervised or allowed to work in regulated any activity.

Volunteers who on an unsupervised basis teach or look after children regularly, or provide personal care on a one-off basis in our school are deemed to be in regulated activity. We will obtain an enhanced DBS certificate (which will include barred list information) for all volunteers who are new to working in regulated activity. Existing volunteers in regulated activity do not have to be re-checked if they have already had a DBS check (which includes barred list information). However, we may conduct a repeat DBS check (which will include barred list information) on any such volunteer should we have any concerns.

The law has removed supervised volunteers from regulated activity. There is no legal requirement to obtain DBS certificate for volunteers who are not in regulated activity and who are supervised regularly and on ongoing day to day basis by a person who is in regulated activity, but an enhanced DBS check without a barred list check may be requested following a risk assessment.

Further information on checks on volunteers can be found in Part three of the DfE guidance "*Keeping children safe in education* 2025".

Volunteers will be subject to the same code of conduct as paid employees of the school.

Where services or activities are provided separately by another body, King's Reach Education will 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 our school on these matters where appropriate. We will request all 'off-site' providers to complete the King's Reach 'Letter of Assurance Form' **(Appendix 1)**

Staff Code of Conduct

- All staff (paid and voluntary) are expected to adhere to a code of conduct in respect of their contact with students and their families. The Teachers' Standards 2012 state that 'all teachers, including headteachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.' Whilst King's Reach Education doesn't employ any full-time teaching staff, we endorse and will endeavour to uphold the principles and values of the Teacher Standards and endeavour to both create and embed a culture of openness, trust and transparency in which the school's values and expected behaviour (set out in the staff code of conduct) are constantly lived, monitored and reinforced by all staff at our school.
- All children and young people at King's Reach Education will be treated with respect and dignity and no punishment, detention, restraint, sanctions or rewards are allowed outside of those detailed in the school's Behaviour Management Policy. Whilst it would be unrealistic and undesirable to preclude all physical contact between adults and children, staff are expected to exercise

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caution and avoid placing themselves in a position where their actions might be open to criticism or misinterpretation.

- Where incidents occur which might otherwise be misconstrued, or in the exceptional circumstances where it becomes necessary to physically restrain a child or young persona at King's Reach Education for their own protection or others' safety, this will be appropriately recorded and reported to the Headteacher and parents/carers. **Any physical restraint used will only ever be an absolute last resort and will be avoided at ALL costs. However, should an incident arise where it is absolutely and irrefutably necessary, King's Reach Education staff will comply with DfE guidance "*Use of reasonable force in schools*".**

- Except in cases of emergency, first aid will only be administered by qualified First Aiders at King's Reach Education. If it is necessary for the child or young person to remove clothing for first aid treatment, there will, wherever possible, be another adult present. All first aid treatment and non-routine changing or any personal care will be recorded and shared with parents/carers at the earliest opportunity.
- Children requiring regular medication or therapies for long-term medical conditions will be made the subject of a Medical Plan that has been agreed with the parents/carers and the relevant health authority.
- For their own safety and protection, staff should exercise caution in situations where they are alone with students.
- Staff at King's Reach Education should also be alert to the possible risks that might arise from social contact with students outside of the school. Home visits to students or private tuition of students should only take place with the knowledge and approval of the Headteacher. Visits/telephone calls by students to the homes of staff members should only occur in exceptional circumstances and with the prior knowledge and approval of the Headteacher. Any unplanned contact of this nature or suspected infatuations or "crushes" will be reported to the Headteacher
- Staff will only use the school's digital technology resources and systems for professional purposes or for uses deemed 'reasonable' by the Headteacher and trustee Body. Staff will only use the approved school email, school phones, apps or other school approved communication systems with students and parents/carers and will only communicate with them on appropriate school business and will not disclose their personal telephone numbers and email addresses to pupils or parents/carers. Staff will not use personal cameras (digital or otherwise) or camera phones for taking and transferring images of pupils or staff without permission and will not store images at home.
- Staff should be aware of the school's whistle-blowing procedures and share immediately any disclosure or concern that relates to a member of staff with the Headteacher Paul Kirrage or the Deputy Headteacher Claire Maudhub if the

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Headteacher is not available, and nothing should be said to the colleague involved. It should be shared with the Chair of the Trustees if it relates to the Headteacher.

- All school staff should be alert to professional colleague behaviours that may cause 'low-level' concerns such as being over friendly with students, having favourites, taking photographs of students on their personal mobile phone, engaging with a child/young person on a one-to-one basis in a secluded area or behind a closed door, using inappropriate sexualised, intimidating, or offensive language (see below section about what a 'low-level' concern is and how to share these concerns).

Contractors

Building contractors who are engaged by or on behalf of King's Reach Education to undertake works on site will be made aware of this policy and the reasons for this. Any long-term contractors who undertake work in the school during term time will be asked to provide their consent for DBS checks to be undertaken. These checks will be undertaken when individual risk assessments by the Trustees and Leadership Team deem this to be appropriate.

Individuals and organisations that are contracted by the school to work with or provide services to students of King's Reach Education will be expected to adhere to this policy and their compliance will be monitored. Any such contractors will be subject to the appropriate level of DBS check, if any such check is required (for example because the contractor is carrying out teaching or providing some type of activity for or supervision of King's Reach students regularly). Contractors engaging in regulated activity relating to children will require an enhanced DBS check (including children's barred list information). For all other contractors who are not engaging in regulated activity relating to children, but whose work provides them with an opportunity for regular contact with children and young people, an enhanced DBS check (not including children's barred list information) will be required. Contractors for whom an appropriate DBS check has not been undertaken will be supervised if they will have contact with our children and young people. Under no circumstances we will allow a contractor in respect of whom no checks have been obtained to work unsupervised or engage in regulated activity relating to children and young people. We will determine the appropriate level of supervision depending on the circumstances but in all off-site situations presently, every young person is supported by a fully checked personal mentor. If an individual working at our school is self-employed, we will obtain the DBS check, as self-employed people are not able to make an application directly to the DBS on their own account.

We will always check the identity of contractors and their staff on arrival at the school.

Allegations made against a member of staff

King's Reach Education takes seriously all allegations made against and concerns raised in relation to members of staff. We will ensure that we promote an open and

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transparent culture in which all concerns about all adults working in or on behalf of King's Reach Education are dealt with promptly and appropriately.

Procedures are in place for our students, parents/carers, and staff to share any concern that they may have about the actions of any member staff, including volunteers and contractors. All such allegations and concerns will be brought immediately to the attention of the Headteacher or The Designated Safeguarding Lead team if the Headteacher is not available and nothing should be said to the colleague involved.

In cases where the Headteacher is the subject of the allegation or concern, they will be reported to the chair of the Trustee Board, in order that they may activate the appropriate procedures.

There may be two levels of allegation/concern:

1. Allegations that may meet the harms threshold.

2. Allegation/concerns that do not meet the harms threshold – known as 'low level concerns.'

Allegations that may meet the harms threshold

In-keeping with KCSIE September 2025 Section 1: Part 4, King's Reach Education takes it safeguarding and child protection duties around safer recruitment and employment practice seriously and when faced with an allegation against a member of staff at King's Reach Education that meets the harm threshold, we will take the following action:

These procedures are for managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children and young people in our school and will be used in respect of all cases in which it is alleged that anyone working in the school that has:

- behaved in a way that has harmed a child/young person, or may have harmed a child/young person and/or;
- possibly committed a criminal offence against or related to a child/young person and/or
- behaved towards a child or children/young people 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 and young people. This includes behaviour that may have happened outside of King's Reach Education that might make an individual unsuitable to work with children and young people, which is known as transferable risk.

The Local Authority Designated Officer (LADO) should be informed of all such allegations that come to our attention and appear to meet the above criteria. Contact can also be made with LA's Schools Safeguarding Coordinator who will liaise with the LADO.

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Where we identify a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, we will contact the **Children's Multi-Agency Partnership (KSCMAP) Front Door by emailing: kscmp@kent.gov.uk ; calling 03000 42 11 26** and/or the police immediately as per the referral process contained in this policy.

When dealing with allegations, we will apply common sense and judgement; deal with allegations quickly, fairly and consistently; and provide effective protection for the child/young person and support the person subject to the allegation.

Some rare allegations will be so serious they will require immediate intervention by children's social care services and/or police. In such cases, referral to the LADO will lead to a Strategy Meeting or Discussion being held in accordance with the DfE guidance. This process will agree upon the appropriate course of action and the time-scale for investigations.

King's Reach Education has a legal duty to refer to the DBS when an individual is removed from regulated activity (or would have been removed had they not left), and we believe the individual has engaged in relevant conduct in relation to children/young people and/or adults, satisfied the harm test in relation to children and/or vulnerable adults or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence. The DBS will consider whether to bar the person. Referrals will be made as soon as possible when an individual is removed from regulated activity. Where we dismiss or cease to use the services of a qualified teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, we will consider whether to refer the case to the Secretary of State, as required by law.

The formal Process for Dealing with an Allegation

A 'case manager' will lead any investigation. This will be the Headteacher 'Paul Kirrage', or the chair of governors or trustee with Safeguarding responsibility 'Stewart King' where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child, young person or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

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- Redeployment within the school so that the individual does not have direct contact with the child or young person/s concerned
- Providing a mentor to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or young person where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location.

If in doubt, the case manager will seek views from the school's (LADO) designated officer at the local authority, as well as the police and children's social care where they have been involved.

Definations for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded**: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedures for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- **Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below:**
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies

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- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate in the context of King's Reach Education (access to counselling etc.)
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

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Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Considerations for self employed tutors and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, King's Reach Education will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The trustees will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavor to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within **1 week**
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within **3 working days**
- If a disciplinary hearing is required and can be held without further investigation, this should be held within **15 working days**

However, these are objectives only and where they are not met, we will endeavor to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed,

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taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate.
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it.

Confidentiality and information sharing

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared

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- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

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This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

At King's Reach Education we will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Concerns that do not meet the harms threshold – known as 'Low level concerns'

The term 'low-level' concern does not mean that it is insignificant. It means that the behaviour towards a child/young person does not meet the threshold set out above. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of King's Reach Education may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO. **However, as a good practice, we will contact the LADO for consultation to ensure that we follow the appropriate and correct procedures even when the concern seems to be 'low-level'.**

Examples of low-level behaviour could include, but are not limited to:

- **Being overly friendly with children and young people at KRE**
- **Having favourites**
- **Taking photographs of children on their personal mobile phone (work phones are permitted for the purposes of uploading images to Padlet but MUST be deleted once uploaded)**
- **Engaging with a child on a one-to-one basis in a secluded area or behind a closed door**
- **Humiliating students**

All 'low-level' concerns will be brought immediately to the attention of the Headteacher or one the Designated Safeguarding Leads if the Headteacher is not available and

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nothing should be said to the colleague involved. In cases where the Headteacher is the subject of the concern, they will be reported to the chair of the King's Reach Education Trustee Board.

The full procedures about dealing with allegations of abuse made against/concerns raised in relation to teachers and other staff can be found in Part Four of the DfE guidance "*Keeping children safe in education* 2025".

Section 2: Concerns that do not meet the harm threshold

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately and in a timely fashion.

We will create this culture by:

Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others

Empowering staff to share any low-level concerns

- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

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Responding to low-level concerns

If the concern is raised via a third party, the Headteacher Paul Kirrage or will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The Headteacher or nominated safeguarding champion on the staff body will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's code of conduct. The Headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL team.

Record Keeping

All low-level concerns will be recorded in writing and placed in staff personnel files. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.

KCC LADO (Local Authority Designated Officer) Contact Details:

http://www.kentchildrenslado@kent.gov.uk

KCC County LADO Service on 03000 410 888

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Please note that if you are unsure whether a referral should be made you can call the number above and ask to speak with the LADO ENQUIRIES OFFICER who will advise you

KEY SAFEGUARDING AND CHILD PROTECTION CONTACTS IN KENT

Job Title	Name	Contact Details
The Chair of the King's Reach Trustee Board is:	Richard King	07501684110 richard@kingsreach.org.uk
The Safeguarding & Child Protection Trustee is:	Stephen Gray	07814387161 Stephen.gray@kingsreach.org.uk
KCC LADO (Local Authority Designated Officer)		kentchildrenslado@kent.gov.uk KCC County LADO Service on 03000 410 888 / 03000419191 Please note that if you are unsure whether a referral should be made you can call the number above and ask to speak with the LADO ENQUIRIES OFFICER who will advise you.
Kent County Council Children's Multi-Agency Partnership (KSCMAP) Front Door Children's Social Care. Any safeguarding concerns including suspected gang and/or county line involvement MUST go through KCC Front Door.		kscmp@kent.gov.uk https://www.kscmp.org.uk/ 03000 42 11 26
Kent County Council Online Safety and Protection Coordinator:		Sessions House, County Hall, Maidstone Kent ME14 1XQ 03000 41 57 97
Safeguarding LAC (Looked After Children). Liaise with KCC Front Door and the Headteacher, Virtual School Kent:	Tony Doran	Tony or a member of the Virtual School Team can be contacted at: 03000 412777 or email: vskadmin.Worrall@kent.gov.uk

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		Address: Worrall House, 30 Kings Hill Avenue, Kings Hill, Kent ME19 4AE
King's Reach Education Community Police Officer/ replace this with Kent Child Centred Community Policing Team contacts	Paul Hughes PC 11799	Child Centred Policing Team Maidstone Neighbourhood Policing Unit Maidstone Police Station, Palace Avenue ME15 6NF Tel: 07976776177

Safety In the School

No internal doors to classrooms will be locked whilst students are present in these areas.
Entry to the King's Reach Education school premises will be controlled by front doors that are secured physically. In the case of individuals visiting the school in a professional capacity e.g., educational psychologists, social workers etc., we will check their ID and be assured that the visitor has had the appropriate DBS check (or the visitor's employers have confirmed that their staff have appropriate checks). They will be logged into and out of the premises and will be issued with a visitor identity badge. Unidentified visitors will be challenged by staff or reported to the Headteacher or school office. Carelessness in closing any controlled entrance will be challenged.

The presence of intruders and suspicious strangers seen loitering near the entrance of King's Reach Education or approaching our students, will be reported to the Police by calling **101** or **999**, depending on the circumstances and the urgency of the case so that if police stop these individuals, they can be spoken to about what they were doing and dealt with accordingly. Brief information about the incident will be sent to KCC Schools West Kent Safeguarding Coordinator with a view to alerting other local schools in liaison with the police and through appropriate systems.

Photographing Students at King's Reach

At induction to King's Reach Education, all parents/carers will be asked to read and sign a photographic/video consent form as part of the induction process. If parents/carers

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do not wish their children to be photographed or filmed whilst at King's Reach Education and explicitly express this view in writing or by declining consent on the form, their rights will be respected.

Curriculum

King's Reach Education acknowledges the important role that the curriculum can play in the prevention of abuse and in the preparation of our young people for the responsibilities of adult life and citizenship. We will ensure that children and young people at King's Reach Education are taught about safeguarding, including online safety and will consider this as part of providing a broad and balanced curriculum. It is expected that our Education and Learning Lead will consider the opportunities that exist for promoting the welfare and safety of pupils. As appropriate, the curriculum will be used to build resilience, help students to keep safe and to know how to ask for help if their safety is threatened or compromised. As part of developing a healthy, safer lifestyle, students will be taught, for example:

- to recognise and manage risks in different situations and then decide how to behave responsibly.
- to judge what kinds of physical contact are acceptable and unacceptable.
- to recognise when pressure from others (including people they know) threatens their personal safety and well-being; including knowing when and where to get help.
- to be aware of sexual harassment, online abuse, racism sexual violence and issues of consent and safeguarding risks, including online risks and what constitutes a healthy relationship, both online and offline via a carefully planned relationships, sex and health education curriculum.
- to use assertiveness techniques to resist unhelpful pressure.
- emotional literacy.

Where necessary we will work with external agencies to support this work.

Working in Partnership with Parents and Carers

It is our policy to work in close partnership with parents or carers to secure the best outcomes for our children and young people at King's Reach. We have a school FSO Family Support Officer() 'Vicky Evans' who will be a direct point of contact for parents and carers and will work closely with them and the Safeguarding Team at King's Reach to provide bespoke support, signposting and to provide a positive bridge between home and school that will nurture engagement and healthy dialogue about their children and any challenges as they arise. As a school, we will endeavour to communicate as clearly as possible our aims, vision, and values of our school as well as expectations of partnership.

- We will support our parents and be professional, non-judgemental, open-minded, inclusive, and transparent in our communication with them. We will

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listen and use clear language and share clear expectations in our all our communications and correspondence.

- We will signpost our parents/carers to a range of support and services through our Family Liaison Officer and Safeguarding Team.
- We will advocate for our families and liaise with agencies in the statutory, voluntary and community sectors and locality teams that are active in supporting families.
- We will be alert to the needs of all parents/carers and particularly those who do not have English as their first language; those that are vulnerable, experiencing hardship or are experiencing and/or facing challenging situations that may give rise to a need for signposting or professional intervention.
- We will keep parents and carers informed and included in their child's journey at King's Reach Education through access to Padlet; daily 'mentor' interaction; termly school reports. As a team, we commit to working with care, tenacity and respect and to always be open, transparent and inclusive in our dealings with them.
- We will actively encourage and support parents, carers and our students to positively engage with school and to attend regularly. As a school, we are committed to ensuring excellent attendance and engagement and mitigating any attendance issues through our bespoke mentor 'pick-up' and 'drop-off' offer. However, we understand that being absent, as well as missing, from education can be warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation (KCSIE 2025) and our Safeguarding Team will quickly address any attendance concerns through the statutory duty guidance outlined in our school attendance policy 2025/2026.

Organisations and Individuals using the King's Reach School Premises

Updated 2025 KCSIE guidance requires the DSL and Safeguarding Team at King's Reach Education to respond to allegations relating to any incident/s occurring when an individual or organisation uses a our school's premises after school or at weekends. As with all safeguarding allegations, King's Reach Education will follow our safeguarding policies and procedures, including informing the Local Authority Designated Officer (LADO) should any allegations be brought to our attention.

Trustee Board:Monitoring and Evaluation

The King's Reach Education Trustee Board will monitor the safeguarding arrangements in the school to ensure that these arrangements are having a positive impact on the safety and welfare of children. This will be evaluated on the basis of evidence of:

- the extent to which a positive culture and ethos is created where safeguarding is an important part of everyday life in the school, backed up by training at every level.
- the content, application and effectiveness of safeguarding policies and procedures, and safer recruitment and vetting processes.

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- the quality of safeguarding practice, including evidence that staff are aware of the signs that children and young people may be at risk of harm either within the setting or in the family or wider community outside the setting.
- the timeliness of response to any safeguarding concerns that are raised.
- the quality of work to support multi-agency plans around the child.

Complaints

All complaints arising from the operation of this policy will be considered under the school's complaint procedure.

This policy links with :

- Safer Recruitment Policy
- Low level concerns procedure
- Staff Code of Conduct
- Supporting students with medical conditions policy
- Mobile phone uses