



Policy Title:	SAFEGUARDING (CHILD PROTECTION) POLICY	
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Safeguarding Children at Duke of Kent School Statement

Duke of Kent School is committed to safeguarding and promoting the welfare of children and vulnerable adults and expects all staff and volunteers to share this commitment. We always consider the best interests of the child. This means that we have a Safeguarding (Child Protection) Policy and procedures in place. All staff (including supply staff, regular volunteers and governors) must ensure that they are aware of these procedures. A copy of the Policy is on the School website, together with related Policies. It is available to anyone by request.

Sometimes we may need to share information and work in partnership with other agencies when there are concerns about a child's welfare. We will ensure that any concerns about a child are discussed with his/her parents/carers first unless there is reason to believe that such a move would be contrary to the child's welfare.

Contact Details

Duke of Kent School Safeguarding Contact Details

Position	Name	E-Mail
Designated Safeguarding Lead (Deputy Head and DSL)	Tom Southee	tsouthee@dokschoo.org

Deputy DSL (Head of Senior School)	Adam Wyllie	awyllie@dokschool.org
Deputy DSL (Head of Pre-Prep and Prep School - EYFS)	Chris Wright	cwright@dokschool.org
Deputy DSL (EYFS Lead) - Maternity.	Becks Salley	bsalley@dokschool.org
Head	Sue Knox	sknox@dokschool.org
Chair of Governors	Richard Brocksom	rbrocksom@dokschool.org
Nominated Safeguarding Governor	Alex Balls	aballs@dokschool.org

Surrey Children's Services and Safeguarding Contact Details

<u>Title / Name</u>	<u>Contact Details</u>
Children's Services South West Area - Guildford and Waverley Mon-Fri: 9-5	0300 123 1640 or 0300 200 1006 , swrais@surreycc.gov.uk or secure email: swrais@surreycc.gcsx.gov.uk Out of Hours emergency Duty Team: 01483 517898
Surrey Children's Single Point of Access (SPA) Mon-Fri: 9-5	0300 470 9100 or cspa@surreycc.gov.uk
Schools and Early Years Child Protection Consultation Line Mon-Fri: 9-5	0300 470 9100
Family Information Services	https://www.surreycc.gov.uk/people-and-community/families

Allegations Against Staff

Local Designated Officer - LADO	0300 123 1650 or LADO@surreycc.gov.uk (Select option 3 for LADO)
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Extremism

Surrey PREVENT Team	preventreferrals@surrey.pnn.police.uk
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	Claire McDonald, Prevent Supervisor for Surrey on 07795 043842.
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Female Genital Mutilation

Surrey Children's Single Point of Access (SPA) Mon-Fri: 9-5	0300 470 9100 or cspa@surreycc.gov.uk
FGM Helpline	Tel: 0800 0283550

Other Useful Contacts

<u>Name</u>	<u>Contact</u>
Childline	0800 1111
NSPCC	0808 800 5000
CEOP - Child Exploitation Online Prevent	Search online

Procedures for dealing with concerns about a child

If you are concerned about a child's welfare, please record your concern, and any observations or conversation heard, and report to the DSL as soon as possible the same day. Do NOT conduct your own investigation. In circumstances such as an emergency or genuine concern that appropriate action has not been taken staff members may speak to Surrey SPA on **0300 470 9100 (9am-5pm Monday to Friday)** or outside of these hours call **01483 517898** to speak to the emergency duty team. Where there is concern for the child's immediate safety you should call Surrey Police on 999. Anyone can make a referral to Children's Services. Where a child resides in Sussex ring 01403 229900.

If your concerns relate to the actions or behaviour of a member of staff then you should report this to the Head (or the Chair of Governors if the concern relates to the Head or Head's household). The DfE statutory guidance in 'Keeping Children Safe in Education' (Sept 2026) and the Surrey County Council Procedures for managing allegations against staff will be followed.

I. Introduction

I.1 This policy has been developed in accordance with the principles established by the Children Acts (1989 and 2004), the Education Act (2002) and the Education and Skills Act (2008), and in line with government publications: 'Working Together to Safeguard Children' (Mar 2026), 'Child Abuse Concerns: guide for practitioners' (March 2015). The guidance reflects 'Keeping Children Safe in Education' (Sept 2026), Surrey Safeguarding Children Partnership (SSCP) Child Protection Procedures¹, 'Prevent Duty Guidance for England and Wales' (2023), Multi Agency Statutory Guidance on Female Genital Mutilation (April 2016) and 'Disqualification under the Childcare Act' (August 2018). 'Independent School Standard Regulations' (April 2019). 'Information Sharing advice for safeguarding practitioners' September 2026. 'The Prevent Duty: Departmental Advice for Schools and Child-minders' (June 2015). 'Mental Health and Behaviour in Schools' (November 2016). 'Counselling in School: A Blueprint for the Future' (March 2015). Child Sexual Exploitation: Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation (Feb 2017). 'Voyeurism (Offences) Act' (2019). Surrey Safeguarding Effective Family Resilience Surrey (Dec 2020). RSE and Health Education statutory guidance (Sept 2026), Working Together to Improve School Attendance (2026). Use of Reasonable Force in Schools (July 23). Early Years Foundation Stage Statutory Framework for group and School based Providers (Sept 2026)

I.2 The Governing Body takes seriously its responsibility to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within our school to identify, assess, and support those children who are suffering harm.

I.3 We recognise that all adults, including temporary staff², volunteers and governors, have a full and active part to play in protecting our pupils from harm, and that the child's welfare is our paramount concern.

I.4 All staff believe that Duke of Kent School should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child.

I.5 This Policy has been authorised by the Governing Body; its procedures apply wherever staff, governors or volunteers are working with pupils even where this is away from the School, for example an educational visit; and also applies to the Early Years Foundation Stage (EYFS) provision.

I.6 The aims of this Policy are:

- to support the child's development in ways that will foster security, confidence and independence;
- to provide an environment in which children and young people feel safe, secure, valued and respected, and feel confident, and know how to approach adults if they are in difficulties, believing they will be effectively listened to;

¹ The SSCP Child protection Procedures are only available online at <https://surreyscb.procedures.org.uk/>

² Wherever the word "staff" is used, it covers ALL staff on site, including ancillary supply and self employed staff, contractors, volunteers working with children etc, and governors

- to raise the awareness of all teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse (see Appendix 1);
- to provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we, the school, contribute to assessments of need and support packages for those children;
- to emphasise the need for good levels of communication between all members of staff;
- to develop a structured procedure within the school which will be followed by all members of the school community in cases of suspected abuse;
- to develop and promote effective working relationships with other agencies, especially the Police and Children's Services; and
- to ensure that all staff working within our school who have access to children have been checked as to their suitability, including a verification of their identity, qualifications, a satisfactory Disclosure and Barring Service (DBS) check (according to guidance) is completed. A central record is kept for audit.

2. **Responsibilities and Training**

All School Staff:

Have a key role to play in identifying concerns early and in providing help for children. To achieve this they will:

- Provide a safe environment in which children can learn.
- Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to.
- Create a culture where children who identify as lesbian, gay, bisexual, or are questioning their gender feel safe, can speak out and share concerns.
- Ensure children know that there are adults in the school who they can approach if they are worried or have concerns
- Ensure all staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Ensure that only appropriately trained professionals will attempt to make a diagnosis of a mental health problem.
- Be well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- Be able to recognise where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff are aware of how these children's experiences can impact on their mental health, behaviour and education.
- Be able to recognise when a child has a mental health concern, then following our child protection policy and procedure and speaking to the designated safeguarding lead or a deputy.
- Plan opportunities within the curriculum for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe.

- Attend training in order to be aware of and alert to the signs of abuse.
- Maintain an attitude of “it could happen here” with regards to safeguarding.
- Know how to respond to a pupil who discloses harm or abuse following training of ‘Working together to Safeguard Children’, and ‘What to do if you are worried a child is being Abused’ (2015)
- Record their concerns if they are worried that a child is being abused and report these to the DSL immediately that day. If the DSL is not contactable immediately a Deputy DSL should be informed.
- Be prepared to refer directly to the Children’s Single Point of Access (C-SPA) and the police if appropriate. We understand that we have a pivotal role to play in multi-agency safeguarding arrangements. All staff and governors ensure that the school or college contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children, if there is a risk of significant harm and the DSL or their Deputy is not available.
- Follow the allegations procedures if the disclosure is an allegation against a member of staff.
- Follow the procedures set out by the Surrey Safeguarding Children Partnership and take account of guidance issued by the Department for Education.
- Provide support for children subject to Early Help, Child in Need or Child Protection that is in keeping with their plan.
- Treat information with confidentiality but never promising to “keep a secret”
- Notify the DSL or their Deputy of any child on a child protection plan or child in need plan who has unexplained absence
- Report low-level concerns (as defined in KCSiE 2026) about any member of staff or contractor to the Head.
- Have an understanding of early help and be prepared to identify and support children who may benefit from early help.
- Will identify children who may benefit from early help (see section 7.12), liaising with the DSL in the first instance. (Options may include managing support for the child internally via the school’s pastoral support process or an early help assessment). In some circumstances it may be appropriate for a member of school staff to act as the lead professional in early help cases.
- Liaise with other agencies that support pupils and provide early help.
- Know who the DSL and Deputy DSL are and know how to contact them.
- Have an awareness of the role of the DSL, the school’s Child Protection Policy, Behaviour Policy and Staff Code of Conduct, and procedures relating to the safeguarding response for children who go missing from education.
- Understand the expectations, applicable roles and responsibilities, in relation to filtering and monitoring. Staff are briefed on their roles in INSET updates.
- Be mindful that the Teacher Standards states that teachers should safeguard children’s wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- Assist the Governing Body and Head in fulfilling their safeguarding responsibilities set out in legislation and statutory guidance.

2.1 We will ensure that:

All members of the Governing Body understand and fulfil their responsibilities, namely to ensure that:

- There is a Child Protection Policy together with a staff behaviour (code of conduct) policy and that these are fully implemented;
- There is a Recruitment, Selection and Disclosure Policy and Procedure;
- The School complies with the 'Disqualification under the Childcare Act 2006' guidance issued in August 2018;
- The school operates safer recruitment procedures, and the member of SLT involved in recruitment and at least one member of the Governing Body have complete safer recruitment training, which is repeated every 5 years
- The School has procedures (set out in Appendix 2); for members of staff and volunteers who suspect or hear a complaint of abuse
- The School has procedures for dealing with allegations of abuse against staff and volunteers, the Head and the DSL (set out in Employment Manual and Section 5);
- The School has procedures for dealing with e-safety concerns (set out in Appendix 5 and the e-safety policy);
- A referral to the DBS is made if any person (whether employed, contracted, a volunteer or student) in regulated activity has been dismissed or removed from working (whether paid or unpaid) due to safeguarding concerns (whether they have harmed, or have posed a risk of harm to a child), or would have been had they not resigned;³
- A referral to the Teacher Regulation Agency is considered where a teacher has been dismissed for misconduct, or would have been dismissed had he/she not resigned first.
- A member of the Senior Leadership Team has been appointed as the DSL; they will be approved by the Governors and they will ensure they have sufficient time to fulfil their duties. The key activities of the role of the DSL are outlined in section 3 and are approved by the Governors.
- The DSL (and deputies) undertake inter-agency training (SSCP Modules 1&2 or formerly the 2 day Inter Agency Course) and also undertake DSL 'New to Role' and the 'Update' Course every two years, Prevent Training and any other appropriate training in order to:
 - Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
 - Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
 - Ensure each member of staff has access to and understands the School's child protection policy and procedures, especially new and part time staff;
 - Be alert to the specific needs of children in need, those with special educational needs and young carers;
 - Be able to keep detailed, accurate, secure written records of concerns and referrals;
 - Obtain access to resources and attend any relevant or refresher training courses;

³ Contact the LADO for guidance in any case.

- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them and to meet the requirements and procedures of the SSCP;
- All other staff have safeguarding training updated regularly and as appropriate to their roles and in accordance with the requirements of the SSCP. Prevent, FGM and Online Safety awareness training will be part of this. They will be provided with updates to their training termly.
- Staff are updated regularly by e mail and in scheduled meetings about current safeguarding topics.
- Any weaknesses in child protection are remedied immediately;
- In accordance with Working Together to Safeguard Children, a member of the Governing Body is appointed to take leadership responsibility for the School's safeguarding arrangements (the Nominated Governor); That Governor, when visiting the school will ensure the policy is in practice through conversations with members of the wider school staff.
- Child protection policies and procedures are reviewed annually (or when new safeguarding issues emerge and when new lessons are learnt) and that the Child Protection Policy is available on the school website;
- The Governing Body considers how children may be taught about safeguarding, for example through use of online resources, through a broad and balanced curriculum and personal social health education (PSHE), together with guidance on adjusting behaviour to reduce risks including the safe use of electronic devices and the internet, building resilience to protect themselves and their peers, and information about who they should turn to for help (see also the School's policy on the acceptable use of IT and e-safety);
- The School be alert to the needs of children with physical and mental health conditions;
- That enhanced DBS checks are in place for all members of the Governing Body; and
- The School follows the local inter-agency procedures of the SSCP.

2.2 In addition to the roles and responsibility of all staff, the Head teacher will support the DSL in ensuring that:

- The Child Protection and Safeguarding Policy and procedures are implemented and followed by all staff.
- All staff are aware of the role of the DSL, including the identity of the DSL and any deputies.
- Sufficient time, training, support, funding, resources, including cover arrangements where necessary, is allocated to the DSL to carry out their role effectively, including the provision of advice and support to school staff on child welfare and child protection matters, to take part in strategy discussions/meetings and other inter-agency meetings and/or support other staff to do so; and to contribute to the assessment of children.
- That opportunities are provided for a co-ordinated offer of early help when additional needs of children are identified.
- Deputy DSLs are trained to the same standard as the DSL and the role is explicit in their job description.
- Adequate and appropriate DSL cover arrangements are in place for any out of hours/out of term activities.

- Where there is a safeguarding concern that the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Child-centred systems and processes are in place for children to express their views and give feedback.
- All staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle-blowing procedures.
- Pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.
- That allegations or concerns against staff are dealt with in accordance with guidance from the Department for Education (DfE), Children's Safeguarding Partnership (CSP) and Surrey County Council (SCC).
- That statutory requirements are met to make a referral to the Disclosure and Barring Service and additionally in the case of teaching staff the Teacher Regulation Agency where they think an individual has engaged in conduct that harmed (or is likely to harm) a child; or if the person otherwise poses a risk of harm to a child.
- Record 'low-level concerns' reported by staff via the DSL. The record should include details of the concern, the context in which it arose, and the action taken. The name of the person raising the concern should also be noted. These should be kept in accordance with GDPR regulations.

2.3 All members of staff, volunteers, and governors know how to respond to a pupil who discloses abuse through delivery of 'Working together to Safeguard Children' (2026), regular staff training and 'What to do if you suspect a Child is being Abused' (2015).

2.4 All parents/carers are made aware of the responsibilities of staff members with regard to child protection procedures through publication of the school's Safeguarding (Child Protection) Policy.

2.5 Community users organising activities for children are aware of the School's child protection guidelines and procedures. See 5.14.

2.6 The name of the designated members of staff for Child Protection, the DSL and deputies, will be clearly advertised in the school, together with photos and with a statement explaining the school's role in referring and monitoring cases of suspected abuse.

2.7 All staff are particularly reminded that:

- teachers must report to the police cases where they discover that an act of female genital mutilation (FGM) appears to have been carried out. Unless the teacher has a good reason not to, they should still consider and discuss any such case with DSL and involve Children's Services as appropriate;
- normal referral processes must be used when there are concerns about children who may be at risk of being drawn into terrorism; and
- anybody can make a referral to Surrey's Children Services. If, at any point, there is a risk of immediate serious harm to a child then a referral must be made.

2.8 Staff Training:

- All staff will have read Part I of 'Keeping Children Safe in Education' (Sept 2026). They complete an online form to demonstrate they have read it alongside a quiz to test their understanding.. Staff who are unable to access the material will be seen by the DSL to disseminate the information in the document. Each time 'Keeping Children Safe in Education' is updated staff will be informed of the changes, given a new copy and asked to sign they have read and understood the changes.
- The DSL will receive child protection training updates at least every two years.
- The DSL will have enhanced training on PREVENT run by the local LA.
- Deputy DSLs will be trained to the same level as the DSL.
- Staff will be trained in child protection regularly. This will be through INSET training. All teaching staff complete an online course on: PREVENT, FGM, Online Safety and CSE.
- Additionally, the school will make assessment of the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as radicalization, CSE, FGM, online safety and mental health.
- All other staff and governors have child protection updates provided by the DSL as appropriate. New Governors will receive safeguarding induction training.
- Regular staff training is supplemented through updates in staff meetings. Any other key updates will be disseminated through email.
- All new staff receive and sign to acknowledge they have read the following documents or received the following training and understood it:
 - Child Protection Policy (inc. PREVENT) and relevant documents (inc. E-Safety (Cyberbullying), Anti Bullying,
 - Staff Code of Conduct
 - Whistleblowing procedure
 - AUP for Technology
 - Most recent copy of 'Keeping Children Safe' Part I
 - Training from a member of the Safeguarding Team based around SSB's most recent version of 'Working Together to Safeguard Children' (inc. identity and contact details of DSL and Deputy DSLs, Children Missing in Education, Surrey Safeguarding procedures)
 - Pupil Behaviour Policy
 - Children Missing in Education Procedures
 - Children Absent from Education

* These documents will either be provided on paper or electronically.

3. The Role of the DSL (and Deputies)

3.1 Responsibilities of the DSL and Deputy DSLs:

- Referring to:

- ☐ The Children's Single Point of Access (C-SPA). Referrals should be made in writing, following a telephone call using the Multi Agency Referral Form (MARF);⁴
- ☐ Surrey CPS to seek advice and support
- ☐ The DBS where a member of staff is dismissed or has left due to risk / harm to a child; and / or
- ☐ The police where a crime may have been committed;
- ☐ The TRA, in consultation with the Head, in cases involving members of staff;
- Keeping written records of concerns about a child even if there is no need to make an immediate referral;
- Make an immediate risk assessment when a report of sexual violence has been reported. Additionally, consider a risk assessment for reports of sexual harassment (considered on a case by case basis).
- Liaising with the Head, updating about safeguarding issues;
- Ensuring that all such records are kept confidentially and securely and are separate from pupil records
- Where pupils leave School ensure their CP file is transferred to the new school or college as soon as possible. It should be transferred separately from the main pupil file. The DSL may discuss with the child's new school so support can be in place from Day 1 at their new school.
- Ensuring that an indication of the existence of the child protection file is marked on the pupil records;
- Liaising with other agencies and professionals;
- Ensuring that either they or the staff member attend case conferences, core groups, or other multi-agency planning meetings, contribute to assessments, and provide a report which has been shared with the parents;
- Ensuring that any pupil currently with a child protection plan who is absent in the educational setting without explanation for two days is referred to their key worker's Children's Services Team;
- Organising child protection induction and, update training for all school staff regularly , delivering SSCP's 'Working Together to Safeguard Children'; and in line with SSCP procedures
- Co-ordinate the online safety provision within the school (more information in the Online Safety Policy)
- Providing the full Governing Body with an annual report (every Summer Term Governors' Meeting); following a review compiled by the Safeguarding Governor and DSL.
- Providing annual updates and safeguarding workshops for the Board of Governors in the Autumn Term Governors' Meeting;
- Understanding the filtering and monitoring systems in place in the school
- Raising awareness of safeguarding issues:
 - ☐ Ensuring this Policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with the Head and the Governing Body regarding this;
 - ☐ Ensuring this Policy is available publicly, and that every January a copy of the School's Child Protection Statement is sent out to all staff;

⁴ Online forms will be e-mailed from the Children's Services Area RAIS Team

- ☐ Ensuring that parents are aware that referrals about suspected abuse or neglect may be made to Surrey's Children's Services and the School's role in this; and
 - ☐ Maintaining links with the SSCP to ensure staff are aware of training opportunities and the local policies on safeguarding;
- In accordance with the 'Prevent Duty Guidance for England and Wales and Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism' 2015:
 - ☐ Acting as the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies in all matters relating to the Prevent duty;
 - ☐ Coordinating Prevent duty procedures in the School;
 - ☐ Liaising with local Prevent coordinators, the police and local authorities and through existing multi-agency forums, including referrals to the Channel Police Practitioner and/or the police where indicated;
 - ☐ Undergoing WRAP or other appropriate training;
 - ☐ Maintaining ongoing training programme for all school employees including induction training for all new employees and keeping records of staff training; and
 - ☐ Monitoring the keeping, confidentiality and storage of records in relation to the Prevent duty.
- Acting as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies;
- Meet all other responsibilities outlined for DSLs in [KCSiE – Annex C](#)

4. Supporting Children

4.1 We recognise that a child who is abused or witnesses violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self worth.

4.2 We recognise that the school may provide the only stability in the lives of children who have been abused or who are at risk of harm.

4.3 We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

4.4 Where a pupil has not suffered and is not likely to suffer significant harm but is in need of additional support from one or more agencies, the DSL will liaise with Surrey Children's Services or Early Help Services and where appropriate an inter-agency assessment will take place, including use of the Common Assessment Framework and Team around the Child approaches, as necessary. Decisions to seek such support for a pupil will be taken in consultation with parents unless there are reasonable grounds for suspecting that in doing so, the pupil will be at risk of significant harm.

4.5 Our school will support all children by:

- encouraging self-esteem and self-assertiveness, through the curriculum as well as our relationships, whilst not condoning aggression or bullying;

- promoting a caring, safe and positive environment within the school;
- liaising and working together with all other support services and those agencies involved in the safeguarding of children;
- notifying Children's Services as soon as there is a significant concern;
- providing continuing support to a child about whom there have been concerns who leaves the school by ensuring that appropriate information is copied under confidential cover to the child's new setting and ensuring the school medical records are forwarded as a matter of priority;
- ensuring allegations against pupils are reported in accordance with the procedures set out in this Policy.
- When dealing with abuse by one or more pupils against another pupil when there is reasonable cause to suspect that a child is suffering or is likely to suffer significant harm the School will refer to Children's Services on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse. It is expected that when there is a disclosure of pupil on pupil abuse all children including the perpetrator are treated as being 'at risk'. The School's policies on behaviour, bullying, discipline and sanctions will also apply.
- A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation if it is considered to be in the interests of a child who might otherwise be at risk, in the interests of the pupils at large, in the best interests of the pupil against whom the allegation has been made or to allow the investigation to proceed more effectively.
- Taking into account contextual safeguarding considerations. More information about contextual safeguarding can be found here: <https://www.contextualsafeguarding.org.uk/>

4.6 The school recognises the particular vulnerabilities of children with SEN/D. Staff are aware of those with SEND needs at the start of each academic year and there is an updated list in the staffroom. The school recognises that additional barriers can exist when recognising abuse and neglect for those children with SEND. These can include: assumptions that indicators of possible abuse such as behaviour, mood and injury related to the child's condition without further exploration; these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children; the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; communication barriers and difficulties in managing or reporting these challenges; and cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school.

4.7 To ensure that all of our pupils receive equal protection we will give special consideration to children who are;

- Disabled or have special educational needs
- Young carers
- Affected by parental substance misuse, domestic abuse or parental mental health needs
- Asylum seekers
- Living away from home
- Vulnerable to being bullied or engaged in bullying
- Already viewed as a 'problem'

- Living in temporary accommodation
- Live transient lifestyles
- Living in chaotic and unsupportive home situations
- Vulnerable to discrimination on the grounds of race, ethnicity, religion, disability or sexuality
- At risk of sexual exploitation
- Do not have English as a first language
- At risk of female genital mutilation
- At risk of forced marriage
- At risk of being drawn into extremism.

4.8 The DSL of the school is the designated person to promote the educational achievement of children looked after.

4.9 **Violence Against Women and Girls, Misogyny and Misandry** The school recognises violence against women and girls (VAWG), misogyny and gender-based violence as safeguarding concerns.

The school will challenge misogynistic, misandrist, sexist, degrading or discriminatory attitudes and behaviours where they arise and will provide age-appropriate education that promotes healthy relationships, respect, equality, consent and appropriate boundaries.

Staff will remain alert to online and offline behaviours, language, content and attitudes that may indicate misogyny, misandry, sexual harassment, extremist or harmful gender-based ideologies.

Concerns will be considered within the wider safeguarding context, including the possibility of links to harmful sexual behaviour, sexual violence, exploitation, radicalisation or other forms of abuse.

5. Staff: Supporting and Allegations Against

5.1 We recognise that staff working in the school who have become involved with a child who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting.

5.2 We will support such staff by providing an opportunity to talk through their anxieties with the DSLs and to seek further support as appropriate.

5.3 All school staff should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.

5.4 The School will follow the Guidance given in Part 4 of 'Keeping Children Safe in Education' Sept 2026.

5.5 There is a Code of Conduct applicable to all staff. Guidance about conduct and safe practice, including safe use of mobile phones and social media by staff and volunteers is given at induction.

Staff are required to sign that they have received and read the Staff Code of Conduct. This happens annually for all staff.

5.6 We understand that a pupil may make an allegation against a member of staff or staff may have concerns about another staff member.

5.7 If such an allegation is made, or information is received which suggests that a person may be unsuitable to work with children for the following reasons:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children
- behaved or been involved in an incident outside of a setting which did not involve children but could impact on their suitability to work with children

the member of staff receiving the allegation or aware of the information, will immediately inform the Headteacher.

5.8 The Headteacher on all such occasions will discuss the content of the allegation with the Local Authority Designated Officer (LADO) at the earliest opportunity and before taking any further action.

5.9 If the allegation made to a member of staff concerns the Headteacher, the person receiving the allegation will immediately inform the Chair of Governors/ who will consult the LADO without notifying the Headteacher first.

5.10 Suspension of the member of staff, excluding the Headteacher, against whom an allegation has been made, needs careful consideration, and the Headteacher will seek the advice of the LADO and relevant external agencies.

5.11 If the allegation does not meet the threshold for an allegation but rather a low-level concern, the Head will collect as much evidence as possible from the person who raises the concern, witnesses and the individual involved. Should a pattern of low level concerns arise against a member of staff, they may be escalated to an allegation and the LADO consulted. Appendix 8 outlines the distinction between allegations and low-level concerns and further information on how these are dealt with.

5.12 Consideration is given to the legal duty to make a referral to the Disclosure and Barring Service (DBS) where a teacher has been dismissed (or would have been dismissed had he or she not resigned) due to safeguarding concerns and a prohibition order may be appropriate, because of 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute', or a

'conviction at any time for a relevant offence'. Cases of professional misconduct will be referred to the Teacher Regulation Agency (TRA) via the Department for Education.

5.13 In the event of an allegation against the Headteacher, the decision to suspend will be made by the Chair of Governors who will seek advice of the LADO and relevant external agencies.

5.14 Should an allegation against an outside individual or organisation be made while using the school premises, we will follow our safeguarding procedures and policies, including informing the LADO.

5.15 Where the allegation is in relation to a member of supply staff or trainee teacher, the school will inform the agency/teacher training provider of the process for managing allegations and ensure they are fully involved in enquiries.

6. Confidentiality and Whistleblowing

6.1 We recognise that all matters relating to child protection are confidential

6.2 The Head or DSLs will disclose any information about a child to other members of staff on a need to know basis only.⁵

6.3 All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

6.4 All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing.

6.5 We will always undertake to share our intention to refer a child to Children's Services with their parents /carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation. If in doubt, we will consult with an Assistant Team Manager at the Children's Services Area Team on this point.

6.6 Whistleblowing

Staff should be aware that there is a separate whistleblowing Policy in the School Employment Manual, available on the Staff Google Drive and whistleblowing is referred to in the Staff Code Of Conduct. Duke of Kent School values a culture of safety and raising concerns. We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so. All staff should be aware of their duty to raise concerns, where they exist, about the management of Child Protection, which may include the attitude or actions of colleagues. If it becomes necessary to consult outside the school, they should speak in the first instance to the LADO. Staff and volunteers

⁵ Guidance about sharing information, can be found in the DfE advice '

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1062969/Information_sharing_advice_practitioners_safeguarding_services.pdf

should also feel able to follow the School's whistleblowing Policy to raise concerns about poor or unsafe safeguarding practices at the School, potential failures by the School or its staff to properly safeguard the welfare of pupils or other wrongdoing in the workplace that does not involve the safeguarding and welfare of children. whistleblowing in relation to the Head or Head's household should be made to the Chair of the Governing Body. Staff are given an annual briefing of the whistleblowing Policy, in the Autumn Term. If staff feel they cannot raise their issue with the school, or feel their concerns are not being addressed, they can ring the NSPCC Whistleblowing Helpline on 0800 0280285.

7. Child Protection Procedures

7.1 Abuse and neglect are forms 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 the family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or by another child or children.

7.2 Further information about the four categories of abuse; physical, emotional, sexual and neglect, and indicators that a child may be being abused can be found in appendix I

7.3 Any child in any family in any school could become a victim of abuse. Staff should always maintain an attitude of “It could happen here”.

7.4 There are also a number of specific safeguarding concerns that we recognise our pupils may experience;

- Child missing from education (Section 16)
- Child absent from education (Section 16)
- Child missing from home or care (Section 16)
- Child sexual exploitation (CSE) (Section 13 and Appendix I)
- Bullying including cyberbullying (Section 10)
- Domestic abuse (Section 12 and Appendix I)
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM) (Section 14 and Appendix I)
- Forced marriage (Section 14 and Appendix I)
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Mental health
- Private fostering
- Radicalisation (Section 11 and Appendix 6)
- Nudes and semi-nudes (sexting) (Section 15)
- Teenage relationship abuse
- Trafficking
- Child on child abuse (Section 8)

7.5 We also recognise that abuse, neglect and safeguarding issues are complex and are rarely standalone events that can be covered by one definition or label. Staff are aware that in most cases multiple issues will overlap one another.

Procedures

7.6 If staff notice any indicators of abuse/neglect or signs that a child may be experiencing a safeguarding issue they should record these concerns and pass it to the DSL or DSL Deputies. They

may also discuss their concerns in person with the DSL or DSL Deputies but the details of the concern should also be recorded in writing

7.7 There will be occasions when staff may suspect that a pupil may be at risk, but have no 'real' evidence. The pupil's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical or inconclusive signs may have been noticed. Duke of Kent School recognises that the signs may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill or an accident has occurred. However, they may also indicate a child is being abused or is in need of safeguarding. In these circumstances staff will try to give the child the opportunity to talk. It is fine for staff to ask the pupil if they are OK or if they can help in any way.

7.8 The Safeguarding Team will record and log any incident brought to them on the school's MyConcern account. MyConcern has passed the school's checks regarding GDPR and data information management. The Safeguarding Team will use the schools 'Flow Chart for Raising Safeguarding Concerns about a Child' found in Appendix 2.

7.9 If a pupil discloses to a member of staff:

- We recognise that it takes a lot of courage for a child to disclose they are being abused. They may feel ashamed, guilty or scared, their abuser may have threatened that something will happen if they tell, they may have lost all trust in adults or believe that what has happened is their fault. Sometimes they may not be aware that what is happening is abuse.
- A child who makes a disclosure may have to tell their story on a number of subsequent occasions to the police and/or social workers. Therefore, it is vital that their first experience of talking to a trusted adult is a positive one.

During their conversation with the pupil staff will;

- Listen to what the child has to say and allow them to speak freely
- Remain calm and not overact or act shocked or disgusted – the pupil may stop talking if they feel they are upsetting the listener
- Reassure the child that it is not their fault and that they have done the right thing in telling someone
- Not be afraid of silences – staff must remember how difficult it is for the pupil and allow them time to talk
- Take what the child is disclosing seriously
- Ask open questions and avoid asking leading questions
- Avoid jumping to conclusions, speculation or make accusations
- Not automatically offer any physical touch as comfort. It may be anything but comforting to a child who is being abused.
- Avoid admonishing the child for not disclosing sooner. Saying things such as 'I do wish you had told me about it when it started' may be the staff member's way of being supportive but may be interpreted by the child to mean they have done something wrong.
- Tell the child what will happen next.

If a pupil talks to any member of staff about any risks to their safety or wellbeing the staff member will let the child know that they will have to pass the information on – staff are not allowed to keep secrets.

The member of staff should write up their conversation as soon as possible in the child's own words. Staff should make this a matter of priority. The record should be signed and dated, the member of staff's name should be printed and it should also detail where the disclosure was made and who else was present. The record should be handed to the DSL.

Sometimes a child may not feel ready to make a disclosure about being abused, neglected, exploited or they may not recognise their experiences as harmful. The school will work to ensure that the child is still supported and offered a safe environment and positive relationships to disclose when they feel ready.

Further guidance can be found in Appendix 2 – this contains a flowchart of concerns and Surrey's guidance, including the '7 Rs' and the 'Surrey Effective Family Resilience Windscreen.

7.10 Notifying Parents:

- The School will normally seek to discuss any concerns about a pupil with their parents. This must be handled sensitively and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure.
- However, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care.
- Where there are concerns about forced marriage or honour based violence parents should not be informed a referral is being made as to do so may place the child at a significantly increased risk.

7.11 Making a referral:

- Concerns about a child or a disclosure should be discussed with the DSL who will help decide whether a referral to children's social care, early help or other support is appropriate in accordance with Surrey Safeguarding Effective Family Resilience Surrey (2019)⁶.
- If a referral is needed then the DSL should make it. However, anyone can make a referral and if for any reason a staff member thinks a referral is appropriate and one hasn't been made they can and should consider making a referral themselves.

6

<https://surreyscp.org.uk/wp-content/uploads/2021/04/Effective-family-resilience-SSCP-Dec-2020-v7-1.pdf>

- The child (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.
- If after a referral the child's situation does not appear to be improving the designated safeguarding lead (or the person that made the referral) should press for re-consideration to ensure their concerns have been addressed, and most importantly the child's situation improves.
- If a child is in immediate danger or is at risk of harm a referral should be made to children's social care and/or the police immediately. Anybody can make a referral.
- Where referrals are not made by the DSL, the DSL should be informed as soon as possible.

7.12 Early Help

We recognise that Duke of Kent School may provide the only stability in the lives of children who have been abused or who are at risk of harm. There is a distinction between having a concern about a child and a child in immediate danger or at risk of harm. Appropriate action must be taken in all instances, with early help being put in place whenever necessary.

Staff are aware of the local Early Help processes, Universal Services and that the DSL will take the lead in any cases. We realise that those who may benefit from early Early Help will include students who:

- Is disabled or has specific additional needs
- Has special educational needs
- Is a young carer
- Is showing signs of being drawn in to anti-social or criminal behaviour
- Is frequently missing / goes missing from care or from home
- Is at risk of modern slavery, trafficking or exploitation
- Is at risk of being radicalized or exploited
- Is in a family circumstance presenting challenges for the child such as alcohol misuse, drug misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol themselves
- Has returned home to their family from care
- Is a privately fostered child

An Early Help assessment, when required, will be carried out by the DSL with the agreement of parents or carers. It will ensure the child's wishes and needs form the central part of the assessment.

Early Help with other local practitioners will be well accessed should it be required.

7.13 Dealing with Self Harm

School staff may become aware of warning signs which indicate a student is experiencing difficulties that may lead to thoughts of self-harm or suicide. These warning signs should always be taken seriously and staff observing any of these warning signs should seek further advice from one of the

designated teachers for safeguarding. Definitions, risk factors, warning signs and a 'What to do if staff suspect self harm or a child discloses self harm' flow chart can be found in Appendix 3.

7.14 Mental Health

School staff may have a concern over the mental health of a child. In this instance, it should be treated as a safeguarding concern and referred to the DSL or a Deputy DSL. The Safeguarding Procedures of the school (listed above) will then be followed.

Staff are aware that a mental health concern can develop into a safeguarding concern, however they are also aware that they should only be diagnosed by a trained professional.

While not every mental health concern is a safeguarding issue, certain behaviours should prompt safeguarding consideration, including:

- Self-harm
- Suicidal thoughts
- Eating disorders
- Significant behavioural changes
- Withdrawal from normal activities
- Sleep difficulties linked to wellbeing concerns

Please see Appendix 9 for further information on Mental Health.

7.15 Extended school and off-site arrangements

Where extended school activities are provided and managed by the school, our own safeguarding and child protection policy and procedures apply. When our children attend off-site activities, we will ensure that effective child protection arrangements, informed by thorough risk assessments, are in place.

When our children attend an alternative provision provider, we continue to be responsible for their safety and wellbeing. We will satisfy ourselves that the placement can meet the child's needs and obtain written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. checks that we would otherwise perform on our own staff. This includes written confirmation that the alternative provider will inform us of any arrangements that may put the child at risk (i.e. staff changes), so that we can ensure ourselves that appropriate safeguarding checks have been carried out on new staff. We will always know where a child is based during school hours. This includes having a record of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. We will regularly review the alternative provision placements we make. Reviews will be at least half termly to provide assurance that the child is regularly attending, and the placement continues to be safe and meets the child's needs. Where safeguarding concerns arise, the placement will be immediately reviewed, and

terminated, if necessary, unless or until those concerns have been satisfactorily addressed. We follow the statutory guidance for alternative provision.

Where a parent/carer expresses their intention to educate their child at home (also known as elective home education), we will work together with the parent/carer and other professionals to ensure that this decision has been made in the best interests of the child. We recognise that this is particularly relevant for children who have SEND, are vulnerable and/or have a social worker.

7.16 Gender

Duke of Kent School recognises that some children and young people may question their gender and may require support, understanding and careful consideration. The welfare, wellbeing and safeguarding of the child will always be the primary consideration in any decision-making. Responses will be individualised and based on the child's age, needs, wishes, circumstances and best interests. Staff will listen respectfully, respond sensitively and avoid making assumptions, while remaining alert to any safeguarding concerns, vulnerabilities, mental health needs, bullying, online harms or other risks that may affect the child.

We will normally work in partnership with parents/carers when supporting a child who is questioning their gender. However, where involving parents/carers could place a child at risk of significant harm, appropriate safeguarding procedures will be followed, and advice will be sought from the DSL. Any requests relating to social transition or other significant changes will be considered carefully on a case-by-case basis, with decisions informed by safeguarding considerations, professional judgement and, where appropriate, advice from relevant agencies. The school will take all reasonable steps to protect children who are questioning their gender from bullying, harassment, discrimination, abuse and victimisation and will maintain appropriate records of concerns, decisions and support arrangements.

Sport:

As children get older, some sports are typically taught and played in single-sex groups. The Equality Act 2010 contains an exception in relation to single-sex sport whereby we can separate children according to their biological sex without discriminating lawfully against them where physical strength, stamina or physique of the average girl would put her at a disadvantage in competition with the average boy (or vice versa) or to ensure safety. Where there are no safety concerns and a child makes a request relating to how they participate, we will consider the request in light of the advice on “considering requests for support with social transition”

Toilets:

We do not allow children into toilets designated for the opposite biological sex. Separate toilets are provided for boys and girls aged 8 and over. Should a child not want to use the toilet designated for their biological sex, we will consider whether we can provide an alternative toilet facility which will not compromise the safety, comfort, privacy or dignity of the child or of other children. All such requests will be recorded, communicated and reviewed regularly.

Changing Rooms and Showers:

We will not allow children aged 11 years or older at the start of the school year to undress in front of a child of the opposite biological sex. When responding to a request to support any degree of social transition we will not allow access to changing rooms designated for the opposite sex.

We provide suitable changing accommodation and showers for pupils aged 11 years or over at the start of the school year having regard for their age, numbers and sex and any special requirements they may have. Should a child not want to use the changing rooms and showers designated for their sex, we will consider whether we can provide an alternative changing or washing facility without compromising the provision of single-sex facilities. All such requests will be recorded, communicated and reviewed regularly.

8. Child on Child

8.1 In most instances, the conduct of pupils towards each other will be covered by our behaviour policy. However, some allegations may be of such a serious nature that they may raise safeguarding concerns. Duke of Kent School recognises that children are capable of abusing their peers. It will not be passed off as 'banter' or 'part of growing up' and the school has a zero tolerance approach to child on child abuse. The forms of child on child abuse are, but not limited to:

- Domestic abuse – an incident or pattern of actual or threatened acts of physical, sexual, financial and/or emotional abuse, perpetrated by an adolescent against a current or former dating partner regardless of gender or sexuality.
- Child Sexual Exploitation – children under the age of 18 may be sexually abused in the context of exploitative relationships, contexts and situations by peers who are also under 18.
- Sexual Harassment, Harmful Sexual Behaviour and Violence – Children and young people presenting with sexual behaviours that are outside of developmentally 'normative' parameters and harmful to themselves and others (For more information, please see Brook Traffic Light Tool: <https://www.brook.org.uk/our-work/category/sexual-behaviours-traffic-light-tool>).
- Serious Youth Violence – Any offence of most serious violence or weapon enabled crime, where the victim is aged 1-19' i.e. murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. 'Youth violence' is defined in the same way, but also includes assault with injury offences.
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks for sexual gratification, or to cause humiliation or distress. Upskirting is now a criminal offence.
- Initiation and hazing type rituals.
- Physical abuse: hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- Bullying: including cyber-bullying, prejudiced-based and discriminatory bullying
- Abuse in intimate personal relationships between peers, consensual and non-consensual sharing of nude and semi-nude images or videos, causing someone to engage in sexual

activity without consent (such as forcing someone to strip, touch themselves sexually or to engage in sexual activity with a third party)

- coercive or controlling behaviour
- exploitation
- discriminatory or derogatory behaviour
- violence connected with serious violence, gangs or criminal exploitation.

8.2 The term child-on-child abuse can refer to all of these definitions and a child may experience one or multiple facets of abuse at any one time. Therefore, our response will cut across these definitions and capture the complex web of their experiences. There are also different gender issues that can be prevalent when dealing with child on child abuse (i.e. girls being sexually touched/assaulted or boys being subjected to initiation/hazing type violence). Duke of Kent School aims to reduce the likelihood of child on child abuse through:

- the established ethos of respect, friendship, courtesy and kindness;
- high expectations of behaviour;
- clear consequences for unacceptable behaviour;
- providing a developmentally appropriate PSHE curriculum which develops pupils' understanding of healthy relationships, acceptable behaviour, consent and keeping themselves safe;
- systems for any pupil to raise concerns with staff, knowing that they will be listened to, valued and believed;

8.3 Research indicates that young people rarely disclose child on child abuse and that if they do, it is likely to be to their friends. Therefore, Duke of Kent School will also educate pupils in how to support their friends if they are concerned about them, that they should talk to a trusted adult in the school and what services they can contact for further advice. Any concerns, disclosures or allegations of child on child abuse in any form should be referred to the DSL using Duke of Kent school's child protection procedures as set out in this policy. Where a concern regarding child on child abuse has been disclosed to the DSL(s), advice and guidance will be sought from Children Social Care and where it is clear a crime has been committed or there is a risk of crime being committed the Police will be contacted. Just because there may be no reported cases, does not mean the child on child abuse is not happening.

8.4 Working with external agencies the school will respond to the unacceptable behaviour. If a pupil's behaviour negatively impacts on the safety and welfare of other pupils then safeguards will be put in place to promote the well-being of the pupils affected and the victim and perpetrator will be provided with support. Both the victim and perpetrator will have a Welfare Risk assessment put in place that will be reviewed regularly by designated support.

8.5 Allegations or child-on-child abuse may be from within or outside the school or online. All staff are encouraged to challenge abusive behaviours or seek support if they do not feel comfortable. Victims will be reassured that they are being taken seriously and that they will be supported and kept safe so that they will not be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and the victim will never be made to feel ashamed for making a report.

'Banter' will not be accepted as an excuse as this could lead to a culture of unacceptable behaviours and unsafe environments;

9. Sexual Violence and Sexual Harassment between Children

9.1 Duke of Kent realises the seriousness of allegations of sexual violence and sexual harassment between children. In the event of a disclosure involving sexual violence or sexual harassment, the school will follow the guidelines set out in the DfE document: Sexual Violence and Sexual Harassment between Children in Schools and Colleges (September 2021) – now incorporated to KCSiE (2026)

9.2 We use the Brook Traffic Light tool to assess and evaluate the sexual behaviour of students. The tool can be found at: <https://www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool>

9.3 The school recognises the recent 'Voyeurism (Offences) Act 2019 and will follow the guidance in the previously mentioned documents.

Further information on our procedures can be found in Appendix 7 – Sexual Violence and Sexual Harassment between Children in Schools.

10. Anti-Bullying, Cyber bullying, Generative AI and Online Safety

10.1 Our school policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. This includes all forms eg. cyber, racist, homophobic and gender related bullying. We keep a record of known bullying incidents. All staff are aware that children with SEND and / or differences/perceived differences are more susceptible to being bullied / victims of child abuse.

10.2 Our pupils increasingly use electronic equipment on a daily basis to access the internet and share content and images via social media sites. Unfortunately, some adults and other children use these technologies to harm children. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing children to engage in sexual behaviour such as webcam photography, face-to-face meetings, accessing misinformation and disinformation (including Fake News) and conspiracy theories. Pupils may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders. Duke of Kent School has an e-safety policy which explains how we try to keep pupils safe in school and how we respond to online safety incidents (See flowchart, 5). The policy includes further detail about the school's filtering systems and monitoring of usage by staff and pupils. Pupils are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated. The school online safety co-ordinator is Ben Monk.

10.3 Filtering and monitoring: The School will ensure systems to protect pupils are reviewed and improved and that the filtering methods selected are appropriate, effective and reasonable. If staff or

pupils come across unsuitable on-line materials, the site must be reported to the e- safety Coordinator. A log of any incidents may be useful to identify patterns and behaviours of the pupils. The school uses:

Upstream: Smoothwall

In-house: Smoothwall Granulated by age group to filter the content accessed on the school network.

The schools' filtering system manages the following content:

- Illegal Online Content
- Discrimination
- Drugs / Substance abuse
- Extremism
- Malware / Hacking
- Pornography
- Piracy and Copyright Theft
- Self-Harm
- Violence

The filtering system meets the following principles:

- Age Appropriate filtering
- Control of the filter
- Identification of individual users
- Ability to block content on Apps
- Applied at network level
- Has a reporting mechanism
- Can report on historical information on the websites visited by users

The school uses Smoothwall software to monitor students' online behaviours on school devices. The DSL and Online Safety coordinator receive an alert of any concerning keystrokes.

We will also follow the government's Plan technology for your school guidance to self-assess against the filtering and monitoring standards and receive personalised recommendations on how to meet them.

We will follow the government's Cyber security standards for schools and colleges guidance which were developed to help us improve our resilience against cyber-attacks.

10.4 The school recognises that artificial intelligence and generative AI can create new safeguarding risks as well as educational opportunities.

Online safeguarding arrangements will consider risks associated with:

- generative AI;
- AI-generated or manipulated images;
- deepfakes and deep nudes;
- online grooming and exploitation;
- sexual abuse and harassment;

- cyberbullying;
- harmful or extremist content;
- misinformation and harmful content;
- online fraud or financial exploitation;
- privacy and personal data;
- inappropriate contact with adults or unknown individuals; and
- the use of technology to facilitate abuse.

The school will provide age-appropriate education to help children understand online risks and develop the knowledge and skills required to use technology safely and responsibly.

11. Radicalisation, Extremism and Terrorism

11.1 Since 2010, when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people and families from violent extremism. There have been several occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

11.2 Duke of Kent School values freedom of speech and the expression of beliefs / ideology as fundamental rights underpinning our society's values. Both pupils/students and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

11.3 There are separate guidelines for visiting speakers which are issued to staff and speakers as appropriate to their role.

11.4 The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. Duke of Kent School is clear that this exploitation and radicalisation should be viewed as a safeguarding concern.

11.5 In the case that a pupil is identified as being at risk from radicalisation the level of level of risk will be considered to identify the most appropriate referral which may include Channel and Children's Services.

11.6 Definitions of radicalisation, extremism, terrorism and indicators of vulnerability to radicalisation are in Appendix 6.

11.7 Duke of Kent School seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

11.8 The Governing Body, the Head and the DSL will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessment may include, the use of school premises by external agencies, anti-bullying policy and other issues specific to the school's profile, community and philosophy. The School has undertaken a risk assessment under the Prevent Duty and this will be reviewed annually. This will be reviewed as part of the annual "Audit of Statutory Duties and Associated Responsibilities" in line with the local authority and the SSCP.

11.9 Response

When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL. They should then refer cases by e-mail to preventreferrals@surrey.pnn.police.uk using the PREVENT referral process and PREVENT referral form. If the matter is urgent then Surrey Police must be contacted by dialling 999. In non urgent cases where police advice is sought then dial 101. The Department of Education has also set up a dedicated telephone helpline and mailbox for non-emergency advice for staff and governors: 020 7340 7264 and counter-extremism@education.gsi.gov.uk.

Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most young people do not become involved in extremist action. For this reason the appropriate interventions in any particular case may not have any specific connection to the threat of radicalisation, for example they may address mental health, relationship or drug/alcohol issues.

11.10 Prevention

We recognise that the School plays a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection.

The School community will therefore:

- work to establish and maintain an ethos where children feel secure and are encouraged to talk and are always listened to;
- include regular consultation with children e.g. through safety questionnaires, participation in anti-bullying week, asking children to report whether they have had happy/sad lunchtimes/playtimes;
- ensure that all children know there is an adult in the school whom they can approach if they are worried or in difficulty;

- include safeguarding across the curriculum, including PSHE, opportunities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help. In particular this will include anti-bullying work, e-safety, road safety, pedestrian and cycle training, and preventing radicalisation. Also focussed work in Year 6 to prepare for transition to Senior school; and
- ensure all staff are aware of school guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.

12. Domestic Abuse

12.1 Domestic abuse represents one quarter of all violent crime. It is actual or threatened physical, emotional, psychological or sexual abuse. It involves the use of power and control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, mental or physical ability. Domestic abuse can also involve other types of abuse.

12.2 We use the term domestic abuse to reflect that a number of abusive and controlling behaviours are involved beyond violence.

12.3 Slapping, punching, kicking, bruising, rape, ridicule, constant criticism, threats, manipulation, sleep deprivation, social isolation, and other controlling behaviours all count as abuse.

12.4 Living in a home where domestic abuse takes place is harmful to children and can have a serious impact on their behaviour, wellbeing and understanding of healthy, positive relationships. Children who witness, see, hear or witness the effects of domestic abuse are at risk of significant harm and staff are alert to the signs and symptoms of a child suffering or witnessing domestic abuse (See Appendix 1).

12.5 Duke of Kent School is enrolled onto the Operation Encompass scheme, a nationwide project that includes Surrey Police, Surrey County Council, Surrey Domestic Abuse Service and Surrey Schools. Every school day morning our key adult/deputy key adult is notified of all domestic abuse incidents that have occurred in the previous 24 hours which involved a pupil at this school (72 hours on a Monday morning). This allows us to provide the right support at the right time for our pupils who are experiencing domestic abuse.

13. Child Exploitation (Child Sexual Exploitation – CSE and Child Criminal Exploitation – CCE & Gangs)

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. This could also be done by an organised network or gang that the child may identify with.

There are a number of areas in which young people are put at risk by gang activity, both through participation in, and as victims of, gang violence which can be in relation to their/s or to a gang-involved adult in their household.

13.1 Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. All staff are aware of the link between online safety and vulnerability to CSE. More information and the indicators of CSE is set out in Appendix I. CSE can happen online and offline and all staff should be aware of the link between online safety and vulnerability to CSE.

13.2 Any concerns that a child is being or is at risk of being sexually exploited should be passed without delay to the DSL. Duke of Kent School is aware there is a clear link between regular school absence/truanting and CSE. Staff should consider a child to be at potential CSE risk in the case of regular school absence/truanting and make reasonable enquiries with the child and parents to assess this risk.

13.3 The DSL will use the Surrey Safeguarding Children's Board CE Screening Tool⁷ on all occasions when there is a concern that a child is being or is at risk of being sexually exploited or where indicators have been observed that are consistent with a child who is being or who is at risk of being sexually exploited.

13.4 In all cases if the tool identified any level of concern (green, amber or red) the DSL should contact their local Safeguarding team and email the completed CSE Screening Tool. If a child is in immediate danger the police should be called on 999.

13.5 Duke of Kent School is aware that a child often is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. As a consequence the child may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse. Most sexual abuse is committed by someone known to the victim.

13.6 Children involved in exploitation should be treated as victims and not offenders.

14. Female Genital Mutilation (FGM) / Forced Marriage / Honour Based Abuse / One Chance Rule / Serious Violence

14.1 Information about each of the above mentioned themes can be found in Appendix I.

15. Sharing Nudes and Semi Nudes

15.1 The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal.

7

<https://surreyscp.org.uk/wp-content/uploads/2021/05/Surrey-CE-Risk-Guidance-March-2020-MH-MAS TER.pdf>

15.2 If a member of staff becomes aware of an incident involving sharing nudes or semi nudes they should follow the child protection procedures and refer to the DSL as soon as possible. The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not view, copy or print the youth produced sexual imagery.

15.3 The school takes all incidences of youth produced sexual imagery seriously. In the event of an incident at school Duke of Kent follow the guidance set out by the UKCCIS in UK Council for Internet Safety (UKCIS), [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)" The DSL should be made aware of any such incidents.

16. Attendance and Children Missing / Absent from Education

Children missing education (CME) is defined as those who are of a compulsory school age, but are either not registered at a school or else not receiving suitable education in place of a school setting.

Children absent in Education refers to students whose attendance falls below the expected standard but are registered with the school.

16.1 Attendance, absence and exclusions are closely monitored. A child going missing from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation. The DSL will monitor unauthorised absences and take appropriate action including notifying the local authority particularly where children go missing on repeat occasions and/or are missing for periods during the school day in conjunction with 'Children Missing Education: Statutory Guidance for Local Authorities'⁸ and Surrey County Council Safeguarding Children Missing Education Policy 2017⁹. Staff must be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

Duke of Kent follows up any unexplained absences and will report to the local authority pupils who have been missing from school for more than ten continuous school days.

The school has an Attendance Policy where information about absences, tracking attendance and all other attendance related information can be found. The policy is on the school website.

The school will hold two emergency contact numbers for students where possible.

Registers are checked each morning by 9:30 and any unreported absences are followed up with a phone call / email to parents.

To help deal with students unable to come to school due to mental health, the school will follow guidance in the Department for Education's *Summary of Responsibilities where a Mental Health Issue is Affecting Attendance* and *Support for Pupils where Mental Health is Affecting Attendance* (both Feb 2023.)

⁸ <https://www.gov.uk/government/publications/children-missing-education>

⁹ <https://surreyscb.procedures.org.uk/hkyqlo/procedures-for-specific-circumstances/children-missing-from-education>

16.2 Attendance is monitored by the Senior Management Team at Duke of Kent. Should there be a significant drop in attendance then the following steps will be followed:

- Attendance below 90% in a half term – parents are written to informing them of the concern over attendance
- Attendance below 90% over two half terms or attendance below 80% for a half term – parents are invited in for a meeting with a member of the Senior Management Team to discuss the attendance concerns
- Attendance below 80% for two half terms or more – parents are invited in for a further meeting with a member of the Senior Management team and a referral to Education Welfare will be proposed

16.3 When students are removed from the admissions register, the admissions registrar will report this to the LA within 5 days.. They will inform them of the new destination of the student, their due date starting there. This includes students that are leaving to be home educated.

16.4 The setting recognises that children being absent, particularly repeatedly and/or for prolonged periods and exclusion from may be indicators of abuse and neglect, including the exploitation of children. The DSL will regularly liaise with members of staff with responsibility for behaviour and attendance to ensure risk is identified and appropriate intervention is in place to protect children from harm.

17. Physical Intervention

17.1 The use of physical intervention should be avoided if possible, however we realise that it may be required. Steps on what to do and when it is appropriate are outlined the Staff Code of Conduct. These have been written in accordance with DfE advice – [‘Restrictive Interventions, INcluding the Use of Reasonable Force in Schools.’](#)

17.2 If physical restraint is required then a member of staff should fill out a ‘Physical Restraint Form’ – found in Appendix 4

18. Bereavement

18.1 In the unfortunate event of bereavement in the school community or if the school is facing an unexpected death, we will follow the advice given by Child Bereavement UK in their ‘Schools Information Pack’. This pack is held by the DSL and can be found at:
<https://childbereavementuk.org/wp-content/uploads/2018/09/Schools-Information-Pack-Web-Complete-Download.pdf>

19. Photography and Mobile Phones in the Early Years Foundation Stage (EYFS)

19.1 The safety of children is paramount. All staff must be aware of the need to act responsibly when using a mobile phone or camera. Casual or inappropriate use may pose a risk to the children.

All staff should be aware of the School Guidance for use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and the associated risks.

19.3 Children have their photographs taken to provide evidence of their achievements for developmental records. Staff, visitors, volunteers and students are not permitted to use their own mobile phones to take or record any images of children for these records.

19.4 Photographs and videos will be stored on the school server, which is password protected. Photographs are printed in the setting by staff, and images are then removed from the camera's/iPad's memory.

19.5 Photographs may be taken during indoor and outdoor play and displayed in the Department or in a child's development records for parents/carers to look through. Often photographs may contain other children in the background.

19.6 Events such as: Sports Day, outings, Christmas play, assemblies and fundraising events may be recorded by video and photographs taken by staff and parents/carers but always in full view of all attending. Often photographs may contain other children in the background.

19.7 No videos/photos should be taken in the swimming pool other than those taken by a nominated staff member.

19.8 Staff must not use their own mobile phone or camera to take photographs. The recording, taking and sharing of images, video and audio on any mobile phone is not permitted.

19.9 Use of all cameras and mobile phones are prohibited in the toilet and changing areas.

19.10 When children undertake a school trip or school journey, mobile phone use by adult leaders should be limited to contact with the school office or the venues being visited, except in emergencies and then only on school approved

20. Health and Safety

20.1 Our Health & Safety policy, set out in a separate document, reflects the consideration we give to the protection of our children both physically within the school environment, and for example in relation to internet use, and when away from the school and when undertaking school trips and visits.

21. Additional Safeguarding Contacts and Linked Documents

Other contact details

- Local Area Contact Details: 0300 123 1640
- Education Safeguarding Co-ordinator: 01483 518518 or 0777 72009477

- Surrey Centre Children's Team: Centre-Children@surreycc.gov.uk

West Sussex Children's Services (MASH)

Main contact points when a pupil resides in Sussex

Tel: 01403 229900 Email cap@westsussex.gcsx.gov.uk

Address: Children's Access Point
 Fourth Floor
 County Hall North (Parkside)
 Chart Way
 Horsham
 West Sussex
 RH12 1XH

Internal Linked Documents:

- *Staff Code of Conduct*
- *Behaviour Policy*
- *Whistleblowing*
- *Anti-bullying*
- *Health & Safety*
- *Parental Complaints and Concerns*
- *Missing Pupils*
- *Curriculum*
- *PSHE inc Sex and relationships Education First Aid including the administration of medicines*
- *Tobacco and Recreational Drug Education*
- *E-Safety Policy*
- *Single Central Register*
- *Risk Assessments*
- *Recruitment, Selection and Disclosure Policy*
- *Radicalisation and Extremism*
- *Lettings Policy*
- *Attendance Policy*
- *Mobile phone policy*

Appendix I – Types and Signs of Abuse

The following definitions are taken from *Working Together to Safeguard Children* (2026). In addition to these definitions, it should be understood that children can also be abused by being sexually exploited, honour based abuse, forced marriage or female genital mutilation. To support the local context, all staff have access to the [Children's Safeguarding Partnership Levels of Need Threshold Document](#).

What is abuse and neglect?

Abuse and neglect are forms 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 a stranger. They may be abused by an adult or adults, or another child or children.

Physical abuse

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

Emotional abuse

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development.

It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children.

These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another.

It may involve serious bullying (including cyber bullying), 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 in isolation.

Sexual abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative

acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

Neglect

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

Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate care-givers)
- ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

The [Neglect Risk Assessment Tool](#) is available to provide more detailed information regarding the assessment of neglect.

Indicators of abuse

Neglect

The nature of neglect

Neglect is a lack of parental care but poverty and lack of information or adequate services can be contributory factors.

Far more children are registered to the category of neglect on Child in Need and Child Protection plans than to the other categories. As with abuse, the number of children experiencing neglect is likely to be much higher than the numbers on the plans.

Neglect can include parents or carers failing to:

- provide adequate food, clothing and shelter
- protect a child from physical and emotional harm or danger
- ensure adequate supervision or stimulation
- ensure access to appropriate medical care or treatment

NSPCC research has highlighted the following examples of the neglect of children under 12 years old:

- frequently going hungry
- frequently having to go to school in dirty clothes
- regularly having to look after themselves because of parents being away or having problems such as drug or alcohol misuse
- being abandoned or deserted
- living at home in dangerous physical conditions
- not being taken to the doctor when ill
- not receiving dental care.

Neglect is a difficult form of abuse to recognise and is often seen as less serious than other categories. It is, however, very damaging: children who are neglected often develop more slowly than others and may find it hard to make friends and fit in with their peer group.

Neglect is often noticed at a stage when it does not pose a risk to the child. The duty to safeguard and promote the welfare of children (*What to do if You're Worried a Child is Being Abused* DfE 2015) would suggest that an appropriate intervention or conversation at this early stage can address the issue and prevent a child continuing to suffer until it reaches a point when they are at risk of harm or in significant need.

Neglect is often linked to other forms of abuse, so any concerns school staff have should be discussed with the DSL.

Indicators of neglect

The following is a summary of some of the indicators that may suggest a child is being abused or is at risk of harm.

It is important to recognise that indicators alone cannot confirm whether a child is being abused. Each child should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Don't keep it to yourself. The [Neglect Risk Assessment Tool](#) provides staff with a resource to identify and act on concerns regarding neglect.

Physical indicators of neglect

- Constant hunger and stealing food
- Poor personal hygiene - unkempt, dirty or smelly
- Underweight
- Dress unsuitable for weather
- Poor state of clothing
- Illness or injury untreated

Behavioural indicators of neglect

- Constant tiredness
- Frequent absence from school or lateness
- Missing medical appointments
- Isolated among peers
- Frequently unsupervised
- Stealing or scavenging, especially food
- Destructive tendencies

Emotional abuse

The nature of emotional abuse

Most harm is produced in *low warmth, high criticism* homes, not from single incidents.

Emotional abuse is difficult to define, identify/recognise and/or prove.

Emotional abuse is chronic and cumulative and has a long-term impact.

All kinds of abuse and neglect have emotional effects although emotional abuse can occur by itself.

Children can be harmed by witnessing someone harming another person – as in domestic abuse.

It is sometimes possible to spot emotionally abusive behaviour from parents and carers to their children, by the way that the adults are speaking to, or behaving towards children. An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later on.

Indicators of emotional abuse

Developmental issues

- Delays in physical, mental and emotional development
- Poor school performance
- Speech disorders, particularly sudden disorders or changes.

Behaviour

- Acceptance of punishment which appears excessive
- Over-reaction to mistakes
- Continual self-deprecation (I'm stupid, ugly, worthless etc)
- Neurotic behaviour (such as rocking, hair-twisting, thumb-sucking)
- Self-mutilation
- Suicide attempts
- Drug/solvent abuse
- Running away
- Compulsive stealing, scavenging

- Acting out
- Poor trust in significant adults
- Regressive behaviour – e.g., wetting
- Eating disorders
- Destructive tendencies
- Neurotic behaviour
- Arriving early at school, leaving late

Social issues

- Withdrawal from physical contact
- Withdrawal from social interaction
- Over-compliant behaviour
- Insecure, clinging behaviour
- Poor social relationships

Emotional responses

- Extreme fear of new situations
- Inappropriate emotional responses to painful situations (“I deserve this”)
- Fear of parents being contacted
- Self-disgust
- Low self-esteem
- Unusually fearful with adults
- Lack of concentration, restlessness, aimlessness
- Extremes of passivity or aggression

Physical abuse

The nature of physical abuse

Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly, it is not necessary to be concerned about most of these minor injuries. But accidental injuries normally occur on the *bony prominences* – e.g. knees, shins.

Injuries on the *soft* areas of the body are more likely to be inflicted intentionally and should therefore make us more alert to other concerning factors that may be present.

A body map can assist in the clear recording and reporting of physical abuse. The body map should only be used to record observed injuries and no child should be asked to remove clothing by a member of staff of the school.

Indicators of physical abuse / factors that should increase concern

- Multiple bruising or bruises and scratches (especially on the head and face)
- Clusters of bruises – e.g., fingertip bruising (caused by being grasped)
- Bruises around the neck and behind the ears – the most common abusive injuries are to the head
- Bruises on the back, chest, buttocks, or on the inside of the thighs

- Marks indicating injury by an instrument – e.g., linear bruising (stick), parallel bruising (belt), marks of a buckle
- Bite marks
- Deliberate burning may also be indicated by the pattern of an instrument or object – e.g., electric fire, cooker, cigarette
- Scalds with upward splash marks or *tide marks*
- Untreated injuries
- Recurrent injuries or burns
- Bald patches.

In the context of the school, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when:

- the explanation given does not match the injury
- the explanation uses words or phrases that do not match the vocabulary of the child (adults words)
- no explanation is forthcoming
- the child (or the parent/carer) is secretive or evasive
- the injury is accompanied by allegations of abuse or assault

You should be concerned if a child:

- is reluctant to have parents/carers contacted
- runs away or shows fear of going home
- is aggressive towards themselves or others
- flinches when approached or touched
- is reluctant to undress to change clothing for sport
- wears long sleeves during hot weather
- is unnaturally compliant in the presence of parents/carers.
- has a fear of medical help or attention
- admits to a punishment that appears excessive.

Sexual abuse

The nature of sexual abuse

Sexual abuse is often perpetrated by people who are known and trusted by the child – e.g., relatives, family friends, neighbours, babysitters, and people working with the child in school, faith settings, clubs or activities. Children can also be subject to child sexual exploitation.

Sexual exploitation is seen as a separate category of sexual abuse. The [CSP professional guidance](#) provides school staff with information regarding indicators of CSE.

Characteristics of child sexual abuse:

- it is often planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic
- grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent (this may occur online)
- grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives.

Most people who sexually abuse children are men, but some women sexually abuse too.

Indicators of sexual abuse

Physical observations:

- Damage to genitalia, anus or mouth
- Sexually transmitted diseases
- Unexpected pregnancy, especially in very young girls
- Soreness in genital area, anus or mouth and other medical problems such as chronic itching
- Unexplained recurrent urinary tract infections and discharges or abdominal pain

Behavioural observations:

- Sexual knowledge inappropriate for age
- Sexualised behaviour or affection inappropriate for age
- Sexually inappropriate behaviour
- Hinting at sexual activity
- Inexplicable decline in education progress
- Depression or other sudden apparent changes in personality as becoming insecure
- Lack of concentration, restlessness, aimlessness
- Socially isolated or withdrawn
- Overly-compliant behaviour
- Acting out, aggressive behaviour
- Poor trust or fear concerning significant adults
- Regressive behaviour,
- Onset of wetting, by day or night; nightmares
- Arriving early at school, leaving late, running away from home
- Suicide attempts, self-mutilation,
- Suddenly drawing sexually explicit pictures
- Eating disorders or sudden loss of appetite or compulsive eating
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Become worried about clothing being removed
- Trying to be 'ultra-good' or perfect; overreacting to criticism.

Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act (2003). It is a form of child abuse and violence against women. [A mandatory reporting duty requires teachers to report 'known' cases of FGM in under 18s](#), which are identified in the course of their professional work, to the police.

The duty applies to all persons in school who are employed or engaged to carry out 'teaching work' in the school, whether or not they have qualified teacher status.

The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the Designated Safeguarding Lead, however the DSL should be informed.

If a teacher is informed by a girl under 18 that an act of FGM has been carried out on her or a teacher observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth, the teacher should personally make a report to the police force in which the girl resides by calling 101. The report should be made immediately.

School staff are trained to be aware of risk indicators of FGM.

Concerns about FGM outside of the mandatory reporting duty should be reported using the school's child protection procedures. Staff should be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer holiday.

There should also be consideration of potential risk to other girls in the family and the wider community. Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including dialling 999 if appropriate.

There are no circumstances in which a teacher or other member of staff should examine a girl.

Forced Marriage

A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

Forced marriage is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.

A forced marriage is not the same as an arranged marriage which is common in many cultures. The families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

School staff should never attempt to intervene directly as a school or through a third party. Contact should be made with the C-SPA and/or the Forced Marriage Unit 200 7008 0151.

Honour-based Abuse

Honour based abuse (HBA) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such abuse can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

Honour based abuse might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion;
- want to get out of an arranged marriage; become involved with a boyfriend or girlfriend from a different culture or religion;
- want to get out of an arranged marriage;
- want to get out of a forced marriage
- wear clothes or take part in activities that might not be considered traditional within a particular culture

It is considered a violation of human rights and may be a form of domestic and/or sexual abuse.

One Chance Rule

All staff are aware of the 'One Chance' Rule' in relation to forced marriage, FGM and HBA. Staff recognise they may only have one chance' to speak to a child who is a potential victim and have just one chance to save a life.

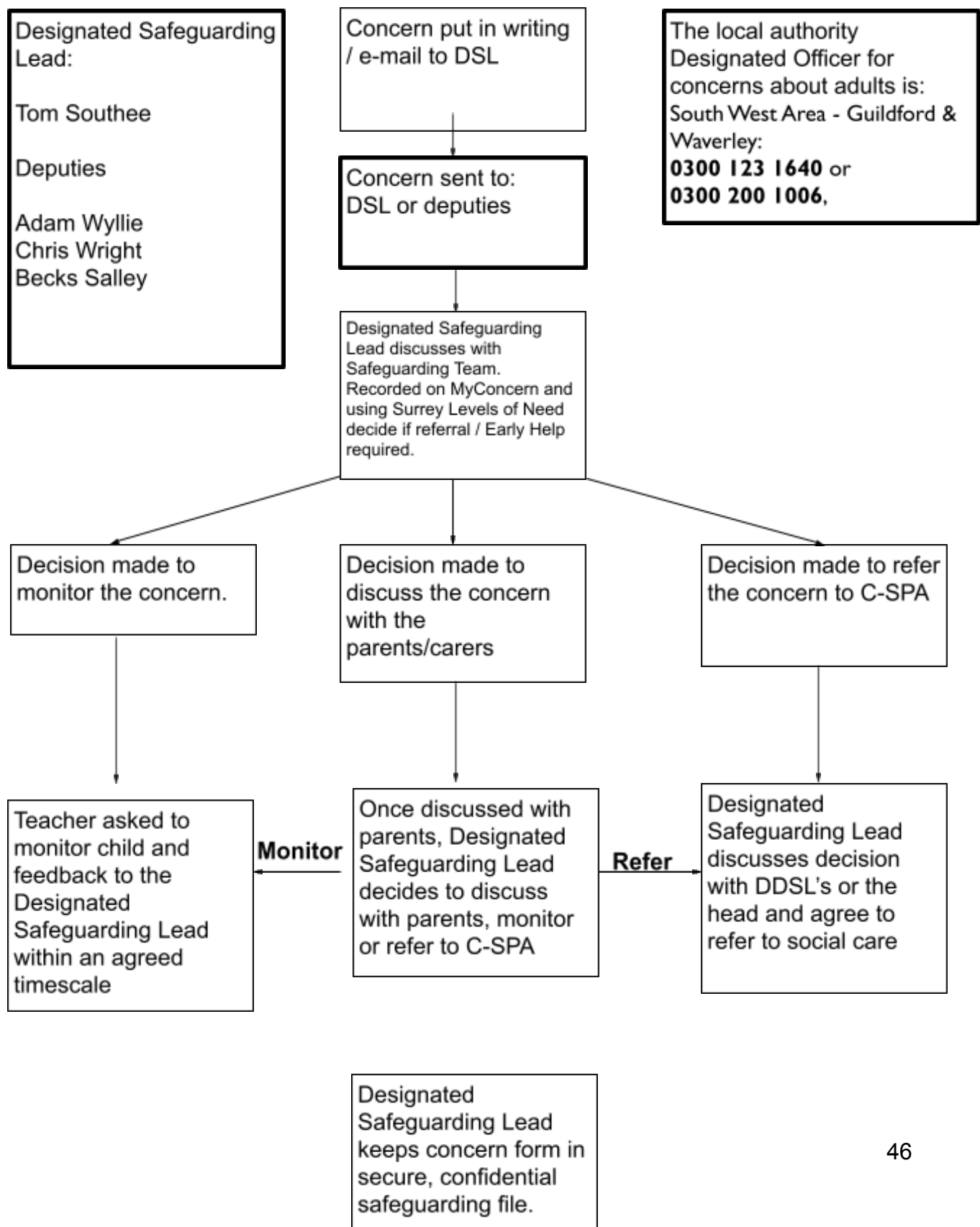
The school is aware that if the victim is not offered support following disclosure that the 'One Chance' opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBA cases.

Serious Violence

More information can be found in the Home Office document 'Criminal Exploitation of Children and Vulnerable Adults: County Line Guidance' Sept 2018.

Appendix 2 – FLOW CHART FOR RAISING SAFEGUARDING CONCERNS ABOUT A CHILD

If a child is in immediate danger or is at risk of harm anyone can make a referral to children's social care and/or police immediately.



A member of staff who is approached by a child should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they may need to pass information to other professionals to help keep the child or other children safe. The degree of confidentiality should always be governed by the need to protect the child.

Additional consideration needs to be given to children with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.

All staff should know who the DSL is and who to approach if the DSL is unavailable. All staff have the right to make a referral to the C-SPA or Police directly and should do this if, for whatever reason, there are difficulties following the agreed protocol, for example, they are the only adult on the school premises at the time and have concerns about sending a child home.

Guiding principles, the seven R's

Receive

- Listen to what is being said, without displaying shock or disbelief
- Accept what is said and take it seriously
- Make a note of what has been said as soon as practicable

Reassure

- Reassure the pupil, but only so far as is honest and reliable
- Don't make promises you may not be able to keep e.g. 'I'll stay with you' or 'everything will be alright now' or 'I'll keep this confidential'
- Do reassure, for example, you could say: 'I believe you', 'I am glad you came to me', 'I am sorry this has happened', 'We are going to do something together to get help'

Respond

- Respond to the pupil only as far as is necessary for you to establish whether or not you need to refer this matter, but do not interrogate for full details
- Do not ask 'leading' questions i.e. 'did he touch your private parts?' or 'did she hurt you?' Such questions may invalidate your evidence (and the child's) in any later prosecution in court
- Do not ask the child why something has happened.
- Do not criticize the alleged perpetrator; the pupil may care about him/her, and reconciliation may be possible
- Do not ask the pupil to repeat it all for another member of staff. Explain what you have to do next and whom you have to talk to. Reassure the pupil that it will be a senior member of staff

Report

- Share concerns with the DSL immediately.
- If you are not able to contact your DSL or the Deputy DSL, and the child is at risk of immediate harm, contact the C-SPA or Police, as appropriate directly

- If you are dissatisfied with the level of response you receive following your concerns, you should press for re-consideration

Record

- If possible make some very brief notes at the time, and write them up as soon as possible
- Keep your original notes on file
- Record the date, time, place, person/s present and noticeable nonverbal behaviour, and the words used by the child. If the child uses sexual 'pet' words, record the actual words used, rather than translating them into 'proper' words
- If appropriate, complete a body map to indicate the position of any noticeable bruising
- Record facts and observable things, rather than your 'interpretations' or 'assumptions'

Remember

- Support the child: listen, reassure, and be available
- Complete confidentiality is essential. Share your knowledge only with appropriate professional colleagues
- Get some support for yourself if you need it

Review (led by DSL)

- Has the action taken provided good outcomes for the child?
- Did the procedure work?
- Were any deficiencies or weaknesses identified in the procedure? Have these been remedied?
- Is further training required?

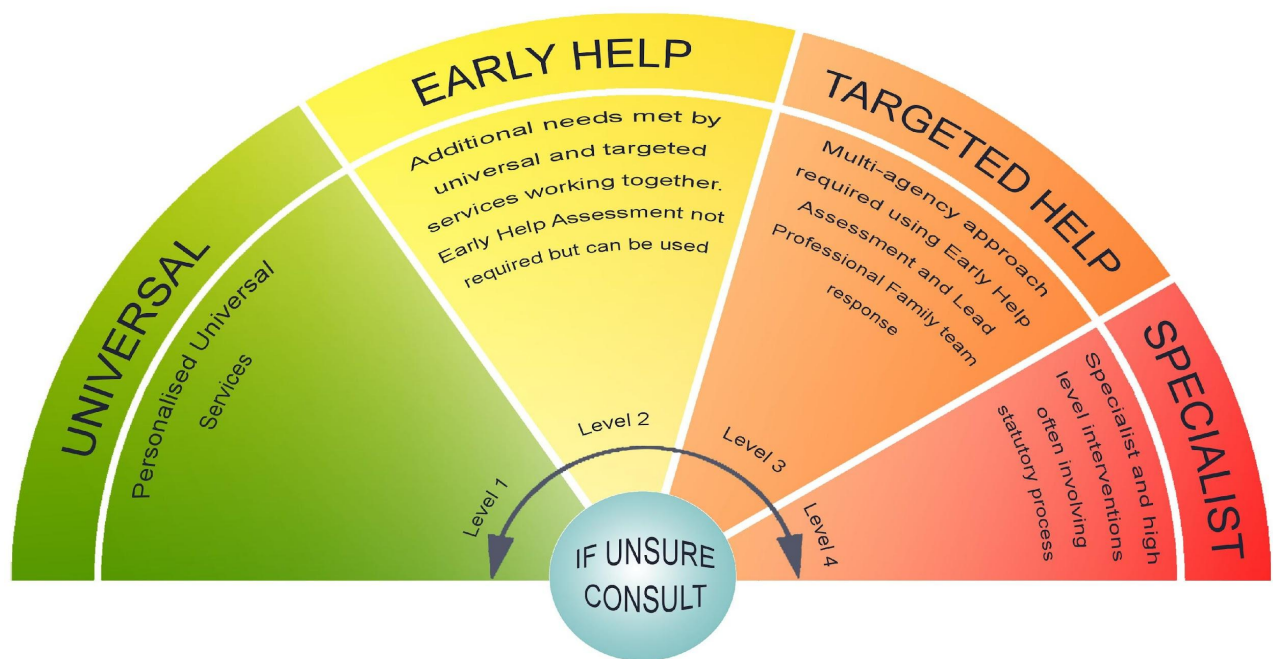
What happens next?

It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. The member of staff should be informed by the DSL what has happened following a report being made. If they do not receive this information they should seek it out.

If they have concerns that the disclosure has not been acted upon appropriately they might inform the Headteacher or Safeguarding Governor of the school and/or may contact the C-SPA.

Receiving a disclosure can be upsetting for the member of staff and schools should have a procedure for supporting them after the disclosure. This might include reassurance that they have followed procedure correctly and that their swift actions will enable the allegations to be handled appropriately.

In some cases additional counselling might be needed and staff should be encouraged to recognise that disclosures can have an impact on their own emotions.



Level 1: Children with no additional needs ('Universal')

These are children all of whose health and developmental needs will be met by universal services such as housing, mainstream education, primary health care, community resources alone. Children and young people at this level are achieving expected outcomes. There are no identified unmet needs or the need is at a low level and can be met by the universal services or with some limited additional advice or guidance. Children, young people, parents and carers can access these services directly.

Level 2: Children requiring early help ('Targeted' and 'Targeted Complex')

These are children whose needs are not clear, not known or not being met. They may be vulnerable and showing early signs of abuse and/or neglect. Children and young people at this level are in need of coordinated early help and support from services. This is the threshold for the provision of coordinated early help informed by interagency examination of need using the CAF or a Family CAF. Where a CAF or Family CAF has identified additional needs that are more complex and indicate a higher level of risk factors, a more coordinated multi-agency response may be required. This is the threshold for a referral to the multi-agency Early Intervention Hub.

Level 3: Children in need

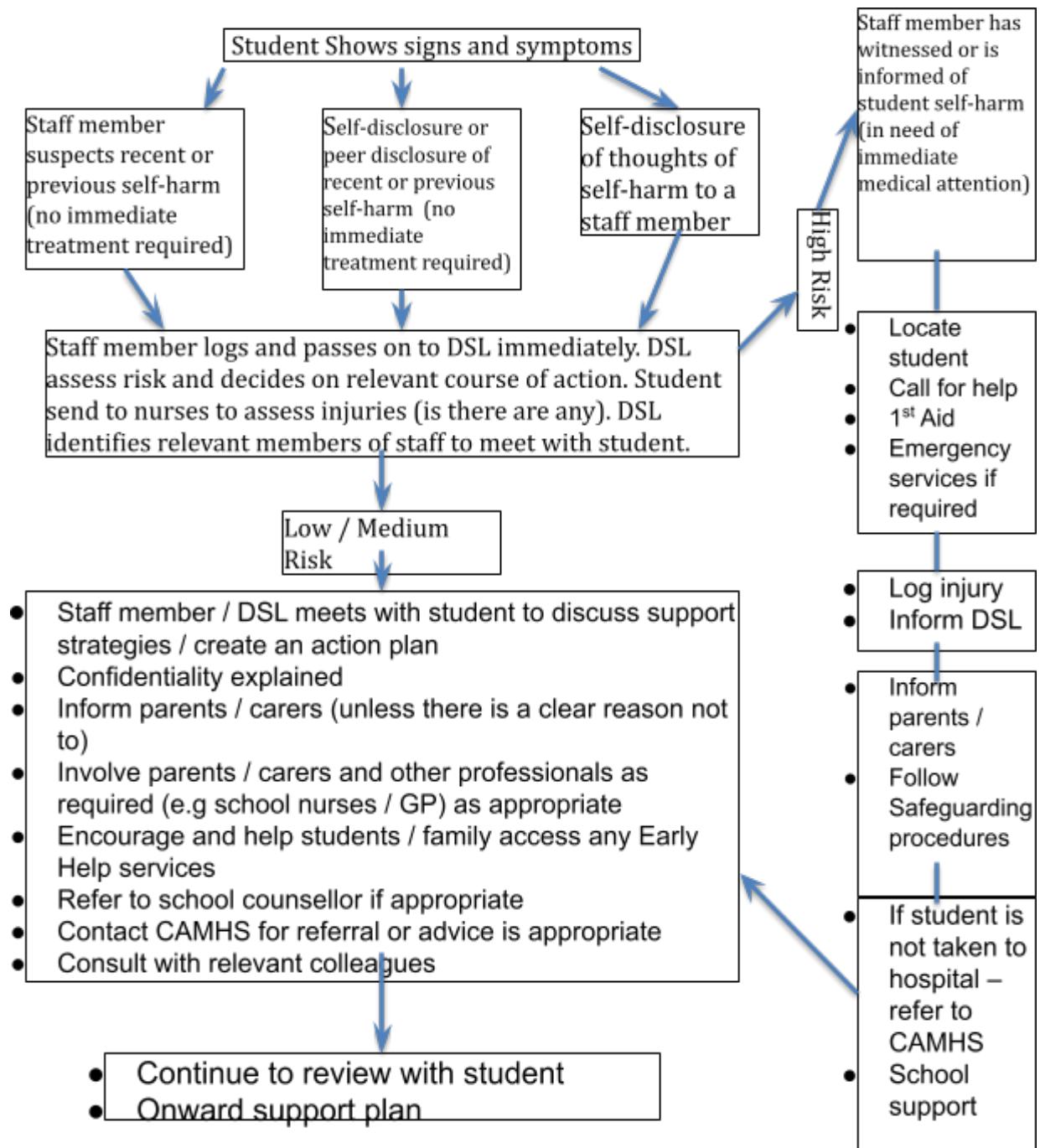
These are children with high-level additional unmet needs. They are unlikely to achieve or maintain a satisfactory level of health or development, or their health and development will be significantly of further impaired, without the provision of services. This is the threshold for an assessment led by children's social care under s.17 Children Act 1989.

Level 4: Children at risk

These are children who are suffering or are likely to suffer significant harm. This is the threshold for child protection. These children are likely to have already experienced adverse effects and to be suffering from poor outcomes. They will require intensive support under s.47 Children Act 1989. This is the threshold for child protection and may lead to court proceedings/voluntary accommodation arrangements in order to implement timely permanency planning processes to promote positive outcomes for the child in this regard. The diagram below shows the continuum of need which reflects these levels.

Appendix 3 – Self-Harm Flow Chart

Should a student disclose they are self harming or there is an immediate danger of a student self-harming, the school will follow the following flow chart:



Appendix 4 – Physical Restraint Form

Duke of Kent School - PHYSICAL RESTRAINT INCIDENT LOG

Date:	Time:	Staff Member:
Student:	Year Group:	Place of Incident:
Adult Witness:	Student Witnesses? Who?	Reason for force:
Incident leading to use of physical restraint (continue on separate sheet if required):		
Student's behaviour (what was said, strategies used to diffuse situation, force used, how it was applied and for how long). (Please continue on separate sheet if necessary):		
Student response. (Please continue on separate sheet if necessary):		
Details of any injury/damage to property. (Please continue on separate sheet if necessary):		
Informed: (Date and Time)	SLT:	Parent:

Please fill out this form on the same day as the incident

Appendix 5 – E-Safety Summary

Online safety and the use of smart devices

This section summarises Duke of Kent School' whole school approach to online safety and the use of smart devices (e.g. mobile phones, smart watches, tablets etc). Our detailed approach is covered in our E-Safety policy and Mobile Phone Policy. Duke of Kent understands the significant and essential role that we have in making sure children are protected from potentially harmful and inappropriate online material. We consider online safety in every aspect of school life.

Our aim is to:

- Have in place online safety processes that protect our children and staff including how we identify, intervene in and escalate online concerns, where appropriate.
- Make sure technology is used responsibly and safely through education.
- Set clear expectations for the use of mobile phones and smart technology.

We fulfil our aims by:

- Ensuring appropriate filtering and monitoring systems are in place on the school's network and devices.
- Educating children to learn how to keep themselves safe when online (using the government's [Teaching online safety in schools](#) guidance), what to do if they are harmed or spot a risk and what the consequences are if they break the school rules about online safety.
- Engaging with parents and carers about what online safety looks like.
- Making sure our whole school approach is reflected in all relevant policies.
- Regularly training staff on online safeguarding risks and how to be online safely.
- Making sure children, staff, parents/carers, **governors/trustees** and volunteers sign an understandable acceptable use agreement that covers how they should use the school's IT systems and their mobile and smart technology.
- Making parents, carers, children and staff aware that staff can search an electronic device they have confiscated.

Due to the constant changes to online technology and the related harms, we will carry out an annual review and risk assessment of our online safety policies, procedures and systems.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk, content, contact, conduct and commerce.

The 4Cs

Being online can be a great source of fun, entertainment, communication and education. Some people's online behaviour places others at risk. The number of issues covered under online safety is large and constantly growing. They are categorised into these four areas of risk:

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

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

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

Commerce: risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If children or members of staff report any issues, we will report it to the Anti-Phishing Working Group (<https://apwg.org/>).

Mobile phones and smart technology (including smart watches and glasses)

Many children have unlimited and unrestricted access to the internet via mobile phone networks; therefore, children could be harmed or harm others online when at school. This may include sexually harassing, bullying and the making or sharing of nudes or semi-nudes (often via large chat groups). To protect children from these risks while they are at our school, our approach to mobile and smart technology (including watches and 'Meta' glasses) is outlined in Mobile Phone and Smart Device Policy.

Media recordings, audio, image and video (including digital files)

When we make media recordings of children, such as taking videos or photos, we will get the child's and their parents'/carers' consent, make sure the child is appropriately dressed and encourage the child to tell us if they are worried about any media that has been taken of them. See our staff code of conduct and online safety policy, which cover our school's expectations for staff making media recordings.

Filtering and monitoring

To limit children's exposure to online risks from Duke of Kent's IT systems, we have strong and effective filtering and monitoring systems, following the government's [Meeting digital and](#)

[technology standards in schools and colleges](#) guidance. We will also follow the government's [Plan technology for your school](#) guidance to self-assess against the filtering and monitoring standards and receive personalised recommendations on how to meet them. We will make sure that:

- Specific staff have assigned roles and responsibilities to manage systems.
- Staff know about the systems in place and how to escalate concerns.
- There are annual reviews of the systems, or more frequently if there is a significant change or issue.
- Our **governing body/board of trustees** reviews the systems with the DSL, IT staff and service providers, to find out what more can be done to keep children safe.
- The systems are effective for the age range of children and consider children potentially at greater risk of harm.
- When we block online content, it does not impact teaching and learning.
- Filtering works across all devices including mobile devices and smart technology

Remote education

When our children are being taught remotely e.g. at home, we will be in regular contact with parents and carers. We will make sure parents and carers are aware of:

- What their child/ren are being asked to do online, including the sites they will be accessing and who from the school will interact with their child/ren.
- The importance of children being safe online and offering advice on how to do so.
- What systems our school uses to filter and monitor online use.

Information security and access systems

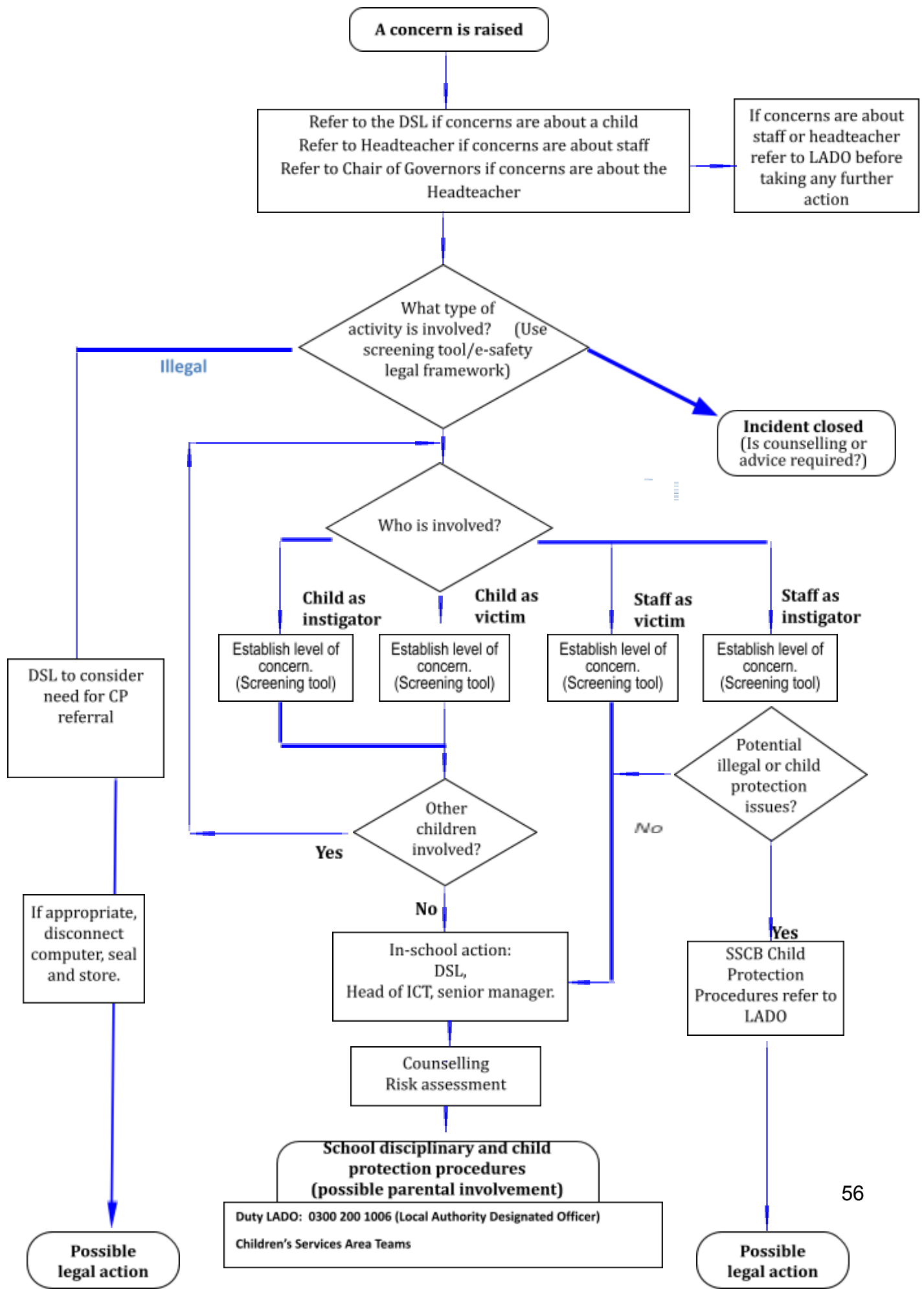
We have procedures in place to protect our IT systems and staff and learners from cybercrime, i.e. when criminals seek to exploit human or security vulnerabilities online to steal passwords, data or money directly. We will follow the government's [Cyber security standards for schools and colleges guidance](#) which were developed to help us improve our resilience against cyber-attacks. Our procedures and systems are reviewed regularly to keep up with the constant changes to cyber-crime technologies.

Children are taught about online safety throughout the curriculum, and all staff receive online safety training which is regularly updated. The school's online safety co-ordinator is **Ben Monk**.

The school will follow the guidance around [harmful online challenges and online hoaxes](#) when supporting children and sharing information with parents/carers.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the DSL will consider a referral into the [Cyber Choices](#) programme.

Dealing with E-Safety Matters:



Appendix 6 - Indicators of Vulnerability to Radicalisation

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
2. Extremism is defined by the Government in the Prevent Strategy as:
Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.
3. Extremism is defined by the Crown Prosecution Service as:
The demonstration of unacceptable behaviour by using any means or medium to express views which:
 - Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
 - Seek to provoke others to terrorist acts;
 - Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
 - Foster hatred which might lead to inter-community violence in the UK.
4. Terrorism is an action that endangers or causes serious violence to a person/people; causes serious violence to a person/people; causes serious damage to property; or seriously interferes with an electronic system. The use or threat **must** be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
5. There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.
6. Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.
7. Indicators of vulnerability include:
 - Identity Crisis – the student / pupil is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
 - Personal Crisis – the student / pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
 - Personal Circumstances – migration; local community tensions; and events affecting the student / pupil’s country or region of origin may contribute to a sense of grievance that is

triggered by personal experience of racism or discrimination or aspects of Government policy;

- Unmet Aspirations – the student / pupil may have perceptions of injustice; a feeling of failure; rejection of civic life;
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration;
- Special Educational Need – students / pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

8. However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

9. More critical risk factors could include:

- Being in contact with extremist recruiters;
- Accessing violent extremist websites, especially those with a social networking element;
- Possessing or accessing violent extremist literature;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Justifying the use of violence to solve societal issues;
- Joining or seeking to join extremist organisations; and
- Significant changes to appearance and / or behaviour;
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

The Department of Education guidance [The Prevent Duty](#) can be accessed via this link.

Appendix 7 – Sexual Violence and Sexual Harassment between Children in Schools Policy / Guidance

This compliments the Government Document of the same name.

Context

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their education attainment as well as their emotional well-being. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.

Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, adult students and school and college staff are supported and protected as appropriate.

Policy

We believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults and other children in school

We recognise that children are capable of abusing their peers and this will be dealt with under our child protection policy and in line with KCSiE (2026)

We are clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up

We will minimise the risk of child on child abuse by:-

Prevention

Taking a whole school approach to safeguarding & child protection

Providing training to staff

Providing a clear set of values and standards, underpinned by the school's behaviour policy and pastoral support; and by a planned programme of evidence based content delivered through the curriculum.

Engaging with specialist support and interventions.

Responding to reports of sexual violence and sexual harassment

Children making a report of sexual violence or sexual harassment, including 'upskirting' will be taken seriously, kept safe and be well supported.

If the report includes an online element staff will be mindful of the Searching, Screening and Confiscation: advice for schools (DfE 2018) guidance.

Staff taking the report will inform the DSL or the Deputy DSL immediately.

Staff taking a report will never promise confidentiality.

Parents or carers should usually be informed (unless this would put the child at greater risk).

If a child is at risk of harm, is in immediate danger, or has been harmed, a Request for Support will be made to the C-SPA securely email: cspa@surreycc.gov.uk or telephone 0300 470 9100, as appropriate.

Risk Assessment:-

Following a report the DSL will make an immediate risk and needs assessment on a case-by-case basis.

The risk assessment will consider;

- The victim, especially their protection and support.
- The alleged perpetrator, their support needs and any discipline action.
- All other children at the school.
- The victim and the alleged perpetrator sharing classes and space at school.

The risk assessment will be recorded and kept under review.

Where there has been other professional intervention and/or other specialist risk assessments, these professional assessments will be used to inform the school's approach to supporting and protecting pupils.

Support regarding risk assessments can be accessed from the [Education Safeguarding Team](mailto:education.safeguarding@surreycc.gov.uk) – education.safeguarding@surreycc.gov.uk

Action: The DSL will consider:-

- The wishes of the victim.
- The nature of the incident including whether a crime has been committed and the harm caused.
- Ages of the children involved.
- Developmental stages of the children.
- Any power imbalance between the children.
- Any previous incidents.
- Ongoing risks.

- Other related issues or wider context.

Options:

Manage internally

Early Help intervention

Refer to C-SPA

Report to the police (generally in parallel with a referral to C-SPA)

Ongoing Response:

The DSL will manage each case individually and will ensure the risk assessment is reviewed regularly with relevant partner agencies, for example the Police and Children's Social Care.

Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim.

The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart on school premises and on transport where appropriate.

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the school will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and may lead to the view that allowing the perpetrator to remain in the same school or college would seriously harm the education or welfare of the victim (and potentially themselves and other pupils).

Where a criminal investigation into sexual assault leads to a conviction or caution, the school or college will, if it has not already, consider any suitable sanctions in light of their behaviour policy, which may include consideration of permanent exclusion. Where the perpetrator is going to remain at the school or college, the Headteacher should continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on school and college premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

The victim, alleged perpetrator and any other children & adults affected will receive appropriate support and safeguards on a case-by-case basis.

The school will take any disciplinary action against the alleged perpetrator in accordance with the school behaviour policy.

The school recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.

Physical Abuse

While a clear focus of peer on peer / child on child abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from pupils to pupils can also be abusive.

These are equally not tolerated and if it is believed that a crime has been committed, will be reported to the police.

The principles from the anti-bullying policy will be applied in these cases, with recognition that any police investigation will need to take priority.

References:

DfE Keeping Children Safe in Education 2026

Appendix 8 – ‘Low-Level’ Concerns

Staff at Duke of Kent should feel confident and safe to come forward and share any concerns or suspicions they may have about the behaviour of another adult. These concerns should be shared with the Head and/or the DSL without delay. This is to ensure that any concerning, problematic or inappropriate behaviour can be dealt with early and that staff are adhering to the Safeguarding Policy and Staff Code of Conduct and working in and creating a safe environment for children and adults alike.

Low-Level Concerns – A definition

The term ‘low-level’ concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out at paragraph 338 of Keeping Children Safe in Education Sept 2026 and in the Safeguarding Policy (5.7). A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to make a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their personal mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language
- humiliating children.

Sharing Low-Level concerns

Low-Level concerns should be shared in the same as allegations outlined in Section 5 of this Safeguarding Policy.

Concerns will be recorded in writing and outline the details of the concern, the context and any action taken. The name of the person sharing the concern will be noted unless anonymity is requested. This will be respected as far and reasonably possible.

The Head / and or DSL will decide if the allegation reaches the threshold for referral to the LADO and if not will be treated as a low-level concern. Information will be gathered, including statements

from the person raising the concern, witness and the accused. Once all information is gathered the behaviours will be categorised and further action may be taken. This may be an investigation or support/training of the member of staff. Rationales and reasons for decisions will be recorded.

Low level concerns will not normally be included in references unless they relate to issues which would ordinarily be included in a reference, for example, substantiated misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it will be referred to in a reference.

Appendix 9 – Mental Health Policy

Mental Health Policy and Wellbeing Framework

“Whether an illness affects your heart, your leg or your brain, it’s still an illness, and there should be no distinction.” - Michelle Obama

We are holistic beings and as educators must be mindful that mental health and wellbeing are as much a part of our role in education as are the cognitive elements. The holistic approach also refers to the need for any approach to wellbeing to be a whole school approach. Not only part of everyone’s (SLT, teaching and support staff and students) agenda and way of being but also designed to support all of those groups.

Duke of Kent school supports pupils’ mental health and wellbeing via a number of initiatives (outlined below). We have a Wellbeing Manager who oversees the introduction of initiatives designed to promote and address staff and pupils’ mental health and wellbeing needs. She is also able to offer 1-1 counselling and 1-1 and group ELSA support.

According to Professor Katherine Weare in *‘What works in promoting social and emotional well-being and responding to mental health problems in schools? Advice for Schools and Framework Document’* there are seven defined areas of positive impact when creating and implementing whole school approaches to wellbeing. This document aims to recognise what we are doing and what we would like to do over the course of the next two years. Generally, the promotion of good mental health and provision for support will have positive impacts across all seven.

1. **academic learning**, motivation, and sense of commitment and connectedness with learning and with school: Prep review with staff, students and parents CI, choir, productions, house competitions, exam anxiety and stress workshops, form times, class/year group visits ‘Golden Weeks’ of no prep, regular outdoor learning for Seniors as well as Pre Prep.
2. **staff well-being**, reduced stress, sickness and absence, improved teaching ability and performance: ‘Hug in a Mug’ appreciation award, Offer of up to 2 1-1 sessions with MD followed by signposting, Staff wellbeing survey, MH first aid training rolled out to all senior tutors September 22, rolled out to other staff? Social secretary role filled by AB - creating opportunities for all staff social activities. More opportunities for team building across departments/sections during INSETs and other times; animal therapy dog visits MD training with her dog via Underdog International to introduce animal therapy Summer 23, yoga/meditation/walks regularly, ‘Golden weeks’ of no marking or meetings, staff mentors/buddies? Wellbeing being part of the appraisal process
3. **pupil well-being** including happiness, a sense of purpose, connectedness and meaning: Wellbeing resources posted in form G classrooms; celebration of MH Awareness week with assemblies, whole class activities, wellbeing surveys and activities; PASS survey, student mentors for transition, trips/ residential/ activities/sports animal therapy dog visits, monthly mindfulness
4. **the development of the social and emotional skills and attitudes** that promote learning, success, well-being and mental health, in school and throughout life: Resilience training course and presentation by clinical psychologist; PSHE programme, Peer Mentor

programme, mindfulness activities Transition Mentor Programme Yr 7&9s - Mental Health Ambassadors to promote positive mental health message, creation of a wellbeing committee (wellbeing prefect/representative for student voice?), creation of psyc/awareness training materials

5. **the prevention and reduction of mental health problems** such as depression, anxiety and stress: dedicated wellbeing space with therapeutic resources, opportunity for self referrals as well as teacher/parent referrals, 1-1 and small group sessions, acknowledgement of MHAwareness days, such as LGBTQ+ history month and Pride, eating disorder week, stress awareness month, introduction of Worry Monsters and discussion of anxiety in Pre Prep and Prep classes. A Diversity group (previously LGBT+ Group) meeting half-termly and student led, staff member supervised. Monthly mindfulness sessions, an outdoor wellbeing structure for outdoor 1-1s and those wanting 'quiet' breaks (in process), a 'talking group' for most vulnerable students (Yr 7 and other transition year groups) to be led by MD or a mental health first aider - resilience exercises, voice.
6. **improving school behaviour**, including reductions in low-level disruption, incidents, fights, bullying, exclusions and absence: interventions with MD for school refusers, supporting anti-bullying campaigns, class talks on empathy and relationships, small group interventions?
7. **reductions in risky behaviour** – such as impulsiveness, uncontrolled anger, violence, bullying and crime, early sexual experience, alcohol and drug use: PSHE programme, Talks by Eagle Radio regarding online sharing of sexual images; 1-1 sessions, outside speaker on gender issues/respect

Every child deserves the right to be heard. By introducing greater access to 1-1 counselling sessions, Open door opportunities and groups such as girls groups and student councils, the hope is they feel that they are heard.

Our universal approach to wellbeing is reflected in the role all staff take in safeguarding and promoting students' wellbeing. We have 16 staff members who are Youth Mental Health First Aid (One Day) trained; and 10 staff who are Youth Mental Health First Aiders. TS is also a MHFA Instructor.

Wellbeing/ Mental Health support process:

If a parent feels their child is struggling with a wellbeing/emotional issue, their first point of contact should be their child's form tutor. The form tutor can ascertain the nature of the issues by discussing with their tutee. For issues that are difficult to advise, MD can support with approach. If tutor feels they need greater support they can request counselling sessions via TS and MD.

Some cases may be referred outside of school to Surrey Mindworks. This is usually if the School Counsellors workload is at capacity. This referral will be made with the blessing of the parents.

ELSA support

Form tutors or teaching staff can suggest/request ELSA support from the Wellbeing Manager or DSL. There is a request form detailing child's information, issues and hoped for solutions/target for pupil. Sometimes, particularly in Prep or Pre Prep this may be a small group of pupils who need similarly intervention for similar behaviour/emotional issues. If issues require deeper emotional explanation they can be referred for 1-1 counselling with MD.

Counselling

1. Pupils in Pre Prep or Prep are referred via parents to form tutor or head of section, or directly via teaching staff (after parent discussion). Pupils in senior school can also self-refer via Open Door.
2. Parents' agreement is sought on providing them with the Parental Agreement document.
3. Pupils attend an assessment session with MD
4. 1-1 sessions arranged for 6 consecutive weeks (extendable according to greater need and presenting issue/circumstance)
5. On ending, parents are informed via email/telephone. Signposting to external agencies is offered at this point.

Person Responsible for this Policy: DSL

Name of Governor and review date: Alex Balls, Safeguarding Governor