



# **SAFEGUARDING POLICY**

## Document Management Information

<b>Applicable to:</b>	All staff in all Academies and Central Support Services including individuals employed by the Trust and contractors and agency staff.  All Members and Trustees.
<b>Dissemination:</b>	Trust wide
<b>Training:</b>	Training is provided to all staff via the Triple S training portal and in September INSET on this policy and Keeping Children Safe in Education 2023.  All other staff, Members, Directors and Governors should take time to familiarise themselves with this policy
<b>Review Frequency:</b>	The policy will be reviewed annually. The policy will be reviewed earlier if needed in the light of new evidence, legislation and guidance.
<b>Policy Author:</b>	Barry Symons - Assistant Director of Education & Trust Safeguarding Lead ( <i>Adapted from the Medway &amp; Kent model policies</i> )
<b>Executive Policy Owner:</b>	Barry Symons - Assistant Director for Education & Trust Safeguarding Lead
<b>Approval by:</b>	Level 1 - Board of Directors
<b>Approval Date:</b>	July 2023
<b>Next Review Due:</b>	July 2024

## Revision History

Document version	Description of Revision	Date Approved
0.1	Draft document	August 2021
1.0	Final Draft submitted to the Board for Approval	September 2021
1.1	Revisions made to reflect KCSIE 2022	July 2022
1.2.	Revisions made to reflect KCSIE 2023 and merger of Kent policy details	August 2023

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## What to do if you have a welfare concern

### Why are you concerned?

For example:

- Allegation/ child shares a concern or worry
- Indicators of abuse or neglect



### Immediately record your concerns

- Log the incident on CPOMS  
<https://waterfrontutc.cpoms.net>
- Reassure the child
- Clarify concerns if necessary:  
**TED**: Tell, Explain, Describe)
- Use child's own words/ use facts



### Inform the Designated Safeguarding Lead (DSL)

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### Designated Safeguarding Lead (DSL)

- Consider whether the child is at immediate risk of harm e.g. unsafe to go home
- Access the:  
**Medway** MSCP [Threshold Guidance](#)      **Kent** [Support Levels Guidance Sheet](#) for further guidance.
- If the child is at **imminent risk of harm** a referral will be made to:  
**Medway** First Response - 01634 334466      **Kent** Front Door - 03000 41 11 11
- If the child is **NOT** at imminent risk, then a referral will be made via:  
The **Medway** [portal](#)      **Kent** [Integrated Children's Services Portal](#)
- Record decision making and action taken in the pupil/student's Child Protection on CPOMS



### Monitor – Be clear about:

- What **ACTION** you have taken at the time of reporting the concerns.
- What you are monitoring e.g. behaviour trends, appearance etc.
- How long you will monitor
- Where, how and to whom you will feedback and how you will record

### If you are unhappy with the response

- Follow the [Whistleblowing policy](#) or  
[MSCP escalation procedures](#)      [Kent Escalation Procedures](#)



### Review and request further support (if necessary)

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

# 1. Introduction and Ethos

- 1.1. The Howard Academy Trust recognise our statutory responsibility to safeguard and promote the welfare of all children. Safeguarding and promoting the welfare of children is **everybody's** responsibility and everyone has a role to play. All members of our community (staff, volunteers, governors, leaders, parents/carers, wider family networks, and [pupils/students](#)) have an important role in safeguarding children and all have an essential role to play in making our community safe and secure.
- 1.2. The Howard Academy Trust recognises the importance of providing an ethos and environment within school that will help children to be safe and feel safe. In our school children are respected and encouraged to talk openly. All children (defined as those up to the age of 18) have a right to be heard and to have their wishes and feelings taken into account and all children regardless of age, gender, ability, culture, race, language, religion, or sexual identity, have equal rights to protection.
- 1.3. Staff working with children at The Howard Academy Trust will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child and if any member of our community has a safeguarding concern about any child or adult, they should act and act immediately.
- 1.4. Staff challenge any form of derogatory and sexualised language or behaviour. They are vigilant to sexualised/aggressive touching/grabbing. We recognise that groups at particular risk include girls, pupils who identify as Lesbian, Gay, Bisexual, Transgender Queer+ (LGBTQ+), or are perceived by peers to be LGBTQ+, and pupils with SEND. We recognise that these children can be targeted by other children and acknowledge the importance of a safe space for them to speak out or share their concerns with members of staff. Pupils are protected from upskirting, bullying (+ cyber), homophobic, biphobic and transphobic behaviour, racism, sexism, and all other forms of discrimination. Any discriminatory behaviours are challenged, and children are supported to understand how to treat others with respect. We also have a statutory duty to report and record any of the above incidents. Staff have familiarity with the Equality Act 2010 and the Public Sector Equality Duty (PSED), the Human Rights Act 1998 and recent reforms to the Act and how they apply to safeguarding.
- 1.5. The Trust and academies acknowledge the need to treat everyone with equity, with fairness, dignity and respect. We recognise that unconscious bias may impact upon our perceptions and expectations of children, particularly those from minority groups and that this may influence the safeguarding actions we take. We seek to educate and challenge all members of the school community to address equality of access and opportunity for all children, by highlighting inequalities and increasing awareness.
- 1.6. Through their day-to-day contact with pupils and students and their direct work with families, all staff and volunteers in school have a crucial role to play in noticing indicators of possible abuse or neglect at an early stage. Our school may be the only secure, stable, and predictable element in their lives.
- 1.7. The Howard Academy Trust will endeavour to support the welfare and safety of all pupils and students through:
  - Ensuring that the child's welfare is of paramount importance.
  - Training all staff to recognise the signs and symptoms of abuse and to know the school's procedures and lines of communication.
  - Ensuring that children's mental and physical health or development is not impaired.
  - Providing children, a balanced curriculum including PSHE (Personal, Social and Health Education); RSE (Relationships and Sex Education) to help pupils and students stay safe, recognise when they don't feel safe and identify who they might / can talk to.
  - Training all staff to recognise the signs and symptoms of abuse and to know the school's procedures and lines of communication.
  - Working with parents to ensure they understand the school's legal responsibility to safeguard and ensure the welfare of all children, including the need for referral to other agencies in some situations.
  - Keeping confidential records that are stored securely, and shared appropriately with other professionals.

- Ensuring the voice of the child is evident in individual case files and informs the school's policy developments.
  - Ensuring that the school practices safer recruitment processes in checking the suitability of staff, supply staff, volunteers, visitors and contractors.
  - Informing parents about expected behaviour.
- 1.8. The Howard Academy Trust expects that if any member of our community has a safeguarding concern about any child or adult, they will act immediately.
- 1.9. This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, 'Keeping Children Safe in Education' 2023 (KCSIE) which requires individual schools and colleges to have an effective child protection policy.
- 1.10. The procedures contained in this policy apply to all staff, including and governors, temporary or third-party agency staff and volunteers) and are consistent with those outlined within KCSIE 2023.

## 2. Policy Context

- 2.1. This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes:
- DfE Keeping Children Safe in Education 2023 (KCSIE)
  - Working Together to Safeguard Children 2018 (WTSC)
  - Ofsted: Education Inspection Framework 2019
  - Framework for the Assessment of Children in Need and their Families 2000)
  - Kent and Medway Safeguarding Children Procedures (Online)
  - Early Years and Foundation Stage Framework 2021 (EYFS)
  - The Education Act 2002
  - The Education (Independent School Standards) Regulations 2014
  - The Non-Maintained Special Schools (England) Regulations 2015
- 2.2. [Sections 175 and 157 of the Education Act 2002](#) require school governing bodies, proprietors, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are pupils or students 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.
- 2.3. The Howard Academy Trust put measures in place to fully safeguard children in response to coronavirus (Covid-19), in accordance with KCSIE 2021 and related government guidance, We will continue to follow government guidance and continue to review safeguarding procedures and amend this policy to support the response to the pandemic if necessary.

## 3. Definition of Safeguarding

- 3.1. Safeguarding children is defined in Keeping Children Safe in Education 2023 as:
- protecting children from maltreatment
  - preventing impairment of children's mental and physical health or development
  - ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
  - taking action to enable all children to have the best outcomes (Children includes everyone under the age of 18)
- 3.2. The Howard Academy Trust acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):
- |   |   |
|---|---|
| ▪ Abuse and neglect   | ▪ County lines and gangs                                  |
| ▪ Bullying, including cyberbullying                         | ▪ Domestic abuse  |
| ▪ Children with family members in prison                    | ▪ Drugs and alcohol misuse                                |
| ▪ Children Missing Education (CME) or absent from education | ▪ Fabricated or induced illness                           |
| ▪ Child missing from home or care                           | ▪ Faith abuse   |
| ▪ Child Sexual Exploitation (CSE)                           | ▪ Gender based abuse and violence against women and girls |
| ▪ Child Criminal Exploitation (CCE)                         | ▪ Hate  |
| ▪ Contextual safeguarding (risks outside the family home)   | ▪ Homelessness  |
|   | ▪ Human trafficking and modern slavery                    |



- Mental health
- Nude or semi-nude image sharing, aka youth produced/involved sexual imagery or “Sexting”
- Online safety
- Child-on-child abuse
- Preventing radicalisation and extremism
- Private fostering
- Relationship abuse
- Serious Violence
- Sexual Violence and Sexual Harassment
- So-Called honour-based abuse including Female Genital Mutilation (FGM) and forced marriage
- Upskirting

3.3. Also see Annex B within ‘Keeping children Safe in Education’ 2023 p.140)

## 4. Policy Compliance, Monitoring and Review

- 4.1. The Howard Academy Trust will review this policy at least annually. The policy will be revised following any national or local policy updates, any significant national events, local child protection concerns and/or any changes to our procedures.
- 4.2. The Board of Directors has strategic leadership responsibility for The Howard Academy Trust safeguarding arrangements and **must** ensure that Waterfront UTC complies with their duties under legislation. The Local Academy Board must ensure policies, procedures and training in their schools or colleges are effective and comply with the law at all times.
- 4.3. The Designated Safeguarding Leads / Head of School will ensure regular reporting on safeguarding activity and systems in school to the Local Academy Board. The Local Academy Board will not receive details of individual student situations or identifying features of families as part of their oversight.
- 4.4. This policy is available on our school website and is available on request from the school office. We also inform parents and carers about this policy when their children join our school and through our school newsletter.

## 5. Key Responsibilities

### Directors and Local Academy Boards

- 5.1. The Board of Directors, Proprietor and staff have read, understood and will follow Keeping Children Safe in Education 2023.
- 5.2. The governing body/proprietor and leadership team have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation
- 5.3. The Board of Directors/Local Academy Boards will ensure that all governors/trustees receive appropriate safeguarding and child protection (including online) training at induction. This training will be regularly updated. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole school approach to safeguarding.
- 5.4. **Waterfront UTC** has a nominated governor for safeguarding, David Giles. David will take the lead role 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.
- 5.5. The Board of Directors/Local Academy Boards should ensure they facilitate a whole school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart.
- 5.6. The Trust Executive Team will regularly review the effectiveness of school filtering and monitoring systems. They will ensure that the leadership team and relevant staff are:
  - aware of and understand the systems in place
  - manage them effectively
  - know how to escalate concerns when identified.
- 5.7. The Local Academy Board, Head of School and Leadership Team will ensure that the DSL is suitably supported in their role and has the appropriate status, authority, funding,

resources, and training and is assured that the DSL understands they have the responsibility in leading safeguarding and child protection across the school.

### Designated Safeguarding Lead (DSL)

- 5.8. The Designated Safeguarding lead will carry out their roles in accordance with Keeping Children Safe in Education 2023.
- 5.9. The school has appointed **Sam Stevens** as the Designated Safeguarding Lead (DSL) they are a member of the senior leadership team. The DSL has the overall responsibility for the day-to-day oversight of safeguarding and child protection systems in school.
- 5.10. Waterfront UTC has appointed Deputy DSLs who will have delegated responsibilities and act in the DSLs absence Amy Pattenden and Fiona McLean
- 5.11. The Howard Academy Trust has appointed Barry Symons (*Assistant Director of Learning*) as Trust DSL to offer support to DSLs within each academy.
- 5.12. 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.
- 5.13. The Designated Safeguarding Lead and any deputies will undergo appropriate training to provide them with the knowledge and skills required to carry out their role.
- 5.14. The Head of School will be kept informed of any significant issues by the DSL.
- 5.15. The DSL and any deputy DSL's training will be updated formally every **two years**, but their knowledge and skills will be updated through a variety of methods (e-bulletins, conferences, local meetings, other training etc.) at regular intervals and **at least annually**, to keep up with any developments relevant to their role.
- 5.16. Availability - during term time the DSL (or a DDSL) will always be available (during school hours) for school staff to discuss any safeguarding concerns. Adequate and appropriate cover arrangements will be made for any out of hours/out of term activities.
- 5.17. During school holidays, the DSL will provide appropriate emergency contact details to the MASH Education Lead on the understanding that these will only be used if absolutely necessary and will not be shared elsewhere.
- 5.18. It is the role of the DSL to:
  - Act as main contact point for all school staff to discuss any safeguarding concerns.
  - Manage and maintain the confidential paper/electronic case management systems to record concerns about pupils/students to ensure the quality of information is accurate, proportionate, and timely, also assessment/referrals are made appropriately.
  - Coordinate safeguarding action for individual children. In the case of Children in Care, the DSL should have the details of the child's social worker and the name of the virtual school head in the authority who looks after the child (with the DSL liaising closely with the designated teacher.)
  - liaise with the headteacher or principal to inform them of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This includes being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - [PACE Code C 2019](#)
  - To liaise with safeguarding partners, other agencies, and staff in line with KCSIE 2023 and WTSC 2018.
  - Ensure that Medway referral procedures are followed as necessary (see referral process page 2).
  - As required, represent and liaise appropriately with other professionals and ensure the school is represented at multi-agency safeguarding meetings (including child protection conferences).
  - Act as a source of support, advice and expertise for all staff during term time for staff in the school to be able to discuss any safeguarding concerns.
  - Understand the importance of information sharing both within the school and with other schools and agencies.
  - To encourage a culture of listening to children and taking account of their wishes and feelings, among all staff this will assist with any measures the school may put in place to protect them.
  - Ensure all staff access appropriate safeguarding training and relevant updates in line with the recommendations within Keeping Children Safe in Education 2023
- 5.19. For further details and information about the DSL role please refer to KCSIE 2023 **Annex C p.162**

## Members of Staff

- 5.20. All members of staff have a responsibility to:
- Provide a safe environment in which children can learn and promote the child's welfare
  - Maintain an attitude of **'it could happen here'** where safeguarding is concerned and to always act in the best interests of the child
  - Understand the early help process and their role in it.
  - Be aware of the indicators of abuse and neglect, so they can identify cases of children who may be in need of help or protection.
  - Understand that children may not feel ready to, or know how to, tell someone they are being abused, exploited, or neglected and/or that they may not recognise their experiences as harmful. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. They may feel embarrassed, humiliated or be being threatened. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns any about a child.
  - Consider wider environmental factors in a child's life that may be a threat to their safety and/or welfare.
  - Be aware of the process of making referrals to children's social care and statutory assessment under the Children Act 1989.
  - Know what to do if a child tells them that he or she is being abused or neglected and understand the impact abuse and neglect can have upon a child.
  - Know how to maintain an appropriate level of confidentiality.
  - Understand and comply with this policy and understand other safeguarding policies and systems.
  - To undertake regular and appropriate training, that is regularly updated.
  - Be aware of, and take appropriate action to raise concerns, about poor or unsafe practice, or potential failures in the school safeguarding regime. (This may include accessing the school whistleblowing policy)

## Children and Young People

- 5.21. Children and young people (pupils/students) have a right to:
- Contribute to the development of school safeguarding policies.
  - Report abuse confidently knowing concerns will be taken seriously and that they will be listened to and effective action will be taken.
  - Seek help from a trusted adult and feel listened to.
  - Learn how to keep themselves safe by recognising when they are themselves at risk and how to get help when they need it, including online.

## Parents and Carers

- 5.22. Parents/carers have a responsibility to:
- Work in partnership with the school to safeguard and promote the welfare of child/ren and understand The Howard Academy Trust/school statutory responsibilities in this area.
  - Read and adhere to the relevant school/policies and procedures.
  - Talk to their children about safeguarding issues with their children & support the school in their safeguarding approaches.
  - Identify behaviours which could indicate that their child is at risk of harm including online
  - Seek help and support from the school, or other appropriate agencies.
- 5.23. We are committed to working with parents positively, openly, and honestly. We ensure that all parents are treated with respect, dignity, and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission, or it is necessary to do so to safeguard a child/ren.
- 5.24. **The welfare and safety of children however are the responsibility of all staff in school and ANY concern for a student's welfare MUST be reported to the Designated Safeguarding Lead.**

## 6. Recognising Indicators of Abuse and Neglect

- 6.1. As a Trust we are aware that abuse, neglect and safeguarding issues are rarely individual events that can be covered by one definition or label. In most cases multiple issues will overlap with one another for further guidance: [Responding to Abuse and Neglect](#) . This is outlined locally with the Medway Threshold Guidance
- 6.2. Knowing what to look for is vital to the early identification of abuse and neglect. If staff are unsure, they should always speak to the Designated Safeguarding Lead (or a deputy).
- 6.3. All staff in school should be aware of the definitions and indicators of abuse and neglect. There are four categories of abuse:
  - **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.
  - **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development.
  - **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.
  - **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.
- 6.4. The most up to date definitions and possible indicators and signs of abuse are found in Appendix 1 of this document. Staff should also refer to [What to do if you are worried a child is being abused 2018](#).
- 6.5. All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. 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.
- 6.6. The warning signs and symptoms of child abuse and neglect can vary from child to child. Children also develop and mature at different rates, so what appears to be worrying behaviour for a younger child, might be normal for an older child.
- 6.7. The Howard Academy Trust recognises that some children have additional or complex needs and may require access to intensive or specialist services to support them.
- 6.8. All staff, but especially the Designated Safeguarding Lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. **Extra-familial harms** take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.
- 6.9. 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.
- 6.10. Children may report abuse happening to themselves, their peers or their family members. All reports made by children to staff will be taken seriously and will be responded to in line with this policy.
- 6.11. By understanding the warning signs, we can respond to problems as early as possible and provide the right support and services for the child and their family. It is important to recognise that a warning sign doesn't automatically mean a child is being abused.

## 7. Specific Safeguarding Issues

- 7.1. The Howard Academy Trust is aware of environmental factors which may impact on a child's welfare and safety and understand safeguarding in the wider context.
- 7.2. The Howard Academy Trust staff are mindful that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care (such as a child in need or a child with a protection plan).

- 7.3. All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education, and sharing nudes or semi-nude images (also known as youth produced sexual imagery) put children in danger. The categories/issues that follow are by no means an exhaustive list but gives an indication of the current themes in safeguarding and protecting children.

### Child-on-Child Abuse

- 7.4. The Howard Academy Trust recognises that children are capable of abusing their peers This referred to as child-on-child abuse and can take many forms.
- 7.5. The Howard Academy Trust believes that abuse is abuse and it will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”. All victims will be taken seriously and offered appropriate support, regardless of where the abuse takes place.
- 7.6. The Howard Academy Trust recognises that child-on-child abuse can take many forms, including but not limited to:
- bullying, including cyberbullying
  - physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
  - sexual violence and sexual harassment
  - ‘upskirting’, which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
  - nude or semi-nude image sharing (also known as ‘sexting’ or youth produced/involved sexual imagery)
  - initiation/hazing type violence and rituals
- 7.7. Staff and leadership recognise that that some peer-on-peer abuse issues may be affected by gender, age, ability and culture of those involved, (i.e. for gender-based abuse, girls are more likely to be victims and boys more likely to be perpetrators) however, all peer-on-peer abuse is unacceptable and all reports will be taken seriously.
- 7.8. In order to minimise the risk of peer-on-peer abuse, **Waterfront UTC** will:
- **implement a robust anti-bullying policy, providing an age/ability appropriate PSHE and RSE curriculum, providing a range of reporting mechanisms e.g. exit cards and access to the Pastoral area. .**
- 7.9. The Howard Academy Trust will not tolerate, dismiss or minimize any harmful behaviours in school and will take swift action to intervene when this occurs. All allegations of peer-on-peer abuse will be recorded, investigated, and dealt with in line with associated school/college policies, including child protection, anti-bullying and behaviour.
- 7.10. Alleged victims, perpetrators and any other child affected by peer-on-peer abuse may be supported by:
- **All staff taking reports seriously, listening carefully, avoiding victim blaming, providing appropriate pastoral support, working with parents/carers, reviewing educational approaches, and in cases of sexual assault, informing the police and/or First Response.**
- 7.11. The school will take steps to ensure that appropriate curriculum time is dedicated to enable children to develop an awareness and understanding of abusive behaviour and minimise the risk of all forms of peer-on-peer abuse. We will also ensure that children recognise warning signs and supports of support both within the school and externally (such as Kent Police, ChildLine etc.).

### Child on Child Sexual Violence or Harassment

- 7.12. The Howard Academy Trust will follow the guidance outlined in part five of KCSIE 2023 which has now merged with the content of DfE guidance ‘[Sexual Violence and Sexual Harassment Between Children in Schools and Colleges](#)’. When responding to concerns relating to child-on-child sexual violence or harassment
- If DSLs are unsure how to proceed, advice will be sought from the Education Safeguarding Service.
- 7.13. The Howard Academy Trust recognises that staff must be vigilant and recognise that information may come from overheard conversations or observed behaviour changes.

- 7.14. It is essential that all victims of sexual violence or sexual harassment are reassured that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment or be made to feel ashamed for making a report.
- 7.15. Immediate consideration will be given as to how best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted).
- 7.16. 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. 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 (if appropriate) and staff and any actions that are required to protect them.
- 7.17. Where possible KCSIE 2023 recommends that two members of staff manage reports of sexual violence and harassment.
- 7.18. Reports will initially be managed internally by the Waterfront UTC and where necessary will be referred to Integrated Children's Services and/or the Police.
- 7.19. The decision making and required action taken will vary on a case by case basis, but will be informed by the wishes of the victim; the nature of the alleged incident (including whether a crime may have been committed); the ages and developmental stages of the children involved; any power imbalance between the children; if the alleged incident is a one-off or a sustained pattern of abuse; if there are any ongoing risks to the victim, other children, adult students or The Howard Academy Trust staff; and, any other related issues or wider context.
- 7.20. We will reassure and teach our pupils/students to understand that the law is in place to protect children and young people, rather than criminalise them.
- 7.21. The Howard Academy Trust will regularly review decisions and actions to update and improve policies and practice.
- 7.22. The school will consider the physical and mental health implications for both the victim and perpetrator. It is identified that both individuals will need additional support and provision of further information about harmful sexual behaviours and may need signposting to further sources of support.

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

- 7.23. 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](#) (Updated December 2020)
- 7.24. 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.
- 7.25. When made aware of concerns involving nude or semi-nude image taking/sharing involving children, staff are advised to:
  - Report any concerns involving nude or semi-nude image sharing involving children 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 (e.g., if a child has shown it to them), this will be immediately reported to the DSL.
  - Not delete the imagery or ask the young person 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.
- 7.26. The Howard Academy Trust recognises that nude and semi-nude image sharing (also known as youth produced/involved sexual imagery or "sexting") is a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).



- 7.27. The DSL will hold an initial review meeting with appropriate staff and will speak with the children involved if appropriate.
- 7.28. Parents and carers will be informed at an early stage and 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.
- 7.29. A referral will be made to ICS and/or the police immediately if:
- the incident involves an adult (over 18).
  - there is reason to believe that a child has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, age of SEND).
  - 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.
- 7.30. All decisions will be recorded in line with our child protection procedures and will be based on the consideration of the best interests of any child involved. The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date.
- 7.31. If DSLs are unsure how to proceed, advice will be sought from the Education Safeguarding Service.

### **Gangs, County Lines, Serious Violence, Crime and Exploitation**

- 7.32. The Howard Academy Trust acknowledges the impact of gangs, county lines, serious violence, crime and exploitation. Any concerns regarding gangs, county lines, serious violence, crime and exploitation will be reported and responded to in line with other child protection concerns. The initial response to child victims is important and staff will take any allegations seriously and work in ways that support children and keep them safe.

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

- 7.33. The Howard Academy Trust recognises both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity.
- 7.34. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator
- 7.35. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online.
- 7.36. Sexual exploitation can be difficult to spot and sometimes mistaken for "normal" teenage behaviour. Knowing the signs can help protect children and help them when they've no one else to turn to. To support in identifying the signs of child sexual exploitation please refer to the Kent and Medway [Exploitation Identification Tool](#) and the MSCP Risk [Assessment tool for sexually active young people](#).

### **Gangs, County Lines and Serious Violence**

- 7.37. Criminal exploitation of young and vulnerable people is a common feature in the facilitation of county lines drugs supply, whether for the storage or supply of drugs, the movement of cash, or to secure the use of dwellings held by vulnerable people in the rural marketplace this is commonly referred to as cuckooing.
- 7.38. All staff have been trained and recognise the need to be vigilant for the signs and aware of risk factors which may increase the likelihood of involvement in serious violence, exploitation, and gang activity including but not limited to:

- Being male - however girls who are exploited can be very different to that of boys, indicators may not be the same, but professionals need to be aware that girls are just as much at risk as boys.
  - Children who associate with other young people involved in exploitation
  - Children who go missing for periods of time or regularly come home late
  - Change in friendships/relationships with others/groups
  - Having been frequently absent or permanently excluded from school
  - having experienced child maltreatment
  - Unexplained gifts/new possessions - these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs.
  - Signs of self-harm/significant change in wellbeing
  - having been involved in offending, such as theft or robbery
- 7.39. Further advice for schools and colleges is provided in the [Home Office's Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines guidance. County Lines Toolkit For Professionals](#) - The Children's Society in partnership with Victim Support and National Police Chiefs' Council
- 7.40. Where an exploitation concern has been identified, the form linked below is to be used to provide intelligence to the police to get a better understanding of local exploitation concerns and issues.
- 7.41. Through this portal you can report **Perpetrators** of child exploitation, **Places and Spaces** where Child Exploitation is suspected of taking place and **vehicles** believed to be connected to be exploiting children. Please use the link to - [Report an Exploitation Concern Online](#). **This is for Child Exploitation specifically. But for general vulnerability concerns, they still need to be reported directly to the police in the usual way (101 or 999). Please note, this portal is also not suitable for reporting crime as is not monitored 24/7.**
- 7.42. Waterfront UTC will make referrals to Children's Social Care and the police. Should we have reason to believe a student has become involved in this activity.

## Mental Health

- 7.43. The Howard Academy Trust will ensure that all staff have an awareness of mental health problems and be aware in some cases, that it can be an indicator that a child has suffered or is at risk of suffering abuse, neglect, or exploitation. Staff are aware of how children's experiences, can impact on their mental health, behaviour, and education.
- 7.44. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences (ACES), this can have a lasting impact throughout childhood, adolescence and into adulthood. It is important that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.
- 7.45. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are '**well placed**' to identify behaviour suggestive of a mental health problem or being at risk of developing one.
- 7.46. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy, and speaking to the designated safeguarding lead or a deputy.

## Online Safety

- 7.47. It is recognised by The Howard Academy Trust that the use of technology presents challenges and risks to children and adults both inside and outside of The Howard Academy Trust academies
- 7.48. The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm.
- 7.49. The Howard Academy Trust will empower, protect and educate the community in their use of technology and establish mechanisms to identify, intervene in, and escalate any incident where appropriate.
- 7.50. The DSL has overall responsibility for online safeguarding within the school but will liaise as necessary with other members of staff.
- 7.51. The DSL and leadership team and Governing Body have read, understood and acted upon all guidance regarding Online Safety within 'Keeping Children Safe in Education' 2023



- 7.52. The Howard Academy Trust identifies the breadth of issues within online safety can be considerable, but they can be broadly categorised into four areas of risk:
- **Content:** being exposed to illegal, inappropriate or harmful material
  - **Contact:** being subjected to harmful online interaction with other users
  - **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm.
  - **Commerce:** being exposed to online gambling, inappropriate advertising, phishing and or financial scams.
- 7.53. The Howard Academy Trust recognises the specific risks that can be posed by mobile phones and cameras and in accordance with KCSIE 2023 and has appropriate policies in place that are shared and understood by all members of the school community. Further information reading the specific approaches relating to this can be found in the school's Online Safety Policy, [Acceptable Use Policy](#) and Image Use Policy which can be found on the THAT Policy Centre.
- 7.54. Academies within The Howard Academy Trust use a wide range of technology. This includes computers, laptops, tablets and other digital devices, the internet, our learning platform, intranet and email systems.
- 7.55. All School owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place
- 7.56. All members of staff have access to appropriate, regular and up-to-date online safety information as part of their safeguarding training.
- 7.57. The Howard Academy Trust will ensure that when pupils and staff access the school systems and internet provision appropriate filters and monitoring systems are in place.
- 7.58. The Howard Academy Trust ensures that all staff receive training on the expectations, applicable roles and responsibilities, in relation to our filtering and monitoring systems and processes.
- 7.59. The Howard Academy Trust ensures that appropriate filtering and monitoring systems are in place on school equipment and systems used by pupils/students and staff, including school devices used by pupils/students at home. This link can assist you in understanding your broader responsibilities: <https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges>
- 7.60. Filtering and monitoring are an important part of school's online safety responsibilities, but they are only one part of our approach to online safety. Pupils/students and adults may have access to systems external to the school control, such as mobile phones and other internet enabled devices and technology. Where concerns are identified, appropriate action will be taken.
- 7.61. The Howard Academy Trust recognises that many pupils/students and parents will have unlimited and unrestricted access to the internet via mobile phones and other enabled devices, this is external to the school's control. Where concerns are identified appropriate action will be taken.
- 7.62. Filtering and monitoring are an important part of school's online safety responsibilities, it is only one part of our approach to online safety. Pupils and adults may have access to systems external to the school control such as mobile phones and other internet enabled devices and technology and where concerns are identified appropriate action will be taken.
- 7.63. The Howard Academy Trust recognises that many pupils/students and parents will have unlimited and unrestricted access to the internet via mobile phones and other enabled devices, this is external to the school's control. Where concerns are identified appropriate action will be taken.
- 7.64. The Howard Academy Trust will ensure a comprehensive whole school curriculum is developed and in place to enable and equip all pupils with the knowledge needed to make the best use of the internet and technology in a safe, considered and respectful way, so they are able to reap the benefits of the online world and manage the risks effectively. **DSLs and SLT may find it helpful to access UK Council for Internet Safety (UKCIS) '[Education for a Connected World Framework](#)' and DfE '[Teaching online safety in school](#)' guidance.**
- 7.65. The Trust/academy will also support parents and the wider school community (including all members of staff) to be aware and alert to the need to keep children safe online. We will share information with parents/carers about:
- what systems are in place to filter and monitor online use,

- what children do online as a part of their learning, including the sites they may be asked to access,
  - who from the school or college (if anyone) their child is going to be interacting with online, as a part of remote learning.
- 7.66. The DSL will respond to online safety concerns in line with the child protection and other associated policies such as anti-bullying and behaviour.
  - Internal sanctions and/or support will be implemented as appropriate.
  - Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.
- 7.67. Where children are asked to learn online at home in response to a full or partial closure:
  - The Howard Academy Trust will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements.
  - All communication with learners and parents/carers will take place using The Howard Academy Trust provided or approved communication channels; for example, The Howard Academy Trust provided email accounts and phone numbers and/or agreed systems e.g., Arbor/ Google Classroom, Microsoft 365 or equivalent.
    - Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.
  - Staff and learners will engage with remote teaching and learning in line with existing behaviour principles as set out in our The Howard Academy Trust behaviour policy/code of conduct and Acceptable Use Policies.
  - Staff and learners will be encouraged to report issues experienced at home and concerns will be responded to in line with our child protection and other relevant policies.
  - When delivering remote learning, staff will follow our Remote Learning Acceptable Use Policy (AUP).
  - Parents/carers will be made aware of what their children are being asked to do online, including the sites they will be asked to access. The Howard Academy Trust will continue to be clear who from the school (if anyone) their child is going to be interacting with online.
  - Parents/carers will be encouraged to ensure children are appropriately supervised online and that appropriate parent controls are implemented at home.
- 7.68. Additional guidance for DSLs and SLT regarding remote learning is available at DfE: [Safeguarding and remote education during coronavirus \(COVID-19\)](#)

### Children Missing Education (CME) and Persistently Absent Children

- 7.69. All staff should be aware that children going missing and who are **absent from education, particularly on repeat occasions and/or prolonged periods** this can be a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage.
- 7.70. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.
- 7.71. The Howard Academy Trust recognises that, when a child is not in school, children may be susceptible to or exposed to other risks, so we work with parents and other partners to keep children in school whenever possible.
- 7.72. Staff should be aware of their school's unauthorised absence and children missing from education procedures

### Elective Home Education (EHE)

- 7.73. Where a parent/carer expresses their intention to remove a child from school with a view to educating at home, we will respond in line with [national Elective Home Education guidance](#) and local:

**Medway**  
Information about this can be found here: [Medway Guidance](#)

**Kent**  
Information can be found here: [Kent guidance](#).

- 7.74. We will work together with parents/carers and other key professionals and organisations to ensure decisions are made in the best interest of the child.

### Domestic Abuse

- 7.75. Domestic abuse is any type of controlling, bullying, threatening or violent behaviour between people in a relationship. Seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it in their own intimate relationships, can have a serious, long lasting impact upon children and is a form of child abuse.
- 7.76. The Howard Academy Trust recognises that Domestic abuse can encompass but is not limited to psychological; physical; sexual; financial; and emotional abuse.
- 7.77. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

### Modern Slavery

- 7.78. Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Statutory Guidance: **Modern slavery: how to identify and support victims.**
- 7.79. If there are concerns that any member of the community is a victim or involved with modern slavery, concerns should be shared with a DSL or deputy and will be responded to in line with this policy.

### So-called ‘honour-based’ abuse

- 7.80. So-called ‘honour-based’ abuse (HBA) encompasses incidents or crimes which have been committed in the belief that they protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators.
- 7.81. All staff need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.
- 7.82. If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the Designated Safeguarding Lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children’s social care. Where FGM has taken place, since 31 October 2015 there has been a **mandatory reporting duty** placed on **teachers** that requires a different approach (see following section).

### Female Genital Mutilation (FGM)

- 7.83. FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.
- 7.84. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a **statutory duty** upon **teachers**, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. It will be rare for teachers to see visual evidence, and they should **not** be examining pupils or students.
- 7.85. The duty does not apply in relation to at risk or suspected cases (i.e., where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence). In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty **FGM Fact Sheet**
- 7.86. Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they

should still consider and discuss any such case with the school's or college's Designated Safeguarding Lead (or deputy) and involve children's social care as appropriate.

### Forced Marriage

- 7.87. The Howard Academy Trust recognise that since February 2023 it has been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if **no** violence, threats or another form of coercion are used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages. (see page 155 of KCSIE 23) ([Legal age increases to 18](#))
- 7.88. Multi-agency statutory guidance for dealing with forced marriage, which can found at [The right to choose: government guidance on forced marriage](#) . Guidance for schools can be found in Section 8. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fmufcdo.gov.uk](mailto:fmufcdo.gov.uk).
- 7.89. Staff at The Howard Academy Trust will use the school's concern reporting system if they have any reason to believe that a child may be at risk of being taken out of the country for the purposes of a forced marriage.

### Breast Ironing

- 7.90. Breast flattening is a form of child abuse. See the CPS legal guidance on [Child Abuse](#)
- 7.91. Breast Ironing is the process whereby young pubescent girls' breasts are ironed, massaged and/or pounded down using hard or heated objects in order for the breasts to disappear or delay the development of the breasts entirely. It is believed that by carrying out this act, young girls will be protected from harassment, rape, abduction and early forced marriage and therefore be kept in education
- 7.92. There are potentially significant physical and psychological consequences and risks related to this practice. Breast flattening is a form of child abuse. Therefore, professionals must follow their Local Safeguarding Children's Board Procedures.

### Preventing radicalisation

- 7.93. The Counter Terrorism and Security Act 2015 placed a duty on specified authorities, which includes schools, to have due regard to the need to prevent people from being drawn into terrorism (the PREVENT duty). The school's work in promoting life in modern Britain and promoting Fundamental British Values (democracy; the rule of law; individual liberty; mutual respect for and tolerance of those with different faiths and beliefs and for those without faith) through the curriculum and pastoral programs underpins this strategy.
- 7.94. Staff should be aware that there is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet).
- 7.95. The department has published advice for schools on the [Prevent duty](#). The advice is intended to complement the Prevent guidance and signposts other sources of advice and support.
- 7.96. Every member of staff at The Howard Academy Trust recognises that children exposed to radicalisation and extremism is no different to safeguarding against any other vulnerability and should be approached in the same way as protecting children from other risks.
- 7.97. Staff will report any concerns to the DSL (or a deputy), who is aware of the [local procedures](#) to follow for making a Prevent referral. If there is an immediate threat, the police will be contacted via 999.
- 7.98. All staff and governors should complete the [Prevent online Awareness training package](#) developed by the Home Office which includes guidance on how to identify people who may be susceptible to being drawn into terrorism, and how to refer them into the Channel process.

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

- 7.99. The Howard Academy Trust acknowledges and understand the common reason for children becoming looked after is as a result of abuse and/or neglect and a previously looked after child potentially remains vulnerable.
- 7.100. The school has a '[designated teacher](#)' (Cindy Flynn) who works with local authorities to promote the educational achievement of registered pupils/students who are looked after or who have been previously looked after.

**Medway**  
[Medway's Virtual School | Education of looked-after children | Medway Council](#)

**Kent**  
[Virtual School Kent \(including the virtual school head\)](#)

- 7.101. The designated teacher will work with the DSL to ensure appropriate staff have the information they need in relation to a child's looked after legal status, contact arrangements with birth parents or those with parental responsibility, care arrangements and the levels of authority delegated to the carer by the authority looking after them.
- 7.102. Waterfront UTC understands their responsibility to inform the Local Authority via First Response of Private fostering arrangements when they believe that a child is being cared for as part of a private fostering arrangement. (When a child under 16, or a8 if they are disabled is cared for and lives with an adult who is not a relative for 28days or more.

## Children who are privately fostered

- 7.103. [Private fostering](#) occurs when a child under the age of 16 (under 18 for children with a disability) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of our staff through the normal course of their interaction, and promotion of learning activities, with children.
- 7.104. Where private fostering arrangements come to the attention of the school, we must notify:

**Medway**  
Through the email [private.fostering@medway.gov.uk](mailto:private.fostering@medway.gov.uk) or visit the website [Private fostering arrangements | Medway Council](#)

**Kent**  
Kent Integrated Childrens Services in line with the local [KSCMP arrangements](#) in order to allow the local authority to check the arrangement is suitable and safe for the child.

## Children who are Lesbian, Gay, Bi, or Trans (LGBT)

- 7.105. The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm, however, The Howard Academy Trust recognises that children who are LGBT or are perceived by other children to be LGBT (whether they are or not) can be targeted by other children or others within the wider community.
- 7.106. The Howard Academy Trust risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. LGBT is included within our Relationships Education/ Relationship and Sex Education and Health Education curriculum, and our staff will endeavour to reduce the additional barriers faced and provide a safe space for children to speak out or share any concerns.
- 7.107. Additional support for education settings regarding equality, diversity and inclusion is available via the [Education People EDIT team](#).

## 8. Child Protection Procedures

- 8.1. The Howard Academy Trust adheres to the MSCP Safeguarding Children and the Kent Safeguarding Children Multi-Agency Partnership Procedures.

### Medway

The full MSCP procedures and additional guidance relating to specific safeguarding issues can be found on the MSCP website:  
<https://www.medwayscp.org.uk/mscb/>

### Kent

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)

- 8.2. If staff have **any concerns** about a child's welfare, they should act on them immediately. See page 5 for a flow chart setting out the process for staff when they have concerns about a child.
- 8.3. If a child is at risk of imminent danger or harm concerns will need to:

### Medway

be referred by telephone to **First Response 01634 334466** and/or the police.

### Kent

Where a child is suffering, or is likely to suffer from harm, or is in immediate danger (for example, under section 17 or 47 of the Children Act), a 'request for support' will be made immediately to Kent [Integrated Children's Services](#) (via the 'Front Door') and/or the police, in line with KSCMP procedures.

- 8.4. **If it is an emergency the police need to be called on 999.**
- 8.5. If there are child protection concerns the role of the school is NOT to investigate but to recognise and refer.
- 8.6. Less urgent concerns or requests for support will be referred to Children's social care and Early Help via:

### Medway

Any Family Solutions referrals will be sent via the **Medway online form** ([the portal](#))

### Kent

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

- 8.7. Once staff have reported their concerns, the DSL will make a decision about what action to take, these include:
- continuing to closely monitor the situation
  - managing any support for the child internally, via the school's own pastoral support processes.
  - a referral to Family Solutions or for an Early Help Assessment
  - a referral to Children's Services for statutory intervention.
- 8.8. All information and actions taken including the reasons for any decision/actions made, will be fully documented on a child's record.
- 8.9. 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.
- 8.10. Wherever possible the school will share safeguarding concerns, or the intention to refer a child to Children's social care, with parents or carers. **However staff will not do so where it is felt that to do so could place the child at greater risk of harm or impede a criminal**



**investigation.** On occasions it may be necessary to consult with First Response and/ or the police for advice on when to share information with parents/carers.

- 8.11. If the DSL is not available to discuss an immediate and urgent concern, staff can seek advice from the Deputy DSL. They may also seek advice from the consultation from

**Medway**  
The 'No Name' consultation line in First Response (9:30-12:30) on 01634 33 1662.

**Via the Front Door**  
03000 411111

### **Kent**

- 8.12. If anyone other than the DSL makes a referral to external services, then they will inform the DSL as soon as possible.
- 8.13. Staff may pass information about a child to the DSL but remain anxious about action subsequently taken. Staff should feel able to check the progress of a case with the DSL so that they can reassure themselves the child is safe and their welfare is being considered. If following this process, the staff member remains concerned it is the responsibility of that staff member to follow the school's escalation process.
- 8.14. If a child's situation does not appear to be improving, then the DSL (or the person that made the request for support) will consider a re-referral.
- 8.15. If, after a request for support or any other planned external intervention, a child's situation does not appear to be improving, the DSL will consider following

**Medway**  
[MSCP escalation procedures](#)

**Kent**  
[Procedures - Kent Safeguarding Children Multi-Agency Partnership \(kscmp.org.uk\)](#)

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.

- 8.16. All members of staff are made aware of the internal and local Early Help/Family Solutions support services. Where a child is being offered or receiving Family Solutions support, staff will be supported to understand their role in any Early Help assessment or intervention. This includes identifying emerging problems, liaising with other professionals, and in some cases acting as the lead practitioner.
- 8.17. The DSL will keep all Early Help cases under constant review and consideration will be given to a request for support to the First Response if the situation does not appear to be improving or is getting worse.
- 8.18. Waterfront UTC is an [Operation Encompass School](#). This means we work in partnership with Kent Police to provide support to children experiencing domestic abuse. All staff know what Operation Encompass is and there is a clear process for managing notifications in school (including cover if a named individual is absent).

### **The child's wishes**

- 8.19. Systems should be in place for children to express their views and give feedback. Ultimately, all systems and processes should operate with the **best interests of the child at their heart. However this should not prevent safeguarding action being taken, for the child or children involved.**

## **9. Record Keeping**

- 9.1. The Howard Academy Trust use an electronic concern system called "CPOMS".
- 9.2. Well-kept records are essential to good child protection practice. Our school is clear about the need to record any concern about a child or children within our school and when these records should be shared with other agencies.

## Reporting a concern

- 9.3. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing on the schools safeguarding system “CPOMS”. If in doubt about recording requirements, staff should discuss with the Designated Safeguarding Lead (or deputy).
- 9.4. Child Protection records will record facts and not personal opinions. A body map will be completed if injuries have been observed.
- 9.5. A body map will be completed if injuries or marks have been observed.
- 9.6. Photographs of injuries should **NOT** be taken by staff; staff should use body maps to detail concerns. Taking photos of injuries can be traumatic and distressing for children and staff. Staff should not examine a child and should only record what they can see.
- 9.7. If photos of injuries are required for evidence purposes, this should be directed/carried out by the Police. If you are asked to take photos of an injury by a social worker or police officer clearly state in the records who asked you to do this, name, date, time, and ensure you record the individuals rationale behind this decision. Staff can challenge this request if they do not feel comfortable and wait for a Social worker/ Police officer to attend.
- 9.8. 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. If members of staff are in any doubt about recording requirements, they will discuss their concerns with the DSL.
- 9.9. Safeguarding records 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.
- 9.10. All safeguarding records will be transferred in accordance with data protection legislation to the child’s subsequent school/setting, under confidential and separate cover. These will be given to the new DSL and a receipt of delivery will be obtained.

## 10. Child protection file

- 10.1. Where children leave the school or college (including in year transfers) the designated safeguarding lead will 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
- 10.2. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.
- 10.3. In addition to the child protection file, the Designated Safeguarding Lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives
- 10.4. If a child is subject to a child protection plan or there are other ongoing concerns at the time of transfer, then it is strongly recommended that the transferring DSL arrange to meet with the receiving DSL in person to ensure there is effective transition and handover of information.
- 10.5. Child protection files should always be kept by the current education setting which the child attends. Transferring settings do not need to keep copies of child protection files, but if there is reason to, they do they must be kept in accordance with data retention (see section 7). In cases where there may be ongoing involvement from transferring settings, for example if any siblings still attend your setting, DSLs may wish to take copies of chronologies etc.

## 11. Multi-agency Working

- 11.1. The Howard Academy Trust identifies that they have a pivotal role to play in multi-agency safeguarding arrangements. Governing bodies and proprietors should ensure that the school



- or college contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children 2018.
- 11.2. The Howard Academy Trust recognises and is committed to its responsibility to work within the MSCP and the KSCMP multi-agency safeguarding arrangements. The leadership team and DSL will work to establish strong and co-operative local relationships with professionals in other agencies in line with statutory guidance.
  - 11.3. The Howard Academy Trust academies will endeavor to identify those children and families who may benefit from the intervention and support of external professionals and will seek to enable referrals (in discussion with parents/carers) as appropriate.
  - 11.4. The Howard Academy Trust recognises the importance of multi-agency working and will provide requested reports support attendance at relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.
  - 11.5. The headteacher/principal and DSL are aware of the requirement for children to have an Appropriate Adult ([PACE Code C 2019](#)) where there is a need for detention, treatment and questioning by police officers and will respond to concerns in line with our school/college 'Searching, Screening and Confiscation' policy and/or behaviour policy, which is informed by the DfE '[Searching, screening and confiscation at school](#)' guidance. Headteachers and DSLs should access the DfE '[Searching, screening and confiscation at school](#)' guidance.

## 12. Confidentiality and Information Sharing

- 12.1. The Howard Academy Trust expect all staff to treat information they receive about a children and young people in a discreet and confidential manner. Confidential information should never be used casually in conversation or shared with any person other than a 'need to know basis'.
- 12.2. All members of staff must be aware that whilst they have duties to keep any information confidential, they also have a professional responsibility to share information with other agencies The Howard Academy Trust recognises our duty to share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE 2023.
- 12.3. The Data Protection Act 2018 places a duty on organisations and individuals with regards to processing personal information fairly and lawfully. As a school we adhere to data protection, yet we do not allow this to stand in our way in the need to promote the welfare and protect the safety of our children in our care. DfE '[Information sharing advice for safeguarding practitioners](#)' (2018) provides further detail
- 12.4. The Howard Academy Trust has an appropriately trained Data Protection Officer (DPO) as required by the General Data Protection Regulations (GDPR) to ensure that our school/college is compliant with all matters relating to confidentiality and information sharing requirements. The Trust DPO can be contacted by emailing [dpo@thatrust.org.uk](mailto:dpo@thatrust.org.uk)
- 12.5. All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing. In accordance with statutory requirements, where there is a child protection concern, this must be reported to the Designated Safeguarding Lead and may require further referral and subsequent investigation by the appropriate authorities.

## 13. Complaints

- 13.1. The Howard Academy Trust has a complaints procedure this can also be found on each academy/Trust website. As a Trust we encourage children and families to raise with us complaints, concerns or comments and have a robust internal investigation process.
- 13.2. 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)
- 13.3. Safeguarding concerns should be raised with school immediately. If a concern or a child is at immediate risk, then the individual needs to contact First Response 01634 334466 or the

- police on 101. All visitors are given a safeguarding leaflet that outlines how to share concerns and code of conduct expected by visitors/contractors.
- 13.4. All reported concerns will be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation against a member of staff or volunteer will be dealt with in line with section 19 of this policy.

## 14. Staff Induction, Awareness and Training

- 14.1. All members of staff have been provided with a copy of Part One of “*Keeping Children Safe in Education*” (2023) which covers Safeguarding information for all staff.
- 14.2. Annex A KCSIE 2023 is a condensed version of Part one which can be provided instead of Part one to those staff who do not directly work with children, if the governing body or proprietor think it will provide a better basis for those staff to promote the welfare and safeguard children. If schools/colleges opt to use Annex A with some staff due to their role, leaders may wish to document this decision within the policy e.g. ‘*all members of staff who do not work directly with children will read Annex A*. If the school/college requires all staff to read part one, remove the reference to ‘annex A’.
- 14.3. All Members of staff have signed to confirm that they have read and understood Part One and Annex B. An electronic form will be completed and records of training will be held by each academy office on Arbor.
- 14.4. School leaders including the DSL will read the entire document. School leaders and all members of staff who work directly with children will access Annex B within Keeping Children Safe in Education 2023.
- 14.5. All school staff will complete the Safeguarding Refresher Training module on the Triple S training system.
- 14.6. The DSL will ensure that all new staff and volunteers (including agency and third-party staff) receive child protection training and information to ensure they are aware of the Waterfront UTC’s internal safeguarding processes as part of their induction. All staff will be provided with a copy of KCSIE and will complete online Safeguarding Training.
- 14.7. All staff should undergo safeguarding and child protection training (including online safety) at induction. The training should be regularly updated. Induction and training should be in line with advice from the local three safeguarding partners. This training will include online safety and will take place at least annually.
- 14.8. In addition to child protection training all members of staff should receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings) as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- 14.9. All staff members (including temporary/supply staff) will be made aware of the school’s expectations regarding safe and professional practice via the staff behaviour policy (or code of conduct) and Acceptable Use Policy.
- 14.10. The Board of Directors recognise the expertise staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis. Opportunity should therefore be provided for staff to contribute to and shape safeguarding arrangements and child protection policy.
- 14.11. The DSL and Head of School will provide an annual report to the Local Academy Board detailing safeguarding training undertaken by all staff and will maintain an up-to-date register of who has been trained.
- 14.12. Waterfront UTC has a nominated lead for the Local Academy Board, David Giles, all members of the Local Academy Board will access appropriate safeguarding training which covers their specific strategic responsibilities at induction and on a regular basis. Training will provide them with the knowledge to ensure their school’s safeguarding policies and procedures are effective. This includes Directors strategic responsibility for online safety.

## 15. Safe Working Practice

- 15.1. All members of staff are required to work within clear guidelines on Safe Working Practice and the school's [Code of Conduct](#). The DSL will ensure that all staff and volunteers have read the child protection policy and staff behaviour policy/code of conduct and understand that their behaviour and practice must be in line with it.
- 15.2. Staff should be aware of the school's Behaviour Management and Physical Intervention **Policies**, and any physical interventions must be in line with agreed policy and procedures and national guidance.
- 15.3. A list of staff that have accessed physical intervention training will be kept by the Head of School/Designated Safeguarding Lead and updated in-line with [use of reasonable force](#) DfE guidance. All incidents will be recorded in-line with guidance.
- 15.4. There may be circumstances when it is appropriate for staff to use reasonable force in order to safeguard children from harm. Further information regarding our approach and expectations can be found in our behaviour policy.
- 15.5. If staff, visitors, volunteers or parent helpers are working with children alone they will, wherever possible, be visible to other members of staff. They will be expected to inform another member of staff of their whereabouts in school, who they are with, for how long. Doors, ideally, should have a clear glass panel in them and be left open.
- 15.6. Guidance about acceptable conduct and safe practice will be given to all staff and volunteers during induction. These are sensible steps that every adult should take in their daily professional conduct with children. This advice can be found in [Guidance for safer working practice for those working with children and young people in education settings May 2019](#) (Safer Recruitment consortium). All staff and volunteers are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.
- 15.7. Staff should be particularly aware of the professional risks associated with the use of electronic communication (e-mail; mobile phones; texting; social network sites) and should familiarise themselves with advice and professional expectations outlined in the school's Online Safety Policy and Acceptable Use Policy.

## 16. Staff Supervision and Support

- 16.1. Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL.
- 16.2. 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 will be 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.
- 16.3. The DSL will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union, the Education Support Partnership or other similar organisations directly.

## 17. Safer Recruitment

- 17.1. The Howard Academy Trust values the importance of developing a safe culture and is committed to ensure that all steps are taken to recruit staff and volunteers who are safe to work with our pupils and staff.
- 17.2. The Howard Academy Trust will use the recruitment and selection process to deter, identify and reject unsuitable candidates. We will ensure that detailed checks are carried out and evidence is provided e.g. criminal record checks (Disclosure and Barring Service (DBS) checks), barred list checks and prohibition checks, together with references and interview

information this will aid the school in deciding about the suitability of the prospective employee.

- 17.3. The school will carry out an online search on shortlisted candidates to help identify any issues that are publicly available online which may be relevant to their suitability to work with children and/or may have an impact on the school/academy's reputation.
- 17.4. The Trust HR Team will ensure that at least one of the persons who conducts the interview has completed safer recruitment training. At all times the Chief Executive/Head of School will ensure that safer recruitment practices are followed in accordance with the requirements of 'Keeping Children Safe in Education', DfE (2023).
- 17.5. Safer recruitment procedures will include the requirement for appropriate checks in line with national guidance (see: [Safeguarding Children and Safer Recruitment](#))
- 17.6. The school maintains an accurate Single Central Record (SCR) in line with statutory guidance.
- 17.7. We are also 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.
- 17.8. 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.
- 17.9. Where the school places a learner with an alternative provision provider, the school will continue to be responsible for the safeguarding of that child. The school will undertake appropriate checks to ensure the provider meets the needs of the pupil, including written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment.

## 18. Allegations Against Members of Staff, including Supply Staff, Contractors and Volunteers

- 18.1. The Howard Academy Trust recognises that allegations sometimes arise from a differing understanding of the same event, but when they occur, they are distressing and difficult for all concerned. We also recognise that many allegations are genuine and there are some adults who deliberately seek to harm or abuse children.
- 18.2. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and such concerns will always be taken seriously by the senior leadership team.
- 18.3. The Howard Academy Trust understands the duty to refer to the LADO where it is alleged that anyone working in the school has:
- behaved in a way that has harmed a child, or may have harmed a child.
  - possibly committed a criminal offence against or related to a child.
  - behaved towards a child 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 children.
- 18.4. In depth information regarding staff allegations can be found within our Procedures for Managing Allegations against Staff policy. This can be found in the THAT Policy Centre. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the schools safeguarding regime. The leadership team at The Howard Academy Trust will take all concerns or allegations received seriously.
- 18.5. If staff have safeguarding concerns, or an allegation is made about another member of staff (including volunteers/supply staff/visitors) posing a risk of harm to children, then:
- 18.6. Allegations should be referred immediately to the Head Teacher or deputy in their absence who will first contact the Local Authority Designated Officer (LADO) to agree further action to be taken in respect of the child and staff member.

### Medway

Please refer to the Medway [LADO Leaflet](#) if you need further information.

### Kent

Advice can be sought via the [Local Authority Designated Officer](#) (LADO) Enquiry Line and/or the Education Safeguarding Service.

- 18.7. In the event of allegations of abuse being made against the Headteacher then staff are advised that allegations should be reported to the Chair of Governors who will contact the LADO in the first instance.
- 18.8. Any member of staff or volunteer who does not feel confident to raise their concerns with the Head of School/Executive Headteacher (if concerning the Head of School) or should contact **the LADO directly on:**

**Medway**  
01634 331065.  
[referral form for professionals](#)

**Kent**  
03000 41 08 88  
[kentchildrenslado@kent.gov.uk](mailto:kentchildrenslado@kent.gov.uk)  
[Submit LADO referral for professionals](#)

- 18.9. The Head of school/Executive Headteacher will seek advice from the LADO within 24 hours of the alleged incident. No member of staff or the Trust HR Team will undertake further investigations before receiving advice from the LADO.
- 18.10. Where Heads of School are unsure how to respond, for example if the school is unsure if a concern meets the harm ‘thresholds’, advice will be sought via the Local Authority Designated Officer (LADO) Enquiry Line and/or the Education Safeguarding Service
- 18.11. The Howard Academy Trust has a legal duty to refer to the [Disclosure and Barring Service](#) 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.
- 18.12. 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 HR.

## 19. Concerns that do not meet the ‘harms threshold’

- 19.1. The Howard Academy Trust has policies and processes in place to deal with low-level concerns and allegations that don’t meet the ‘harm threshold’. We have a clear reporting procedures for children, parents and other people to report concerns or complaints, including abusive or poor practice. We also acknowledge that low-level concerns can arise in several ways from various sources, e.g. suspicion, complaint or a disclosure. Procedures in place for confidentially sharing, recording and handling of low-level concerns
- 19.2. A low-level concern is any concern (no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’) that a member of staff has acted in a way that:
- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
  - does not meet the allegations threshold or is not considered serious enough to refer to the local authority designated officer (LADO).
- 19.3. Low-level concerns can exist on a wide spectrum, from the inadvertent and thoughtless, through to behaviour which is intended to enable abuse.
- 19.4. Where low-level concerns are reported, the Head of School should share or liaise with the LADO enquiries officer via

**Medway**  
the [LADO Enquiry Line.](#)

**Kent**  
The [LADO Enquiry Line.](#)

- 19.5. The Medway LADO policy states that all allegations, including low level are considered with the LADO, please communicate and engage with the LADO in relation to all low-level concerns.
- 19.6. The Howard Academy Trust staff code of conduct explains what a low-level concern is and the importance of sharing concerns.



## 20. Whistleblowing Procedure

- 20.1. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and such concerns will always be taken seriously by the leadership team. All members of staff are made aware of the schools [Whistleblowing procedure](#). It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk.
- 20.2. 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).

## 21. Safeguarding Children with Special Educational Needs and Disabilities

- 21.1. The Howard Academy Trust understands that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. These children may have an impaired capacity to resist or avoid abuse. The DSL will work closely with the SENDco, Sophie Rouse, to plan support as required.
- 21.2. All staff will ensure that children with SEN and disabilities will be able to overcome the barriers that exist for this group of children and specifically ensure that those with communication difficulties will be supported to make sure that their voice is listened to and acted upon.
- 21.3. It is important that all staff are aware that children with SEN and disabilities may not always outwardly display indicators of abuse and that some children can be disproportionately impacted by things like bullying and exploitation without outwardly showing signs.
- 21.4. All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour/mood change or injuries and not to assume that they are related to the child's disability and be aware that children with SEN and disabilities may not always outwardly display indicators of abuse. To address these additional challenges, our school will always consider extra pastoral support for children with SEN and disabilities.

## 22. Curriculum and Staying Safe

- 22.1. [Working Together to Safeguard Children \(2018\)](#) states that the curriculum should ensure opportunities for “developing children’s understanding, awareness and resilience”.
- 22.2. Schools play a pivotal and 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.
- 22.3. The school uses the PSHE and RSE curriculum to increase self-esteem, self-awareness and social and emotional understanding, assertiveness and decision making this ensures that our pupils/students have a range of strategies to ensure their own protection and that they are able to also protect others. Online safety is also integrated into the curriculum
- 22.4. The school ensures that teachers that teach the PSHE curriculum have been trained and equipped to deliver high quality PSHE education in a safe way. For further information and training on Medway PSHE programs please follow the link: [School PSHE programmes](#)
- 22.5. Children feel they can talk to a range of staff when they feel they are worried and can feedback about their school experience. Children at Waterfront UTCI will be listened to, heard and their concerns will be taken seriously and acted upon as appropriate.
- 22.6. Other systems that exist outside of expected day to day classroom interaction and support include: *anti-bullying policy, questionnaires, Pastoral Area, the Base, ELSA trained TAs.*

## 23. The Use of School Premises by Other Organisations

- 23.1. Services or activities provided separately by another organisation from time to time may seek to use the school premises. The Trust Central Team will seek written assurance that the organisations concerned have suitable policies and procedures in place with regard to

safeguarding children and that relevant safeguarding checks have been made for all staff and volunteers.

- 23.2. The governing body or proprietor will therefore seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school or college on these matters where appropriate.
- 23.3. Without this assurance then an application to use the premises will be refused
- 23.4. If The Howard Academy Trust receives an allegation relating to an incident that happened when an individual or organisation was on school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). The Howard Academy Trust will follow their safeguarding policies and procedures, including informing the LADO as they would with any safeguarding allegation.

## 24. Security

- 24.1. The Howard Academy Trust has a responsibility to provide a secure site that is controlled by clear management directives, but the site is only as secure as the people who use it. Therefore, all staff and people on the site have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light.
- 24.2. Visitors and volunteers must only enter through the main entrance and after signing in at the office will be issued with a school lanyard or visitor's pass. School has a clear system of ensuring visitors are to be accompanied/supervised by [regulated staff member](#).
- 24.3. The Howard Academy Trust will not tolerate or accept the behaviour of any individual (parent or other) that threatens school security or leads others (child or adult) to feel unsafe). This type of behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school site.
- 24.4. Any individual on site who is not known or identifiable by a visitor's pass may be challenged by any staff member for clarification and reassurance.

## 25. Monitoring and Review

- 25.1. All school staff (including temporary/supply staff and volunteers) will have access to a copy of this policy. The policy will also be available to parents/guardians.
- 25.2. This policy has been written in in (August 2023) to reflect the new guidance and legislation issued in relation to safeguarding children and promoting their welfare.
- 25.3. All staff should have access to this policy and sign to the effect that they have read and understood its contents. The DSL will review the policy following any child protection concerns (including following learning identified from serious case reviews) or allegations against staff to ensure that it reflects appropriate, accurate and up-to-date safeguarding practice.
- 25.4. The policy forms part of our trust/school development plan and will be reviewed annually.

## 26. Local Support

- 26.1. All members of Staff in The Howard Academy Trust are made aware of local support available.
- 26.2. If a child may be at risk of **imminent harm**, you should call

### Medway

- Children's Services First Response Team on 01634 334466 and/or the Police on 999

### Kent

- Front Door : 03000 411111 and/or the Police on 999

- 26.3. Contact details for Education Safeguarding Officer (Education Safeguarding Service)

**Medway**

**Education Safeguarding Officer**

- Kate Barry (Non Working Day Wednesday)
- 01634 331017
- [kate.barry@medway.gov.uk](mailto:kate.barry@medway.gov.uk)

**Education Safeguarding Officer**

- Fiona Veitch (Non Working Day Friday)
- 01634 331464
- [Fiona.veitch@medway.gov.uk](mailto:Fiona.veitch@medway.gov.uk)

**Safeguarding Service Manager**

- Maisie Adkins
- 01634 331065
- [maisie.adkins@medway.gov.uk](mailto:maisie.adkins@medway.gov.uk)

**Kent**

- Area Safeguarding Advisor
- [www.theeducationpeople.org/our-expertise/partner-providers/kent-county-council-providers/safeguarding/](http://www.theeducationpeople.org/our-expertise/partner-providers/kent-county-council-providers/safeguarding/)

**Kent Integrated Children’s Services/ Children’s Social Work Services**

- Front Door: 03000 411111
- Out of Hours Number: 03000 419191

**Education Lead in MASH - For MASH Related Enquiries only.**

- Harriet O'Brien
- 01634 331025
- [harriet.obrien@medway.gov.uk](mailto:harriet.obrien@medway.gov.uk)

**Contact details for the LADO:**

**Medway**

- Telephone: 01634 331065
- Further information and contact details found: [Advice and resources for professionals](#)

**Kent**

- 03000 410888
- [kentchildrenslado@kent.gov.uk](mailto:kentchildrenslado@kent.gov.uk)

**Medway Children’s Social Work Services**

- First Response: 01634 334466 (Monday to Friday from 9am to 5pm)
- Out of Hours: 03000 419 191

**Kent Police**

- 101 (or 999 if there is an immediate risk of harm)

**Medway Safeguarding Children Partnership (MSCP)**

- [mscp@medway.gov.uk](mailto:mscp@medway.gov.uk)
- 01634 336 329

**Kent Safeguarding Children Multi-Agency Partnership (KSCMP)**

- [www.kscmp.org.uk](http://www.kscmp.org.uk)
- 03000 421126 or [kscmp@kent.gov.uk](mailto:kscmp@kent.gov.uk)

26.4. Schools may wish to include other local contacts such as Schools’ Police Officers/PCSO, voluntary contacts and Early Help teams etc.

## 27. National Support

**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 Pupils/Students**

- NSPCC: [www.nspcc.org.uk](http://www.nspcc.org.uk)
- ChildLine: [www.childline.org.uk](http://www.childline.org.uk)
- Papyrus: [www.papyrus-uk.org](http://www.papyrus-uk.org)
- Young Minds: [www.youngminds.org.uk](http://www.youngminds.org.uk)



- 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)
- Kidscape: [www.kidscape.org.uk](http://www.kidscape.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)
- Kidscape: [www.kidscape.org.uk](http://www.kidscape.org.uk)
- The Samaritans: [www.samaritans.org](http://www.samaritans.org)
- Mind: [www.mind.org.uk](http://www.mind.org.uk)
- NAPAC (National Association for People Abused in Childhood): [napac.org.uk](http://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)

## APPENDIX 1: Definitions of Forms of Abuse/Specific Safeguarding Issues

### Definitions of Forms of Abuse

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

- **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.
- **Physical abuse:** 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.

Please click on the hyper link for further information, advice and guidance: [NSPCC Physical Abuse](#)

- **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 from 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.

Please click on the hyper link for further information, advice and guidance: [NSPCC Emotional Abuse](#)

- **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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

Please click on the hyper link for further information, advice and guidance: [NSPCC Sexual Abuse](#)

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

Please click on the hyper link for further information, advice and guidance: [NSPCC Neglect](#)

### Specific Safeguarding Issues

Please see below links to information and guidance about specific safeguarding issues. You will find further information in Annex B: Keeping Children Safe in Education 2023

## Mental Health

- The department has published advice and guidance on [Preventing and Tackling Bullying](#), and [Mental Health and Behaviour in Schools](#).

In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance [Promoting children and young people's emotional health and wellbeing](#). Its resources include social media, forming positive relationships, smoking and alcohol. See [Rise Above](#) for links to all materials and lesson plans.

- 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/)
- Every mind matters <https://www.nhs.uk/oneyou/>

The department is providing funding to support costs of a significant training programme for senior mental health leads and the national rollout of the [Link Programme](#). Training for senior mental health leads, will be available to all state-funded schools and colleges by 2025, to help introduce or develop their whole school or college approach to mental health

## Support for Learning Disabilities

- Respond: [www.respond.org.uk](http://www.respond.org.uk)
- Mencap: [www.mencap.org.uk](http://www.mencap.org.uk)

## Domestic Abuse

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

## Honour based Violence (FGM and Breast Ironing)

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

## Contextual Safeguarding, Child-on-Child abuse, Sexual Exploitation and Criminal Exploitation:

- Contextual Safeguarding Network: <https://contextualsafeguarding.org.uk>
- National Crime Agency: [www.nationalcrimeagency.gov.uk/who-we-are](http://www.nationalcrimeagency.gov.uk/who-we-are)
- Rape Crisis: <https://rapecrisis.org.uk>
- Lucy Faithfull Foundation: [www.lucyfaithfull.org.uk](http://www.lucyfaithfull.org.uk)
- Brook: [www.brook.org.uk](http://www.brook.org.uk)
- Victim Support: [www.victimsupport.org.uk](http://www.victimsupport.org.uk)
- Anti-Bullying Alliance: [www.anti-bullyingalliance.org.uk](http://www.anti-bullyingalliance.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)

- [Supporting practice in tackling child sexual abuse - CSA Centre](#)

#### Substance Misuse

- Drugs advice for Schools: [Gov.uk Drugs advice for schools](#)
- Talk to Frank <https://www.talktofrank.com/>
- 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/)

#### 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>
- Parents Info: [www.parentinfo.org](http://www.parentinfo.org)
- Marie Collins Foundation: [www.mariecollinsfoundation.org.uk](http://www.mariecollinsfoundation.org.uk)
- Internet Matters: [www.internetmatters.org](http://www.internetmatters.org)
- NSPCC/ Net Aware: [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)
- Stop it Now!: [www.stopitnow.org.uk](http://www.stopitnow.org.uk)
- Parents Protect: [www.parentsprotect.co.uk](http://www.parentsprotect.co.uk)
- LGFL '[Undressed](#)' provided schools advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.

#### 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)

## APPENDIX 2: Related Safeguarding Policies

This policy is one of a series in the Trusts integrated safeguarding portfolio and should be read in conjunction with the policies as listed below: (to be read and followed alongside this document).

- Behaviour management and use of physical intervention
- Code of Conduct
- Behaviour Policy (Students)
- Online Safety; Social media and Mobile technology
- Anti-Bullying
- Data protection/GDPR Policy
- Image use
- Relationship and Sex Education (RSE)
- Health and safety
- Attendance
- Risk assessments (e.g. school trips, use of technology, school re-opening)
- First aid Policy
- Managing allegations against staff
- Staff behaviour policy, including Acceptable Use of Technology Policies (AUP)
- Safer recruitment
- Whistleblowing

## APPENDIX 3: Procedure for dealing with disclosures (the 6 R's - what to do if)

### 1. Receive:

- Listen to what is being said without displaying shock or disbelief you display denial to a child or show shock or disgust at what they are saying, the child may be afraid to continue and will shut down.
- Accept what is being said without judgement.
- Take it seriously.

### 2. Reassure:

- Reassure the child, but only so far as is honest and reliable. Don't make promises that you can't be sure to keep, e.g. "everything will be all right now".
- Don't promise confidentiality - never agree to keep secrets. You have a duty to report your concerns.
- Tell the child that you will need to tell some people, but only those whose job it is to protect children.
- Acknowledge how difficult it must have been to talk and reassure them they have done the right thing.

### 3. React:

- React to the student only as far as is necessary for you to establish whether or not you need to refer the matter, but do not interrogate for full details
- Do not ask leading questions; "Did he/she....?" Such questions can invalidate evidence.
- Do ask open "TED" questions; Tell explain describe
- Do not criticise the perpetrator; the student may have affection for him/her
- Do not ask the student to repeat it all for another member of staff
- Explain what you have to do next and who you must talk to

### 4. Record:

- Make some very brief notes at the time and write them up in detail as soon as possible.
- Do not destroy your original notes
- Record the date, time, place, words used by the child and how the child appeared to you - be specific. Record the actual words used by the child
- Record statements and observable things, not your interpretations or assumptions - keep it factual.

### 5. Remember:

- Contact the designated member of staff
- The designated teacher may be required to make appropriate records available to other agencies

### 6. Relax

- Get some support for yourself