



# SAFEGUARDING & CHILD PROTECTION POLICY

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

Date of Policy	September 2024
Reviewer(s)	Director of Safeguarding, Mental Health & Wellbeing
Approved by	Principal
Next Review Date	September 2025

This policy and related procedures are in line with statutory requirements and based on statutory guidance from [Keeping Children Safe in Education 2024](#) and [Working Together to Safeguard Children \(WTSC\) 2023](#). The Worthgate School's child protection procedures are in accordance with government guidance and refer to locally agreed multi-agency safeguarding arrangements put in place by the three safeguarding partners. It will be updated annually (as a minimum) and be available publicly either via the school website, school intranet or in paper version.

### Updated content for academic year: 2024-2025

The core content for 2024-2025 has been updated to reflect key requirements and principles outlined in KCSIE 2024. There have been some amendments and additional content has been included in line with KCSIE 2023 and 2024 together with the aligned procedures within [Working Together to Safeguard Children \(WTSC\) 2023](#).

This policy applies to **all** students in the School. Therefore, the term "child" is understood as applying to all our "young people," regardless of their age or Programme of Study (since we often have a small number of students over the age of 18

### Key Contacts

	Name	contact information
Designated Safeguarding Lead (DSL)	Martyn Rogers <b>Director of Safeguarding, Mental Health, and Wellbeing</b>	<a href="mailto:mrogers@worthgateschool.com">mrogers@worthgateschool.com</a> 07794 087422
Deputy Designated Safeguarding Lead and Mental Health Lead	Mike Bell <b>Assistant Principal Pastoral SENCo</b>	<a href="mailto:mbell@worthgateschool.com">mbell@worthgateschool.com</a> 07825 395584
Deputy Designated Safeguarding Lead	Robin Cousins <b>Director for Higher Education</b>	<a href="mailto:rcousins@worthgateschool.com">rcousins@worthgateschool.com</a> 07854 998744
Deputy Designated Safeguarding Lead	Dr Nicola Robinson <b>Vice Principal</b>	<a href="mailto:nrobinson@worthgateschool.com">nrobinson@worthgateschool.com</a> 07717 884801
Deputy Designated Safeguarding Lead	Emily Coleman Deputy Head of Boarding	<a href="mailto:ecoleman@worthgateschool.com">ecoleman@worthgateschool.com</a>
Safeguarding Governor	Liz Francis <b>Independent Governor, Safeguarding and Compliance</b>	<a href="mailto:lfrancis@catsschools.com">lfrancis@catsschools.com</a> 07866 609046

Link to local contacts, including local Prevent, are available in Section 15.

# Contents

- 1. INTRODUCTION AND ETHOS .....5
- 2. POLICY CONTEXT .....6
- 3. DEFINITION OF SAFEGUARDING.....7
- 4. RELATED SAFEGUARDING POLICIES.....10
- 5. POLICY COMPLIANCE, MONITORING AND REVIEW .....11
- 6. KEY RESPONSIBILITIES .....11
  - Governance and Leadership.....11
  - Designated Safeguarding Lead (DSL).....12
  - Members of Staff.....14
  - Children and Young People.....15
  - Parents and Carers .....16
- 7. CHILD PROTECTION PROCEDURES .....16
  - Recognising Indicators of Abuse, Neglect and Exploitation .....16
  - Responding to Child Protection Concerns.....18
  - Recording Concerns.....19
  - Our Alumni .....20
  - Multi-Agency Working.....20
  - Confidentiality and Information Sharing .....20
  - Complaints.....21
- 8. SPECIFIC SAFEGUARDING ISSUES .....21
  - Child-on-Child and Student-on-Student Abuse .....22
  - Student-on-student Sexual Violence or Harassment .....24
  - Nude and/or Semi-Nude Image sharing by Children .....25
  - Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) .....26
  - Serious Violence .....26
  - So-called ‘honour’-based abuse.....27
  - Preventing Radicalisation .....27
  - Cybercrime .....27
- 9. SUPPORTING CHILDREN POTENTIALLY AT GREATER RISK OF HARM .....28
  - Safeguarding Children with Special Educational Needs or Disabilities (SEND) .....28
  - Children Requiring Mental Health Support.....29
  - Children Missing from Education .....29

10. PROTOCOL FOR EXEATS – SAFEGUARDING CHECKS .....	30
11. ONLINE SAFETY.....	31
Policies and Procedures.....	32
Appropriate Filtering and Monitoring .....	33
Information Security and Access Management .....	33
Staff Training.....	34
Educating Learners .....	34
Working with Parents/Carers .....	34
12. STAFF ENGAGEMENT AND EXPECTATIONS.....	34
Staff Induction, Awareness and Training .....	34
Safer Working Practice .....	35
Staff Supervision and Support.....	35
13. SAFER RECRUITMENT AND ALLEGATIONS.....	36
Safer Recruitment and Safeguarding Checks.....	36
Allegations Against Members of Staff, Volunteers and Contractors.....	37
Concerns that meet the ‘harm threshold.’ .....	37
Safe Culture .....	38
14. OPPORTUNITIES TO TEACH SAFEGUARDING.....	39
15. SAFEGUARDING MEASURES FOR EXTERNAL PROVISION AND LEASING OF PREMISES.....	39
Site Security.....	40
Visiting Speakers.....	40
16. LOCAL SUPPORT .....	40
Education Safeguarding Service Contacts .....	41
Kent County Council Key Contacts .....	42
Area Education Officers .....	43
Prevent Education Officers .....	43
APPENDIX 1: CATEGORIES OF ABUSE .....	44
APPENDIX 2: STAFF BEHAVIOUR POLICY (CODE OF CONDUCT) .....	47
APPENDIX 3: NATIONAL SUPPORT ORGANISATIONS.....	51
APPENDIX 4: THE ROLE OF THE DESIGNATED SAFEGUARDING LEAD.....	54
APPENDIX 5: LOW LEVEL CONCERNS POLICY .....	59

## 1. INTRODUCTION AND ETHOS

The Worthgate School is a community, and it recognises its statutory responsibility to safeguard and promote the welfare of all children. Safeguarding is everybody's responsibility and all those directly connected (staff, volunteers, governors, agents, leaders, parents, guardians, families, and learners) are an important part of the wider safeguarding system for children and have an essential role to play in making this community safe and secure. Staff working with children at The Worthgate School are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child and if any member of our community has a safeguarding concern about any child or adult, they should act immediately on this concern.

The Worthgate School believes that the best interests of children always come first. All children (defined as those up to the age of 18) and all young people (those over the age of 18) have a right to be heard and to have their values, wishes and feelings sought and considered, and all children regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection. Whilst this policy references child and children, it applies to all students at The Worthgate School (including those over the age of 18).

The Worthgate School recognises the importance of providing an ethos and environment within the school that will help children and young people to be safe and feel safe. In our school children and young people are respected and encouraged to talk openly. We will ensure children's wishes and feelings are considered when determining what safeguarding action to take and what services to provide.

The annual Governor's safeguarding review will ensure policy and procedure are sufficiently agile to meet the increasing demands of keeping students safe.

Our core safeguarding principles are:

- **Prevention** - positive, supportive, proactive, safe culture; curriculum and pastoral opportunities for children; safer recruitment procedures.
- **Protection** - following the agreed procedures and ensuring all staff are trained and supported to recognise and respond appropriately, confidently, and sensitively to safeguarding concerns.
- **Support** - for all learners, parents, and staff and, where appropriate, specific interventions are deployed for those who may be at immediate or progressive risk of harm.
- **Working with parents, agents, guardians, and other agencies** - to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.

This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, 'Keeping Children Safe in Education' (KCSIE) 2024 and Working Together to Safeguard Children (WTSC) 2023 which requires individual schools and schools to have an effective child protection policy.

The procedures contained in this policy apply to all staff, including governors, temporary or third-party agency staff and volunteers, and are consistent with those outlined within the revised KCSIE 2024.

## 2. POLICY CONTEXT

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes, but is not limited to:

- DfE Keeping Children Safe in Education 2024 (KCSIE)
- Working Together to Safeguard Children 2023 (WTSC)
- Ofsted: Education Inspection Framework 2023 (EIF)
- ISI: Inspection Framework 2023
- Children Missing in Education 2024
- After-school clubs, Community Activities, and Tuition (2023)
- Framework for the Assessment of Children in Need and their Families 2000
- Kent and Medway Safeguarding Children Procedures (Online)
- Early Years Foundation Stage (EYFS) 2023
- The Education Act 2002 and 2011
- The Equality Act 2010
- Children and Social Work Act 2017
- The Children Act 1989 and 2004
- Digital and Technology Standards in Schools and Colleges May 2024
- The Education (Independent School Standards) Regulations 2014
- The Non-Maintained Special Schools (England) Regulations 2015
- Prevent Duty Guidance, 2015 (updated 2021)
- Relationships Education. Relationships and Sex Education (RSE) and Health Education, 2021
- Boarding Schools NMS 2022:

Section 175 of the Education Act 2002 requires school governing bodies, local education authorities and further education institutions to put in arrangements to safeguard and promote the welfare of all children who are pupils at a school, or who are students under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.

In line with these policies and procedures, the school will:

- identify those students where there are child protection concerns and make a referral to Kent Social Services
- attend child protection case conferences in order to effectively share information about risk and harm
- contribute to the development and monitoring of child protection plans in liaison with Kent Social Services

- carry out the school's role in implementing the child protection plan and continually monitoring the child's wellbeing and liaising with the allocated social worker as require

### 3. DEFINITION OF SAFEGUARDING

In line with KCSIE 2024 and WTSC 2023, safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- protecting children from maltreatment.
- preventing impairment of children's mental and physical health or development.
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- taking action to enable all children to experience and achieve the best outcomes.

The aim of the policy is also:

- To support the students' development in ways that will foster security, confidence, resilience, and independence.
- To provide an environment in which young people feel safe, secure, valued, and respected, feel confident and know how to approach adults if they are in difficulties, believing they will be effectively listened to.
- To raise the awareness of all teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.
- To provide a systematic means of monitoring young people known or thought to be at risk of harm or children in need, and ensure we, the school, contribute to assessments of need and support packages for those children.
- To emphasise the need for good levels of communication between all members of staff.
- To develop a structured procedure within the school that will be followed by all members of the school community in cases of suspected abuse.
- To develop and promote effective working relationships with other agencies, especially the Police and Social Care.
- To ensure that all staff working within our school who have substantial access to children have been checked as to their suitability, and that a central record is kept for audit.
- To ensure that when a safeguarding issue is raised, the student's wishes and feelings are considered when determining what action to take and what services to provide.
- To ensure that all school staff challenge instances of prejudice related behaviour, including but not limited to, instances of sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment.

The school acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):

- Abuse, Neglect and Exploitation
- Bullying (including cyberbullying and initiation/ hazing type violence and rituals)

- Children Missing in Education (CME)
- Children Missing from Education, to include unexplained absences
- Child missing from home or care
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- Child abduction and community safety
- Children and the court system
- Children with family members in prison
- Contextual Safeguarding (Risks outside the family home)
- County Lines and gangs
- Domestic abuse
- Exploitation
- Substance misuse
- Fabricated or induced illness
- Faith abuse
- Female Genital Mutilation (FGM)
- Forced marriage
- Gangs and youth violence
- Gender based abuse and violence against women and girls
- Hate crime
- Homelessness
- Honour based abuse
- Human trafficking and modern slavery
- Mental health
- Modern Slavery
- Nude or semi-nude image sharing, aka youth produced/involved sexual imagery or “Sexting”
- Online safety
- Student-on-student abuse
- Preventing radicalisation and extremism
- Private fostering
- Relationship abuse
- Serious Violence
- Sexual Violence and Sexual Harassment
- Upskirting & downblousing

The following situations will be considered separately:

Child abduction and community safety: Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed



by parents or other family members, by people known but not related to the victim (such as neighbours, friends, and acquaintances) and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. Where Kent schools and settings are concerned about a specific incident, advice should be sought from the police and/or the [Education Safeguarding Service](#) when sharing information with the wider school/setting community. More general information is available at [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org).

Children and the court system: as described in KCSIE, children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for any crimes they have witnessed. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. In the boarding school context, we encourage families to share any information that may affect the wellbeing and academic achievement of their child, so that the child can be made aware of the support available to them at school, including counselling.

Children with family members in prison: The school is committed to supporting children and young people who have a parent or close relative in prison and will work with the family to find the best ways of supporting the child. The school recognises that children with family members in prison are at risk of poor outcomes including, poverty, stigma, isolation, poor mental health, and poor attendance. The school will treat information shared by the family in confidence and it will be shared on a 'need to know' basis. The school will work with the family and the child to minimise the risk of the child not achieving their full potential.

Children with families in areas of conflict\_ The school is committed to ensure that the appropriate support and welfare is in place to support the child where their family is located within an area currently or previously experiencing conflict within the region. In doing so, it recognises the impact on their mental health and attendance if this prevails and the school will work with the family to minimise the impact on the child.

Homelessness: DSLs in education settings should be alert to children living with families who are being made homeless or at risk of becoming homeless as this presents a real risk to the child's welfare.

In our boarding school setting, indicators that a family may be at risk of homelessness can/may include:

- Late payment of fees.
- Requests to move to independent accommodation.
- Conflict in their home country.

In these instances, the school will try to avoid directly communicating with the student and will instead liaise with the student's parents and/or agent and/or CGS's regional manager to try to resolve the financial issue. The school will support the student regarding any anxiety associated with their situation.

Modern Slavery: Modern slavery can affect anyone, regardless of age and gender or nationality - and includes the trafficking of people for the purposes of exploitation. Refer to the *Exeat Policy* regarding permitting students' exeat: appropriate checks are made regarding both the suitability and authenticity of any adults involved here.

(Also see Part One and Annex B within 'Keeping Children Safe in Education' 2024 for details and support concerning specific forms of abuse and safeguarding issues.)

#### **4. RELATED SAFEGUARDING POLICIES**

This policy is one of a series in the school integrated safeguarding portfolio and should be read and actioned in conjunction with the policies as listed below:

- Additional Learning Support
- Anti-Bullying
- Attendance
- Data Protection
- Dignity at Work
- Equality and Diversity
- Exeat
- E-Safety & ICT
- IT Acceptable Use
- Health and safety
- First Aid
- Mental health and wellbeing
- Missing Student
- Online Safety
- Staff Behaviour (Code of Conduct) (see Appendix 2)
- Safer Recruitment
- Screening, Searching and Confiscation Policy and Procedure
- Student Behaviour
- Personal Development (including PSHE and RSE)
- Risk Assessments
- Taxi
- Transgender
- Use of Reasonable force (Physical Restraint)
- Visiting Speaker
- Whistleblowing

## 5. POLICY COMPLIANCE, MONITORING AND REVIEW

The Worthgate School will review this policy at least annually and will update it as needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. The policy will be revised following any national or local policy updates, any local child protection concerns and/or any changes to our procedures. Risk assessments will be carried for any specific activities that may incur risk associated with student safeguarding and welfare (e.g. the school has a risk assessment for the use of shared boarding room accommodation).

All staff (including temporary staff and volunteers) will be provided with this policy and KCSIE 2024. These are available as electronic documents, although staff can request paper versions via the DSL. Both documents are also available in both staff rooms. Parents, guardians, and carers can obtain a copy of the school Safeguarding and Child Protection Policy and other related policies, including the Mental Health and Wellbeing policy on request. Additionally, our policies can be viewed on the school website (<https://worthgateschool.com/policies/>)

The policy forms part of our school development plan and will be reviewed annually by the governing body which has responsibility for oversight of safeguarding and child protection systems. The DSL and Principal will ensure regular reporting on safeguarding activity and systems to the governing body. The governing body will not receive details of individual learner situations or identifying features of families as part of their oversight responsibility.

## 6. KEY RESPONSIBILITIES

### **Governance and Leadership**

The governing body reads and follows KCSIE 2024. Together with the school Senior Leadership Team, they have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation. The governing body/proprietor have regard to the KCSIE 2024 guidance and will ensure our policies, procedures and training is effective and always complies with the law.

The school has a nominated governor for safeguarding: Liz Francis who is also the Independent Governor for Safeguarding and Compliance. The nominated governor will support the DSL and have oversight in ensuring that the school has an effective policy which interlinks with other related policies; that locally agreed procedures are in place and being followed, and that the policies are reviewed at least annually and when required.

The governing body and Senior Leadership Team will ensure that the DSL is supported in their role and is provided with sufficient time so they can provide appropriate support to staff and children regarding any safeguarding and welfare concerns.

The Principal will ensure that our child protection and safeguarding policies and procedures adopted by the governing body, are understood, and followed by all staff.

## Designated Safeguarding Lead (DSL)

From October 2023, the school appointed Martyn Rogers as the DSL, with the additional Senior Lead for Mental Health. Additionally, the school has appointed Deputy DSLs: Nicola Robinson (Vice Principal), Mike Bell, (Assistant Principal Pastoral & SENco), Robin Cousins, (Director for Higher Education) and Emily Coleman (Deputy Head of Boarding), who will have delegated responsibilities and act in the DSL's absence.

The DSL has overall responsibility for the day-to-day oversight of safeguarding and child protection systems in school, including online safety, understanding the filtering, and monitoring systems and processes in place. Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.

The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. Deputy DSLs are trained to the same standard as the DSL. The DSL and any deputy DSLs' training will be updated formally every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.

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

The DSL (and deputies) will be provided with sufficient time so they can provide appropriate support to staff and children regarding any safeguarding or welfare concern. This may include handling of referrals to integrated social care and working with other agencies where appropriate.

- It is the role of the DSL to carry out their functions as identified in Annex C of KCSIE 2024. This includes, but is not limited to:
  - Acting as the central contact point for all staff to discuss any safeguarding concerns.
  - Act as a point of contact with the safeguarding partners
  - Coordinating safeguarding action for individual children.
  - Maintaining a confidential recording system for safeguarding and child protection concerns.
  - Referring cases:
    - of suspected abuse, neglect and exploitation to the local authority children's social care as required and support staff who make referrals to local authority children's social care.
    - to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme.
    - where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required, and
    - where a crime may have been committed to the Police as required. [NPCC - When to call the police](#) should help understand when to consider calling the police and what to expect when working with the police.
- Liaising with staff (especially teachers, pastoral support staff, school nurses, IT technicians, mental health leads and the special educational needs coordinator (SENCO), on matters of

safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral.

- Liaising with the welfare team where safeguarding concerns are linked to mental health.
- Performing due diligence regarding weekly internet usage reports: identifying individual student causes for concerns, in addition to themes associated with e.g. gambling, pornography, violence etc. for subsequent strategic whole-school or group education and/or staff training.
- Promoting a supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances (Additional guidance available from the DfE on dealing with issues around parental responsibility: <https://www.gov.uk/government/publications/dealing-with-issues-relating-to-parental-responsibility>);
- Working with the Principal and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school or college.
- When supporting children with a social worker or Looked After Children (LAC) the DSL should have the details of the child's social worker and the name of the virtual school head in the authority that looks after the child (with the DSL liaising closely with the designated teacher).
- Liaising with other agencies and professionals in line with KCSIE 2024 and WTSC 2023
- Ensuring that locally established procedures as put in place by the three safeguarding partners as part of the Kent Safeguarding Children Multi-Agency Partnership procedures (KSCMP), including referrals, are followed, as necessary.
- Representing, or ensuring the school is appropriately represented at multi-agency safeguarding meetings (including Child Protection conferences).
- Managing and monitoring the school role in any multi-agency plan for a child.
- Being available during term time (during school hours) for staff in the school to discuss any safeguarding concerns.
- Helping promotes educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff.
- Ensuring all staff have access to, and understand, the school's safeguarding and child protection policy and procedures, especially new and part-time staff
- Ensuring the school's safeguarding and child protection policy is reviewed annually (as a minimum) and the procedures are updated and reviewed regularly, and work with governing bodies regarding this.
- Ensuring adequate and appropriate DSL cover arrangements in response to any closures and out of hours and/or out of term activities.
- Ensuring all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE 2024.

- Assuming lead responsibility for online safety and understanding the filtering and monitoring systems and processes in place.

## Members of Staff

All members of staff have a responsibility to:

- Provide a safe environment in which children can learn.
- Be aware of the indicators of abuse, neglect, and exploitation so that they can identify cases of children who may need help or protection.
- Be aware of safeguarding issues that can put children at risk of harm (e.g. behaviours linked with substance misuse; missing education; radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos)
- Be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.
- Be able to identify and act upon indicators that children are, or at risk of developing mental health issues. Be prepared to identify children who may benefit from early help.
- Know what to do if a child tells them that they are being abused or neglected and understand the impact abuse and neglect can have upon a child.
- Know that a child may not feel ready or know how to tell someone that they are being abused, exploited or neglected and /or may not recognise their experiences as harmful.
- Understand the 'early help assessment' process and their role in it.
- Understand their school safeguarding policies (including the following policies: Safeguarding and Child Protection; Behaviour (student); Staff behaviour (code of conduct, including low-level concerns and whistleblowing) and systems.
- Be aware of the school's response to children who are absent from education ("Missing Student Policy").
- Know what is meant by 'professional curiosity' and the importance of referring early indicators of abuse or neglect and exploitation.
- Undertake regular and appropriate training which is regularly updated.
- Be aware of the local process of making referrals to children's social care and statutory assessment under The Children Act 1989.
- Know how to maintain an appropriate level of confidentiality.
- Reassure children who report concerns that they are being taken seriously and that they will be supported and kept safe.

- Act in line with Teachers' Standards 2012 which state that teachers (including headteachers) should safeguard student's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

The Worthgate School recognises that safeguarding within a residential boarding environment is paramount in maintaining a safe and secure safeguarding environment for students, as outlined in the National Minimum Standards for Boarding (2022). To ensure safeguarding of students the following processes are in place:

- Exeat process.
- Curfew Checks.
- House Parents register all visitors to the residences.
- House Parents on duty when Boarding Houses are open.
- Emergency Duty Manager (EDM) on call after school hours.
- Segregation of ages and biological sex as appropriate within accommodation.
- Door alarms set each night in accommodation for students under 18.
- Window restrictors on windows on under 18 residences.
- Shackleton and Reach database for dissemination of student Information pertinent to the student care and support required.
- One to one tuition takes place in a classroom with the door open or where there are glass panels in the door.
- Driving students in cars: this is only permitted with the correct business insurance in place and with permission from a member of SLT. The school operates a policy of two chaperones in a car when permission is granted for the transportation to take place. If permission is not granted, any student needing transportation must therefore be driven by our registered taxi company(ies), whose drivers are all DBS checked.
- Risk assessments for students sharing rooms and for other relevant student experiences (and mixing of age-groups).
- Student education via the teaching and boarding staff stressing to the students how they can raise any concerns and access support where necessary.

### **Children and Young People**

Children and young people (learners) have a right to:

- Feel safe, be listened to, and have their wishes and feelings sought and considered.
- Confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
- Contribute to the development of school safeguarding policies.
- Receive help from a trusted adult.
- Learn how to keep themselves safe, including online.

## Parents and Carers

Parents/carers have a responsibility to:

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

## 7. CHILD PROTECTION PROCEDURES

### Recognising Indicators of Abuse, Neglect and Exploitation

All staff in school are made aware of the definitions and indicators of abuse, neglect and exploitation as identified by Working Together to Safeguard Children (2023) and Keeping Children Safe in Education (2024) Pt.1 S.20. This is outlined locally within the [Kent Support Levels Guidance](#).

The Worthgate School recognises that when assessing whether a child may be suffering actual or potential harm there are four categories of abuse:

- Physical
- Emotional
- Neglect
- Sexual

For further information see [Appendix 1](#).

Members of staff are aware that concerns may arise in many different contexts and can vary in terms of their nature and seriousness. The indicators of abuse and neglect can vary from child to child. Children develop and mature at different rates, so what is worrying behaviour for a younger child might be normal for an older child. It is important to recognise that indicators of abuse and neglect do not automatically mean a child is being abused, however all concerns should be taken seriously and explored by the DSL on a case-by-case basis.

The Worthgate School recognises abuse, neglect, and safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label alone. In many cases, multiple issues will overlap with one another, therefore staff will always be vigilant and always raise concerns with a member of the Safeguarding team.

Parental behaviours may also indicate child abuse or neglect, so staff should also be alert to parent-child interactions or concerning parental behaviours. This could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.



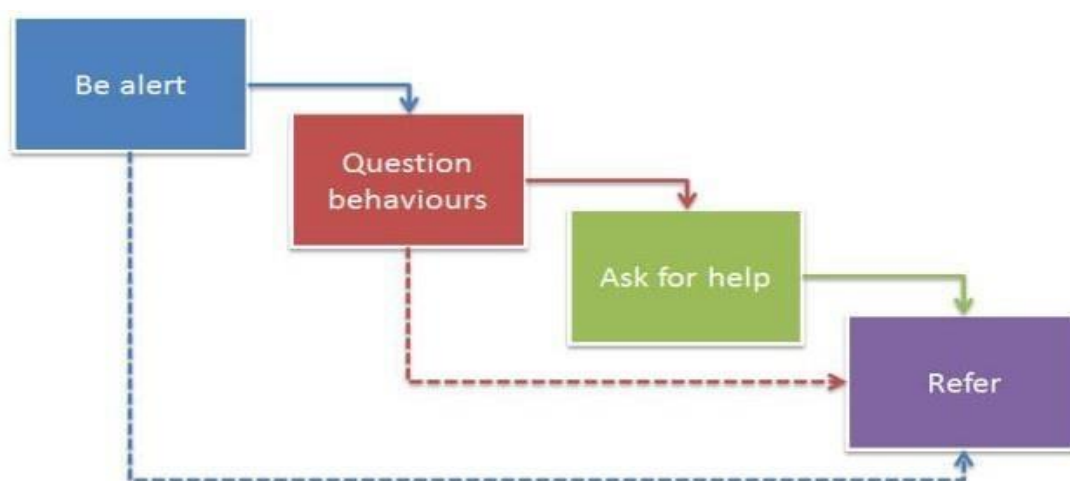
Children may report abuse happening to themselves, their peers or their family members and is not restricted to the school premises. All reports made by children to staff will be taken seriously and will be responded to in line with this policy

Safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children offsite. Children can be at risk of abuse or exploitation in situations outside their families. Extra- familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, serious youth violence, and county lines.

By understanding the indicators of abuse and neglect, we can respond to problems as early as possible and provide the right support and services for the child and their family.

Technology can be a significant component in many safeguarding and well-being issues. Children are at risk of abuse online as well as face to face and in many cases, abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online.

All members of staff are expected to be aware of and follow this approach if they are concerned about a child:



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

In all cases, if staff are unsure, they will always speak to a member of the Safeguarding team.

The Worthgate School recognises that some children have additional or complex needs and may require access to intensive or specialist services to support them.

If deemed necessary by the Principal or by staff authorised by the Principal, following a concern about a child's safety or welfare, the searching and screening of children and confiscation of any items, including electronic devices, will be managed in line with the school 'Searching, Screening and Confiscation' policy and behaviour policy, which is informed by the DfE [Searching, Screening and Confiscation Advice for Schools 2022](#).

### **Responding to Child Protection Concerns**

If staff are made aware of a child protection concern, they are expected to:

- Listen carefully to the concern and be non-judgmental.
- Only use open questions to clarify information where necessary, e.g., who, what, where, when, how or Tell, Explain, Describe (TED).
- Not promise confidentiality as concerns will have to be shared further, for example, with the DSL and potentially Integrated Children's Services.
- Be clear about boundaries and how the report will be progressed.
- Inform the DSL (or a deputy), as soon as possible
- Record the concern on Shackleton Safeguarding Private Note.

The DSL or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, the DSL and dDSLs are not available, the Safeguarding Governor should be contacted. If this were not possible, staff should speak to a member of the senior leadership team and/or take advice from Education Safeguarding Service or via consultation with a social worker from the Front Door. In these circumstances, any action taken will be shared with a DSL as soon as is possible.

The Worthgate School will respond to concerns in line with the Kent Safeguarding Children Multi-Agency Partnership procedures (KSCMP).

- The full KSCMP procedures and additional guidance relating to reporting concerns and specific safeguarding issues can be found on their website: [www.kscmp.org.uk](http://www.kscmp.org.uk)
- Specific information and guidance to follow with regards to accessing Early Help and Preventative Services and/or Children's Social Work Services as part of Integrated Children's Services (ICS) in Kent can be found here: [www.kelsi.org.uk/support-for-children-and-young-people/integrated-childrens-services](http://www.kelsi.org.uk/support-for-children-and-young-people/integrated-childrens-services)

Where a child is suffering, or is likely to suffer from harm, or is in immediate danger, a 'request for support' will be made immediately to Integrated Children's Services (via the 'Front Door') and/or the police, in line with KSCMP procedures.

- The Worthgate School recognises that in situations where there is immediate child protection concerns for a child as identified in line with Support Level Guidance, it is NOT to investigate as

a single agency, but to act in line with KSCMP guidance which may involve multi-agency decision making.

- The DSL may seek advice or guidance from their Area Education Safeguarding Advisor from the Education Safeguarding Service before deciding next steps.
- They may also seek advice or guidance from a social worker at the Front Door service who are the first point of contact for Integrated Children's Services (ICS).

In the event of a request for support to the Front Door being necessary, parents/carers will be informed and consent to this will be sought by the DSL in line with guidance provided by KSCMP and ICS. Parents/carers will be informed of this, unless there is a valid reason not to do so, for example, if to do so would put a child at risk of harm or would undermine a criminal investigation. The rationale and decision making will be made by the DSL in consultation with the Principal and a record made of the decision made.

All staff are aware of the process for making request for support referrals for statutory assessments under the Children Act 1989, along with the role they might be expected to play in such assessments.

Where it is identified a child may benefit from Early Help support (as provided by ICS), the DSL (or deputy) will lead as appropriate and make a request for support via the Front Door.

- The DSL will keep all early help cases under constant review and consideration will be given to escalating concerns to the Front Door or seeking advice via the Education Safeguarding Service if the situation does not appear to be improving or is getting worse.

If, after a request for support or any other planned external intervention, a child's situation does not appear to be improving or there is a concern regarding decisions made, the DSL will consider following [KMSCP Procedures](#) to ensure their concerns have been addressed and, most importantly, that the child's situation improves. DSLs may request support with this via the Education Safeguarding Service ([Education Safeguarding Service](#) )

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

### **Recording Concerns**

All safeguarding concerns, discussions and decisions, and reasons for those decisions, will be recorded in writing on the school safeguarding incident/concern Shackleton private note and passed without delay to the DSL or a deputy DSL.

If members of staff are in any doubt about recording requirements, they should discuss their concerns with the DSL.

Records will be completed as soon as possible after the incident/event, using the child's words, and will be signed and dated by the member of staff. They should include the child's wishes and feelings as well

as a record of any communication with parents or other agencies. Child protection records will record facts and not a member of staff's personal opinions. If there is an immediate concern, the member of staff should consult with a DSL before completing the form as reporting urgent concerns takes priority.

Safeguarding records will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and details regarding any action taken, decisions reached and the outcome. They are kept for individual children and are maintained separately from all other records relating to the child in the school. Safeguarding records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL. Safeguarding records are shared with staff on a 'need to know' basis only.

All safeguarding records will be transferred in accordance with data protection legislation to the child's subsequent school, in line with KCSIE under confidential and separate cover. These will be given to the new DSL and a receipt of delivery will be obtained. In addition to the child protection file, the DSL will also consider if it would be appropriate to share any information with the DSL at the new school or school in advance of a child leaving. For example, information that would allow the new school or school to continue to provide support.

Where the school receives child protection files, the DSL will ensure key staff such as the named person with oversight for SEN, will be made aware of relevant information as required.

### **Our Alumni**

If an alumnus has experienced any form of child -on - child abuse (formerly known as peer-on-peer abuse) and not previously reported it, we strongly encourage them to contact the school. We would advise them to contact the DSL.

### **Multi-Agency Working**

The Worthgate School recognises and is committed to its responsibility to work within the KSCMP multi-agency safeguarding arrangements. The Senior Leadership Team and DSL will work to establish strong and co-operative local relationships with professionals in other agencies in line with statutory guidance.

The Worthgate School recognises the importance of multi-agency working and is committed to working alongside partner agencies to provide a coordinated response to promote children's welfare and protect them from harm. This includes contributing to KSCMP processes as required. Such as, participation in relevant safeguarding multiagency plans and meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.

### **Confidentiality and Information Sharing**

The Worthgate School recognises our duty and powers to hold, use and share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE 2024.

All staff must be aware that they cannot promise confidentiality in situations which might compromise a child's safety or well-being. The Worthgate School has an appropriately trained Data Protection Officer

(DPO) as required by the General Data Protection Regulations (GDPR) to ensure that our school is compliant with all matters relating to confidentiality and information sharing requirements. The DPO for CATS Global Schools is Laura McDowell.

The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children (KCSIE 2024). DfE "[Information sharing advice for safeguarding practitioners](#)" (2018) provides further detail.

The DSL will disclose information about a learner on a 'need to know' basis.

All members of staff must be aware that whilst they have a duty to keep any information confidential, they also have a professional responsibility to be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children; this may include sharing information with the DSL and with other agencies as appropriate. All staff are aware they cannot promise confidentiality in situations which might compromise a child's safety or well-being.

### **Complaints**

All members of the school community should feel able to raise or report any concerns about children's safety or potential failures in the school safeguarding regime. The school has a Complaints Procedure available to parents, learners and members of staff and visitors who wish to report concerns. This can be found on the school website.

Whilst we encourage members of our community to report concerns and complaints directly to us, we recognise this may not always be possible. Children, young people, and adults who have experienced abuse at school can contact the NSPCC 'Report Abuse in Education' helpline on 0800 136 663 or via email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

Staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

All reported concerns will be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation against a member of staff or volunteer will be dealt in line with the [local Kent allegations arrangements](#) (LADO) and KCSIE 2024 (Part 4).

## **8. SPECIFIC SAFEGUARDING ISSUES**

The Worthgate School is aware of a range of specific safeguarding issues and situations that can put children at greater risk of harm. In addition to Part One, DSLs, school leaders and staff who work directly

with children will read Annex B of KCSIE 2024 which contains important additional information about specific forms of abuse and safeguarding issues.

Where staff are unsure how to respond to specific safeguarding issues, they should follow the processes as identified in part 7 of this policy and speak with a member of the DSL team.

### **Child-on-Child and Student-on-Student Abuse**

All members of staff at The Worthgate School recognise that children can abuse their peers, and that it can happen both inside and outside of school and online.

The Worthgate School recognises that student-on-student abuse can take many forms, including but not limited to:

- Bullying, including cyberbullying, prejudice-based and discriminatory bullying.
- Abuse in intimate personal relationships between peers.
- Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- Sexual violence and sexual harassment.
- Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery).
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- Downblousing, which is the practice of making unauthorised photographs down the top of a female's dress, capturing an image of her breasts.
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

The Worthgate School realises that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

The Worthgate School is aware that the wide range of nationalities in the school can sometimes put specific groups at greater risk.

The Worthgate School also recognises that even if there are no reported cases of student-on-student abuse, such abuse is still likely to be taking place (it may be the case it has not been reported).

All staff have a role to play in challenging inappropriate behaviours between peers. Staff recognise that that some student-on-student abuse issues may be affected by gender, age, ability, and culture of those involved.

Concerns about a learner's behaviour, including student-on-student abuse taking place offsite, will be responded to as part of a partnership approach with learners and parents/carers. Offsite behaviour concerns will be recorded and responded to in line with existing appropriate policies, for example anti-bullying, IT acceptable use, behaviour, and child protection policies.

To minimise the risk of student-on-student abuse, The Worthgate School will:

- Implement a robust anti-bullying policy.
- Provide an age appropriate PSHE and RSE curriculum and include within this curriculum, information and materials that support children in keeping themselves safe from abuse, including abuse from their peers and online.
- Provide a residential Life Skills programme.
- Provide a range of reporting mechanisms such as the Tell Us/Need to Talk buttons
- Provide high quality pastoral support via Personal Tutors, House Pastoral Directors (HPDs) and 1-2-1 welfare meetings with Boarding Team Leads (BTLs).
- Provide a well-being room for student access at any time, overseen by the nursing team.
- Provide an Independent Person and school counsellor.
- Recognise the risk of intra familial harm and provide support to siblings following incidents where necessary as part of Trauma Informed practice.

The Worthgate School wants children to feel able to confidently report abuse and know their concerns will be treated seriously. All allegations of child-on-child abuse will be reported to the DSL and will be recorded, investigated, and dealt with in line with associated school policies, including child protection, anti-bullying, and behaviour. Learners who experience abuse will be offered appropriate support, regardless of where the abuse takes place.

Alleged victims, perpetrators and any other child affected by child-on-child abuse will be supported by:

- Taking reports seriously.
- Listening carefully.
- Avoiding victim blaming.
- Providing appropriate pastoral support.
- Reviewing pastoral and educational approaches.
- Following procedures as identified in other policies e.g., the school anti-bullying, behaviour, and child protection policy.
- Where necessary and appropriate, informing the police and/or ICS.

### **Allegations raised by alumni.**

The actions described in this section will be applied as far as is practicable when alumni raise allegations of student-on-student abuse. Depending on the timescales involved, different investigative approaches may be necessary. The school takes student-on-student abuse seriously and will respond to all concerns or disclosures of student-on-student abuse, including those that have occurred historically, immediately.

### **Student-on-student Sexual Violence or Harassment**

When responding to concerns relating to student-on-student sexual violence or harassment, The Worthgate School will follow the guidance outlined in Part Five of KCSIE 2024 and the DfE [‘Sexual Violence and Sexual Harassment Between Children in Schools and Schools’](#) guidance. The school will also note the Human Rights and Equality Acts.

The Worthgate School recognises sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children and can occur online, concurrently online, and offline, or technology may be used to facilitate offline abuse or exploitation. It will be made clear to all parties that the school has a zero-tolerance approach to sexual violence and sexual harassment and that they are never acceptable.

All victims of sexual violence or sexual harassment will be reassured by the school staff that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment or be made to feel ashamed for making a report.

When there has been a report of sexual violence or harassment, the DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted). The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children, adult students and staff and any actions that are required to protect them.

Reports will initially be managed internally by the school and where necessary will be referred to safeguarding partners (e.g. Integrated Children’s Services and/or the Police). Important considerations which may influence this decision include:

- the wishes of the victim in terms of how they wish to proceed.
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether harmful sexual behaviour has been displayed.
- the ages of the students involved.
- the developmental stages of the students involved.
- any power imbalance between the students.
- if the alleged incident is a one-off or a sustained pattern of abuse - sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature.



- that sexual violence and sexual harassment can take place within intimate personal relationships between students.
- understanding intra familial harms and any necessary support for siblings following incidents.
- whether there are any ongoing risks to the victim, other students, adult students, or school staff.
- any other related issues and wider context, including any links to student sexual exploitation and student criminal exploitation.

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

### **Nude and/or Semi-Nude Image sharing by Children**

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

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

The Worthgate School recognises that consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as youth produced/involved sexual imagery or "sexting") can be a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or a deputy).

When made aware of concerns involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos by children, staff are advised to:

- Report any concerns to the DSL immediately.
- Never view, copy, print, share, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already viewed the imagery by accident, this will be immediately reported to the DSL.
- Not delete the imagery or ask the child to delete it.
- Not say or do anything to blame or shame any children involved.
- Explain to child(ren) involved that they will report the issue to the DSL and reassure them that they will receive appropriate support and help.
- Not ask the child or children involved in the incident to disclose information regarding the imagery and not share information about the incident with other members of staff, the child(ren) involved or their, or other, parents and/or carers. This is the responsibility of the DSL.

DSLs will respond to concerns as set out in the non-statutory UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)' and the local [KSCMP](#)

guidance. When made aware of a concern involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos:

- The DSL will hold an initial review meeting to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child involved. This may mean speaking with relevant staff and the children involved as appropriate.
- Parents and carers will be informed at an early stage and be involved in the process to best support children, unless there is good reason to believe that involving them would put a child at risk of harm.
- All decisions and action taken will be recorded in line with our child protection procedures and as part of KCSIE 2024 regarding information sharing.
- A referral will be made to ICS and/or the police immediately if:
  - the incident involves an adult (over 18);
  - there is reason to believe that a child has been coerced, extorted, or groomed, or there are concerns about their capacity to consent, for example, age of the child or they have special educational needs.
  - the image/videos involve sexual acts and a child under the age of 13, depict sexual acts which are unusual for the child's developmental stage, or are violent.
  - a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes.
- The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date.
- If DSLs are unsure how to proceed, advice will be sought from the Education Safeguarding Service.

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

The Worthgate School recognises that CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

If staff are concerned that a child may be at risk of CSE or CCE, immediate action should be taken by speaking to a member of the DSL team.

### **Serious Violence**

The Worthgate School recognises the impact of gangs, county lines, serious violence, crime, and exploitation. It is recognised that the initial response to child victims is important, and that staff will take any allegation seriously and work in ways that support children and keep them safe.

All staff are made aware of the indicators which may signal children are at risk from or are involved with serious violent crime. These may include unexplained gifts or new possessions, increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.

Any concerns regarding serious violence will be reported and responded to in line with other child protection concerns.

### **So-called ‘honour’-based abuse**

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

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

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

### **Preventing Radicalisation**

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

An individual risk assessment will be completed in line with the September 2023 Government guidance [‘Managing risk of radicalisation in your education setting’](#) if there are concerns raised that a student may be ‘at risk’ of extremist ideologies or radicalisation.

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

### **Cybercrime**

The Worthgate School recognises that children with skill and interest in computing and technology may inadvertently or deliberately stray into ‘cyber-enabled’ (crimes that can happen offline but are enabled at scale and at speed online) or ‘cyber dependent’ (crimes that can be committed only by using a computer/internet enabled device) cybercrime.

If staff are concerned that a child may be at risk of becoming involved in cyber-dependent cybercrime, the DSL will be informed, and consideration will be given to accessing local support and/or referring into

the [Cyber Choices](#) programme, which aims to intervene when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Where there are concerns about 'cyber-enabled' crime such as fraud, purchasing of illegal drugs online, child sexual abuse and exploitation, or other areas of concern such as online bullying or general online safety, they will be responded to in line with this and other appropriate policies.

### **Sexual Relationships**

The Worthgate School is aware of the possibility of sexual relationships between students while at school. All boarding staff are always vigilant for such behaviours and would refer to SLT for robust sanctions that would follow. Please refer to the Student Behaviour policy.

### **Domestic Abuse**

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

Worthgate is an Operation Encompass School. This means we work in partnership with Kent Police to provide support to students experiencing domestic abuse.

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

## **9. SUPPORTING CHILDREN POTENTIALLY AT GREATER RISK OF HARM**

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

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

The Worthgate School acknowledges that children with special educational needs or disabilities (SEND), Additional Learning Needs (ALS) or certain health conditions can face additional safeguarding challenges and barriers for recognising abuse, neglect and exploitation, or certain health conditions. This includes cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

As outlined in KCSIE 2024, The Worthgate School recognises that children with SEND/ALS may face additional communication barriers and experience difficulties in managing or reporting abuse or challenges. Children with SEND/ALS will be appropriately supported to communicate and ensure that their voice is heard and acted upon.

All members of staff will be encouraged to appropriately explore indicators of abuse such as behaviour, mood changes or injuries and not to assume that they are related to the child's disability. Staff will be mindful that children with SEND/ALS or certain medical conditions may be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.

Members of staff are encouraged to be aware that children with SEND/ALS can be disproportionately impacted by safeguarding concerns, such as exploitation, peer group isolation or bullying including prejudice-based bullying. To address these additional challenges, our school will always consider implementing extra pastoral support and attention for children with SEND/ALS. The DSL will work closely with the Assistant Principal Pastoral in charge of SEND, to plan support as required.

### **Children Requiring Mental Health Support**

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

Together with the DSL, the Medical team, the Assistant Principal Pastoral, and the school's Mental Health Lead, will have the responsibility to promote well-being and mental health of students and staff in the school. They may decide to refer a student to the school counsellor.

### **Children Missing from Education**

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

The school is aware of those students who are persistently absent from school from their hourly/daily/weekly attendance records. The Attendance Policy clearly states who needs to be notified and what action should be taken and the relevant timescales.

The Pastoral team, with the Attendance Officer, will liaise weekly to review low attendance, reasons for it, sanctions, support and outcomes. Other relevant staff will be engaged where it is in a student's interest to receive specialist support. Attendance statistics will be published according to statutory and school requirements and the parents of students will be contacted promptly regarding attendance issues as per the Terms and Conditions of the school.

Students falling below 95% attendance are at risk of falling into 'dire attendance' and will have their attendance monitored closely through use of the Discipline Stages and other relevant strategies. The school will observe the requirements of the UKVI. This will include being proactive in monitoring student attendance and ceasing to sponsor students who continue not to meet attendance requirements despite support.

The school will report all unauthorised, non-attendees to the UKVI once they have missed 10 consecutive contact points. A contact point is defined as an entire day (Monday to Friday) for this purpose. In addition to timetabled classes, contact points may also include meetings with residential staff or other school welfare staff.

## **10. PROTOCOL FOR EXEATS – SAFEGUARDING CHECKS**

As a boarding school, students must request permission to leave Canterbury for the day or to stay away overnight. This is called an EXEAT, and it is a legal requirement for boarding schools in the United Kingdom. Students can apply for day exeats, or overnight exeats if they are not returning to boarding. It is extremely important for safety reasons that we know when the students are away from school, and where they are and who they are with when away, and it is a serious breach of the Safeguarding policy if these procedures are not followed. There is a separate Exeats Policy detailing all the processes and associated compliance

Exeats must be submitted at least two weeks before the end of a term. This includes any half term break, Easter, and Christmas holidays. No exeats will be permitted within this time frame so students must ensure that all travel arrangements have been booked and confirmed. The school has the right to decline any exeat placed that does not adhere to the above.

Students requesting an exeat must submit all the relevant details on the Reach app or Desktop. Parents are also able to request an exeat on behalf of their son / daughter using the Reach app or Desktop.

The Reach platform demands the required information from the student and includes:

- Dates and times
- Destination
- Travel Plans – including the ability to upload boarding passes for international exeats.
- Host information

The parameters of each exeat are set by the student's age and will include automated workflows to request the appropriate permissions for each type of exeat.

Students requesting an exeat must submit all the relevant details using the Reach App:

- Their phone number (if students are going outside of the U.K., then they also need to include one which works outside the UK).
- The FULL postal address including postcode of the address.

Any U18 students must include the full name and phone number of the responsible adult (see below).

If traveling abroad, the flight details must be included and shown to the duty House Parent.

Responsible adults must be 25 or over and should be known to the parents/agent/guardian. Parental permission must be received with information about the responsible adult (full name, age, relationship to student, address, mobile number, and a scanned photo of an ID). We will also speak to or meet the responsible adult before any exeat is approved, as the school needs to complete relevant due diligence to be satisfied of the suitability of the person into whose care the student is temporarily transferred. If this person is deemed unsuitable, the school will contact the parent to inform them of this fact. The exeat will not be granted in such cases.

U16 students who wish to leave Canterbury must be collected and returned by a parent or responsible adult. The responsible adult will need to show photo ID. It is possible, in exceptional circumstances, for the School to arrange a couriered taxi only if the responsible adult cannot collect or return the student to the accommodation.

The Assistant Principal (Boarding and Welfare), the Deputy Head of Boarding, the Boarding Team Leads and the Student Communications team can approve or decline exeats. Students will be informed when their exeat has been declined. Reasons for declining an exeat may include but are not restricted to behavioural issues; poor attendance; the exeat not being submitted on time; not having parental permission; not having been completed correctly; containing incorrect information; or if the School has any concerns regarding the safety of the student and their proposed time away from School. Appropriate action and sanctions will be taken if information on the exeat is found to be untruthful or deceiving.

N.B. There is an Exeats watchlist in the school's MS Exeats Team, which informs the approval team of named students whose exeat requires discussion before approval, for welfare / safeguarding reasons.

## 11. ONLINE SAFETY

It is recognised by The Worthgate School that the use of technology presents challenges and risks to children and adults both inside and outside of school. It is essential that children are safeguarded from

potentially harmful and inappropriate material or behaviours online. The Worthgate School is a certified NOS school and will adopt a whole school approach to online safety which will empower, protect, and educate our learners and staff in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.

The school is aware of the risks of the use of mobile technology in school. Many students have unlimited and unrestricted access to the internet via 3G/4G/5G, and the school has procedures outlined in the E-Safety & ICT policy which advises students how to manage their mobile use in school and away from school. Issues of online safety are discussed in the PSHE curriculum and lessons, as well as assemblies. Posters are displayed in all boarding areas and around the school giving guidance and information on online safety and behaviours. Advice website and information lines are also displayed and shared with students.

The Worthgate School will ensure online safety is reflected as required in all relevant policies. Online safety is considered as a running and interrelated theme when devising and implementing our policies and procedures and when planning our curriculum, staff training, the role and responsibilities of the DSL and parental engagement.

The Worthgate School identifies that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- **Content:** being exposed to illegal, inappropriate, or harmful content. For example, pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- **Contact:** being subjected to harmful online interaction with other users. For example, peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm. For example, making, sending, and receiving explicit images (e.g., consensual, and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying.
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

The Worthgate School recognises that technology, and the risks and harms related to it, evolve, and change rapidly. The school will carry out an annual review of our approaches to online safety, supported by an annual risk assessment which considers and reflects the risks our children face.

### **Policies and Procedures**

The DSL has overall responsibility for online safety within the school but will liaise with other members of staff, the Senior IT Support Technician, the Vice Principal, Assistant Principal Academic and Curriculum Directors, and the House Pastoral Directors, as necessary.

The DSL will respond to online safety concerns reported in line with our child protection and other associated policies, including our anti-bullying, E-Safety, and behaviour policies. Internal sanctions and/or



support will be implemented as appropriate. Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.

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

The Worthgate School recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras, and wearable technology. In accordance with KCSIE 2024, The Worthgate School has appropriate mobile and smart technology and image use policies in place, which are shared and understood by all members of the community.

### **Appropriate Filtering and Monitoring**

The Worthgate School will do all we can to limit children's exposure to online risks through school provided IT systems and will ensure that appropriate filtering and monitoring systems are in place. (The school has adequate filtering systems to keep the students safe when accessing the internet at school through the Wi-Fi network. The usage is monitored monthly by the central IT function and reports are made available to the DSL . (See the Online Policy for further details.) In addition:

- If learners or staff discover unsuitable sites or material, they are required to report the concern immediately to a member of staff who will report the URL of the site to technical staff/services.
- All users will be informed that use of our systems will be monitored, and that monitoring will be in line with data protection, human rights, and privacy legislation.
- Filtering breaches or concerns identified through our monitoring approaches will be recorded and reported to the Vice Principal, the DSL and technical staff.
- Any access to material believed to be illegal will be reported immediately to the appropriate agencies, such as the [Internet Watch Foundation](#) and the police;
- When implementing appropriate filtering and monitoring, The Worthgate School will ensure that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.

The Worthgate School acknowledges that whilst filtering and monitoring is an important part of school online safety responsibilities, it is only one part of our approach to online safety. Learners will use appropriate search tools, apps and online resources as identified following an informed risk assessment. Learners' internet use will be supervised by staff according to their age and ability and they will be directed to use age-appropriate online resources and tools by staff.

### **Information Security and Access Management**

The Worthgate School is responsible for ensuring an appropriate level of security protection procedures are in place, to safeguard our systems as well as staff and learners. Further information can be found in acceptable use agreements, the On-line Safety and Data Protection policies.

The Worthgate School will review the effectiveness of these procedures periodically to keep up with evolving cybercrime technologies.

### **Staff Training**

The Worthgate School will ensure that all staff, as part of their safeguarding role receive online safety training as part of induction and that ongoing online safety training and update for all staff will be integrated, aligned, and considered as part of our overarching safeguarding approach through appropriate training platforms.

### **Educating Learners**

The Worthgate School will ensure a comprehensive whole school curriculum response is in place to enable all learners to learn about and manage online risks effectively as part of providing a broad and balanced curriculum.

We will use the National College's resources and training available to us as a certified school, as well as the UK Council for Internet Safety (UKCIS) ['Education for a Connected World Framework'](#) and DfE ['Teaching online safety in school'](#) guidance.

### **Working with Parents/Carers**

The Worthgate School will build a partnership approach to online safety and will support parents/carers to become aware and alert of the potential online benefits and risks for children by:

- Providing information on our school/school website.
- Providing updates through our existing communication channels (newsletters, Facebook, student communications, agents, on-line safety working group communications etc.).

## **12. STAFF ENGAGEMENT AND EXPECTATIONS**

### **Staff Induction, Awareness and Training**

All members of staff have been provided with a link to the updated 'Keeping Children Safe in Education' which covers safeguarding information for all staff.

- School leaders, including the DSL team will read the entire document.
- School leaders and all members of staff who work directly with children are directed to read as a minimum, Part One and Annex B of Keeping Children Safe in Education (KCSIE) 2024.
- All other staff are directed to read as a minimum Annex A of Keeping Children Safe in Education.
- All members of staff have signed to confirm that they have read and understood the parts of KCSIE applicable to their role, and this annual signed declaration is held by the DSL.

The DSL will ensure that all new staff and volunteers (including agency and third-party staff) receive child protection training to ensure they are aware of the school internal safeguarding processes as part of their induction. This training will include online safety and will take place at least annually.

Safeguarding training for staff includes online safety training, and how to manage/report on student-on-student sexual violence/ sexual harassment. This training will be integrated, aligned, and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning.

In addition to specific child protection training, all staff will receive regular safeguarding and child protection updates (via email, e-bulletins, staff meetings), to provide them with relevant skills and knowledge to safeguard children effectively.

Staff will be encouraged to contribute to and shape school safeguarding arrangements and child protection policies via input from knowledgeable and experienced staff, inviting input at staff meetings.

Although the school has a nominated Safeguarding Governor, all members of the governing body will access appropriate safeguarding training which covers their specific strategic responsibilities on a regular basis.

### **Safer Working Practice**

All members of staff are required to work within our clear guidelines on safer working practice as outlined in the school code of conduct.

All staff members (including agency and third-party staff) will be made aware of the school expectations regarding safe and professional practice via the Staff Code of Conduct and Acceptable Use Agreement (AUA).

Staff should work, and be seen to work, in an open and transparent way including self-reporting if their conduct or behaviour falls short of these guiding principles. This means that staff should work one-to-one with a child only when necessary (both in person or online) and with the knowledge and consent of senior leaders and parents/carers.

Staff will be made aware of the school behaviour management and physical intervention policies, and any physical interventions/use of reasonable force must be in line with agreed policy and procedures and national guidance.

All staff will be made aware of the professional risks associated with the use of social media and electronic communication (such as email, mobile phones, texting, social networking). Staff will adhere to relevant school policies including Staff Code of Conduct, Acceptable Use and On-line Safety Policies.

### **Staff Supervision and Support**

Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL team. The induction process will include familiarisation with child protection responsibilities and procedures to be followed if members of staff have any concerns about a child's safety or welfare.

The school will provide appropriate supervision and support for all members of staff to ensure that:

- All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children.
- All staff are supported by the DSL in their safeguarding role.
- All members of staff have regular reviews of their own practice to ensure they improve over time.

The DSL will also put staff in touch with outside agencies for professional support if they so wish or refer to the Employee Assistance Programme (EAP). Staff can also approach organisations such as their Union, the Education Support Partnership, or other similar organisations directly.

As per the group's Supervision practice policy, given the particular position of the DSL within the safeguarding framework of the school, the DSL should be offered and encouraged to undertake regular, half-termly or more frequently if desired, 1:1 external supervision.

### 13. SAFER RECRUITMENT AND ALLEGATIONS

#### **Safer Recruitment and Safeguarding Checks**

The Worthgate School is committed to ensure that we develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our learners and staff.

The Worthgate School will follow relevant guidance in Keeping Children Safe in Education 2024 (Part 3 'Safer Recruitment') and from The Disclosure and Barring Service (DBS):

- The governing body and Senior Leadership Team are responsible for ensuring that the school/school follows safe recruitment processes outlined within guidance.
- The governing body will ensure that at least one member of each interview panel has completed safer recruitment training.
- Online checks will be performed on short-listed candidates to help identify any incidents or issues made publicly available for the recruitment team to explore with the applicant during interview. (N.B. Prospective candidates will be made aware in advance of their applications that the school will perform online searches as part of their due diligence).

The school maintains an accurate Single Central Record (SCR) in line with statutory guidance.

The Worthgate School is committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools.

We advise all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands, and warnings. We will ensure that all staff and volunteers have read the staff code of conduct and understand that their behaviour and practice must be in line with it.

## **Allegations Against Members of Staff, Volunteers and Contractors**

The School/School will respond to allegations in line with the [local Kent allegations arrangements](#) and KCSIE 2024 guidance. School guidance on ways to prevent allegations can be found in the Staff Code of Conduct policy The code of conduct is also given to all staff at the start of their time at the school as part of their Safeguarding training.

Any concerns or allegations about staff, including those which do not meet the allegation/harm threshold (see Low Level Concerns (LLC) policy appended to this policy) will be recorded and dealt with appropriately in line with national and local guidance. Ensuring concerns are dealt with effectively will protect those working in or on behalf of the school from potential false allegations or misunderstandings.

Where the Principal is unsure how to respond or if the school is unsure if a concern meet the harm 'thresholds', advice will be sought via the [Local Authority Designated Officer](#) (LADO) Enquiry Line and/or the [Education Safeguarding Service](#).

As a boarding school, we will provide alternative accommodation if a member of the boarding staff is suspended in circumstances of a child protection nature.

### **Concerns that meet the 'harm threshold.'**

The Worthgate School recognises that it is possible for any member of staff, including DSL, volunteers, governors, contractors, agency and third-party staff (including supply teachers) and visitors to behave in a way that indicates a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or school. This includes when someone:

- Indicates they have harmed a child or may have harmed a child.
- Means they have committed a criminal offence against or related to a child.
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with child.

Allegations should be referred immediately to the Principal who will contact the [Local Authority Designated Officer](#)(LADO) to agree further action to be taken in respect of the child and staff member. Where there is a conflict of interest in reporting the matter to the Principal the allegation should be reported directly to the LADO. In the event of allegations of abuse being made against the Principal, staff are advised that allegations should be reported without informing the Principal, to the Chair of Governors, Toby Salt who will contact the LADO.

Allegations reported to the LADO will be done immediately within one working day, at the latest. In cases of serious harm, the police should be informed from the outset.

For supply staff and contractors, the agency/employment business must be kept fully informed and involved.

Consideration is given to making a referral to the TRA (Teaching Regulation Agency) where a teacher has been dismissed (or would have been dismissed had he or she not resigned) and a prohibition order may be appropriate, because of 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute', or a 'conviction at any time for a relevant offence'.

Concerns that do not meet the 'harm threshold' The Worthgate School may also need to act in response to 'low-level' concerns about staff, which typically would be behaviours which are inconsistent with our staff code of conduct, including inappropriate conduct outside of work and concerns that do not meet the allegations threshold. The full Low-Level Concerns (LLC) policy can be found at the end of this policy.

LLCs will be recorded in writing and reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern is identified, the school will implement appropriate action, for example consulting with [the LADO enquiry line](#) and following our disciplinary procedures.

### **Safe Culture**

As part of our approach to safeguarding, the school has created and embedded a culture of openness, trust and transparency in which our values and expected behaviour as set out in our code of conduct are constantly lived, monitored and reinforced by all staff (including supply teachers, volunteers and contractors) and where all concerns are dealt with promptly and appropriately.

All staff and volunteers should feel able to raise any concerns about poor or unsafe practice and potential failures in the school safeguarding regime. The Senior Leadership Team at The Worthgate School will take all concerns or allegations received seriously.

All members of staff are made aware of the school Whistleblowing procedure. It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk. Staff can access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally.

Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

The Worthgate School has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or Schools Personnel Service.

## **14. OPPORTUNITIES TO TEACH SAFEGUARDING**

The Worthgate School will ensure that children are taught about safeguarding, including online safety, as part of providing a broad and balanced curriculum. This will include covering relevant issues through PHSE and RSE programmes. We recognise that The Worthgate School plays an essential role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour; what is 'safe;' to recognise when they and others close to them are not safe; and how to seek advice and support when they are concerned. Our curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness, and decision making so that learners have a range of age-appropriate contacts and strategies to ensure their own protection and that of others.

The Worthgate School recognises that a 'one size fits all' approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND/ALS children might be needed.

Our school systems support children to talk to a range of staff. Children will be listened to and heard, and their concerns will be taken seriously and acted upon as appropriate. A list of staff/members of the school community that student may wish to talk to is posted throughout the school campus and boarding residences.

## **15. SAFEGUARDING MEASURES FOR EXTERNAL PROVISION AND LEASING OF PREMISES**

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

In accordance with the Department for Education (DfE) guidance on After-school Clubs, Community Activities, and Tuition (2023), the Designated Safeguarding Lead (DSL) at The Worthgate School will ensure that any external organisations leasing premises or accessing school resources undergo appropriate due diligence checks, safeguarding training, and provide relevant resources both before and during their use of the school's facilities.

This policy outlines the necessary reporting procedures and safeguarding measures that apply within the school, and all external organisations using the school's premises must adhere to these requirements. Knowledge of and reference to Keeping Children Safe in Education (KCSIE) 2024 will be incorporated into any Service Level Agreement (SLA) or Memorandum of Understanding (MOU) established with external providers.

The Operations Management team and the DSL will collaborate to ensure that all parties involved are aware of and comply with The Worthgate Safeguarding and Child Protection Policy. In cases where

safeguarding measures are not adhered to, the DSL will immediately inform the Principal, and appropriate actions will be taken, which may include terminating the SLA or MOU and removing the individual(s) from the premises. The DSL will also coordinate with the Operations Management team to notify the organisation of any breaches and take necessary follow-up action.

For any instances where The Worthgate School makes use of external premises or resources, the DSL will liaise with the hosting organisation to ensure that safeguarding measures and points of contact are clearly defined. The DSL's contact details will be shared with the provider, and The Worthgate School will adhere to the host's safeguarding procedures, while also ensuring compliance with its own policies, KCSIE, and Working Together to Safeguard Children (WTSC) guidelines

### **Site Security**

All members of staff have a responsibility for maintaining awareness security of buildings and grounds and for reporting concerns that may become known.

Visitors will be expected to, sign in and out via the Reception office and to display a visitor's badge whilst on site. Any individual who is not known or identifiable on site should be challenged for clarification and reassurance.

The school will not accept the behaviour of any individual (parent or other) that threatens school security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school site.

### **Visiting Speakers**

The Worthgate School recognises the value that external speakers bring to its students and seeks to encourage the provision of enrichment to learners and staff whilst meeting our statutory obligations of the Prevent Duty guidance published in 2015 (updated 2021)

The School is committed to freedom of speech but will strive to reduce the likelihood that visiting speakers or organisations seek to promote extremist views or attempts to radicalise students and staff. The Worthgate School will conduct due diligence checks to ensure that the material they are speaking on fits the remit of the School and does not lead to students being at risk of being drawn into terrorism or terrorist ideologies. Further information is available in our Visiting Speakers Policy.

## **16. LOCAL SUPPORT**

All members of staff in The Worthgate School are made aware of local support available.



## Education Safeguarding Service Contacts

Head Office: Room 2.30 Sessions House, County Hall, Maidstone, ME14 1XQ	
Claire Ray Head of Service	03301 651200
Rebecca Avery Training & Development Manager	03301 651110
Robin Brivio Senior Safeguarding Advisor	03301 651200
Ashley Assiter (Mon --> Weds) Online Safety	03301 651500
<p>For advice on safeguarding issues please call your area office on the numbers listed below.</p> <p>If a child may be at risk of <b>imminent harm</b>, you should call the <b>Integrated Front Door on 03000 411111</b> (<a href="mailto:frontdoor@kent.gov.uk">frontdoor@kent.gov.uk</a>) or the <b>Police on 999</b></p>	
Ashford	03301 651340
Canterbury	03301 651440
The Education People Consultation Line	03301 423157
Dartford	03301 651240
Dover	03301 651340
Folkestone & Hythe	03301 651340
Gravesham	03301 651240
Maidstone	03301 651440
Sevenoaks	03301 651240

Swale	03301 651140
Thanet	03301 651140
Tonbridge & Malling	03301 651440
Tunbridge Wells	03301 651440

#### Education Safeguarding Advisors

- Myles O'Keeffe
- Anup Kandola
- Kirstie Owens
- Gemma Willson (Monday/Tuesday) Claire Ledger (Wednesday/Thursday/Friday)

#### Kent County Council Key Contacts

**Integrated Front Door: 03000 411111** (outside office hours **03000 419191**)

**Early Help Contacts** (district teams) can be found on [www.kelsi.org.uk](http://www.kelsi.org.uk)

**LADO Team contact number: 03000 410888.**

If your call is urgent i.e. a child is in **immediate danger** and you cannot be connected to the team, you should call the Integrated Front Door on Phone: **03000 411111**

**Email:** [Frontdoor@kent.gov.uk](mailto:Frontdoor@kent.gov.uk)

Kroner House, Eurogate Business Park, Ashford. Kent TN24 8XU

### Area Education Officers

<b>North Kent</b>  <b>Ian Watts</b> Area Education Officer  Telephone: 03000 41 43 02 Email: <a href="mailto:Ian.Watts@kent.gov.uk">Ian.Watts@kent.gov.uk</a>	<b>East Kent</b>  <b>Marisa White</b> Area Education Officer  Telephone: 03000 41 87 94 Email: <a href="mailto:Marisa.White@kent.gov.uk">Marisa.White@kent.gov.uk</a>
<b>South Kent</b>  <b>David Adams</b> Area Education Officer  Telephone: 03000 41 49 89 Email: <a href="mailto:David.Adams@kent.gov.uk">David.Adams@kent.gov.uk</a>	<b>West Kent</b>  <b>Nick Abrahams</b> Area Education Officer  Telephone: 03000 41 00 58 Email: <a href="mailto:Nicholas.Abrahams@kent.gov.uk">Nicholas.Abrahams@kent.gov.uk</a>

### Prevent Education Officers

<b>North/West/ Medway - Sally Green</b> <a href="mailto:sally.green2@kent.gov.uk">sally.green2@kent.gov.uk</a> 03000 413439
<b>South/East - Jill Allen</b> <a href="mailto:jill.allen@kent.gov.uk">jill.allen@kent.gov.uk</a> 03000 413565

## APPENDIX 1: CATEGORIES OF ABUSE

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

**Abuse:** is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. 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. Children can 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 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. (KCSIE 2024).

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

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

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

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

**Signs that MAY INDICATE physical abuse:**

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

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

**Signs that MAY INDICATE emotional abuse:**

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

- Excessive need for approval, attention, and affection

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

**Signs that MAY INDICATE neglect:**

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

## APPENDIX 2: STAFF BEHAVIOUR POLICY (CODE OF CONDUCT)

As per our Mission, The Worthgate School aims to provide the highest quality in education, pastoral care, and boarding. We are committed to creating a safe, respectful, and inclusive environment which celebrates what connects us as a global school community. We believe that happiness breeds success and aim to offer stimulating and supportive living and learning experiences where achievements are celebrated. We strive to develop well rounded, confident, and responsible individuals who aspire to achieve their best and can contribute positively to the demands of a changing world.

### Guiding Principles

The Code of Conduct applies to all staff working in the School, whether paid or unpaid, whatever their position, role, or responsibilities. Staff includes employees, governors, head office or visiting staff, agents, contractors, and volunteers.

As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people in education settings are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a student cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification, or to intimidate, bully, humiliate, coerce, or threaten students. As a result, all staff will be encouraged to demonstrate exemplary behaviour in order to protect themselves from allegations and to avoid putting themselves at risk.

All staff should put the well-being, development, and progress of all students first by taking all reasonable steps to ensure the safety and wellbeing of students under their supervision. They must use their professional expertise and judgment for the best interests of students in their care and demonstrate self-awareness by taking responsibility for their own actions. Staff are expected to raise concerns about the practices of teachers or other professionals where these may have a negative impact on students' learning or progress or may put students at risk. All staff are provided with, and are expected to read, understand, and uphold:

- Keeping Children Safe in Education , Part 1, and Annex A
- Worthgate policies:
  - Safeguarding and Child Protection Policy
  - Low Level Concerns Policy
  - Behaviour Policy (Students)
  - Anti-bullying Policy
  - Dignity at Work Policy
  - Equality and Diversity Policy
  - Whistleblowing Policy
  - Use of Reasonable Force Policy

- Mental health and Wellbeing Policy
- Staff Code of Conduct Policy

Staff should never form inappropriate relationships with a child or young person. It is an offence for a person aged 18 or over, such as a teacher, to have a sexual relationship with a child under 16 even if, in the case of those over 16, the relationship is consensual. The School considers it inappropriate for staff to form relationships of a sexual nature with a student at any School, irrespective of their age. This will be regarded as gross misconduct. Such behaviour gives rise to concern that the staff involved cannot be trusted to maintain professional boundaries with students and students at the School and could bring the School into disrepute.

Staff are expected to address issues of discrimination and bullying whenever they arise and help to create a fair and inclusive school environment. As part of a unified staff community, all staff should develop productive and supportive relationships with colleagues, exercising any management responsibilities in a respectful and fair manner. All staff should comply with school policies and procedures and are expected to participate in the school's development and improvement activities.

A low-level concern is a concern that a member of staff may have regarding a colleague, but that this concern does not meet the threshold of being a serious and immediate safeguarding issue. The member of staff in question may have acted in a way that is inconsistent with the staff code of conduct.

Examples include:

- a. Being over-friendly with students
- b. Having favourites
- c. Using inappropriate sexualised, intimidating, or offensive language
- d. Engaging with a child one-to-one in a secluded area/behind closed doors
- e. Staff taking photographs of children on their mobile phone
- f. Humiliating children

## **Guidelines**

The following are common sense guidelines of how this can be achieved (the list is not exhaustive):

- a. Demonstrate honesty and integrity and maintain an effective learning or boarding environment.
- b. Always report low level concerns as per the Low-Level Concern policy (Appendix 4 of the Safeguarding Policy).
- c. Never make sexually suggestive comments to students in jest or fun, or engage in rough, physical, or sexually provocative games, including horseplay.
- d. Never ask for personal information without providing an explanation of the reason for asking it and how the information is going to be used and stored.
- e. Do not guarantee confidentiality and/or privacy.



- f. Always refer concerns about staff, which typically would be behaviours which are inconsistent with our staff code of conduct, including inappropriate conduct outside of work and concerns that do not meet the allegations threshold to the Principal.
- g. Never do things of a personal nature for a student that they can do for themselves.
- h. If a student approaches you inappropriately, discourage them and ensure you implement safe working practices such as never being alone with them, and informing your line manager immediately or as soon as possible. In addition, make a written record of what has happened, including dates and times, what you said to your student, who you spoke with after the event and what advice you were given.
- i. If you find yourself in the position of teaching one-to-one, always notify your line manager or another member of staff of the situation. If you have to move location, then this also needs to be made known. Always leave the classroom door open and always ask the student to sit nearest the door. Where this is not possible, never obstruct the exit pathway of the student by placing yourself between the exit and the student.
- j. If you have to speak to a student on a personal matter, it is always best practice to have another member of staff present. Where this is not possible, notify your immediate line manager prior to speaking to the student and where this is not feasible, as soon as you can, remembering to record notes about the interaction.
- k. It is not appropriate for staff to socialise with students without the school being aware, and it is not appropriate for staff to use chat rooms or other online forums not set up by the school to communicate with students (e.g. Facebook, Twitter, Instagram). Staff should always communicate within clearly defined boundaries.

Staff should ensure that:

- Personal social networking sites are set to private and never listed as approved contacts.
- Staff never use or access social networking sites of students.
- Staff do not give their personal contact details to students, including their mobile telephone number or email address.
- Staff only contact students for professional reasons and in accordance with any school policy.
- Staff only communicate with students via their school email addresses (Microsoft Outlook and Teams ).
- Staff need to be fully aware of guidance on Prevent and Female Genital Mutilation and must have completed the online safeguarding course which covers these areas as well as whole staff training on safeguarding.
- Staff should be aware of the CATS Global Schools Whistleblowing policy and be secure in their knowledge they are always welcome to raise issues of concern without fear of consequences.

- Staff may not register or post on the Worthgate Facebook page or Instagram without the express permission of the Principal. A new account must be created without any personal details or friends on, and students may not access any personal information about you. Your school email should be used to sign up and not a personal one.
- Staff must not remove any school documents from the site nor take any photographs without due permission.
- Staff should under no circumstance take a student into their car.
- Staff should not accept, offer, or promise expensive gifts from students. As per the CATS Global Schools anti-bribery policy, all members of staff are required to read the anti-bribery policy and declare any gifts that may be given to them.
- Staff are asked to declare a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities. Should circumstances change, staff must disclose any changes that may result in not being to carry out the duties for which they are employed.
- As the University Foundation Programme has a shelf life of two years and students can re-sit IB modules up to two years after a student has left the school, it is not considered appropriate for staff to have contact with former students during this period. Staff may however contact students or former students at any time using their The Worthgate School email.

The school regularly receives visits from parents, potential parents, and others, and naturally wishes to convey a professional impression. Therefore, whilst not wishing to impose unreasonable obligations of staff they are, nonetheless, required to look smart in appearance.

In terms of physical contact with students, staff must always consider whether their behaviour is situationally appropriate - a hug initiated by the student at graduation in the presence of others would be viewed differently to a hug initiated by you alone in a classroom. Consider that with allegations, a history of initiating contact is seen as a contributing factor.

***The above guidance should not be considered exhaustive and more detailed guidance may be required for specific posts/activities. If staff have any concerns regarding the appropriateness of any practice/ action, they should contact their line manager/a member of the Senior Leadership Team /the Designated Safeguarding Lead (DSL).***

## APPENDIX 3: NATIONAL SUPPORT ORGANISATIONS

### NSPCC 'Report Abuse in Education' Helpline

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

### National Organisations

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

### Support for Staff

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

### Support for Learners

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

### Support for Adults

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

### Support for Learning Disabilities

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

### Contextual Safeguarding Network

- <https://contextualsafeguarding.org.uk/>
- Kent Resilience Hub <https://kentresiliencehub.org.uk/>

## Substance Misuse

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

## Domestic Abuse

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

## Criminal and Sexual Exploitation

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

## Honour Based Abuse

- Forced Marriage Unit: [www.gov.uk/guidance/forced-marriage](http://www.gov.uk/guidance/forced-marriage)
- FGM Factsheet:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/496415/6\\_1639\\_HO\\_SP\\_FGM\\_mandatory\\_reporting\\_Fact\\_sheet\\_Web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf)
- Mandatory reporting of female genital mutilation: procedural information:
- <https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation>  
<https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>
- <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/female-genital-mutilation-fgm/>

## Student-on-student Abuse, including bullying, sexual violence, and harassment

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

- Diana Award: [www.antibullyingpro.com/](http://www.antibullyingpro.com/)
- Bullying UK: [www.bullying.co.uk](http://www.bullying.co.uk)
- Kidscape: [www.kidscape.org.uk](http://www.kidscape.org.uk)

### Online Safety

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

### Mental Health

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

### Radicalisation and hate

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

### Children with Family Members in Prison

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

## APPENDIX 4: THE ROLE OF THE DESIGNATED SAFEGUARDING LEAD

As stated in KCSIE 2024: The Designated Safeguarding Lead(DSL\_ should take lead responsibility for safeguarding and child protection (including online safety, understanding the filtering, and monitoring systems and processes in place). This should be explicit in the role holder’s job description. The DSL should have the appropriate status and authority within the school to carry out the duties of the post. The role of the DSL carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and contributing to the assessment of children.

At the The Worthgate School, the DSL is the Director of Safeguarding, Mental Health, and Wellbeing

### Manage referrals

The DSL is expected to refer cases:

- of suspected abuse and neglect to the local authority children’s social care, via the Children’s Integrated Service as required and support staff who make referrals to local authority children’s social care
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required, and
- where a crime may have been committed to the Police as required. [NPCC When to Call the Police](#): should help understand when to consider calling the police and what to expect when working with the police.

### Working with others

The DSL is expected to:

- act as a source of support, advice, and expertise for all staff
- act as a point of contact with the safeguarding partners
- liaise with the Principal to inform him of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance [PACE Code C 2019](#)
- as required, liaise with the “case manager” (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member.

- liaise with staff (especially teachers, pastoral support staff, school nurses, IT technicians, mental health lead and special educational needs coordinators (SENCO), on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically;
- have an awareness of those children who may be more vulnerable to poor educational outcomes due to safeguarding and other issues such as children in need, children with child protection plans, children with mental health issues, young carers and children who have special educational needs;
- liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health (N.B. at the The Worthgate School, the DSL is also the Senior Mental Health Lead).
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- work with the Principal and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement, and achievement at school. This includes:
  - ensuring that the school knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and
  - supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker or child protection plan reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

### **Information sharing and managing the child protection file**

The DSL is responsible for ensuring that child protection files are kept up to date.

Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

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

- They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice
- Where children leave the school (including in year transfers) the DSL should ensure their child protection file is transferred to the new school or college 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. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as Designated Safeguarding Leads and SENCOs are aware as required.

Lack of information about their circumstances can impact on the child's safety, welfare, and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

### **Raising awareness**

The DSL should:

- ensure each member of staff has access to, and understands, the school's child protection policy and procedures, especially new and part-time staff.
- ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this.
- ensure the child protection policy is available publicly and parents know that referrals about suspected abuse or neglect may be made and the role of the school in this.
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements, and
- help promote educational outcomes by sharing information about welfare, safeguarding, and child protection issues that children who have or have had a social worker are experiencing with teachers and school leadership staff.

### **Training, knowledge, and skills**

The DSL (and any Deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The DSL (and any Deputies) should also undertake Prevent awareness training. Training will provide the DSL with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly local authority children's social care, so they:



- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- understand the importance of the role the designated safeguarding lead has in providing information and support to local authority children social care in order to safeguard and promote the welfare of children.
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health, and wellbeing, and what is needed in responding to this in promoting educational outcomes.
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers.
- understand the importance of information sharing, both within the school, and with the safeguarding partners, other agencies, organisations, and practitioners.
- understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation.
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school.
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online.
- obtain access to resources and attend any relevant or refresher training courses.
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them. In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other DSLs, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

### **Providing support to staff**

Training should support the DSL in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters.

This includes specifically to:

- ensure that staff are supported during the referrals processes, and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

## **Understanding the views of children**

It is important that all children feel heard and understood.

Therefore, the DSL (and deputies) should be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or may put in place to protect them, and,
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

## **Holding and sharing information**

The critical importance of recording, holding, using, and sharing information effectively is set out in Parts one, two and five of KCSIE 2024 and therefore the DSL should be equipped to:

- understand the importance of information sharing, both within the school, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations, and practitioners.
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), and
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

## APPENDIX 5: LOW LEVEL CONCERNS POLICY



**CATS**  
GLOBAL SCHOOLS

**SEPTEMBER 2022**

**LOW LEVEL CONCERN POLICY**

**Going further than others**

---

## Contents

Section	Heading	Page
1	Principles	41
2	Scope and References	41
3	Distinction between an Allegation and a Low-Level Concern	41
4	Importance of Sharing Low-Level Concerns	42
5	Implementation	42
6	Data Protection	42
7	How Low-Level concerns will be recorded	43
8	Review of the Central Low Level Concerns File	43
9	Retention of a Low-Level Concern	43
10	Should Low-Level Concerns be Referred to in a Reference?	43
11	Role of the Board	44
<b>Appendix</b>		
1	Template concern form	45

### 1. Principles

The Worthgate School is committed to ensuring Low-Level Concerns are monitored, recorded, and dealt with appropriately to create a safer culture for all staff, students, and visitors.

The Worthgate School has a moral, legal, and social responsibility to provide a safe environment for students studying and residing with us.

### 2. Scope and References

This policy sets out good practice and provides guidance on how to deal with situations and implements safeguards where a low-level concern may be encountered to ensure promotion of a safe culture and the prevention of harm. It will work in conjunction with all school policies and procedures, including, but not exclusive to, the following: Safeguarding Policy, GDPR, Health and Safety, Prevent Strategy and Safer Recruitment Policy. Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

### 3. Distinction between an allegation and a Low-Level concern

A culture encouraging the reporting of Low-Level Concerns enables staff to share any concerns they may have, no matter how small, about the behaviour of any adult in the school.

Concerns should not be limited to Safeguarding but could relate to behaviour which does not meet the professional standards expected within CGS.

The term '**allegation**' means that it is alleged that a person who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- or behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

An **allegation** can also relate to an adult's behaviour outside of work, and their relationships with others, if they:

- have behaved in a way in their personal life that raises safeguarding concerns. These concerns do not have to directly relate to a child but could, for example, include an arrest for the possession of a weapon
- have, as a parent or carer, become subject to child protection procedures
- are closely associated with someone in their personal lives (e.g., partner, member of the family or other household member) who may present a risk of harm to child/ren for whom the adult is responsible in their employment/volunteering.

A **Low-Level concern** is any concern about an adult's behaviour towards a child that does not meet the allegation threshold set out above or is not otherwise serious enough to consider a referral to the LADO.

A **Low-Level concern** is any concern – no matter how small, and even if no more than a 'nagging doubt' – that an adult may have acted in a manner which:

- is not consistent with an organisation's Code of Conduct, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

Staff do not need to be able to determine in each case whether their concern is a low-level concern, or if it is in fact serious enough to consider a referral to the LADO or meets the threshold of an allegation. Once staff share what they believe to be a low-level concern, that determination should be made by the Principal.

## 4. Importance of sharing Low-Level concerns

It is necessary to ensure a culture of openness and trust is fostered within an organisation in which staff can share any concerns about the conduct of colleagues and be assured that these will be received in a sensitive manner. It is well documented that organisational child sexual abuse is often preceded by grooming, and that such conduct was observed and considered questionable. This could be targeted at protective adults, not just children or vulnerable adults. This behaviour was rarely reported to the relevant individual in the organisation, was not recorded, and not available later for evaluation of patterns emerging. It is not possible for individuals to accurately judge people, as there is no one profile to describe everyone who abuses a child, so focus should be placed upon specific behaviours.

To minimise the risk of situational offending, there needs to be a culture of allowing the confidence to speak out. This requires a robust framework, policy, training, support, and leadership to facilitate this and a willingness to accept that abuse could happen in any organisation.

## 5. Implementation

To be effective, this policy must have 'buy in' from all staff, and leaders must be seen to adhere to and model the expected values and behaviours as written in the policy.

Training on this policy will be incorporated in both the Safeguarding Induction Training for new staff and the Annual Safeguarding Training for all staff. Staff should complete the 'Low Level Concern Form' in Appendix 1 of this policy as fully as possible and pass it directly to the Principal, or in their absence the Chair of Governors, without informing the adult who is the subject of the form. If the concern is about the Principal, it should be passed to the Chair of Governors without informing the Principal.

When a low-level concern has been raised by a third party, the Principal should collect as much evidence as is possible by speaking with the person who raised the concern, to the individual and to any witnesses.

Any concerns or issues relating to the Low-Level Concern Policy will be included in the annual safeguarding report to governors.

## 6. Data protection

The Data Protection Act 2018 makes specific provision for the processing of personal data necessary for safeguarding children from harm. The Information Sharing Code of Practice (Information Commissioner's Office 2019) specifically cites safeguarding of children as a 'clear example of a compelling reason' to share personal data. Where a concern is low-level, rather than an allegation, the balance between safeguarding interest and personal data rights will be considered carefully to ensure it is a reasonably necessary measure that the data should be shared.

## 7. How Low-Level concerns will be recorded

Low Level Concern Forms and records will be retained (including those subsequently deemed to relate to behaviour which is entirely consistent with the Code of Conduct) in the school folder and log in the central P&E area on SharePoint. Where there are multiple low-level concerns relating to the same individual, these will be kept in chronological order as a running record. These records will be kept confidential and held securely with only the Principal, P&E team having access. The log will contain details of the concern, the context in which it arose, and action taken. The name of the person reporting should be noted respecting wishes to remain anonymous as far as reasonably possible.

Where concerns also involve issues of misconduct or where such issues have caused the poor performance; disciplinary, grievance or whistleblowing procedures to be triggered, the normal records required would still be made and kept according to procedure in addition to the low-level concerns records.

Where the low-level concern is serious enough to be referred to the LADO (or in the case of Local arrangements requiring all concerns to be reported to the LADO), the related records will be placed and retained on the staff member's employee file. Where a low-level concern is reclassified as an allegation, then the records relating to it will be treated accordingly.

## 8. Review of the central Low-Level concerns file

The Safeguarding Governor will review the school Low Level Concerns file termly. A record of these reviews will be made. This is to ensure such concerns are being dealt with promptly and appropriately and that any

potential patterns of concerning, problematic or inappropriate behaviour are identified, a course of action can be decided and carried out. This might be internal disciplinary procedures, or referral to the LADO if the harms threshold is met. It will also be considered whether there are any wider cultural issues in school that enabled the behaviour to occur. If appropriate policies would be revised or extra 55

training delivered to minimise the risk of recurrence. The rationale for all decisions and actions taken will be recorded.

## 9. Retention of Low-Level concern records

There is currently no guidance on the retention of Low-Level Concerns, but the point at which an employee leaves the organisation would be considered a natural point at which the content of the file may be reviewed to ensure it still has value (either as a safeguarding measure or because of its possible relevance to future claims) and is therefore necessary to keep.

## 10. Should Low-Level Concerns be referred to in a reference?

With reference to KCSIE guidance, allegations which are proven to be false, unsubstantiated, or malicious, should not be included in employer references. Likewise, a history of repeated concerns which have all been found to be false, unsubstantiated, or malicious should also not be included in any reference. Misconduct or consistent poor performance, where relevant, may be included. This would not normally include Low-Level concerns of a safeguarding nature, unless the threshold is met for referral and found to be substantiated, where it should then be referred to in a reference. Where KCSIE does not apply, consideration must be given to legal obligations and duty of care in giving accurate references.

## 11. Role of the board

The DSLs will include in the Termly Reports to the Board, the information about the implementation of the Low- Level Concern Policy and any evidence as to its effectiveness, with any relevant data.





THE  
WORTHGATE SCHOOL  
CANTERBURY

<input type="checkbox"/> Accident	<input type="checkbox"/> Incident	<input type="checkbox"/> Safeguarding Concern
<b>Date of incident:</b>		
<b>Name, date of birth and details of the person(s) the report is being made about:</b>		
<b>Account of incident or concern:</b> (give clear details relating to what happened, where, when, who was involved, what was said, nature of injury or behaviour, any witnesses etc. <b>(Keep it factual)</b> )		
<b>Action taken:</b>		
<b>Name of person making the report:</b>		
<b>Signed:</b>		
<b>Date:</b>		
<b>ADMIN USE ONLY</b>		
<b>Principal:</b>		
<b>Signed:</b>		
<b>Date:</b>		

<b>Further action taken:</b>	
------------------------------	--

