SAFEGUARDING
and
CHILD PROTECTION POLICY

Approved by Governing Body		**October 2026**
Next review date		**September 2027**
Head Teacher	 Kate Le Page	
Co-Chairs of Governors	Louise Hallam & Tony Kung	

Values

The Wells Free School is an inclusive school which aims to ensure all pupils have access to the best possible education, and where the happiness, safety and wellbeing of all individuals, matter. We believe that all members of our school community have a right to succeed, and the entitlement to develop their full potential. We are committed to ensuring all pupils have access to a broad, balanced and relevant curriculum which aims to prepare them for life outside school, and which is designed to meet everyone's specific needs.

Equal Opportunities Statement

We are committed to the promotion of equality and equity and an understanding of individual rights and responsibilities. We will ensure that all members of our school community have equal access to the education provided by our school. We celebrate the different experiences all members of the school community bring to our school, and recognise that these experiences, interests and strengths affect the ways in which people learn. We aim to harness this diversity to enable all members of our school community to thrive and enjoy their time at our school.

Disability Statement

The Wells Free School is proud to be an inclusive school. We offer access to a broad and balanced curriculum for all pupils regardless of disability. We strive to ensure all pupils can access, educationally and physically, all learning opportunities within and beyond the school.

We aim to ensure that all users can access key learning areas and will ensure that no user experiences any discrimination or reduced entitlement to learning due to being unable to physically access areas of the school.

As with any additional needs, the school works closely with parents and appropriate outside agencies to ensure equality of access for all.

Nurture UK

The school is a Nurture UK accredited school. As such, we share the vision that:

1. Child development is not limited by lack of nurture in education.
2. Adults working with and caring for our children are supported and equipped with evidence-based tools to help them flourish and learn.

Nurture as a practice means relating to and coaching children and young people to help them form positive relationships, build resilience, and improve their social, emotional, and mental health and wellbeing. As a school we consistently implement the six principles of nurture:

1. Children's learning is understood developmentally.
2. The classroom offers a safe base.
3. The importance of nurture for the development of wellbeing
4. Language is a vital means of communication.
5. All behaviour is communication.
6. The importance of transition in children's lives

These six principles help staff to focus on the social and emotional needs and development of our children, ensuring all children are ready to learn.

SECTION A – STATEMENT OF INTENT

The Head Teacher and governors are committed to implementing and establishing best practice to ensure that staff and others, work in line with the latest published guidance on *Keeping Children Safe in Education*, to achieve the best possible outcomes.

SECTION B – ORGANISATION

There can be no complacency where safeguarding of children is concerned and therefore everyone has a responsibility to ensure that any issue is addressed in an appropriate manner. The Wells Free School has specified personnel trained to comply with legal requirements and best practice. These staff will lead implementation of all the associated policies and procedures and can always be consulted if required.

KEY CONTACTS:

	Name	The Wells Free School contact information
Designated Safeguarding Lead (DSL)	Anna-Marie Cheeseman	annamarie.cheeseman@thewellsfreeschool.co.uk dsl@thewellsfreeschool.co.uk
Deputy Designated Safeguarding Lead(s)	Kate Le Page Rae Akehurst Natalie Arnold	headteacher@thewellsfreeschool.co.uk senco@thewellsfreeschool.co.uk Natalie.arnold@thewellsfreeschool.co.uk dsl@thewellsfreeschool.co.uk
Headteacher	Kate Le Page	headteacher@thewellsfreeschool.co.uk
Safeguarding Governor	Suzanne Farr	Suzanne.farr@thewellsfreeschool.co.uk

What to do if you have a welfare concern at The Wells Free School

Why are you concerned?

For example:

- something a child has said, such as an allegation, disclosure or comment that causes concern
- changes in appearance, presentation, behaviour, emotional wellbeing or attendance
- unexplained injuries, marks or bruises
- witnessed or reported concerning, harmful or inappropriate behaviour, including online
- concerns linked to family circumstances, peer relationships or wider community context

Act immediately and record your concerns: If urgent, speak to a DSL first

Follow the The Wells Free School's procedure:

- Reassure the child and listen carefully; do not promise confidentiality
- Use open questions if needed, for example, **TED**: **T**ell, **E**xplain, **D**escribe
- Record facts and not opinions, using the child's own words where possible on CPOMs
- Report to the DSL: seek support for yourself as required

Inform The Wells Free School Designated Safeguarding Leads

- If a child is at risk of immediate harm, is unsafe to go home, or requires urgent protection, make an urgent Request for Support to the Front Door Service via the Kent Children's Portal and/or call the Police on 999.
- If there is no immediate risk of harm, consider what support is needed in line with the Kent Support Level Guidance and KSCMP procedures. This may include internal support, signposting to community based early help services, contacting the Police, reporting allegations against staff to the LADO, or making a Request for Support to the Front Door Service via the Kent Children's Portal.
- If the The Wells Free School believes a child may need support but is unclear whether a Request for Support is required, advice can be sought through a consultation from the Front Door Service via **03000 411 111**
- If support is required out of working hours, contact the Out of Hours Service via **03000 41 91 91**.

If you are unhappy with the response:

DSLs/Staff:

- Follow The Wells Free School whistleblowing procedures Whistleblowing Policy Feb 2026
- Follow Kent safeguarding partnership escalation procedures.

Parents:

- Follow The Wells Free School's complaints procedures Complaints Policy and Procedure June 2026

Record decision making and action taken in the [pupil/student] child protection file

Monitor

Be clear about:

- What you are monitoring, for example, behaviour trends, appearance.
- How long you will monitor for
- Where, how and to whom you will feedback, and how you will record

Review and **request further support** if necessary.

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

1. Child Focused Approach to Safeguarding

1.1 Introduction

The Wells Free School recognises its statutory responsibility to safeguard and promote the welfare of all children. Safeguarding is **everybody's responsibility** and everyone has a role to play in keeping children safe. This includes staff, volunteers, governors, leaders, parents/carers, wider family networks and pupils.

The Wells Free School believes that the best interests of children always come first. All children, defined in law and in this policy as anyone under the age of 18, have a right to be heard, protected and supported. This policy applies to all children, including those living with birth parents or extended family, children in kinship care, adopted children, looked after children, previously looked after children and care leavers. Where safeguarding concerns relate to pregnancy, staff will also consider the help, support and protection needs of unborn children.

All children have equal rights to protection, regardless of age, sex, ability, culture, race, language, religion, belief, sexual orientation or identity. The Wells Free School is committed to creating and maintaining an inclusive, anti-discriminatory safeguarding culture. Staff are expected to recognise and challenge racism, discrimination and prejudice, and to consider how these experiences may affect children's safety, welfare and access to support.

Staff at The Wells Free School will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child. If any member of our community has a safeguarding concern about any child or adult, they should act and act immediately.

This policy applies to child protection concerns relating to children who attend The Wells Free School. It may also apply to other children connected to The Wells Free School, such as siblings, children on student or work placements, or members of staff who are under the age of 18.

The Wells Free School recognises the importance of providing an ethos and environment where children are safe and feel safe. Children will be respected, listened to and encouraged to talk openly. Their wishes and feelings will be considered when deciding what safeguarding action to take and what support to provide.

The Wells Free School recognises that children's behaviour, presentation and experiences should be understood in context. Staff will take a trauma-informed and child-centred approach, considering the possible root causes of behaviour and the impact of abuse, neglect, exploitation, discrimination, adversity and wider contextual or extra-familial harm.

Our core safeguarding principles are:

- **Prevention:** providing a positive, supportive and safe culture, curriculum and pastoral opportunities for children, alongside safer recruitment procedures.
- **Protection:** following agreed procedures and ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns
- **Support:** adopting a child-centred approach and providing appropriate support for pupils, parents/carers and staff, including specific interventions for those who may be at risk of harm.
- **Collaboration:** working with parents/carers, where safe and appropriate, and with other agencies to ensure timely, proportionate and effective safeguarding action is taken.

The procedures contained in this policy apply to all staff, including governors, temporary or third-party agency staff and volunteers, and are consistent with those outlined within 'Keeping Children Safe in Education' 2026.

1.2 Policy Context

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

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

- Keeping Children Safe in Education (KCSIE) 2026
- Working Together to Safeguard Children (WTSC) 2026
- Early Years and Foundation Stage Framework (EYFS) 2026
- Ofsted: Education Inspection Framework 2026
- Framework for the Assessment of Children in Need and their Families, 2000
- Kent and Medway Safeguarding Children Procedures
- The Education Act 2002
- Education and Inspections Act 2006
- The Human Rights Act 1988
- The Equality Act 2010 (including the Public Sector Equality Duty)
- Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), and the Data (Use and Access) Act 2025 – referred to collectively as 'data protection laws'

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

The Wells Free School will follow local or national guidance in response to any emergencies. We will amend this policy and our procedures as necessary but regardless of the action required, our safeguarding principles will always remain the same and the welfare of the child is paramount.

1.3 Definition of Safeguarding

In line with 'Working Together to Safeguard Children' and KCSIE, safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- promoting the upbringing of children with their birth parents, or otherwise their family network, whenever possible and where this is in the best interests of the child(ren)
- taking action to enable all children to have the best outcomes.

Child protection is part of safeguarding and promoting the welfare of children. It refers to the activity undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

The Wells Free School understands that significant harm is the threshold used to determine when statutory child protection intervention may be required. Under the Children Act 1989, "Harm" is the "ill treatment or the impairment of the health or development of the child". Harm can be determined "significant" by "comparing a child's health and development with what might be reasonably expected of a similar child". There are no absolute criteria for determining significant harm. Significant harm may arise from a single serious incident or from a pattern of acute, longstanding, chronic or cumulative concerns which impair a child's health or development.

The Wells Free School recognises that safeguarding concerns are rarely isolated. Children may experience multiple and overlapping harms, including abuse, neglect, exploitation, online harms and extra-familial harm. Our safeguarding response will consider the full context of a child's lived experience, including their relationships, family circumstances, peer groups, community, online activity and wider environment.

Safeguarding includes a wide range of issues including, but not limited to:

- abuse and neglect
- bullying, including cyberbullying, prejudice-based and discriminatory bullying
- child-on-child abuse
- children absent from education, missing from education, home or care
- children with family members in prison or affected by parental offending
- contextual safeguarding and extra-familial harm
- domestic abuse
- drugs and alcohol misuse
- exploitation, including child sexual exploitation and child criminal exploitation, group-based exploitation, county lines, gangs, serious violence, trafficking and modern slavery
- fabricated or induced illness
- gender-based abuse and violence against women and girls
- hate, discrimination and harmful prejudice
- homelessness
- honour or faith-based abuse, including Female Genital Mutilation and forced marriage
- mental health concerns
- online abuse and technology-assisted harm, including making or sharing nudes or semi-nudes
- preventing radicalisation and extremism
- private fostering
- sexual violence, sexual harassment, harmful sexual behaviour and relationship abuse

Further information about specific safeguarding issues can be found in Part one and Annex A of Keeping Children Safe in Education.

1.4 Related Safeguarding Policies

This policy is one of a series in the The Wells Free School integrated safeguarding portfolio and should be read and actioned in conjunction with the policies listed below:

- Acceptable Use of Technology Policies (AUP)
- Allergy
- Attendance
- Bereavement
- Children with health needs who cannot attend school
- Complaints
- Data protection and information sharing
- Emergency procedures, such as evacuations and lockdowns
- Employment of Ex-offenders
- EYFS
- First aid and medical care
- Food and drink in school
- Health and safety
- Inclusion and special education needs
- Looked after children and post looked after children
- Managing allegations against staff
- Online Safety
- Recruitment
- Relational

- Relationship, Sex and Health Education (RSHE)
- Remote education
- Restrictive interventions
- Risk assessments, such as school trips, use of technology
- Staff Code of Conduct
- Supporting children with medical conditions
- Suspension and permanent exclusion
- Whistleblowing

Supporting Guidance to be read and followed alongside this document

- Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings - Safer Recruitment Consortium
- What to do if you are worried a child is being abused
- Early Years Foundation Stage (EYFS) Statutory Framework: The Safeguarding and Welfare Requirements

These documents can be found on Teams in the School Hub and on the safeguarding board in the staff room.

1.5 Policy Compliance, Monitoring and Review

The Wells Free School will review this policy at least annually and update it as needed, so that it remains current and reflects safeguarding issues as they emerge and evolve, including lessons learnt. The policy will also be updated following relevant national or local guidance changes, significant safeguarding events or learning, and any changes to The Wells Free School procedures.

All staff, including temporary staff, agency staff and volunteers, will be provided with access to this policy and Part one of the current version of Keeping Children Safe in Education. Staff will be expected to read and understand the relevant information as part of induction and ongoing safeguarding training. These documents can be accessed:

- On teams – school hub
- A hard copy on the safeguarding wall in the staff room

The Trustee Governors, working with the senior leadership team and DSL, will ensure mechanisms are in place to support all staff to understand and discharge their safeguarding roles and responsibilities as set out in Part one of KCSIE.

Parents/carers can obtain a copy of The Wells Free School Child Protection Policy and other related policies on request. These policies can also be viewed via The Wells Free School website:
www.thewellsfreeschool.co.uk

The policy forms part of our Whole School Development Plan and safeguarding arrangements and will be reviewed annually by governing body who have responsibility for oversight of safeguarding and child protection systems.

The Designated Safeguarding Lead (DSL) and will provide regular reports to the governing body on safeguarding activity, systems and themes. Reports will support effective oversight and challenge but will not include details that identify individual pupils or families, unless this is required for a specific safeguarding purpose and is lawful and appropriate.

2. Key Responsibilities

2.1 Governance and Leadership

The governing body and leadership team have strategic responsibility for the school safeguarding arrangements and will ensure they comply with their duties under legislation and Keeping Children Safe in Education.

The governing body will ensure there is a whole school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development, and that all systems, processes and policies operate with the best interests of the child at their heart.

The governing body and leadership team will ensure appropriate policies and procedures are in place so that timely action is taken to safeguard and promote children's welfare. The headteacher and DSL will ensure that these policies and procedures are understood and followed by all staff.

The governing body will have regard to their obligations under the Human Rights Act 1998, the Equality Act 2010, including the Public Sector Equality Duty, and the local multi-agency safeguarding arrangements set out by the Kent Safeguarding Children Multi-Agency Partnership (KSCMP).

- This includes but is not limited to safeguarding all members of the school community, including staff, pupils, parents/carers and other family members, who are identified with protected characteristics within the Equality Act; age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.
- For further information about our approaches to equality, diversity, and inclusion, please access our website www.thewellsfreeschool.co.uk.

The governing body and leadership team will promote an inclusive, anti-discriminatory safeguarding culture and ensure staff are supported to identify, understand and challenge racism, discrimination and disproportionality in safeguarding practice.

The governing body will ensure an appropriate senior member of staff, from the school leadership team, is appointed to the role of Designated Safeguarding Lead (DSL). They will ensure the DSL and any deputies have the appropriate status, authority, time, funding, training, resources and support to carry out the role effectively.

The school has a nominated governor for safeguarding. This person will provide appropriate oversight and challenge, including whether safeguarding policies are effective, interlink with other relevant policies, reflect local procedures and are reviewed at least annually and updated when required. Safeguarding updates are shared with governors at meetings

2.2 Designated Safeguarding Lead (DSL)

The school has appointed Anna-Marie Cheeseman, Deputy Head, who is a member of the senior leadership team, to act as our Designated Safeguarding Lead (DSL).

The DSL has overall responsibility for the day-to-day oversight of safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place.

The school has also appointed 3 Deputy DSLs who are trained to the same standard as the DSL and will have delegated responsibilities to act in the DSLs absence:

- Kate Le Page, Headteacher
- Rae Akehurst, Inclusion Lead
- Natalie Arnold, Office Manager

For the purposes of this policy, references to the DSL, includes the DSL and any appropriately trained deputies, however, The Wells Free School recognises that whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.

The DSL is most likely to have a complete safeguarding picture and is the most appropriate person to advise staff on the response to safeguarding concerns.

The DSL will carry out their role in line with Annex B of KCSIE. This includes, but is not limited to:

- managing referrals to the Front Door Service, the police, the Channel programme, the Disclosure and Barring Service and other agencies as required.
- working with others, including the headteacher, senior leaders, relevant staff, social workers, early help services, Family Help workers, local authority services and other safeguarding partners.
- acting as a source of support, advice and expertise for all staff.
- maintaining a confidential recording system for safeguarding and child protection concerns.
- coordinating safeguarding action for individual children, including children who need a social worker, children receiving early help, children who are looked after or previously looked after, and children subject to child protection or child in need plans.
- ensuring the school contributes to multi-agency safeguarding arrangements and is appropriately represented at relevant safeguarding meetings.
- ensuring locally established procedures, including Kent Safeguarding Children Multi-Agency Partnership procedures are followed as necessary.
- promoting educational outcomes by sharing relevant welfare, safeguarding and child protection information with teachers and school/college leadership staff, where appropriate.
- taking lead responsibility for online safety, including understanding filtering and monitoring systems and processes.
- ensuring staff access appropriate safeguarding and child protection training, including online safety, and receive regular safeguarding updates.
- keeping the headteacher informed of safeguarding issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- being aware of the requirement for children to have an Appropriate Adult where there is a need for police detention, treatment or questioning.
- ensuring child protection files are kept up to date, stored securely and transferred appropriately when a child moves setting.

During term time, the DSL will be available during school hours for staff to discuss safeguarding concerns.

- The DSL or a deputy DSL will be in school from 7:30am until 6pm (Monday – Thursday) and 7:30am until 5pm on a Friday.

Where the DSL is not available, following arrangement is in place so that safeguarding concerns can be raised, received, monitored and acted on without delay.

- The DSL or a deputy DSL will always be available on the telephone if they are not in the school. Staff in the building will be told who to contact in the event of a safeguarding situation and which number to contact them on. There is also a monitored email inbox dsl@thewellsfreeschool.co.uk which can be accessed. Staff are clear that urgent concerns must be reported immediately to the DSL, a deputy DSL, senior leader, or reported directly themselves to the appropriate service where urgent safeguarding action may be required.

The school will ensure appropriate DSL cover arrangements are in place during any closures, out-of-hours activities and out-of-term activities arranged by the school.

- This is achieved through the use of the monitored DSL inbox dsl@thewellsfreeschool.co.uk.

The DSLs will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years. The DSLs knowledge and skills will be refreshed at regular intervals, and at least annually, to keep up with developments relevant to safeguarding and child protection.

2.3 Members of Staff

All staff have an important role in safeguarding and promoting the welfare of children. They are particularly well placed to observe changes in a child's behaviour, appearance, attendance or wellbeing, identify concerns early, provide help for children and prevent concerns from escalating.

All members of staff have a responsibility to:

- provide a safe environment in which children can learn.
- be aware of the systems within school which support safeguarding, including this child protection policy, the staff code of conduct, the safeguarding response to children who are absent from education, and the role of the DSL.
- be aware of the indicators of abuse, neglect and exploitation, so they can identify children who may need help or protection.
- be prepared to identify children who may benefit from support before statutory intervention, including universal services, community-based Early Help, targeted early help through Family Help, and/or statutory support from children's social care, in line with the Kent Support Levels Guidance and local procedures.
- understand the local process for seeking advice and making referrals, including Requests for Support to the Front Door Service, and for statutory assessments under the Children Act 1989, in line with the Kent Support Levels Guidance. This includes where a child may be in need, disabled, or suffering, or likely to suffer, significant harm.
- know what to do if a child tells them they are being abused, neglected or exploited, and understand the impact this can have on a child.
- maintain an attitude of professional curiosity and speak to the DSL if they have any concerns about a child.
- be 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.
- know how to maintain an appropriate level of confidentiality, while understanding that early sharing of information is vital to keeping children safe.
- reassure children who report concerns that they are being taken seriously and that they will be supported and kept safe.
- undertake safeguarding and child protection training, including online safety, and engage with regular safeguarding updates.
- act in line with the school staff code of conduct and other relevant safeguarding policies.
- where applicable, act in line with the Teachers' Standards, which state that teachers, including headteachers, should safeguard children's wellbeing and maintain public trust in the teaching profession.

Staff at The Wells Free School recognise that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as being abusive or harmful. This will not prevent staff from having professional curiosity and speaking to a DSL where they have concerns.

Staff at The Wells Free School will determine how best to build trusted relationships with children and parents/carers which support appropriate communication and early identification of needs and concerns. This will be achieved in line with relevant school policies, including the staff code of conduct and pupil relational policy.

2.4 Children

Children have a right to:

- feel safe, be listened to, and have their wishes and feelings considered.
- be taken seriously when they raise concerns about abuse, neglect, exploitation or any other safeguarding issue.
- receive appropriate help and support from safe adults.
- safely express their views, share concerns and give feedback about safeguarding arrangements.
- contribute to the development of school safeguarding policies.
- learn how to keep themselves and others safe, including online.

2.5 Parents and Carers

Parents/carers have an important role in safeguarding and promoting the welfare of their children. They are encouraged to work in partnership with the school and to:

- understand and follow relevant school policies and procedures.
- talk to their children about safeguarding, including online safety, and support the school in their safeguarding approach.
- identify behaviours or changes which may indicate that their child, or another child, may be at risk of harm, including online.
- speak to the school if they have concerns about their child, or another child's, welfare or wellbeing.
- seek advice or support from the school or other agencies if they have concerns about their child, or another child's, safety or wellbeing.

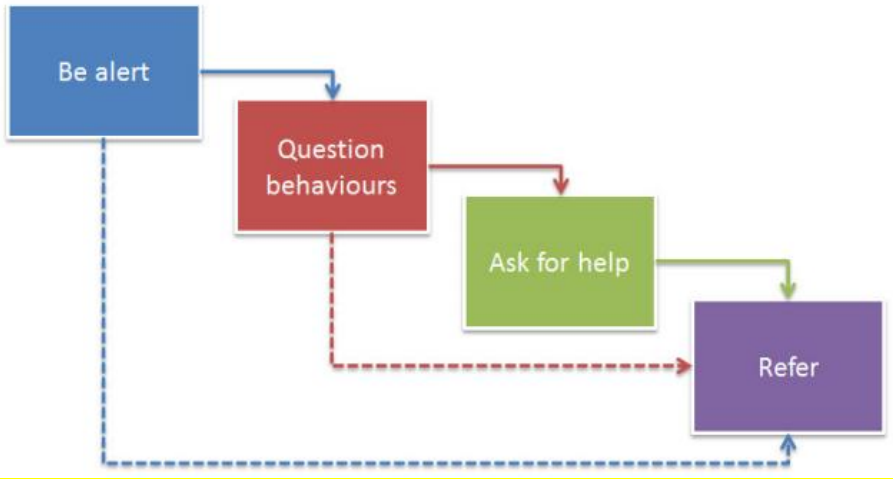
3. Child Protection Procedures

3.1 Recognising Indicators of Abuse, Neglect & Exploitation

Staff will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child.

All staff are made aware of the definitions and indicators of abuse, neglect and exploitation as identified in 'Working Together to Safeguard Children' and 'Keeping Children Safe in Education'. Staff will also be expected to understand these indicators in line with the Kent Support Levels Guidance.

All members of staff are expected to be aware of and follow the 'What to do if you are worried a child is being abused' guidance if they are concerned about a child:



The Wells Free School recognise that when assessing whether a child may be at risk of suffering, be suffering, or is likely to suffer, harm, there are four categories of abuse (further information is included in appendix 1):

- Physical abuse
- Sexual abuse
- Emotional abuse
- Neglect

By understanding the indicators of abuse, neglect and exploitation, we can identify children who may need help or protection, respond as early as possible, and help ensure children and families receive the right support.

The Wells Free School recognises that concerns may arise in many different contexts and can vary in nature and seriousness. Indicators of abuse, neglect and exploitation do not automatically mean that a child is being harmed; however, all concerns will be taken seriously and explored by the DSL on a case-by-case basis.

The Wells Free School recognises abuse, neglect, exploitation and other safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label. In many cases, multiple issues will overlap.

All staff will consider whether children may be at risk of abuse, neglect, exploitation or harm in situations outside their families. The Wells Free School recognises that extra-familial harms can take a variety of forms and that children may be vulnerable to multiple harms, including sexual abuse, sexual harassment and exploitation, domestic abuse within their own intimate relationships, criminal exploitation including financial exploitation, serious youth violence, county lines, online harms and radicalisation. Staff will report any concerns to the DSL in line with this policy, and the DSL will consider the wider context of the child's experiences when assessing risk and support needs.

The Wells Free School recognises that any child may benefit from support before statutory intervention is required. This may include support from universal services, community-based Early Help, or the targeted early help level of Family Help. Further information about how The Wells Free School responds to safeguarding and welfare concerns, including requests for support, is set out in section 3.2 of this policy.

All staff will be alert to the potential need for additional support for children who may be more vulnerable or whose circumstances may indicate emerging, escalating or unmet needs. Staff will be particularly alert to the potential need for additional support for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs, whether or not they have a statutory Education, Health and Care plan
- has a mental health need
- is a young carer
- is pregnant and/or is a parent themselves
- has exhibited early signs of abusive, violent and/or harmful behaviours
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement, association with organised crime groups or county lines
- is frequently missing or goes missing from education, home or care
- electively home educated
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of permanent exclusion, is attending alternative provision or is attending a Pupil Referral Unit
- is at risk of exploitation, modern slavery or trafficking, including criminal or sexual exploitation
- is at risk of being radicalised into terrorism
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues or domestic abuse
- is misusing alcohol or other drugs themselves

- is at risk of honour or faith-based abuse, such as Female Genital Mutilation or Forced Marriage
- is privately fostered.

Where staff identify that a child may benefit from additional support, they will report their concerns to the DSL in line with this policy.

Staff will be alert to:

- concerns raised by children, including disclosures or comments about themselves, their peers or family members.
- changes in a child's behaviour, appearance, attendance, presentation or emotional wellbeing.
- indicators of abuse, neglect or exploitation.
- concerning interactions between children and parents/carers.
- parental behaviours which may indicate risk, including concerns linked to substance misuse, mental health, domestic abuse or other family circumstances.
- risks outside the family home, including peer groups, the wider community and online context.
- the needs of children with additional or complex needs, who may require additional support or specialist services.

Children may not feel ready or know how to tell someone they are being abused, neglected or exploited. They may also not recognise their experiences as harmful. This should not prevent staff from having professional curiosity and speaking to the DSL if they have concerns.

All reports and concerns raised by children will be taken seriously and responded to in line with this policy. Staff will reassure children that they are being taken seriously, that they will be supported and kept safe, and that they will not be made to feel ashamed or that they are creating a problem by reporting concerns.

The Wells Free School recognises that technology can be a significant component in many safeguarding and wellbeing issues; children are at risk of abuse or exploitation online from people they know (including other children) and from people they do not know; in many cases, abuse will take place concurrently via online channels and in daily life.

Following a concern about a child's safety or welfare, any searching, screening or confiscation of items, including electronic devices, will be managed in line with the Use of Restrictive Interventions Policy which is informed by the DfE 'Searching, screening and confiscation at school' guidance.

- The DSL will be informed of any search where there were reasonable grounds to suspect a pupil was in possession of a prohibited item, or where a search identifies a potential safeguarding risk. The DSL will consider the circumstances and any wider safeguarding concerns.

3.2 Responding to Child Protection Concerns

Where safeguarding concerns are identified, the child's lived experience, voice and views will remain central to our decision-making, assessment and planning.

If staff are concerned about the safety or welfare of a child, they are expected to:

- listen carefully to child and reflect back the concern.
- use the child's own language.
- be non-judgmental.
- avoid leading questions, using open questions where necessary to clarify information, for example: who, what, where, when, or TED: Tell, Explain, Describe
- not promise confidentiality, as concerns will have to be shared further, for example, with the DSL and/or other agencies.
- be clear about boundaries and how the concern will be progressed.

- record the concern using the facts as the child presents them, in line with school record keeping procedures (CPOMs).
- inform the DSL, as soon as practically possible.

All staff are made aware that early information sharing is vital for the effective identification, assessment, and allocation of appropriate support. This applies when concerns first emerge and where a child is already known to other agencies. Staff will not assume that a colleague or another professional will act or share information that may be critical in keeping a child safe.

The Wells Free School recognises that children should not be seen or relied upon as protective factors for adults. When considering family circumstances, adult vulnerabilities or parental needs, staff will remain focused on the child's needs, safety, welfare and lived experience. Staff will not assume that a child's presence, behaviour, affection, resilience or relationship with a parent/carer reduces risk, prevents harm, or means that an adult's needs are safely managed.

The Wells Free School will respond to safeguarding concerns in line with the Kent Safeguarding Children Multi-Agency Partnership (KSCMP) procedures, the Kent Support Levels Guidance which follow the principle of 'Right Help, Right Time, Right Professional'.

- The full KSCMP procedures and additional guidance relating to reporting concerns and specific safeguarding issues can be found on the KSCMP website: www.kscmp.org.uk

All staff will be made aware of the process for identifying, assessing and responding to children's needs in line with the Kent Support Levels Guidance. This includes understanding the criteria, including the level of need, for when children and families may be supported through

- universal services and community-based Early Help
- the targeted early help level of Family Help, under sections 10 and 11 of the Children Act 2004
- statutory services under section 17 of the Children Act 1989, including children in need and disabled children
- statutory child protection processes under section 47 of the Children Act 1989, where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm
- care and supervision proceedings under section 31 of the Children Act 1989
- accommodation under section 20 of the Children Act 1989.

Staff are not expected to make threshold decisions alone. If staff are concerned about a child's welfare or safety or are unsure what level of support may be required, they will speak to the DSL in line with this policy. The DSL will consider the concern in line with the Kent Support Levels Guidance, KSCMP procedures and local referral pathways.

- Where safeguarding concerns are identified, options may include:
  - managing support for the child internally through school pastoral, welfare and/or safeguarding support processes, where this is appropriate and does not place the child at additional risk.
  - considering whether parents/carers should be informed to further support the child's wellbeing, where it is safe and appropriate to do so.
  - accessing universal services and community-based Early Help for *children with emerging needs*, including support available through Kent Family Hubs, the school and other local universal, voluntary or community services.
  - making a Request for Support to the Front Door Service via the Kent Children's Services Portal where a child's needs cannot be met by universal or community-based early help support alone and coordinated, multi-disciplinary support may be required, or where there is reasonable cause to suspect that the child is suffering, or is likely to suffer, significant harm.

Community-based Early Help is support for children of all ages that improves a family's resilience, improves outcomes or reduces the chance of a problem getting worse. It is not a single service, but a system of support delivered by local authorities and their partners, including education providers. The Kent Support Levels Guidance describes this as '*children with emerging needs (Level 2)*'.

- Children at this level are usually best supported by professionals who already work with them, such as health professionals, early years settings, schools or colleges, and/or through community resources such as Family Hubs or voluntary services.
- A Request for Support via Front Door Service is not required for support at this level.
- Where community-based Early Help is appropriate, the DSL will consider what support can be provided within school and/or through local universal, voluntary or community services, including Kent Family Hubs.
- Where the need of a child/family escalate, become persistent, or cannot be met by universal or community-based Early Help alone, the DSL will consider whether a Request for Support to Family Help is required in line with the Kent Support Levels Guidance.

Where children and families have multiple and/or complex needs, or persistent needs, which cannot be met by universal or community-based early help support alone, they may require coordinated, multi-disciplinary support to prevent escalation through the targeted early help level of Family Help. The Kent Support Levels Guidance describes this as '*Family Help – Children with multiple and/or complex needs (Level 3)'*. Support at this level may include targeted early help and statutory support under section 17 of the Children Act 1989, where required to safeguard and promote the child's welfare.

- A Request for Support is required and will be made to the Front Door Service via the Kent Children's Services Portal.

Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, and needs and risks cannot be safely managed through targeted or Child in Need Family Help support alone, a statutory child protection response is required. The Kent Support Levels Guidance describes this as '*Family Help – Children in need of protection (Level 4)'*.

- Safeguarding activity at this level is led under section 47 of the Children Act 1989.
- A Request for Support is required and will be made to the Front Door Service via the Kent Children's Services Portal.
- If a child is at immediate risk, the Request for Support will be marked as "urgent".
- If the child is in immediate danger, emergency services will be contacted using 999.

The Wells Free School will take appropriate safeguarding action in response to concerns but will not investigate child protection concerns as a single agency or attempt to determine whether abuse, neglect or exploitation has occurred. Staff will record and report concerns in line with this policy and KSCMP procedures, and information will be shared with Children's Front Door and/or the police where appropriate, so that concerns can be considered through the appropriate multi-agency process.

The Wells Free School recognises that children may be harmed in contexts outside the home, including within peer groups, the wider community and online. When making a Request for Support, the school will provide as much relevant information as possible so that any assessment can consider the full context of the child's lived experience and take a contextual approach to harm.

If the school believes a child may need support but is unclear whether a Request for Support should be submitted, the DSL may seek advice through a no-name consultation with the Front Door Service before deciding next steps. A consultation will not be used where a child is suffering, or is likely to suffer, significant harm; in these circumstances, a Request for Support will be submitted without delay.

The DSL will usually have responsibility for making Requests for Support and other safeguarding referrals. However, all staff are made aware of the local Kent process for making referrals to the Front Door and for statutory assessments under the Children Act 1989, including the role they may be expected to play in such assessments.

If staff have any concerns about a child's welfare or safety, they are expected to act on them immediately.

- If staff are unsure whether something is a safeguarding issue, they will speak to a DSL.
- If, in exceptional circumstances, a DSL or deputy DSL is not available, this must not delay appropriate action being taken. In these circumstances, staff should speak to a member of the school senior leadership team, seek a consultation from the Front Door Service, contact the police where urgent action is required, or make a Request for Support themselves. Contact information is available in the safeguarding flowchart on page 6.
- Any safeguarding action taken by staff must be shared with the DSL as soon as possible.

Parents/carers will usually be spoken to where a Request for Support is being considered, and their agreement to engage will be sought where this is required and safe/appropriate to do so. This will be considered in line with KSCMP procedures and the Kent Support Levels Guidance.

- Parent/carer agreement to engage is not required for *'Family Help – Children in need of protection (Level 4)'*, where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. A Request for Support must be made in these circumstances; however, it is good practice for the school to work openly and transparently with parents/carers and inform them of the Request for Support where it is safe to do so.
- Parents/carers will not be informed before a Request for Support is made where this may place a child at increased risk of harm, place an adult at risk of serious harm, prejudice the prevention or detection of serious crime, or undermine a criminal investigation.

If, after a Request for Support or other external intervention, a child's situation does not appear to be improving, or there are concerns about a decision or response, staff or the DSL will consider whether to re-refer and/or follow the Kent Safeguarding Children Escalation Procedure to ensure concerns are addressed and, most importantly, that the child's situation improves.

Any pastoral or welfare support provided by the school to children and families will be recorded and reviewed. The DSL will oversee support where families are requiring additional support, to ensure that school activity does not obscure potential safeguarding concerns from the wider professional network.

3.3 Multi-agency working

The Wells Free School recognises the pivotal role education settings play in multi-agency safeguarding arrangements. We are committed to working in line with the Kent Safeguarding Children Multi-Agency Partnership procedures, the Kent Support Levels Guidance and the principle of 'Right Help, Right Time, Right Professional'.

The school leadership team, governing body and DSL(s) will work to establish effective and co-operative relationships with safeguarding partners and other local agencies. This may include Children's Front Door, social workers, Family Help practitioners, health professionals, mental health services, specialist teachers, educational psychologists, other education settings and the police.

The Wells Free School will work with partner agencies to provide a coordinated safeguarding response which promotes children's welfare and protects them from harm. This includes contributing to relevant multi-agency plans and meetings, such as child in need meetings, child protection conferences, core groups, strategy discussions and care planning meetings.

Where a child is supported through community-based Early Help, Family Help, child in need, child protection or care planning processes, the school will work with partner agencies to promote joined-up planning, avoid unnecessary duplication and ensure the child's educational needs, safety, voice and lived experience are considered.

The school will allow access for Kent Children's Social Care and, where relevant, a placing local authority, so that they can conduct, or consider whether to conduct, assessments under section 17 or section 47 of the Children Act 1989.

When making a Request for Support or contributing to statutory assessments, the school will provide relevant information about the child's presentation, attendance, progress, relationships, family circumstances, wider context and any known risks outside the home, including online, peer group or community-based concerns.

The headteacher and DSL are aware of the requirement for children to have an Appropriate Adult where there is a need for police detention, treatment or questioning. The school will respond in line with relevant guidance and local procedures, including the school Relational and Use of Restrictive Interventions policies (which include Searching, Screening and Confiscation), where applicable.

3.4 Child Protection Records

All safeguarding concerns, discussions, decisions, and reasons for those decisions, will be recorded in writing using the school safeguarding system. Records will automatically be passed highlighted to the DSL without delay.

- Incidents and safeguarding concerns are recorded on CPOMs and external visitors who have a concern will be provided with a 'non-MIS user safeguarding form' which will be handed directly to a DSL. All staff have CPOMs logins and regular audits take place to ensure that staff are using these regularly.

If there is an immediate safeguarding concern, staff will speak to the DSL first. Completing a written record must not delay urgent safeguarding action.

Records will be completed as soon as possible after the incident/event, within 24 hours. They must be dated and timed accurately on CPOMs by the member of staff. They will be accurate, factual and written in a clear and professional manner, using the child's own words where relevant. Records will not include personal opinions unless these are clearly identified as professional judgement.

Staff will include relevant details such as the date, time, location, people present, the concern or allegation made, any visible injuries, the child's presentation and any action taken. A body map will be completed where visible injuries to a child have been observed.

If staff are unsure about recording requirements, they will seek advice from the DSL.

Our child protection records will include a clear and comprehensive summary of concerns, details of how concerns have been followed up and resolved, actions taken or not taken, decisions reached, the rationale for those decisions and any outcomes.

Child protection records will be kept confidential and stored securely on our CPOMs system. Records will be maintained separately from the child's main school record and retained in line with data protection legislation and school record retention arrangements.

The DSL will have oversight of child protection records and will ensure they are reviewed, shared and transferred appropriately in line with statutory guidance, KSCMP procedures and school record keeping arrangements.

3.5 Transferring and receiving child protection files and safeguarding information

When a child leaves The Wells Free School the DSL will ensure that their child protection file is transferred to the DSL at the new setting as soon as possible. This will be within 5 days for an in-year transfer or within the first 5 days of the start of a new term.

Child protection files will be transferred securely, separately from the child's main file, and in accordance with data protection legislation and statutory safeguarding guidance. Confirmation of receipt will be obtained.

In addition to transferring the child protection file, the DSL will consider whether it is appropriate to share relevant information with the DSL at the new setting in advance of the child leaving. This may include information to support the new setting to undertake an assessment of risk to others, as well as to make arrangements to safeguard the child, promote their welfare or continue appropriate support. Where there are safeguarding concerns, known risks or significant support needs, the DSL will instigate a direct conversation with the new setting to support effective information sharing and transition planning.

Where The Wells Free School receives a child protection file from another setting, the DSL will review the records and ensure relevant staff are made aware of information they need to know in order to safeguard and support the child. This may include the Inclusion Lead, pastoral staff, relevant teaching staff or other appropriate members of staff.

Where information shared during transition indicates that a child may present a risk to others and/or may be at risk themselves, The Wells Free School will consider what safeguarding action is required before, or as soon as possible after, the child starts. This may include completing or reviewing a safeguarding risk assessment and putting in place an appropriate safety and support plan.

Where a child joins The Wells Free School and no child protection file is received, the DSL will proactively contact the previous setting to confirm whether a child protection file exists and, if so, ensure it is transferred securely without delay.

3.6 Confidentiality and Information Sharing

The Wells Free School recognises its duty and powers to hold, use and share relevant information with appropriate agencies where this is necessary to safeguard and promote the welfare of children. Information will be shared at the earliest opportunity where this is needed to identify, assess or respond to risk, in line with Keeping Children Safe in Education, Working Together to Safeguard Children, KSCMP procedures and data protection legislation.

The Wells Free School has an appropriately trained Data Protection Officer (DPO) in line with data protection law requirements. The DPO is Satswana www.satswana.com.

All staff are made aware of the need to protect children's privacy and to handle information in a way that is lawful, proportionate and secure. Staff are also made aware that confidentiality must never prevent appropriate safeguarding action from being taken.

Staff will not promise confidentiality to a child, as safeguarding concerns may need to be shared with the DSL, the Front Door Service, the police and/or other agencies where appropriate.

Staff are expected to be proactive in sharing information as early as possible to help identify, assess and respond to concerns about a child's safety, welfare or wellbeing. Staff will not assume that a colleague or another professional will share information that may be critical to keeping a child safe.

Data protection laws do not prevent the sharing of information for the purpose of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. Information sharing decisions will be informed by safeguarding need, risk assessment, proportionality, data protection requirements and the need to promote the welfare and safety of the child and others.

Staff will have due regard to relevant data protection laws and principles, including when information should be shared and when it should be withheld. Staff will receive appropriate information and guidance about confidentiality, information sharing and data protection through induction and safeguarding training.

Where possible and appropriate, staff will be open and transparent with children and families about what information may be shared, with whom and why. However, information may be shared without agreement where this is necessary to safeguard a child, promote a child's welfare, prevent delay or avoid increasing risk.

The headteacher and DSL will share relevant safeguarding information with staff on a need-to-know basis, so that staff can safeguard and support children appropriately.

Staff can access further information through the school confidentiality policy, data protection policy and/or information governance procedures: Policies

3.7 Complaints

All members of the school community should feel able to raise or report any concerns about children's safety, safeguarding practice or potential failures in the school safeguarding arrangements.

The Wells Free School has a complaints procedure available to parents/carers, staff and visitors who wish to raise a concern or complaint. This can be found:
https://thewellsfreeschool.co.uk/docs/policies/Complaints_Policy_and_Procedure_June_2026.pdf
Policies

The leadership team at The Wells Free School will take all safeguarding concerns, complaints and whistleblowing reports seriously. Concerns will be considered and responded to in line with the relevant school policy and procedure.

Whilst we encourage members of our community to raise concerns directly with the school where appropriate, we recognise this may not always be possible.

- Children, young people or adults who have experienced, witnessed or are concerned about sexual abuse or harassment in education settings can contact the NSPCC Report Abuse in Schools helpline on 0800 136 663.
- Staff who do not feel able to raise concerns about child protection failures internally, or who feel their concerns are not being addressed, can contact the NSPCC Whistleblowing Advice Line on 0800 028 0285

Any concern or complaint that constitutes an allegation against, or concern about, a member of staff, supply teacher, volunteer or contractor will be dealt with in line with section 8 of this policy.

4 Specific Forms of Abuse and Other Safeguarding Issues

The Wells Free School recognises that children may be vulnerable to a wide range of safeguarding issues, both inside and outside the home, including online. Staff will maintain an attitude of 'it could happen here' and will report any concerns to the DSL in line with section 3 of this policy.

Further information about specific safeguarding issues is available in Keeping Children Safe in Education.

4.1 Child-on-child abuse (including harassment and violence)

All members of staff at The Wells Free School recognise that children can abuse other children; this is known as child-on-child abuse and may take place online, face-to-face, physically, verbally or through a combination of channels.

Staff will maintain an attitude of "it could happen here". Even if there are no reported cases of child-on-child abuse, staff will remain alert to the possibility that it may be taking place and not being reported.

The Wells Free School adopts a zero-tolerance approach to child-on-child abuse. We believe that abuse is abuse and it will never be tolerated or dismissed as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys”; this can lead to a culture of unacceptable behaviours, misogyny/misandry, and can create an unsafe environment for children and a culture that normalises abuse, which can prevent children from coming forward to report it.

The Wells Free School recognises that child-on-child abuse can take many forms, including but not limited to:

- bullying, including cyberbullying, prejudice-based and discriminatory bullying.
- abuse in intimate personal relationships between children, sometimes known as ‘teenage relationship abuse’.
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm, including where there is an online element which facilitates, threatens and/or encourages physical abuse.
- serious physical assault and harm, or the threat of harm with a weapon.
- sexual violence such as rape, assault by penetration and sexual assault, including where there is an online element which facilitates, threatens and/or encourages sexual violence.
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- 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.
- Consensual and non-consensual making or sharing of nudes and semi-nudes (previously known as sexting or youth produced sexual imagery), including where generated by Artificial Intelligence (AI)
- Upskirting (which is a criminal offence), which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- Initiation/hazing type violence and rituals, which could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element.

The Wells Free School recognises that harmful sexual behaviour exists on a continuum, from developmentally inappropriate or problematic sexual behaviour through to abusive behaviour and sexual violence.

Concerns will be considered in context, taking account of the age and stage of development of the children involved, any power imbalance, coercion, threats, exploitation, the nature of the behaviour, the impact on those affected, and any wider safeguarding risks.

All staff have a role to play in challenging inappropriate, harmful or abusive behaviours between children. Staff will be alert to factors which may increase risk or affect how children experience or report abuse, including age, developmental stage, sex, ability, SEND, culture, ethnicity, sexual orientation, gender identity, power imbalance, peer group dynamics and wider contextual factors. Staff will be aware of the possibility that children may minimise, normalise or not recognise harmful behaviours, and that some behaviours may be facilitated, threatened, encouraged or shared online.

The Wells Free School recognises that for some (but not all) forms of child-on-child abuse, girls are more likely to be victims and boys are more likely to be perpetrators. However, all child-on-child abuse is unacceptable, will be taken seriously and will be responded to in line with this policy.

The Wells Free School recognises that the law is in place to protect children rather than unnecessarily criminalise them. Where relevant, this will be explained to pupils in an age and developmentally appropriate way which avoids alarming or distressing them, while making clear that harmful, abusive or non-consensual behaviour is unacceptable and will be taken seriously.

The Wells Free School want children to feel confident to report abuse, knowing that their concerns will be treated seriously and that they will be supported and kept safe. The school will ensure reporting systems are

well promoted, easily understood and easily accessible. Children who report child-on-child abuse will be reassured that they are not creating a problem and will not be made to feel ashamed for sharing a concern.

The Wells Free School recognises that child-on-child abuse is a safeguarding issue for all children involved. We will consider the safety, welfare and support needs of the child who has experienced harm, any other affected children, and the child alleged to have caused harm.

Any concerns or allegations relating to child-on-child abuse, whether on-site, off-site or online, will be recorded and reported to the DSL in line with this policy.

- The DSL will consider the concern in line with relevant school policies and procedures, including behaviour, anti-bullying and child protection procedures.
- The DSL will consider the behaviour in context, including the child's age and stage of development, any SEND or communication needs, trauma or abuse history, power imbalance, coercion, intent, frequency, escalation and the impact on others.
- Concerns will be responded to, and where appropriate investigated under relevant school procedures, while recognising the need to engage with multi-agency processes where safeguarding or child protection concerns are identified.
- Where concerns involve harmful sexual behaviour, sexual harassment or sexual violence, DSLs will respond in line with Part five of KCSIE.
- Responses will always be child-centred, proportionate and based on the circumstances of the case.

When a concern of child-on-child abuse is reported, a DSL will consider whether an immediate risk and needs assessment is required. This will be considered on a case-by-case basis and may include:

- the wishes and feelings of the child who has been harmed
- the nature of the concern or alleged incident
- whether a crime may have been committed
- whether harmful sexual behaviour may have been displayed
- the ages and developmental stages of the children involved
- any power imbalance, coercion, intimidation or exploitation
- whether the concern appears to be a one-off incident or part of a pattern of behaviour
- any vulnerability, SEND or additional needs affecting the children involved
- any online elements or wider contextual factors
- any ongoing risks to the child who has been harmed, other children, staff or the wider school community
- whether the concern links to other safeguarding issues, such as child sexual exploitation, child criminal exploitation, serious violence or abuse within intimate personal relationships between children.

The risk and needs assessment, where completed, will be recorded and kept under review. Actions will be taken to protect and support all children involved and to address any wider safeguarding risks within the school environment.

The school will take appropriate safeguarding, pastoral and/or behaviour-related action in response to child-on-child abuse. However, where the concern indicates that a child may require Family Help, statutory support or protection, a DSL will make a Request for Support via the Kent Children's Services Portal, in line with the Kent Support Levels Guidance and KSCMP procedures.

The school will normally inform parents/carers of the children involved in child-on-child abuse, unless doing so would place a child at risk of harm, place another person at risk, prejudice the prevention or detection of crime, or undermine a police or statutory safeguarding response.

- Information shared with parents/carers will be relevant to their own child and shared in line with safeguarding, confidentiality and data protection requirements. The school will not share confidential information about other children, including any safeguarding action, support or sanctions, unless there is a lawful and appropriate basis to do so.

Child-on-child abuse is preventable. Timely, evidence-based support can be key to preventing children from going on to commit abuse or violence. The Wells Free School will work to minimise the risk of child-on-child abuse by creating a safe culture, promoting respectful relationships, providing appropriate curriculum opportunities, ensuring children know how to report concerns, and responding consistently to harmful behaviour.

- A robust anti-bullying policy within our relational approach
- Age-appropriate PSHE and RSE curriculum lessons
- A named adult, identified by each child, in which they feel comfortable to share information with
- Make it clear who the DSLs are in school, and that part of their role is to listen to any concerns (including child-on-child abuse).
- Regularly monitor our CPOMs system for emerging patterns of issue

Children affected by child-on-child abuse will be supported according to their needs.

- Pastoral support
- Support from a trusted adult
- Safety planning
- Reasonable adjustments
- Signposting to local or national services
- Working with parents/carers
- Curriculum responses
- Behaviour support
- Referral to external agencies
- Arrangements to reduce contact or manage risk where appropriate

4.2 Making or sharing nudes and/or semi-nudes

The Wells Free School recognises that all incidents involving the making or sharing of nudes or semi-nudes, whether consensual or non-consensual, will require a safeguarding response.

For the purpose of this policy, nudes and semi-nudes means nude or semi-nude images, videos or livestreams of children under the age of 18. This includes imagery that is taken/created by a child, taken/created by a child and shared by another person, digitally altered, or generated using artificial intelligence (AI). Nudes and semi-nudes may be shared online, between devices, through social media, messaging apps, gaming platforms, forums, livestreams or other digital routes.

Creating, possessing or sharing nudes and semi-nudes of children under 18, including where this has happened with consent, is illegal and can present complex safeguarding issues. However, The Wells Free School recognises that the law is in place to protect children rather than unnecessarily criminalise them. Responses will therefore be child-centred, proportionate and focused on safeguarding and supporting the children involved.

All concerns must be reported to and managed by the DSL in line with this policy, the Kent and Medway Responding to Nude and Semi-Nude Image Sharing Guidance, the Kent Support Levels Guidance and the UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people' guidance.

When made aware of concerns involving consensual or non-consensual sharing of nudes and semi-nudes, staff must:

- report the concern to the DSL immediately.
- never view, copy, print, share, forward, store or save the imagery, or ask a child to share or download it.
- report immediately to the DSL if imagery has been viewed inadvertently
- not delete the imagery or ask the child to delete it.

- not investigate images themselves or ask children involved to disclose information about the imagery, as this is the responsibility of the DSL.
- avoid saying or doing anything which may blame or shame any child involved.
- reassure the child that they will be supported and kept safe.
- explain that the concern must be shared with the DSL and that confidentiality cannot be promised.
- not share information about the incident with other staff, children, parents/carers or other families.

When made aware of a concern involving making or sharing of nudes and semi-nudes, the DSL will hold an initial review meeting in line with the UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people' guidance to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child involved. This may include speaking with relevant staff and children, involving parents/carers where safe and appropriate, seeking advice, making a Request for Support via the Kent Children's Services Portal, and/or contacting the police where required.

Parents/carers of children involved in making or sharing nudes or semi-nudes, will be informed at an early stage, unless there is good reason to believe that involving them would put a child at risk of harm.

A Request for Support will be made to the Front Door Service via the Kent Children's Services Portal, and/or the police informed immediately if:

- the incident involves an adult (over 18).
- there is reason to believe that a child has been coerced, blackmailed, groomed or exploited.
- there are concerns about a child's capacity to consent, including due to age, developmental stage, vulnerability or additional needs
- the imagery involves sexual acts, violence, threats, exploitation or other high-risk features (for example, a child under the age of thirteen, or images depict sexual acts which are unusual for the child's developmental stage)
- a child is at immediate risk of harm
- there are wider safeguarding concerns, including links to child sexual exploitation, child criminal exploitation, harmful sexual behaviour or abuse within intimate personal relationships between children.

All decisions and action taken regarding nude or semi-nudes will be responded to and recorded in line with our child protection procedures.

The DSL may choose to involve other agencies where there are concerns about nudes or semi-nudes at any time, including if further information is disclosed at a later date or there are additional concerns or incidents.

If the DSL is unsure if a Request for Support is appropriate, advice will be sought from the Front Door Service.

4.3 Exploitation, including child sexual exploitation (CSE), child criminal exploitation (CCE), county lines, serious violence and modern slavery

The Wells Free School recognises that Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), county lines, serious violence and modern slavery are safeguarding issues and may overlap. Children may also experience exploitation alongside other forms of abuse, neglect or harm. The school will therefore need to consider the full context of the child's lived experience, including risks outside the home, peer groups, community locations, transport routes and online environments.

The Wells Free School recognises that CSE and CCE are forms of abuse. They occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal or sexual activity. This may involve an exchange for something the child needs or wants, and/or be for the financial advantage or increased status of the perpetrator or facilitator, and/or involve violence or the threat of violence.

The Wells Free School recognises that exploitation may be committed or facilitated by individuals, organised networks or gangs, and the child may identify as being part of the group that is exploiting them. Exploitation can affect children of any age and sex, and it is not possible for a child to consent to being exploited, abused or trafficked.

Children may not recognise that exploitation is happening to them and may be manipulated, groomed or coerced into situations they do not fully understand. Children who are exploited may also be coerced, controlled, threatened or manipulated into activity which appears to be offending behaviour, and the school will consider whether such behaviour may be linked to exploitation before responding.

The Wells Free School recognises that:

- **Child Sexual Exploitation** (CSE) is a form of child sexual abuse. CSE can be a one-off occurrence or a series of incidents over time and may range from opportunistic to complex organised abuse. CSE can affect any child who has been coerced into sexual activity, including 16- and 17-year-olds who can legally consent to sexual activity. Some children may believe they are in a genuine romantic relationship and may not recognise that they are being exploited.
- **Child Criminal Exploitation** (CCE) can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, pickpocketing, vehicle crime, threatening or committing serious violence, or carrying weapons. Children can become trapped in criminal exploitation through threats, violence, intimidation, debt bondage, grooming or coercion, including threats towards their families. The experience of girls who are criminally exploited can be different from that of boys, and indicators may not be the same. Girls are also at risk of criminal exploitation. Both boys and girls who are criminally exploited may be at higher risk of sexual exploitation.
- **County lines** is a form of criminal exploitation involving gangs or organised criminal networks using dedicated mobile phone lines or other forms of “deal line” to export illegal drugs. This activity can happen locally as well as across the UK; no specific distance of travel is required. Children may be exploited to move, store or sell drugs or money and may be controlled through coercion, intimidation, violence, threats, debt bondage, online activity or exploitation of their family circumstances.
- **Serious violence** includes violence and exploitation involving weapons, gangs, criminal networks or serious physical harm. It can involve carrying, threatening with, or using knives or other weapons, or concerns that a child may be exposed to weapons through peers, gangs, criminal networks or community-based harm. The likelihood of involvement in serious violence may be increased by factors such as being male, having been suspended, spent time in alternative provision or been permanently excluded, having experienced child maltreatment, having been involved in offending, having used drugs or alcohol in early adolescence, or having previously been a victim or displayed violence. Serious violence can often peak in the hours just before or after school/college, including when children are travelling to and from the setting, and may be concentrated in particular places.
- **Modern slavery** includes human trafficking, slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, criminal exploitation, forced criminality, forced labour, domestic servitude and the removal of organs.

Staff will be alert to indicators that a child may be at risk of, or experiencing, exploitation, county lines or serious violence. These may include:

- unexplained gifts, money or new possessions
- increased absence from school/college or regularly missing education
- going missing from home or care, or regularly returning home late
- changes in friendship groups or relationships with older individuals or group

- a significant decline in educational performance
- signs of assault, unexplained injuries, self-harm or changes in wellbeing
- drug or alcohol misuse
- association with others involved in exploitation, gangs or criminal networks
- receiving requests for drugs via a phone line, moving drugs or collecting money
- being found in accommodation with which they have no connection, sometimes referred to as a trap house, cuckooing address or hotel room linked to drug activity
- owing money or a “debt bond” to exploiters
- having their bank account used to facilitate criminal activity
- being vulnerable to grooming, coercion, threats, intimidation or online exploitation.

The school will seek to understand when and where children may feel unsafe, including by listening to children, consulting staff and working with partners to understand the local context and support a coordinated safeguarding response.

The Wells Free School recognises that children who have been exploited may need additional support to help keep them safe and engaged in education.

If staff are concerned that a child may be at risk of, or experiencing, child sexual exploitation, child criminal exploitation, county lines, serious violence, trafficking or modern slavery, they will report their concerns to the DSL without delay.

The DSL will consider concerns about exploitation in line with this policy and relevant local and national guidance and make referrals or reports as appropriate.

- The DSL will consider use of the Kent and Medway Child Exploitation Identification Tool where there are concerns that a child may be experiencing, or be vulnerable to, exploitation.
- Where broader intelligence is known about potential exploitation or other community safety concerns, the DSL will consider whether information should be shared with Kent Police through the Community Partnership Intelligence Portal.
- Where modern slavery or trafficking is suspected, relevant safeguarding and/or child protection procedures will be followed, and the DSL will consider whether a referral through the National Referral Mechanism is required.
- Any safeguarding concerns for children will be referred to the Front Door Service and/or police as appropriate. If there is a crime in progress or immediate risk, emergency services will be contacted using 999.

When sharing information or making a Request for Support to the Front Door Service or other appropriate agencies, The Wells Free School will provide as much relevant information as possible to support a contextual safeguarding response. This may include information about the child’s presentation, attendance, peer relationships, online activity, family circumstances, community risks, known locations of concern, transport routes, patterns of absence, and any indicators of exploitation, trafficking, modern slavery or serious violence.

4.4 Domestic abuse

The Wells Free school recognises that domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Domestic abuse can include, but is not limited to, psychological, physical, sexual, financial/economic or emotional abuse, including coercive and controlling behaviour. Domestic abuse can take place inside or outside the home and within different types of relationships, including intimate partner relationships, ex-partners and family members. Types of domestic abuse can include intimate partner violence, abuse by family members, teenage relationship abuse and child-to-parent or caregiver abuse.

The Wells Free School recognises that anyone can be a victim of domestic abuse, regardless of sex, age, ethnicity, socio-economic status, sexuality, background or identity.

The Wells Free School recognises children can be victims of domestic abuse in their own right if they see, hear or experience the effects of abuse. Children may also experience domestic abuse within their own intimate relationships, sometimes referred to as teenage relationship abuse. Where one or both children are under 16, this may not fall within the statutory definition of domestic abuse, but it will still be responded to as a safeguarding concern.

The Wells Free School recognises that domestic abuse can have a detrimental and long-term impact on children's health, wellbeing, development and ability to learn.

The Wells Free School recognises that domestic abuse may occur, continue or escalate following separation. Concerns will not be viewed in isolation, and the school will consider the child's lived experience, family circumstances and any wider safeguarding risks.

Staff will respond to domestic abuse concerns in a trauma-informed way and will avoid victim-blaming language or assumptions.

The DSL will consider concerns about domestic abuse in line with this policy, KSCMP procedures, the Kent Support Levels Guidance and any relevant local or national guidance. Where the concern indicates a need for Family Help, statutory support or protection, the DSL will consider whether a Request for Support should be made via the Kent Children's Services Portal. If a child or adult is in immediate danger, emergency services will be contacted using 999.

The Wells Free School participates in Operation Encompass. Operation Encompass is an information-sharing scheme between the police and education settings which supports schools/colleges to provide timely, informed support to children affected by domestic abuse. Police forces in England have a duty to notify a child's school where they have attended a domestic abuse incident and have reasonable grounds to believe a child may be a victim of domestic abuse. This includes children connected to the household regardless of whether they were present at the incident.

Operation Encompass notifications will help the school to have up-to-date and relevant information about a child's circumstances so that appropriate support can be considered according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures, and where there are concerns about a child's welfare, the DSL will consider whether a Request for Support is required in line with the Kent Support Levels Guidance.

Operation Encompass notifications will be handled confidentially, stored securely and managed in line with data protection requirements and school child protection recording procedures. The DSL will have oversight of notifications and will ensure that relevant information is shared with staff on a need-to-know basis to safeguard and support the child.

Where the school is unsure how to respond to an Operation Encompass notification, advice may be sought from the Front Door Service or from the Operation Encompass advice and helpline service: 0204 513 9990.

4.5 Honour or Faith-Based Abuse (HBA)

The Wells Free School recognises that honour or faith-based abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community. This can include female genital mutilation, forced marriage and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. Staff will be alert to this dynamic and the additional risks it may create when deciding what safeguarding action is required.

All forms of HBA are abuse, regardless of the motivation, and will be handled and escalated as such. If staff have any concerns that a child may be at risk of, or has experienced, honour or faith-based abuse, they will speak to the DSL without delay. The DSL will consider concerns in line with this policy, KSCMP procedures,

the Kent Support Levels Guidance and any relevant national or local guidance. If there is an immediate threat or danger, the police will be contacted.

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in the UK and is a form of child abuse with long-lasting harmful consequences.

- All staff will speak to the DSL if they have any concerns that a child may be at risk of FGM or may have experienced FGM.
- Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, to directly report to the police where they discover that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions.
- It will be rare to see visual evidence of FGM, and staff must not examine pupils unless the teacher has good reason not to, they should also discuss the concern with the DSL. The mandatory reporting duty does not apply to suspected or at-risk cases where FGM has not been discovered; in these cases, staff must follow local safeguarding procedures and speak to the DSL.

Forced marriage is a crime.

- A forced marriage is one entered into without the full and free consent of one or both parties, and where violence, threats or another form of coercion is used. Coercion may be physical, emotional or psychological. A lack of full and free consent can also arise where a person cannot consent, for example due to learning disabilities.
- It is also a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even where violence, threats or another form of coercion are not used. This applies to non-binding, unofficial “marriages” as well as legal marriages.
- Staff will report any concerns about forced marriage to the DSL. Advice can also be sought from the Forced Marriage Unit: 020 7008 0151 or fmu@fcdo.gov.uk

4.6 Preventing radicalisation

The Wells Free School recognises that children may be susceptible to radicalisation into terrorism. Protecting children from this risk forms part of the school’s wider safeguarding approach.

The Wells Free School is aware of its duty under section 26 of the Counter-Terrorism and Security Act 2015 to have “due regard to the need to prevent people from becoming terrorists or supporting terrorism”. This is known as the Prevent duty.

For the purposes of this policy:

- **extremism** is the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs
- **radicalisation** is the process of a person legitimising support for, or use of, terrorist violence
- **terrorism** is an action that endangers or causes serious violence to people, causes serious damage to property, or seriously interferes with or disrupts an electronic system, where the use or threat is designed to influence the government or intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

The Wells Free School recognises that there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism. As with other safeguarding risks, staff will be alert to changes in behaviour, presentation, language, relationships or online activity which may indicate that they are in need of help or protection.

Staff will use their professional judgement and act proportionately where they have concerns that a child may be susceptible to radicalisation. Any concerns will be reported to the DSL in line with this policy.

The DSL and senior leaders will be familiar with the Prevent duty guidance and local procedures for making a Prevent referral. The school's approach to Prevent will be considered as part of wider safeguarding arrangements and will include appropriate attention to:

- leadership and partnership
- staff capability, training and awareness
- reducing permissive environments, including online environments, external speakers, visitors, use of premises and access to extremist or terrorist content.

The Wells Free School will ensure that staff receive appropriate Prevent training so they understand the Prevent duty, can recognise concerns, know how to report them internally, and understand the local Prevent referral process.

- Prevent training will be run every 2 years through the Kent and Medway Prevent team. For staff who do not attend this training, the school will utilise the National College online Prevent training course. Our IT monitoring and filtering is through Netsweeper and is actively monitored by the DSLs and Netsweeper team. If the Netsweeper team are concerned, they will make contact with the school. As safeguarding governor, Suzanne Farr is responsible for strategic oversight on behalf of the governing body
- The DSL will receive more in-depth training to enable them to support staff on Prevent matters and provide updates on relevant issues.

Where the DSL considers that a Prevent referral may be appropriate, this will be managed in line with local Kent Prevent procedures, the Kent Support Levels Guidance and relevant national guidance. The DSL may seek advice from the Kent and Medway Prevent Team where appropriate. If there is an immediate threat to safety, emergency services will be contacted using 999.

Prevent referrals are assessed by police and may be passed on to a multi-agency Channel panel to consider whether support is required. Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. A representative from The Wells Free School may be asked to attend a Channel panel to support assessment and planning.

Where a child is receiving support through Prevent or Channel and moves to a new setting, the DSL will share relevant information with the DSL at the new setting in advance of the child leaving, so that support can continue when the child arrives.

4.7 Cybercrime

The Wells Free School recognises that cybercrime is criminal activity committed using computers and/or the internet. Cybercrime is broadly categorised as either **cyber-enabled** or **cyber-dependent**.

- **Cyber-enabled crime** refers to crimes that can happen offline but are enabled at scale and speed online, such as fraud, purchasing illegal drugs online, child sexual abuse and exploitation, online harassment or other technology-assisted harm.
- **Cyber-dependent crime** refers to crimes that can only be committed using a computer, computer network or internet-enabled device. This may include unauthorised access to computers, sometimes referred to as hacking, denial of service attacks or "booting", and making, supplying or obtaining malware such as viruses, spyware, ransomware, botnets or Remote Access Trojans.

The Wells Free School recognises that children with particular skills and interests in computing and technology may inadvertently or deliberately become involved in cyber-dependent crime, sometimes without understanding the legal, ethical or safeguarding implications.

If staff are concerned that a child may be at risk of becoming involved in cyber-dependent crime, they will report their concerns to the DSL. The DSL will consider the concern in line with this policy, the Kent Support Levels Guidance and any relevant local or national guidance.

Where appropriate, the DSL may consider accessing local support and/or referring to the Cyber Choices programme.

Cyber Choices is focused on cyber-dependent crime. Concerns about cyber-enabled crime, such as fraud, purchasing illegal drugs online, child sexual abuse and exploitation, online bullying or other online safety concerns, will be responded to in line with this policy and relevant school safeguarding, behaviour, acceptable use and online safety arrangements.

If the concern indicates that a child may require Family Help, statutory support or protection, the DSL will consider whether a Request for Support should be made via the Kent Children's Services Portal, in line with the Kent Support Levels Guidance and KSCMP procedures. If a child is in immediate danger, emergency services will be contacted using 999.

4.8 Child abduction and community safety incidents

The Wells Free School recognises that child abduction is the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members, by people known to the child, or by strangers.

The Wells Free School also recognises that community safety incidents in the vicinity of the school can raise safeguarding concerns for children, parents/carers and staff.

Staff will report any concerns about child abduction or community safety incidents to the headteacher and/or DSL immediately. Where there is an immediate risk to a child, emergency services will be contacted using 999.

The Wells Free School will support children to develop age-appropriate personal safety awareness through the curriculum and wider safeguarding education. This will focus on building children's confidence, judgement and ability to seek help, rather than simply warning them about strangers.

4.9 Children and the court system, including children affected by parental separation, court orders or family disputes

The Wells Free School recognises that children may be affected by the court system in different ways, including where they are required to give evidence in criminal proceedings or where they are affected by private or public family law proceedings, child arrangements or parental disputes.

Where staff are aware that a child is involved in, or affected by, court proceedings, they will share relevant information with the DSL so that appropriate support can be considered. This may include pastoral support, adjustments within school liaison with parents/carers where appropriate and working with partner agencies where this is needed to safeguard and promote the child's welfare.

The Wells Free school recognises that parental separation, child arrangements and family court processes can be stressful for children and may contribute to conflict, anxiety or safeguarding concerns. The welfare and best interests of the child will remain central to the school's decision-making.

Where parents/carers disagree about arrangements, decisions or the exercise of parental responsibility, the school will act in line with statutory guidance, relevant court orders, education law, safeguarding duties and data protection requirements. Where necessary, parents/carers may be advised to seek independent legal advice or resolve disputes through the appropriate legal route.

The Wells Free School will consider any court orders or legal restrictions that are shared with the setting and relevant to the child's education, welfare or safety. Parents/carers may be asked to provide the most recent court order where this is appropriate and/or necessary to help the school understand arrangements or restrictions.

Staff will remain alert to any safeguarding concerns arising from parental disputes, child arrangements or court proceedings. Concerns will be reported to the DSL and responded to in line with this policy.

4.10 Homelessness

The Wells Free School recognises that being homeless, or being at risk of homelessness, can present a real risk to a child's welfare.

The DSL will be aware of local contact details and referral routes into the Local Housing Authority so that concerns can be raised or progressed at the earliest opportunity. Discussion with, or referral to, the Local Housing Authority does not replace safeguarding action where a child has been harmed or is at risk of harm

Where The Wells Free School receives information that a child has been placed in temporary accommodation, the DSL will consider what support may be required to safeguard and promote the child's welfare. This may include considering the impact on attendance, wellbeing, learning, transport, access to resources and family support needs.

4.11 Children with family members in prison or affected by parental offending

The Wells Free School recognises that children with family members in prison, or who are otherwise affected by parental offending, may experience additional emotional, practical and safeguarding needs. This may include stigma, isolation, poverty, poor mental health, disrupted family relationships, attendance concerns or changes in behaviour.

Staff will share any concerns with the DSL so that appropriate support can be considered. This may include pastoral support, safe adult support, signposting to specialist services, liaison with parents/carers where appropriate, and consideration of early help or wider multi-agency support.

The Wells Free School will respond to children affected by parental imprisonment or offending in a sensitive and trauma-informed way, recognising the potential impact on the child's safety, wellbeing, attendance, learning and relationships.

5 Supporting Children Potentially at Greater Risk of Harm

The Wells Free School recognises that some children may be more vulnerable to abuse, neglect, exploitation or harm, or may face additional barriers to recognising, reporting or being supported with safeguarding concerns. Staff will be alert to the needs and experiences of these children and will ensure concerns are reported to the DSL in line with this policy.

The school will take a child-centred, trauma-informed and contextual approach, considering the child's voice, lived experience, individual circumstances and any barriers they may face in accessing help or support.

5.1 Safeguarding children with Special Educational Needs or Disabilities (SEND)

The Wells Free School recognises that children with special educational needs or disabilities (SEND), can face additional safeguarding challenges both online and offline.

The Wells Free School recognises that additional barriers can exist when recognising abuse, neglect and exploitation for these children. These may include:

- assumptions that indicators of possible abuse, such as behaviour, mood or injury, relate to the child's SEND without further exploration.
- children being more prone to peer group isolation or bullying, including prejudice-based bullying
- the potential for children with SEND to be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.

- communication barriers and difficulties in managing or reporting concerns.
- children not understanding that what is happening to them is abuse, neglect or exploitation.
- the need for intimate or personal care, or children being isolated from others.
- children being more dependent on adults for care and support.
- difficulties with cognitive understanding.

Staff will appropriately explore potential indicators of abuse, neglect and exploitation and will not assume that these are related to a child's SEND. Concerns will be reported to the DSL in line with this policy.

The Wells Free School will support children with SEND to communicate, be listened to and have their voice heard and acted upon. Staff will consider whether reasonable adjustments, communication aids, trusted adults or other support may be needed to help children share concerns.

Any report or concern involving a child with SEND will require close liaison between the DSL and the Inclusion Lead with oversight for SEND: Rae Akehurst, where appropriate.

The Wells Free School will consider whether extra pastoral support, communication support or other adjustments are required to safeguard and promote the welfare of children with SEND.

The Wells Free School has intimate and/or personal care arrangements which promote children's health, safety, independence and welfare, while respecting their dignity and privacy. Arrangements for intimate and personal care will be open, transparent and appropriately recorded. Further information can be found in: First Aid Medical and Personal Care Policy Sept 2026.pdf

5.2 Safeguarding children with medical conditions

The Wells Free School recognises that children with medical conditions, including allergies, should be properly supported so they can access education safely and fully. Further information can be found in our First Aid Medical and Personal Care Policy Sept 2026.pdf, Allergy Policy Sept 2026.pdf and Medical Care Plans

An incident relating to the management of a child's medical condition, including allergies, will not automatically require safeguarding actions. However, staff will report concerns to the DSL where an incident, pattern of incidents or wider information suggests that a child may be at increased risk of abuse, neglect or exploitation because of their medical condition. This may include, for example, where relevant information about a child's medical condition is not shared with the school, where a child is repeatedly sent to school without essential medication or equipment, or where agreed healthcare arrangements are not followed in a way that places the child at risk.

DSL will consider concerns in line with this policy, national and local guidance and relevant school medical or allergy arrangements. Where appropriate, this may include considering whether a Request for Support should be made.

5.3 Children requiring mental health support

The Wells Free School has an important role to play in supporting the mental health and wellbeing of our pupils. We recognise that mental health problems can, in some cases, develop into safeguarding concerns, including where there are concerns about self-harm, eating disorders, suicidal ideation or risk of suicide. Mental health problems can also be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect or exploitation.

Only appropriately trained professionals should diagnose a mental health problem. However, The Wells Free School recognises our staff are well placed to observe children day-to-day and identify those whose behaviour, presentation or circumstances suggest that they may be experiencing a mental health problem or be at risk of developing one.

- Staff will be alert to potential warning signs that a child may be struggling with their mental health. These may include significant changes in behaviour, ongoing difficulty sleeping, withdrawing from

social situations, not wanting to do things they usually enjoy, physical signs of self-harm, neglecting themselves, suicidal ideation, changes in attendance, engagement, relationships or emotional wellbeing.
    - Not every child who displays these behaviours will have a mental health concern. However, staff will remain professionally curious and will record and report any concerns so children can receive appropriate support and early intervention.

If staff have a concern about a child's mental health or wellbeing, they will follow the school processes for recording and reporting concerns: reporting to the DSL, pastoral lead, senior mental health lead, SENCO, and recording on CPOMs. A DSL will then engage with MHST or the School nursing team as appropriate.

If a mental health concern is also a safeguarding concern, staff will speak to the DSL in line with this policy. The DSL will consider whether the child may benefit from support through universal services or community-based early help, or whether a Request for Support is required.

Where mental health support is needed, parents/carers will be informed to support the child's wellbeing, unless doing so would place the child at additional risk.

If staff believe that a child is in immediate danger, emergency services will be contacted using 999 or arrangements will be made for the child to be taken to A&E immediately by a parent/carer or other suitable person. If a child needs urgent help for their mental health but it is not an emergency, help will be sought through NHS 111.

The Wells Free School will consider the range of locally available support to meet children's mental health and wellbeing needs. This may include internal pastoral support, the senior mental health lead, Mental Health Support Teams, school nursing, early help/Family Help, NHS services, early support hubs, young futures hubs, voluntary sector support and specialist services.

The Wells Free School will ensure that any mental health support or intervention offered is appropriate to the child's needs, age and phase of education, and is evidenced as safe and effective.

The Wells Free School will support children's mental health and wellbeing by:
- promoting positive mental wellbeing and resilience.
- observing pupils and identifying early those who may be experiencing mental health problems or be at risk of developing them.
- ensuring early targeted support is considered and provided where appropriate.
- liaising with and/or referring to specialist services where needed.

Age and ability appropriate education will be provided to pupils to help promote positive mental health, wellbeing and resilience.
- Through an age-appropriate PSHE / RSE curriculum
- Drawing and Talking
- ELSA
- Emotional Resilience Coaching
- Other pastoral provision
- Assemblies
- Whole school wellbeing work
- Mental health awareness activities

5.4 Children who are absent from education

In line with the Working Together to Improve School Attendance and Children Missing Education statutory guidance, The Wells Free School recognises that children being absent from education for prolonged periods

and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues, including abuse and neglect, child sexual exploitation, child criminal exploitation and county lines.

The Wells Free School recognises that a robust response to absence supports the identification of safeguarding concerns and may help prevent the risk of children becoming missing from education in the future.

Staff will be alert to patterns of absence, persistent absence, severe absence, repeated absence, unexplained absence and children missing from education. Where absence raises a welfare or safeguarding concern, staff will report this to the DSL in line with this policy.

The DSL will consider whether absence may be linked to wider safeguarding risks within the family or community, including abuse, neglect, exploitation, mental health concerns, domestic abuse, forced marriage, FGM, trafficking, serious violence, county lines, online harm or other extra-familial harm.

Where possible, The Wells Free School will hold more than one emergency contact number for each pupil, so there are additional options to contact a responsible adult where a child who is absent from education is also identified as a welfare or safeguarding concern.

- The Wells Free School will seek to hold emergency contact information for both parents where appropriate, unless doing so would place a child at risk of harm or be contrary to a court order or other legal restriction.
- Where contact with a parent or other adult is restricted or unsafe, this will be clearly recorded in line with school safeguarding and record keeping procedures.
- The Wells Free School will be proactive in understanding children's significant relationships and lived experiences, including the role of fathers, non-resident parents and other adults who may be important in the child's life, where this is appropriate and safe.

The Wells Free School recognises that a child may be considered missing from education at any stage where their whereabouts, education provision or safety cannot be established.

Where The Wells Free School has concerns that a child has unexplained, persistent, repeated or prolonged absence, or may be missing from education, action will be taken in line with statutory duties and local procedures. This may include working with parents/carers, Kent PRU and Attendance Service (KPAS), the local authority CME team, the Front Door Service and/or other agencies as appropriate.

Where there are concerns that a child may be missing from education, including where the school becomes aware that a child has moved out of area or their whereabouts are unknown, the school will make a referral to KPAS promptly so that appropriate checks can be undertaken. The school will not delay referral while completing local enquiries where this may prevent timely action by the local authority.

Where there are concerns that a child may be missing from education or where their absence raises welfare or safeguarding concerns, the DSL will make a Request for Support as appropriate.

The Wells Free School will provide information to the local authority where required when a child is removed from roll, including at standard and non-standard transition points, in line with Children missing education statutory guidance and local procedures.

5.5 Children attending alternative provision

Where The Wells Free School places a pupil with an alternative provision provider, the school remains responsible for the safeguarding of that child and will ensure that the placement is appropriate and meets the child's needs.

The Wells Free School recognises that children attending alternative provision may have complex needs and may be vulnerable to additional safeguarding risks. Safeguarding arrangements will therefore be considered before, during and throughout the placement.

Before a placement is agreed, The Wells Free School will obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the provision. This includes confirmation that the provider will inform the school of any arrangements that may affect the child's safety, including relevant staffing changes, so the school can assure itself that appropriate safeguarding checks remain in place.

The Wells Free School will carry out appropriate due diligence and quality assurance before commissioning alternative provision and will continue to monitor whether the provision remains safe, suitable and able to meet the child's individual needs.

The Wells Free School will always know where a child is based during school hours. This includes keeping records of the address of the alternative provision provider and any subcontracted provision or satellite sites the child may attend.

Alternative provision placements will be reviewed regularly, at least half-termly, to provide assurance that the child is attending regularly, the placement remains safe, and the provision continues to meet the child's needs.

Where safeguarding concerns arise, the placement will be reviewed immediately and will be suspended or ended, if necessary, unless and until concerns have been satisfactorily addressed.

The DSL will ensure appropriate safeguarding information is shared with the alternative provision provider, in line with information sharing, confidentiality and data protection requirements, so that the child can be safeguarded and supported effectively.

The Wells Free School will respond to any safeguarding concerns relating to a child attending alternative provision in line with this policy.

5.6 Elective Home Education (EHE)

The Wells Free School recognises that many home educated children have a positive learning experience, and that parents/carers may choose elective home education with their child's best education at the heart of the decision. The Wells Free School also recognises that elective home education can mean some children are not in receipt of suitable education and may become less visible to the services that are there to keep them safe and supported.

Where a parent/carer expresses their intention to remove a child from school with a view to educating at home, we will respond in line with national Elective Home Education guidance, the School Attendance (Pupil Registration) (England) Regulations 2024 and local Kent guidance.

Where possible, The Wells Free School will work with the local authority, parents/carers and other key professionals to ensure that the implications of elective home education have been considered before a final decision is made and that decisions are made in the best interests of the child. This will be particularly important where the child has SEND, an Education, Health and Care plan, has or is known to partner agencies, or is otherwise vulnerable.

The Wells Free School will consider local guidance and tools, including the KSCMP EHE Leavers Checklist, to support proportionate safeguarding checks, information sharing and decision-making before a child is removed from roll. This will include considering the child's lived experience, any existing safeguarding or welfare concerns, parental responsibility arrangements, SEND or EHCP needs, young carer status, attendance, and whether further advice or a Request for Support is required.

Where there are safeguarding or welfare concerns, the DSL will consider whether a Request for Support is required.

5.7 Children who need a social worker (child in need and child protection plans)

The Wells Free School recognises that children may need a social worker due to safeguarding or welfare needs, including abuse, neglect, exploitation or complex family circumstances.

The DSL will hold and use information about children who need or have a social worker so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.

Where a child needs or has a social worker, this will inform school decisions about safeguarding and welfare. This may include responding to unauthorised absence, children absent from or missing education, behaviour, pastoral support, academic support and any wider safeguarding risks within the family or community.

Where appropriate, information will be shared with relevant staff on a need-to-know basis so that the child can be safeguarded and supported effectively.

5.8 Looked after children, children in kinship care, previously looked after children and care leavers

The Wells Free School recognises that the most common reason for children becoming looked after is abuse and/or neglect, and that looked after and previously looked after children may remain vulnerable.

Where safeguarding concerns arise for children who are looked after, previously looked after, in kinship care or leaving care, the school will ensure safeguarding action is considered alongside existing care planning, education planning and support arrangements.

The school has appointed a designated teacher: Rae Akehurst, Inclusion Lead. The designated teacher will work with local authorities, including Virtual School Kent, to promote the educational achievement of registered pupils who are looked after or who have been previously looked after, including those in kinship care.

The designated teacher will work closely with the DSL to ensure appropriate staff have the information they need in relation to a child's looked after legal status, contact arrangements with birth parents or those with parental responsibility, care arrangements and the levels of authority delegated to the carer by the local authority.

Where a child is looked after, the DSL will hold details of the child's social worker and the name of the Virtual School Head in the authority that looks after the child.

Where a child is a care leaver, the DSL will hold details of the local authority Personal Advisor appointed to guide and support them and will liaise with them as necessary regarding any safeguarding or welfare concerns.

5.9 Young carers

The Wells Free School recognises that young carers may have caring responsibilities for a family member with a long-term illness, disability, mental health need, substance misuse issue or other care need.

The Wells Free School will be alert to the needs of young carers, recognising that caring responsibilities can impact on a child's attendance, attainment, behaviour, emotional wellbeing, relationships and ability to participate fully in school life.

Early identification is important to ensure young carers receive support at the right time and from the appropriate services. Staff will remain alert to indicators that a child may be a young carer, including changes in attendance, punctuality, concentration, tiredness, homework completion, emotional wellbeing, social relationships or increased responsibilities at home. If staff are concerned that a child may be a young carer, or that caring responsibilities may be affecting their safety, welfare or wellbeing, they will report this to the DSL.

The DSL will consider what support may be required, including pastoral support within school, reasonable adjustments, support with attendance or learning, and whether advice or support should be sought from external partners, local authority services, health services or young carers services.

Where caring responsibilities appear to be inappropriate, excessive, unsafe, or are having a significant impact on the child's welfare, the DSL will consider whether a Request for Support should be made.

Support for young carers is currently available through:

- Imago Young Carers, who provide information, advice, signposting and support for young carers, families and professionals.
- The Wells Free School Young Carers Champion is Rae Akehurst.

5.10 Children who are privately fostered

Private fostering occurs when a child under the age of 16 (under 18 for children with a disability) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer.

Where private fostering arrangements come to the attention of the school for example, through the normal course of their interaction and promotion of learning activities with children, we must notify Kent Front Door Service in line with the local KSCMP arrangements in order to allow the local authority to check the arrangement is suitable and safe for the child.

5.11 Children who are Lesbian, Gay or Bisexual (LGB)

The Wells Free School recognises that a child being lesbian, gay or bisexual is not in itself a risk factor for harm. However, children who are lesbian, gay or bisexual can sometimes be vulnerable to discriminatory bullying, prejudice, harassment or child-on-child abuse.

The Wells Free School also recognises that children who are perceived by others to be lesbian, gay or bisexual, whether they are or not, can be just as vulnerable as children who are.

Staff will be alert to the possibility that children who are lesbian, gay or bisexual, or perceived to be, may face additional barriers to sharing concerns, particularly where they do not have a trusted adult they can speak to openly.

The Wells Free School will take steps to prevent and respond to discriminatory bullying, prejudice and harmful behaviour, including through our safeguarding, behaviour, anti-bullying, curriculum and pastoral arrangements. Where appropriate, sanctions and support will be considered in line with relevant school policies.

The Wells Free School will provide a safe, inclusive and trusted environment where children can speak openly, share concerns and be taken seriously. Concerns will be reported to the DSL in line with this policy.

Appropriate education will be provided through our Relationships Education/Relationships and Sex Education and Health Education curriculum to support respectful relationships, inclusion and the prevention of prejudice-based bullying.

5.12 Children who are questioning their gender

The Wells Free School recognises that some children may question the way they feel about being a boy or a girl, including the physical attributes of their sex and the related ways in which they fit into society.

The Wells Free School recognises that children may express themselves in ways that are less typically associated with their sex, and this is not in itself a safeguarding concern. Staff will avoid making assumptions based on appearance, behaviour, interests or presentation.

The Wells Free School will be a respectful environment where bullying, harassment, discrimination and harmful behaviour are not tolerated. Staff will be alert to the potential vulnerabilities of children who are questioning their gender, including bullying, family difficulties, online harm, mental health concerns, psychosocial needs or wider safeguarding concerns.

Staff will take time to listen to and understand the child's thoughts, feelings and experiences. Staff will remain professionally curious and consider the full context of the child's lived experience, including relationships with family, peers and the wider school environment.

The Wells Free School will respond to children who are questioning their gender in line with KCSIE, ensuring that any support is considered as part of the school's wider safeguarding responsibilities and with the child's welfare and best interests as a central consideration. The school will take a careful, considered and recorded approach, recognising that children's individual circumstances, needs and experiences will vary.

The Wells Free School will not make assumptions or initiate action regarding social transition. Where a child is questioning their gender, staff will respond sensitively, listen to the child's views and experiences, and consider any support needs or safeguarding concerns in line with this policy.

Where a child speaks to a member of staff about questioning their gender but does not ask the school to make changes to how they are treated, staff will not normally break confidence unless there is a related safeguarding concern. Where a conversation raises concerns about the child's wellbeing or safety, staff will follow this policy and speak to the DSL.

Parents/carers will usually be involved as a matter of priority where a child requests support relating to social transition. Their views will be treated with importance and properly considered. In the rare circumstances where involving parents/carers may place the child at greater risk of harm, the DSL will be involved before parents/carers are contacted or any decisions are made.

Where a child and their parents/carers requests support or changes in relation to social transition, the school will follow an agreed decision-making process, taking account of KCSIE, safeguarding duties, equality and human rights obligations, and relevant school policies. When considering any requests for support with social transition, school will ensure our decision-making process is documented and records are kept.

The Wells Free School will be particularly alert to the vulnerabilities of children who have socially transitioned from an early age, including where their biological sex may not be known to peers or some staff. The DSL will be involved in these cases, particularly where support, safeguarding or wellbeing concerns arise as the child approaches or experiences puberty. Any information will be handled sensitively and recorded appropriately.

Any decision-making will be child-centred and safeguarding-led. The school will consider what is in the best interests of the child, while also taking account of the safety, welfare, rights and needs of other children who may be affected. The child's voice and lived experience will always be carefully considered, however any agreed response may not always be the same as the child's wishes.

The DSL and relevant senior leaders will be involved in considering any request for support relating to social transition. The school may also consider relevant advice from parents/carers, clinical professionals, the SENCO, mental health lead, pastoral staff or other appropriate professionals, depending on the child's circumstances.

The Wells Free School will take a careful approach when considering any request relating to social transition, recognising that such decisions may have significant implications for the child and others affected, and that arrangements may need to remain flexible and open to review.

Any requests or issues relating to names, pronouns, uniform, toilets, changing rooms, residential accommodation, sport, trips or other school arrangements will be considered through the school's process and in line with KCSIE, safeguarding duties, equality and human rights obligations, and relevant school policies.

The Wells Free School will ensure that records are accurate and that relevant staff have the information they need to safeguard and support the child. Information will be shared on a need-to-know basis and managed in line with confidentiality, data protection and safeguarding requirements.

The school will keep any agreed arrangements under review, recognising that a child's circumstances, wishes or needs may change over time. This includes where new safeguarding information becomes known, where a child wishes to change or reverse previous arrangements, or where arrangements may no longer be meeting the child's needs or the needs of others affected.

If staff have any concerns about a child who is questioning their gender, including concerns about bullying, mental health, family response, online harm, self-harm, exploitation or any other safeguarding issue, they will report these to the DSL in line with this policy.

Where a safeguarding or welfare concern is identified, the DSL will consider whether a Request for Support should be made.

6 Online Safety

It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. The Wells Free School recognises that online safety is an essential part of safeguarding and will adopt a whole school approach to online safety which empowers, protects, and educates pupils and staff in their use of technology, and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

Online safety is considered a running and interrelated theme when devising and implementing our policies and procedures, and when planning our curriculum, staff training, the role and responsibilities of the DSL, and parental engagement.

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

- **Content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, 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 by AI and online bullying.
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

Staff will maintain an attitude of "it could happen here" in relation to online harm. Any concerns about a child's online safety, digital activity or technology use will be reported to the DSL in line with this policy.

The governing body and leadership team will ensure that online safety is reflected within the school's safeguarding arrangements and that appropriate systems, policies, procedures, training and monitoring are in place.

The DSL has responsibility for online safety within the school including understanding the filtering and monitoring systems and processes in place. The DSL will work with senior leaders, IT staff/providers, curriculum leads and other relevant staff to ensure online safety concerns are recognised, reported and responded to appropriately.

The DSL will respond to online safety concerns in line with our child protection and other associated policies, including our Online Safety Policy and Relational Policy

- Internal sanctions and/or support will be implemented as appropriate.

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

The Wells Free School uses a wide range of technology. This includes computers, laptops, iPads and other digital devices, the internet our learning platform (Seesaw), intranet and email systems.

All school owned devices and systems will be used in accordance with relevant policies, including but not limited to acceptable use policies, online safety including mobile and smart technology policies, staff code of conduct, and with appropriate safety and security measures in place. Policies

6.1 Generative Artificial Intelligence (AI)

The Wells Free School recognises that generative artificial intelligence (AI) tools can support teaching, learning, communication and administrative tasks when used safely, lawfully and appropriately. However, AI can also create safeguarding, data protection, privacy, intellectual property, academic integrity and information security risks. These include, but are not limited to:

- exposure to inappropriate or harmful content, including bullying, harassment, abuse and exploitation
- the creation or sharing of AI-generated or digitally manipulated images
- privacy and data protection breaches/risks
- intellectual property infringements
- academic integrity challenges such as plagiarism and cheating
- exposure to inaccurate, misleading, or biased content.

Staff and pupils will be made aware of the benefits and risks of using generative AI tools and the school expectations by:

- staff training
- acceptable use policy
- AI policy
- Curriculum lessons around AI and its benefits and risks

The Wells Free School will not permit the use of generative AI tools for work and/or educational purposes unless they have been approved by the school following appropriate risk assessment and, where required, a Data Protection Impact Assessment (DPIA). The risk assessment will evaluate whether the tool meets the DfE generative AI product safety standards expectations and will consider safeguarding, data protection, privacy, confidentiality, age and ability of users, content risks, bias and accuracy, intellectual property, academic integrity, information security and how use will be monitored or reviewed.

The Wells Free School will maintain a record of any generative AI tools approved for staff and/or pupils.

- Co-pilot is approved for use by school staff

AI tools that record, transcribe, summarise or generate notes from meetings, lessons, training or online discussions must only be used where approved by the school and in line with safeguarding, confidentiality, consent, data protection and acceptable use arrangements. All participants will be made aware where such tools are being used and how any information will be captured, used, stored and shared.

The Wells Free School recognises that the use of images online, including through AI tools, can create safeguarding, privacy and data protection risks for children and staff. Images of pupils or staff must not be uploaded to, generated by, edited in, or shared through AI tools unless risk assessed and approved by the school. Any taking or publishing of images of pupils or staff will always be in line with our image use, consent, acceptable use, data protection and safeguarding arrangements.

The Wells Free School will ensure expectations about the safe and appropriate use of AI are set out in our acceptable use arrangements.

The Wells Free School will respond to any misuse of AI in line with relevant policies, including but not limited to, anti-bullying, behaviour, data protection, complaints, allegations against staff and child protection.

Concerns involving AI-generated or digitally manipulated content, including nude or semi-nude imagery, harmful impersonation, bullying, harassment, abuse or exploitation, will be reported to the DSL and responded to in line with this policy.

Where the school believe that AI tools may have facilitated the creation of Child Sexual Abuse Material (CSAM), the school will respond in line with this policy, local safeguarding procedures, the UKCIS 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' and national guidance from the IWF and NCA-CEOP as appropriate.

6.2 Mobile and Smart Devices

The Wells Free School recognises the safeguarding risks that can be posed by mobile phones, smart devices and wearable technology. This includes devices that can send or receive messages or notifications, connect to mobile networks or the internet, record images, audio or video, or share location information, and may include but is not limited to, devices with built-in mobile connectivity, smart phones, smart watches, smart glasses, fitness trackers and other wearable technology.

Our wider approach to mobile phones, smart devices and wearable technology, including expectations for pupils, staff, visitors and parents/carers, is set out in our online safety policy

The Wells Free School will operate in line with the expectation that schools are mobile phone-free environments by default. Pupils will not have access to mobile phones during the school day, including during lessons, transition times, breaktimes and lunchtimes, except where an agreed exception applies. Any exceptions will be determined by the school leadership team in line with safeguarding, behaviour, accessibility, reasonable adjustment and considerations around individual need, and will be set out in the school mobile phone and smart technology policy.

The Wells Free School recognises that while restrictions on mobile phone use, including operating mobile-free environments, can help to manage safeguarding risks, such measures are most effective when embedded within a wider safeguarding and behaviour framework. Clear, proportionate and consistently applied expectations, alongside education that promotes safe and respectful online behaviour, strong and supportive relationships and robust safeguarding and anti-bullying policies, are essential to support safe and appropriate use.

The Wells Free School recognises that safeguarding concerns involving mobile phones, smart devices and wearable technology may arise outside of school, but still affect children's safety, wellbeing, relationships, attendance or learning. Such concerns will be reported to the DSL and responded to in line with this policy.

The Wells Free School will ensure that mobile phone and smart technology expectations do not discourage pupils from disclosing safeguarding concerns. Where a pupil needs to report messages, images, videos, posts or other content as part of reporting a concern, staff will respond in line with this policy, avoid viewing or sharing illegal or harmful content unnecessarily, and report the concern to the DSL.

6.3 Appropriate filtering and monitoring on school devices and networks

The Wells Free School will do all that it reasonably can to limit children's exposure to online harms through school devices, systems, platforms and networks. In line with the requirements of the Prevent Duty and KCSIE, we will ensure that appropriate filtering and monitoring systems are in place.

Filtering and monitoring are part of our wider safeguarding approach and will be supported by effective supervision, staff training, clear policies, curriculum education, regular risk assessment and timely response to concerns.

The Wells Free School recognises the distinction between filtering and monitoring. Filtering is preventative and controls access to illegal, inappropriate or harmful content and services. Monitoring observes and reports on user activity to support safeguarding intervention where concerns are identified.

Filtering and monitoring arrangements will be informed by the school's safeguarding risk profile. This will include the age and ability of children, children who may be at greater risk of harm, how often children access technology, the devices and systems used, remote access arrangements, any use of personal devices, and the risks identified through the Prevent duty risk assessment.

The Wells Free School recognises that filtering and monitoring must be effective in real-world use and not limited to traditional web browsing. The school will seek to ensure application of appropriate filtering and monitoring across websites, apps, cloud services, embedded browsers, mobile devices, remote access and generative AI tools, including any technical limitations.

When implementing appropriate filtering and monitoring, The Wells Free School will ensure that systems are configured to help protect children from illegal, inappropriate and harmful content, while avoiding unreasonable restrictions that could limit what children can be taught about online safety, safeguarding and the safe use of technology.

Filtering and monitoring form an important part of our online safety and safeguarding responsibilities, but they are not a standalone solution. The Wells Free School recognises that we cannot rely on filtering and monitoring alone to safeguard pupils. Effective safeguarding practice, clear policies and procedures, appropriate supervision, classroom and behaviour management, staff training, and regular education about safe and responsible technology use are all essential.

Pupils will use search tools, apps, online resources and digital platforms that are appropriate to their age, ability and needs. These will be selected by staff following an informed consideration of safeguarding, educational value, data protection and privacy requirements.

Internet and technology use will be supervised by staff in a way that is appropriate to pupils' age, ability, needs and potential risk of harm.

- Direct supervision for highlighted individuals
- Monitoring by DSLs through use of Netsweeper
- Individual allocation of numbered iPads for each child across classes

6.3.1 Responsibilities

The governing body has overall strategic responsibility for ensuring that appropriate filtering and monitoring systems and processes are in place as part of the school's wider safeguarding arrangements. This includes ensuring that filtering and monitoring provision is reviewed, that roles and responsibilities are clear, and that leaders and relevant staff understand how to manage systems effectively and escalate safeguarding concerns when identified.

Anna-Marie Cheeseman, a member of the senior leadership team, has operational responsibility for filtering and monitoring and will work with Suzanne Farr, governor representative to ensure there is oversight of the school's approach to meeting the DfE Filtering and monitoring standards.

Our senior leadership team is responsible for:

- ensuring filtering and monitoring systems are appropriate to the school context and safeguarding risk profile.
- procuring filtering and monitoring systems.
- documenting decisions on what is blocked or allowed and why.
- ensuring reviews and checks are completed and recorded.
- overseeing reports.
- ensuring all staff understand their role, are appropriately trained, follow policies, processes and procedures and act on reports and concerns.
- ensuring the DSL and staff have sufficient time and support to manage their filtering and monitoring responsibilities.

The DSL has lead responsibility for overseeing and acting on:

- any filtering and monitoring reports.
- any child protection or safeguarding concerns identified.
- checks to filtering and monitoring systems.

The IT service providers – Intec and Netsweeper have technical responsibility for:

- maintaining filtering and monitoring systems.
- providing filtering and monitoring reports.
- completing technical actions identified following any concerns or checks to systems.
- working with the senior leadership team and DSL to procure systems, identify risks, carry out reviews and carry out checks.

All staff will receive information about filtering and monitoring as part of induction and ongoing safeguarding training. This will include their responsibilities for reporting concerns, responding to incidents, following acceptable use expectations and escalating concerns where filtering or monitoring may not be working effectively.

All staff, pupils and parents/carers are expected to follow this policy, the school's acceptable use policy and to report any filtering or monitoring concerns.

6.3.2 Decision making and reviewing our filtering and monitoring provision

When procuring or making decisions about filtering and monitoring provision, the senior leadership team will work closely with the DSL and Intec to ensure systems are appropriate to the school's needs and circumstances.

Decisions about filtering and monitoring will be informed by the school's safeguarding risk profile. This will include consideration of:

- the age and ability of pupils
- children who may be at greater risk of harm
- how often pupils access technology
- our local context, including contextual safeguarding concerns
- the devices, systems, platforms and networks in use
- remote access arrangements
- any use of Bring Your Own Devices (BYOD)
- the school's Prevent duty risk assessment
- emerging risks, including mobile platforms, apps, cloud services and generative AI.

Decisions about what is blocked or allowed, and the rationale for those decisions, will be recorded. Any changes to filtering and monitoring arrangements will be assessed by staff with appropriate safeguarding, educational and technical knowledge and approved by the leadership team. Changes will be logged and recorded.

Reviews of filtering and monitoring provision will be carried out at least once every academic year by the senior leadership team member responsible for filtering and monitoring, with support from the DSL and Intec / Netsweeper Reviews will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record will be kept of these checks.

- Reviews will consider whether filtering and monitoring remain effective across all relevant devices, systems and locations, including school-owned devices, mobile devices, apps, embedded browsers, cloud services, remote access, guest access and any permitted personal device use.
- Filtering and monitoring arrangements will be reviewed earlier than the annual review where there is a safeguarding concern, a change in technology or working practice, the introduction of new systems or devices, changes to remote access or personal device arrangements, or updates to local or national guidance.

The Wells Free School will also undertake regular and active checks on filtering and monitoring systems to ensure they are working effectively in practice and as expected.

- These checks will be recorded and used to provide assurance to the governing body that filtering and monitoring arrangements remain appropriate, effective and aligned with safeguarding responsibilities.
- Checks will be undertaken from both a safeguarding and technical perspective and will consider the school context and risk profile. This may include checking different devices, accounts, user groups, filtering policies, locations, apps, mobile devices, remote access arrangements and AI tools, where relevant.
- The School Business Manager will complete monthly checks on the filtering system by attempting to access blocked sites in the presence of a DSL.
- These will be recorded each time with a date, time and screen shot of the blocking message and sent to the DSL.
- These checks will be undertaken in a confidential location such as the finance or SLT office.
- Checks will be undertaken from a range of different devices and will test the different filtering policies e.g. staff, default and student.
- Any technical concerns will be reported to the DSL, Netsweeper and Intec.

- Any technical concerns identified through checks or reviews will be escalated to Netsweeper and Intec. Any safeguarding concerns identified will be reported to the DSL and responded to in line with this policy.

6.3.3 Appropriate filtering

The Wells Free School's education internet connectivity is provided through Clarion. The Wells Free School uses Netsweeper to block access to harmful content.

Netsweeper blocks school provided internet access to illegal content and activity as identified in the Online Safety Act, including:

- Child Sexual Abuse Material (CSAM)
- Controlling or coercive behaviour
- Extreme sexual violence
- Extreme pornography
- Fraud
- Racially or religiously aggravated public order offences
- Inciting violence
- Illegal immigration and people smuggling
- Promoting or facilitating suicide
- Intimate image abuse
- Selling illegal drugs or weapons
- Sexual exploitation
- Terrorism

Netsweeper is a member of Internet Watch Foundation (IWF) and uses IWF services to block access to CSAM.

Netsweeper has signed up to Counter-Terrorism Internet Referral Unit list (CTIRU).

Netsweeper blocks school provided internet access to sites which could promote or include harmful and/or inappropriate behaviour or material. This includes content or activity which promotes hate speech or discrimination, gambling, harmful bullying content, malware/hacking, misinformation, disinformation, privacy and copyright theft, pornography, self-harm and eating disorders and/or violence against women and girls.

Our filtering system is operational, up to date and applied to all users, including guest accounts, all school owned or provided devices, systems and networks, and all devices using the school linternet connection. This is achieved by:

- All school devices are filtered through Netsweeper
- Children accessing the internet on iPads must use the Netsweeper search engine app – safari has been disabled
- Children have specific iPads allocated to them by number in each class
- Netsweeper allow settings to identify device names or IDs, the time and date of attempted access, and the search term or content being blocked.
- The school has several different filtering policies e.g. staff, students, default. Each new device is automatically set to default unless specifically moved to a different policy by Netsweeper or a DSL.

The DSL and leadership team will work with Netsweeper and our IT service provider Intec as appropriate and as identified in section 6.3.2, to ensure that our filtering policy is checked and reviewed to reflect our needs, risks and requirements.

If there is failure in the software or abuse of the system, for example if pupils or staff accidentally or deliberately access, witness or suspect unsuitable material has been accessed, they are required to:

- Staff immediately turn off monitor/screen
- Report the concern immediately to a DSL
- DSL to report the URL/site/app to Netsweeper.

Filtering breaches will be reported to the DSL and technical staff and will be recorded and escalated as appropriate and in line with relevant policies, including our child protection, acceptable use, allegations against staff and behaviour policies.

Parents/carers will be informed of filtering breaches involving their child, unless to do so would put a child at risk of harm or compromise a criminal investigation.

Any access to material believed to indicate a risk of significant harm, or that could be illegal, will be reported as soon as it is identified to the appropriate agencies. This may include but is not limited to the Internet Watch Foundation (where there are concerns about child sexual abuse material), Kent Police, NCA-CEOP, the Local Authority Designated Officer (LADO) or Front Door Service.

If staff are teaching topics which could create unusual activity, or if staff perceive there to be unreasonable restrictions affecting teaching, learning or administration, they will report this to the DSL and/or leadership team.

6.3.4 Appropriate monitoring

We will appropriately monitor the use of all school provided devices and networks to detect safeguarding risks in real or near-real time, including accessing or attempting to access, or engaging with or attempting to engage with illegal and/or harmful/inappropriate content or activity by any user. This is achieved by:

- All internet traffic to be monitored by Netsweeper. Netsweeper will monitor all school provided devices even if off site.
- Children will be physically monitored and supervised during use.
- All iPads are numbered and each number has been allocated specifically to individual children in different classes.
- Web access for children is only through the Netsweeper app. Children are unable to access the internet other than through this app.
- Onguard is the monitoring software provided by Netsweeper and all DSLs have access to this. This allows DSLs to actively monitor categories of concern through internet use. Netsweeper also have a dedicated safeguarding team who actively monitor internet use and report to the school if there are significant concerns.
- No children's devices are allowed in school
- Staff mobile phones are linked to the staff policy only, which is also monitored via Netsweeper and Onguard.
- Guest users have access to the guest policy, which is locked down and uses the default policy and is also monitored via Netsweeper and Onguard.

The Wells Free School has clear expectations regarding the use of personal mobile phones and smart devices by staff and visitors. Where personal devices of staff and/or visitors are permitted to access school systems or networks, the school will consider how filtering and monitoring applies in line with safeguarding, data protection, human rights and privacy requirements as specified in our Acceptable Use Policy.

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

Monitoring systems and processes will be supported by sufficient staff capacity, appropriate safeguarding expertise and clear processes to review, prioritise and act on alerts or reports.

If a concern is identified via our monitoring approaches:

- Where the concern relates to students, it will be reported to the DSL and will be recorded and responded to in line with relevant policies, such as child protection, acceptable use, and behaviour policies.
- Where the concern relates to staff, it will be reported to the headteacher (or chair of governors if the concern relates to the headteacher), in line with our staff Code of Conduct.
- where the concern relates to a technical issue or system limitation, it will be reported to the relevant senior leader and IT provider.

Parents/carers will be informed of safeguarding concerns involving their child identified through our monitoring approaches, unless to do so would put a child at risk of harm or compromise a criminal investigation.

Where our monitoring approaches detect any immediate risk of harm or illegal activity, this will be reported as soon as possible to the appropriate agencies. This may include, but is not limited to, the emergency services via 999, Kent Police, NCA-CEOP , LADO or Front Door Service.

6.4 Information security and access management

The Wells Free School recognises that information security and access management are part of our wider safeguarding responsibilities. Appropriate security measures will be in place to help protect children, staff, systems, personal information and safeguarding records.

The Wells Free School will take appropriate action to strengthen cyber security, reduce the risk of disruption, prevent data breaches and mitigate safeguarding risks, in line with the DfE Cyber security standards for schools and colleges and relevant data protection law requirements.

The Wells Free School will ensure expectations are in place for secure access to systems and information. This includes arrangements relating to passwords, account access, user permissions, multi-factor authentication where applicable, use of school systems, secure storage of information, reporting concerns and responding to incidents.

The Wells Free School will review the effectiveness of information security, access management and cyber security arrangements periodically, and in response to cyber incidents, data breaches, system changes, technology developments or updates to national guidance.

Rae Akehurst and Anna-Marie Cheeseman, member of the senior leadership team and Suzanne Farr, governor, are responsible for ensuring that our The Wells Free School has met the DfE cyber security standards for schools and colleges.

Staff will report concerns about data breaches, cyber security incidents, inappropriate access to systems, lost or stolen devices, compromised accounts, phishing, malware or risks to safeguarding information in line with school procedures.

Further information can be found in our Online Safety policy

6.5 Remote learning

Where The Wells Free School provides remote learning, it will be delivered in line with safeguarding, privacy, data protection, acceptable use and online safety requirements.

Remote learning will take place through school approved systems and channels, for example school email accounts/telephone numbers, or other approved platforms (Microsoft 365).

Staff and pupils will engage with remote learning in line with existing expectations for behaviour, staff conduct, safeguarding and acceptable use.

Staff will only use school approved platforms, accounts and communication methods when delivering remote learning or communicating with pupils and families. Any exceptional circumstances which mean this cannot be followed must be discussed with the DSL and/or senior leadership.

Pupils, parents/carers and staff will be encouraged to report concerns or issues that arise during remote or online learning. Concerns will be responded to in line with this policy and other relevant school procedures.

Where remote learning raises a safeguarding or welfare concern, staff will report this to the DSL in line with this policy. The DSL will consider whether a Request for Support should be made. Further expectations for remote learning are set out in our remote learning.

6.6 Online Safety Training for Staff

The Wells Free School will ensure that online safety is included within safeguarding and child protection training for all staff, including at induction and through regular updates.

Training and updates will include staff roles and responsibilities in relation to online safety, including filtering and monitoring, acceptable use, reporting concerns and responding to online safety incidents.

Online safety training will be integrated into the School's wider safeguarding training arrangements. Further information is set out in section 7 of this policy.

6.7 Educating pupils

The Wells Free School will ensure that pupils receive age and ability appropriate education to help them understand online risks and how to stay safe online.

Online safety education will support pupils to understand safe and respectful use of technology, including content, contact, conduct and commerce risks, reporting concerns and seeking help.

Online safety will be addressed through the curriculum and wider safeguarding education, including PSHE/RSHE and other appropriate opportunities. Further information is set out in section 9 of this policy.

6.8 Working with parents/carers

The Wells Free School will work in partnership with parents/carers to support children's online safety. We will use appropriate communication channels to reinforce the importance of children being safe online and to share information about online risks, safe technology use, reporting routes and how parents/carers can support children at home.

- This includes through the school website, newsletters, parent/carer events, curriculum information, safeguarding updates or other communication channels.

The Wells Free School will ensure parents/carers are provided with clear information about the school's online safety arrangements. This will include, where appropriate, information about filtering and monitoring systems, what children are being asked to do online, the sites, platforms or services they may be asked to access, and who from the school, if anyone, their child may interact with online.

- This includes acceptable use arrangements, home/school agreements, curriculum information, the school website, parent/carer communications and the Online Safety policy.

Parents/carers will usually be informed and involved where online safety concerns arise involving their child, unless doing so may place a child at increased risk of harm or could undermine a police or statutory safeguarding response.

Where The Wells Free School becomes aware of potentially harmful online risks, challenges, hoaxes or trends, we will respond in a proportionate and safeguarding-led way. Communications with children, staff and parents/carers will aim to provide clear, helpful advice without unnecessarily amplifying harmful content or creating avoidable anxiety.

6.9 Reviewing online safety

The Wells Free School recognises that technology, and the risks and harms related to it, evolve and change rapidly.

The school will review its approach to online safety at least annually, supported by a risk assessment which considers and reflects the current online risks faced by pupils.

- Online safety is reviewed at least annually through the school's safeguarding and online safety review cycle. The review is led by the DSL and senior leadership team and is informed by filtering and monitoring data, safeguarding incidents, pupil voice, parent feedback, curriculum evaluation and emerging local and national risks. Regular filtering and monitoring checks are undertaken throughout the year and reported to leaders. Outcomes of the review, together with safeguarding and online safety themes, are reported to governors through DSL safeguarding reports and governing body meetings. The safeguarding governor provides challenge and oversight of the school's online safety arrangements, including filtering and monitoring systems, to ensure they remain effective and compliant with DfE guidance.

The review will consider the effectiveness of the school's wider online safety arrangements, including policies and procedures, staff training, curriculum, pupil voice, parental engagement, incident records, filtering and monitoring assurance, mobile and smart technology, artificial intelligence, remote learning and information security.

The governing body, leadership team and DSL will use the outcomes of online safety reviews to identify strengths, address gaps and improve the school's approach to keeping children safe online.

7 Staff Engagement and Expectations

7.1 Staff awareness, induction and training

All members of staff will be provided with, and are required to read, part one of the current version of 'Keeping Children Safe in Education'.

All staff who work directly with children will also read Annex A of KCSIE, which provides further information to support safeguarding practice.

School leaders, including the DSL, headteacher, governors and relevant senior leaders, will read the full version of KCSIE to ensure they understand the statutory safeguarding requirements placed on schools and colleges.

Staff will also be directed to any additional sections of KCSIE, local procedures or school policies that are relevant to their role, responsibilities or the children they work with.

All members of staff will confirm that they have read and understood the national guidance and safeguarding information shared with them. This will be recorded on the single central record.

It is a requirement that all members of staff have access to this policy and confirm that they have read and understood its contents. Staff are expected to re-read this policy at least annually and following any updates, so they understand the schools safeguarding expectations, procedures and reporting arrangements.

All staff will be made aware of the systems within The Wells Free School which support safeguarding as part of induction. This will include, but is not limited to:

- this child protection policy
- the Relational policy, including measures to prevent bullying, cyberbullying, prejudice-based and discriminatory bullying
- the staff code of conduct, including expectations regarding low-level concerns, allegations against staff, whistleblowing, acceptable use of technology, staff/pupil relationships and communication, including use of social media

- the school's safeguarding response to children who are absent from education, particularly on repeat occasions and/or for prolonged periods
- the role and identity of the DSL and any deputy DSLs
- how to report safeguarding concerns, including concerns about children, staff, safeguarding practice or online safety.

All new staff and volunteers, including agency, supply and third-party staff where appropriate, will receive safeguarding and child protection training as part of induction. This will include online safety and an understanding of expectations, applicable roles and responsibilities in relation to filtering and monitoring.

Induction training will ensure staff understand the school's internal safeguarding processes, how to identify and report, respond and record concerns, and how to follow Kent safeguarding procedures, including the role of the DSL and making a Request for Support to the Front Door Service where relevant. This information is shared during induction, staff handbook, safeguarding leaflet, e-learning, local flowchart and staff briefings.

All staff, including agency, supply and third-party staff where appropriate, will receive safeguarding and child protection training, including online safety, which is updated at least annually. This will ensure staff are aware of a range of safeguarding issues, understand their responsibilities and know how to report concerns. This is achieved at annual INSET day, twilight training, e-learning, staff briefing or whole staff safeguarding update.]

Online safety training for staff will be integrated, aligned and considered as part of the whole school safeguarding approach, wider staff training and curriculum planning. This will include staff responsibilities in relation to online safety, acceptable use, mobile phones/smart devices, filtering and monitoring, reporting concerns and responding to online safety incidents. This is achieved using online safety training, annual safeguarding updates, filtering and monitoring briefing and acceptable use updates.

In addition to safeguarding and child protection training, all staff will receive regular safeguarding and child protection updates, including online safety, as required and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively via email updates, staff meetings, e-bulletins and safeguarding briefings.

The Wells Free School recognises the expertise staff build through safeguarding training and through managing safeguarding concerns in practice. Staff will be given opportunities to contribute to and shape school safeguarding arrangements and child protection policies via staff consultation, safeguarding reviews, staff meetings, policy feedback, audits, debriefs or learning from incidents.

All governors will receive appropriate safeguarding and child protection training, including online safety, at induction. This training will support them to provide strategic challenge and assurance that safeguarding policies, procedures and practice are effective and support the delivery of a robust whole school approach to safeguarding. This training will be regularly updated via annual updates, refresher training, governor safeguarding briefings, external training or safeguarding reports.]

When considering safeguarding training requirements, The Wells Free School will have regard to the Teachers' Standards, including the expectation that teachers manage behaviour effectively to ensure a good and safe educational environment and have a clear understanding of the needs of pupils.

The DSL and headteacher will provide an annual report to the governing body detailing safeguarding training undertaken by staff and relevant governors/proprietors/trustees. The Wells Free School will maintain an up-to-date record of safeguarding and child protection training.

7.2 Safer working practice

The Wells Free School will take steps, through this policy and other relevant school policies and procedures, to promote a culture of continuous vigilance, deter and prevent abuse, and ensure that inappropriate or unsafe behaviour is challenged and responded to appropriately.

All staff, volunteers, contractors, agency and third-party staff are expected to work within clear expectations for safe and professional conduct, as set out in the school staff code of conduct, acceptable use arrangements and other relevant policies. This includes expectations relating to professional boundaries, communication with children and families, physical contact, one-to-one working, confidentiality, information sharing, use of technology, social media, mobile and smart devices, and reporting concerns about the conduct of adults.

Staff will be made aware of the school procedures for reporting and responding to concerns about adults working with children, including allegations, low-level concerns and whistleblowing. Concerns will be managed in line with the relevant sections of this policy and the school staff code of conduct.

Staff will be made aware of the school Relational and restrictive intervention policies. Staff will manage behaviour effectively to ensure a good and safe educational environment and will have a clear understanding of the needs of all children. Any physical intervention and/or use of reasonable force will be in line with our agreed policy, procedures and national guidance.

All staff will be made aware of the professional risks associated with the use of social media, personal devices and electronic communication, including email, mobile phones, messaging, texting and social networking. Staff will follow relevant policies, including the staff code of conduct, acceptable use arrangements and data protection procedures.

7.3 Supervision and support

The Wells Free School will provide appropriate supervision, guidance and support for staff so that they are able to fulfil their safeguarding responsibilities effectively.

The school will ensure that staff are supported to understand and carry out their responsibilities for safeguarding and promoting the welfare of children, including knowing when and how to seek advice from the DSL.

Staff will be supported by the DSL in their safeguarding role, including through advice, guidance, debriefing and opportunities to discuss concerns where appropriate.

The Wells Free School recognises that safeguarding work can be complex and emotionally demanding. Any member of staff affected by issues arising from concerns about children's welfare or safety can seek support from the DSL, headteacher or other appropriate senior leader.

Where appropriate, the DSL or senior leaders may signpost staff to external sources of professional support. Staff may also seek support directly from organisations such as their union or other relevant professional support services.

Where staff work within Early Years Foundation Stage provision, The Wells Free School will ensure that appropriate supervision arrangements are in place in line with EYFS requirements. Staff in both EYFS and Year 1 have supervision regularly with Susie Good, our school's Emotional Intelligence coach. This takes place at least once a term. This gives staff an independent ear to listen to safeguarding or welfare concerns. Supervision is recorded by Susie Good and remains confidential to those involved.

8 Safer Recruitment and Allegations Against Staff

8.1 Safer recruitment and safeguarding checks

The Wells Free School is committed to ensuring that we develop a safe culture and that all reasonable steps are taken to recruit, engage and deploy staff, supply teachers, trainee teachers, volunteers, contractors, agency staff and other third-party staff who are safe and suitable to work with or around children. We recognise that people working in or on behalf of the school must be suitable for their role, have the relevant qualifications, training and experience, and have completed any required safeguarding checks.

The Wells Free School will follow Part three of Keeping Children Safe in Education and relevant guidance from the Disclosure and Barring Service when recruiting staff, supply teachers, trainee teachers, volunteers, contractors, agency staff and others who may work with or around children.

The governing body and leadership team are responsible for ensuring that safe recruitment processes are followed in line with statutory guidance.

The Wells Free School will ensure safer recruitment, safeguarding checks and related decision-making are carried out fairly, proportionately and in line with safeguarding duties, equality legislation and, where applicable, the Public Sector Equality Duty.

At least one person involved in conducting interviews will have completed safer recruitment training.

The Wells Free School will maintain an accurate Single Central Record (SCR) in line with statutory guidance. This is hosted securely on the School Business Manager's computer and is maintained by the School Business Manager with oversight from the Headteacher. It includes information on DBS certificates, staff training and key certificates gained by DSLs and the EVC. It is checked at least annually as part of a safeguarding monitoring visit.

Where required, The Wells Free School will complete relevant professional status, prohibition, restriction, sanction or direction checks, in line with Part three of KCSIE

The Wells Free School will consider and comply with relevant requirements relating to the Childcare Disqualification Regulations 2009 and obligations under the Childcare Act 2006, where applicable.

The Wells Free School will determine whether roles, including volunteer roles, are regulated activity in line with KCSIE, DfE Regulated activity in relation to children: scope supporting guidance and relevant legislation. Appropriate safeguarding checks will be completed before individuals start work or volunteering, as required by statutory guidance.

All staff working in or on behalf of the school are expected to disclose any information that may affect their suitability to work with children. This may include convictions, cautions, court orders, reprimands, warnings or other relevant information and any information where their personal circumstances or associations may present a relevant safeguarding risk. This includes information arising during employment, not only at the point of recruitment. Any information shared will be considered proportionately and in line with safeguarding, HR, data protection and LADO guidance.

Where The Wells Free School places a pupil with an alternative provision provider, we will obtain appropriate written safeguarding assurance from the provider before the placement starts. This will include confirmation that relevant safeguarding checks have been completed for individuals working at the provision. Further information about our safeguarding responsibilities for children attending alternative provision is set out in section 5.5 of this policy.

Where The Wells Free School organises work experience placements, we will follow the relevant advice and guidance in Part three of KCSIE, including consideration of supervision arrangements, safeguarding responsibilities and any checks required for adults involved in the placement.

Where The Wells Free School organises homestays or exchange visits, we will follow the relevant advice and guidance in Part three of KCSIE and other applicable national guidance.

8.2 Allegations or concerns about staff, including supply teachers, trainee teachers, volunteers and contractors

The Wells Free School will ensure there are clear processes in place to manage any safeguarding concern or allegation, no matter how small, about any adult working in or on behalf of the school. This includes staff, supply teachers, trainee teachers, volunteers, contractors, agency staff and other third-party staff or organisations working with children.

The Wells Free School will respond to any concern or allegation about an adult working in or on behalf of the school in line with Part four of KCSIE and local Kent allegations management arrangements. This includes concerns or allegations that meet the 'harm threshold' and concerns that do not meet the harm threshold, sometimes referred to as 'low-level concerns'.

The Wells Free School will work with relevant agencies, including the Local Authority Designated Officer (LADO) as appropriate. The LADO provides advice and oversight where concerns or allegations indicate that an adult working with children may have harmed a child, may pose a risk of harm to children, may have committed a criminal offence related to a child, or may not be suitable to work with children. In Kent, the LADO function is undertaken by the LADO Education Safeguarding Advisory Service (LESAS).

Detailed information about how concerns and allegations are managed can be found in our staff code of conduct.

Concerns or allegations will be recorded and dealt with appropriately. Ensuring concerns are managed effectively protects children and also protects adults working in or on behalf of the school from potential false allegations, misunderstandings or unsafe practice going unaddressed.

If staff have a safeguarding concern or an allegation is made that another adult working in or on behalf of the school has harmed a child, may have harmed a child, or may pose a risk of harm to children, this will be referred to the headteacher. The headteacher will consider whether an onward referral to the LADO is required.

Where the concern or allegation is about the headteacher, or where there is a conflict of interest in reporting the matter to the headteacher this will be referred to one of the Co-chairs of governors, who will contact the LADO. Where there is a conflict of interest in reporting the matter to both Co-chairs of governors, the concern will be reported directly to the LADO.

Where the headteacher is unsure how to respond, including where it is unclear whether a concern meets the harm threshold, advice will be sought from the LADO in line with local Kent arrangements.

Where a concern or allegation relates to a supply teacher, trainee teacher, contractor, volunteer, agency worker or other third-party member of staff, The Wells Free School will liaise with the relevant employer, agency, training provider, contractor or other organisation as appropriate. The school recognises that safeguarding responsibilities are shared with the relevant third-party organisation; however, this does not remove the school's responsibility to take appropriate safeguarding action, record decisions and involve the LADO where the concern meets, or may meet, the harm threshold.

Where the concern relates to a trainee teacher, the school will consider the concern in line with Part four of KCSIE, local Kent allegations management arrangements and any relevant partnership arrangements with the training provider. Safeguarding action will not be delayed while responsibility for employment, placement or training arrangements is clarified.

After resolving or concluding allegations or low-level concerns about adults working in or on behalf of the school, the headteacher, and the LADO where involved, will consider whether there are lessons to be learned and whether any improvements are required to safeguarding practice, policy, training, supervision or safer working arrangements.

Where The Wells Free School receives an allegation relating to an incident that happened when an individual or organisation was using our premises for activities with children, such as community groups, sports associations or service providers, we will follow our safeguarding policies and procedures and inform the LADO as appropriate.

8.2.1 Concerns that meet the 'harm threshold'

The Wells Free School recognises that an allegation may meet the harm threshold where an adult working in or on behalf of the school has:

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

Allegations against staff which meet this threshold will be responded to and managed in line with Part four of KCSIE, local Kent allegations management arrangements and the reporting process set out in section 8.2 above.

The school is responsible for deciding whether a Request for Support to the Front Door Service is required for the child or any other children affected. This may be discussed with the LADO as part of allegations management, but the school will not delay appropriate safeguarding action and will act in line with KSCMP procedures, the Kent Support Levels Guidance and section 3 of this policy.

If staff are concerned that appropriate safeguarding action is not being taken following an allegation about an adult working with children, they are advised to follow the school whistleblowing procedure and/or to contact the LADO directly themselves.

8.2.2 Concerns that do not meet the 'harm threshold'

The Wells Free School recognises that concerns or allegations about adults working in or on behalf of the school which do not meet the harm threshold, sometimes referred to as low-level concerns, must still be shared, recorded and responded to appropriately in line with Part four of KCSIE and our staff code of conduct policy.

A low-level concern does not mean that the concern is insignificant. A low-level concern is any concern, no matter how small, that an adult working in or on behalf of the school may have acted in a way that is inconsistent with expected professional standards or the school staff code of conduct. This includes behaviour outside of work where this may affect the adult's suitability to work with children, and where the concern does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Low-level concerns may arise in a number of different ways, including through suspicion, complaint, disclosure, observation, allegations made by a child, parent/carer or adult, or information arising from vetting checks.

The Wells Free School will promote an open and transparent culture in which all concerns about adults working in or on behalf of the school are shared responsibly with the right person and dealt with promptly and appropriately. This helps identify inappropriate, problematic or concerning behaviour early, minimises the risk of abuse, and supports adults to understand and maintain appropriate professional boundaries.

Low-level concerns should be reported to the Headteacher. Where concerns relate to the Headteacher they should be reported to the Chair of Governors.

The headteacher will be informed of all low-level concerns and is the ultimate decision-maker in respect of the response to low-level concerns. Where low-level concerns are initially reported to the DSL or another nominated person, they will be shared with the headteacher in a timely manner.

Staff are encouraged to self-refer where they have found themselves in a situation which could be misinterpreted, may appear compromising to others, or where, on reflection, they believe they may have behaved in a way that falls below expected professional standards.

Low-level concerns about supply teachers, trainee teachers, contractors, agency staff, volunteers or other third-party staff will be shared with their employer, agency, training provider or relevant organisation as

appropriate, so that any potential patterns of concerning or inappropriate behaviour can be identified and appropriate action taken.

If the school is in any doubt as to whether a concern meets the harm threshold, advice will be sought from the LADO.

Low-level concerns will be recorded in writing. Records will include details of the concern, the context in which the concern arose, the action taken and the rationale for any decisions made. Records will be kept confidential, held securely and managed in line with data protection laws and school record retention procedures.

Low-level concern records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern is identified, The Wells Free School will consider appropriate action. This may include consulting with the LADO, taking advice from HR/personnel providers, reviewing safeguarding practice, providing additional training or supervision, revising relevant policies, or following disciplinary procedures.

The Wells Free School will consider whether any wider cultural, supervision, training or policy issues may have enabled the behaviour to occur and will take appropriate action to reduce the risk of recurrence.

8.3 Safe Culture, including whistleblowing

As part of our approach to safeguarding, The Wells Free School will create and maintain a culture of openness, trust and transparency. Our values and expected behaviours, as set out in our staff code of conduct, will be lived, monitored and reinforced by all adults working in or on behalf of the school, including staff, supply teachers, trainee teachers, volunteers, contractors, agency staff and other third-party staff.

The Wells Free School will ensure that all concerns about adults working in or on behalf of the [school/college] are taken seriously, shared responsibly, recorded and dealt with promptly and appropriately. This includes concerns that meet, or may meet, the harm threshold and concerns that do not meet the harm threshold.

Staff are encouraged and should feel confident to self-refer where they have found themselves in a situation which could be misinterpreted, might appear compromising to others, or where, on reflection, they believe they may have behaved in a way that falls below expected professional standards.

All staff and volunteers should feel able to raise concerns about poor or unsafe practice, inappropriate behaviour, or potential failures in the school's safeguarding arrangements. The leadership team at The Wells Free School will take all concerns or allegations seriously.

All staff will be made aware of the[school whistleblowing procedure: It is a disciplinary matter not to report concerns about the conduct of a colleague or other adult working with children where this could place a child at risk.

Staff can access the NSPCC Whistleblowing Advice Line if they do not feel able to raise concerns about child protection failures internally. Staff can call 0800 028 0285 or email help@nspcc.org.uk. The NSPCC states that its Whistleblowing Advice Line supports people who are worried about how child protection issues are handled in their workplace.

The Wells Free School has a legal duty to refer to the Disclosure and Barring Service (DBS) where a person has harmed, or poses a risk of harm, to a child, or where there is reason to believe they have committed one of the relevant offences and they have been removed from working in regulated activity or would have been removed had they not left.

Where these circumstances arise in relation to a member of staff, volunteer or other adult working in or on behalf of The Wells Free School, a DBS referral will be made as soon as possible after resignation or removal, in accordance with statutory guidance and advice from the LADO and/or HR provider.

Where a case involving concerns or allegations about an adult working in or on behalf of The Wells Free School has been concluded, the school will consider whether there are lessons to be learned and whether improvements are required to safeguarding practice, safer working arrangements, staff training, supervision, policy or culture.

9 Opportunities to Teach Safeguarding

The Wells Free School will ensure that pupils are taught about how to keep themselves and others safe, including online, as part of providing a broad and balanced curriculum.

Relevant issues will be covered through Relationships Education, Relationships and Sex Education and Health Education, pastoral provision, curriculum opportunities and wider safeguarding education as appropriate to phase, age and statutory requirements.

The Wells Free School recognises that we play an essential role in helping children to understand what safe and appropriate behaviour looks like, including in relationships with other children and adults. Our curriculum and wider safeguarding education will support pupils to recognise when they or others may not be safe, and how to seek advice, help and support.

Our curriculum provides opportunities to develop self-awareness, self-esteem, social and emotional understanding, assertiveness, decision-making and help-seeking skills, so that pupils have a range of age-appropriate strategies to support their own safety and the safety of others.

The Wells Free School recognises the crucial role we have to play in preventative education. Preventative education is most effective as part of a whole school approach which prepares pupils for life in modern Britain and creates a culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence, sexual harassment, derogatory behaviour and other forms of physical violence or conflict.

The Wells Free School has a clear set of values and standards which are upheld and demonstrated throughout all aspects of school life. These are underpinned by our relational policy, pastoral support arrangements and a planned programme of safeguarding education. This programme is delivered through regularly timetabled opportunities and reinforced through the wider curriculum and school life.

Our programme will be fully inclusive and age and stage of development appropriate. The Wells Free School recognises that a one-size-fits-all approach will not be appropriate for all children, and that some pupils may need a more personalised or contextualised approach. This may include children who are victims of abuse, neglect or exploitation, children with SEND, children with a social worker, children who are in care, young carers and children who may be more vulnerable to online harm or child-on-child abuse.

Through the curriculum and wider safeguarding education, The Wells Free School will help pupils develop an age-appropriate understanding of positive relationships, respect, personal boundaries, consent, equality, self-esteem and emotional wellbeing. Pupils will learn how to recognise risks, stay safe online and offline, identify inappropriate or harmful behaviour, including online bullying, grooming, exploitation, harmful content and influences, misinformation and disinformation, and know how and where to seek help and support. Safeguarding education will be delivered in a manner that is appropriate to pupils' age, understanding and developmental stage.

Online safety will be addressed through the curriculum and safeguarding education approaches. This will support pupils to understand content, contact, conduct and commerce risks, safe and respectful use of technology, privacy, reporting concerns and where to get help. Further information about the school’s wider online safety approach is set out in section 6 of this policy.

The Wells Free School systems will support children to speak to a range of trusted staff. All children will be listened to and heard, and their concerns will be taken seriously and acted upon as appropriate.

The Wells Free School recognises the value of external organisations and speakers in enriching safeguarding education. External organisations and speakers will be assessed before they are given access to pupils. This may include considering the educational value of the input, the age and ability appropriateness of content, alignment with school values and curriculum aims, any safeguarding considerations, and whether relevant checks or supervision arrangements are required.

When using external visitors or resources, The Wells Free School will remain responsible for ensuring that safeguarding education is accurate, appropriate, inclusive and delivered in a way that supports children's safety and wellbeing.

10 Physical Safety

10.1 Restrictive Interventions, including the Use of 'Reasonable Force'

There may be circumstances when it is necessary for The Wells Free School staff to use restrictive interventions to safeguard children, staff or others from harm. This approach is informed by the DfE guidance Restrictive interventions, including the use of reasonable force in schools.

Restrictive interventions' is an umbrella term that refers to any action, planned or reactive, that limits a pupil's movement, liberty or freedom. This includes, but is not limited to:

- the use of reasonable force.
- physical restraint.
- non force restrictive practices.
- seclusion, where a pupil is prevented from leaving a space for safety reasons.

The Wells Free School is committed to minimising the need for restrictive interventions through positive behaviour support, early intervention and de-escalation strategies.

Restrictive interventions will only be used, when necessary, never as a punishment, and only where there is a real risk of harm.

Any use of reasonable force will be lawful, necessary and proportionate. It will involve no more force than is necessary, will be used for the shortest possible time, and will depend on the individual circumstances.

Particular care will be taken when supporting pupils with SEND or other vulnerabilities, recognising that these pupils may be disproportionately affected. Reasonable adjustments and preventative approaches will be considered where appropriate.

In line with the DfE statutory guidance, all significant incidents involving restrictive interventions, including the use of reasonable force, restraint or seclusion, will be recorded in writing as soon as practicable and reported to parents/carers as soon as practicable, unless doing so would place a child at risk of harm or compromise a safeguarding or criminal investigation.

Records will be reviewed by The Wells Free School leaders and governors to support safeguarding oversight, identify patterns, consider any disproportionate impact and inform staff training, support and policy development.

Further detail regarding behaviour management, de-escalation strategies, staff training and physical intervention can be found in the Relational Policy, SEND Policy / SEND Information Report, use of Restrictive Interventions Policy and Staff Code of Conduct.

10.2 Safeguarding in physical spaces, sport and residential arrangements

The Wells Free School recognises that safeguarding children includes ensuring that physical spaces, activities and accommodation arrangements are safe, appropriate and protect children's privacy, dignity and wellbeing.

The Wells Free School will consider its safeguarding duties alongside its obligations under equality and human rights legislation when making decisions about toilets, changing rooms, showers, sport, physical education, residential accommodation, educational visits and other physical arrangements.

Toilets, changing rooms, showers and other intimate or private spaces will be managed in line with KCSIE, relevant premises requirements, safeguarding duties and the school's local arrangements. The school will ensure that arrangements do not compromise the safety, comfort, privacy or dignity of any child.

Where a child requires an alternative arrangement in relation to toilets, changing rooms, showers, sport, residential accommodation or similar provision, the school will consider this through a careful, recorded and safeguarding-led process. This will include consideration of the child's needs and wishes, the safety and welfare of other children, relevant legal duties, practical arrangements and any relevant guidance. Where the request relates to a child who is questioning their gender, this will be considered in line with section 5.12 of this policy.

Sport, PE and other physical activities will be organised with due regard to children's safety, fairness, supervision, privacy and individual needs. Where activities are organised by sex for reasons of safety, fairness or safeguarding, arrangements will be made in line with KCSIE, the Equality Act and relevant school policies.

Where The Wells Free School arranges overnight visits, trips, camps, boarding, residential accommodation or similar activities, sleeping and accommodation arrangements will be risk assessed and planned to safeguard all children. This will include consideration of supervision, privacy, dignity, individual needs, SEND, medical needs, relationships between children, child-on-child abuse risks and any additional vulnerabilities.

Any decisions or individual arrangements made under this section will be recorded, reviewed as appropriate and shared with relevant staff on a need-to-know basis, in line with safeguarding, confidentiality and data protection requirements.

10.3 The use of school premises by other organisations

Where The Wells Free School facilities or premises are rented or hired out to organisations or individuals, for example to community groups, sports associations, and service providers to run community or extra-curricular activities, we will ensure that appropriate arrangements are in place to keep children safe.

Where those services or activities are provided under the direct supervision or management of our school staff, our existing child protection and safeguarding arrangements, including this policy, will apply.

Where services or activities are provided separately by another organisation using the school facilities or premises, the headteacher and governing body will seek assurance that the provider has appropriate safeguarding and child protection policies and procedures in place. This may include inspecting policies and procedures as needed.

The headteacher and governing body will ensure that arrangements are in place for the provider to liaise with the school on safeguarding matters where appropriate.

If appropriate safeguarding assurance is not achieved, an application to use the premises will be refused.

Safeguarding requirements will be included in any transfer of control agreement, such as a lease or hire agreement, as a condition of use and occupation of the premises.

Failure to comply with safeguarding requirements may lead to termination of the agreement.

Where The Wells Free School receives an allegation relating to an incident that happened when an individual or organisation was using our premises for activities with children, we will follow our safeguarding policies and procedures and inform the LADO as appropriate.

10.4 Site security

All members of staff have a responsibility for maintaining awareness of buildings and site security and for reporting concerns that may come to light.

The Wells Free School will have arrangements in place to help keep children, staff and visitors safe on site.

- This includes keeping gates and doors secure, not sharing padlock codes, wearing identification badges and lanyards, signing visitors in and out, supervision of contractors, and reporting site security concerns.

Appropriate checks and supervision will be undertaken in respect of visitors, volunteers and contractors coming into school as outlined within national guidance and local procedures.

- This includes visitors signing in and out, displaying visitor badges, being escorted where appropriate, and arrangements for visitors without appropriate checks.

For visitors attending in a professional capacity from partner agencies, such as social workers, Family Help practitioners, health professionals, police officers or other professionals, The Wells Free School will check their identity and purpose for visiting. The school will not routinely require these professionals to provide evidence of an individual DBS certificate before accessing children, as appropriate safeguarding checks are expected to have been undertaken by their employer. Where there are any concerns about identity, purpose, professional status or suitability, these will be clarified with the professional's employer or relevant agency before access is agreed, unless doing so would delay an urgent safeguarding response.

Any individual who is not known or identifiable on site should be challenged by staff for clarification and reassurance. Children will be encouraged to report any concerns about unknown or unidentified adults to a member of staff.

The Wells Free School will not accept the behaviour of any individual, including parents/carers, visitors or members of the public, that threatens site security or causes children, staff or others to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access to the school site.

Any site security concern which may indicate a safeguarding risk will be reported to the DSL and responded to in line with this policy.

11 Local Support

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

- **Kent Family Help**
  - Kent Support level guidance: www.kscmp.org.uk/guidance/kent-support-levels-guidance
  - Make a Request for Support to the Front Door Service via Kent Integrated Children's Services Portal – select 'urgent' if there is an immediate risk/concern
  - Front Door Service Consultation: 03000 411111
  - Out of Hours Number: 03000 419191

- **Community Based Early Help and Family Hubs**
  - Early Help and Preventative Services - KELSI and Early Help contacts - KELSI
  - Kent Family Hubs - Kent County Council

- **Kent Police**
  - NPCC When to call the police - guidance for schools and colleges
  - Home | Kent Police
  - Telephone 101 or 999 if there is an immediate risk of harm
  - [Insert details for local policing support, for example, local PCSO, school officer etc].

- **Kent Safeguarding Children Multi-Agency Partnership (KSCMP)**
  - www.kscmp.org.uk
  - 03000 421126 or kscmp@kent.gov.uk

- **Adult Safeguarding**
  - Adult Social Care via 03000 41 61 61 (text relay 18001 03000 41 61 61) or email social.services@kent.gov.uk
  - Kent and Medway Safeguarding Adults Board: Kent & Medway SAB website

- **Kent LADO Education Safeguarding Advisory Service (LESAS)**
  - Local Authority Designated Officer (LADO) - Kent Safeguarding Children Multi-Agency Partnership
    - To refer to the LADO, complete a referral on the Kent Integrated Children's Services Portal.
      - To enquire if a LADO referral should be made, please use the LESAS enquiry form.
      - For strategic education safeguarding or online safety advice, or to enquire about LESAS commissioned services/support, please use the LESAS enquiry form.

Appendix 1: Categories of Abuse

Abuse, neglect, harm and exploitation are rarely standalone events that can be covered by one definition or label. In many cases, multiple issues will overlap.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or by others. Abuse can be carried out both on and offline and can be perpetrated by men, women, and other children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

Sexual abuse: involves forcing or enticing a child 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 penetration with an object) 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 the school's policy and procedures for dealing with it.

Signs that may indicate Sexual Abuse

- Sudden changes in behaviour and/or education performance.
- Depression/withdrawal.
- Regression to younger behaviour.
- Sexualised behaviour or displays of affection which are sexual and age inappropriate.
- Self-harm, self-mutilation, attempts at suicide
- Fire setting.
- Alluding to secrets which they cannot reveal, secrecy relating to use of technology, or unexplained gifts or money.
- Clinginess and/or need for constant reassurance
- Distrust of familiar adults or anxiety about being left with specific people.
- Fear of undressing, for example for PE.
- Sexually transmitted infection or pregnancy.

The Centre of Expertise on Child Sexual Abuse provides resources to help education professionals identify and respond to concerns of child sexual abuse and abusive behaviours.

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

Signs that may indicate physical abuse

- Bruises, abrasions or injuries around the face, mouth, cheeks or soft areas of the body.
- Bi-lateral injuries, fingertip bruising, bite marks, strap marks, welts or injuries suggesting beatings.
- Burns or scalds, including unusual patterns, spread of injuries or deep contact burns such as cigarette burns.
- Injuries that cannot be accounted for, or explanations which are inadequate, inconsistent, excessively plausible, or where there is a delay in seeking treatment.
- Covering arms and legs even when hot.
- Inappropriate or harmful medication use.

- Aggressive behaviour or severe temper outbursts.

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

Signs that may indicate emotional abuse

- Overreaction to mistakes.
- Lack of self-confidence or self-esteem.
- Excessive need for approval, attention and affection.
- Sudden speech disorders.
- Unwillingness or inability to play.
- Extremes of passivity and/or aggression.
- Self-harm, eating disorders.
- Fear of parents being contacted.
- Compulsive stealing or drug, alcohol or solvent misuse.
- Secrecy relating to use of technology.

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

Signs that may indicate neglect

- Constant hunger.
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing.
- Frequent lateness, non-attendance or running away.
- Untreated medical problems.
- Loss of weight/being constantly underweight.
- Poor relationships with peers, low self-esteem or withdrawn presentation.
- Compulsive stealing and/or scavenging.
- Rocking, hair twisting or thumb sucking.

Appendix 2: Support Organisations and Resources

KSCMP

- Worried about a child: www.kscmp.org.uk/guidance/worried-about-a-child
- Factsheets: www.kscmp.org.uk/training/factsheets
- Supporting resources: www.kscmp.org.uk/training/training-resources
- Video explainers: www.kscmp.org.uk/training/video-explainers
- Missing children: www.kscmp.org.uk/guidance/missing-children

NSPCC 'Report Abuse in Education' Helpline

- 0800 136 663 or help@nspcc.org.uk

National Organisations

- NSPCC: www.nspcc.org.uk
- Barnardo's: www.barnardos.org.uk
- Action for Children: www.actionforchildren.org.uk
- Children's Society: www.childrenssociety.org.uk
- Centre of Expertise on Child Sexual Abuse: www.csacentre.org.uk

Support for Staff

- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline
- NSPCC Whistleblowing helpline: www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line
- Shout: www.giveusashout.org

Support for pupils/students

- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- The Mix: www.themix.org.uk
- Fearless: www.fearless.org
- Victim Support: www.victimsupport.org.uk
- Lucy Faithfull Foundation 'Shore Space': https://shorespace.org.uk

Support for Adults

- KCC Adult Safeguarding: www.kent.gov.uk/social-care-and-health/adult-social-care/adult-safeguarding
- Kent and Medway Safeguarding Adults Board: https://kmsab.org.uk/
- Crime Stoppers: www.crimestoppers-uk.org
- Victim Support: www.victimsupport.org.uk
- The Samaritans: www.samaritans.org
- NAPAC (National Association for People Abused in Childhood): www.napac.org.uk
- Report Fraud: www.reportfraud.police.uk
- Shout: www.giveusashout.org

Support for Special Education Needs and Disabilities

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk
- Council for Disabled Children: https://councilfordisabledchildren.org.uk
- Kent Autistic Trust: www.kentautistictrust.org
- AFASIC: www.afasic.org.uk
- National Autistic Society: www.autism.org.uk

- Kent County Council: www.kent.gov.uk/education-and-children/special-educational-needs-and-disabilities/support-for-parents-with-send-children
- Information Advice and Support Kent (IASK): www.iask.org.uk

Kent Resilience Hub

- https://kentresiliencehub.org.uk

Children with Family Members in Prison

- National information Centre on Children of Offenders (NICCO): www.nicco.org.uk
- Prisoners' Families Helpline - https://www.prisonersfamilies.org

Substance Misuse

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

Domestic Abuse

- KSCMP: www.kscmp.org.uk/guidance/domestic-abuse
- Domestic abuse services: www.domesticabuseservices.org.uk
- Refuge: www.refuge.org.uk
- Women's Aid: www.womensaid.org.uk
- Men's Advice Line: www.mensadviceline.org.uk
- National Domestic Abuse Helpline: www.nationaldahelpline.org.uk
- Respect Phoneline: https://respectphoneline.org.uk

Exploitation, violence and modern slavery and trafficking

- KSCMP: www.kscmp.org.uk/guidance/exploitation
- Kent & Medway Violence Reduction Unit: https://kentandmedwayvru.co.uk/
- It's not okay: www.itsnotokay.co.uk
- NWG Network: www.nwgnetwork.org
- County Lines Toolkit for Professionals: www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit
- The Children's Society: www.childrenssociety.org.uk/what-we-do/our-work/preventing-child-sexual-exploitation
- Report modern slavery: www.modernslavery.gov.uk
- Unseen: www.unseenuk.org

Honour Based Abuse

- Karma Nirvana: https://karmanirvana.org.uk
- FGM Factsheet
- Mandatory reporting of female genital mutilation: procedural information: www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information
- Forced Marriage Unit: www.gov.uk/guidance/forced-marriage
- The right to choose - government guidance on forced marriage: www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage

Radicalisation and hate

- Kent and Medway Prevent Team: www.kelsi.org.uk/child-protection-and-safeguarding/The-Prevent-Duty-In-Education
- Educate against Hate: www.educateagainsthate.com
- Counter Terrorism Internet Referral Unit: www.gov.uk/report-terrorism
- True Vision: www.report-it.org.uk

Child-on-child abuse, including harassment and violence

- NSPCC Problematic and harmful sexual behaviour: https://learning.nspcc.org.uk/child-abuse-and-neglect/harmful-sexual-behaviour
- Rape Crisis: https://rapecrisis.org.uk
- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk/advice/creating-safer-places/help-and-advice-for-schools
- Stop it Now! www.stopitnow.org.uk
- Anti-Bullying Alliance: www.anti-bullyingalliance.org.uk
- Diana Award: www.antibullyingpro.com
- Kidscape: www.kidscape.org.uk
- Centre of expertise on Child Sexual Abuse: www.csacentre.org.uk
- Lucy Faithfull Foundation 'Shore Space': https://shorespace.org.uk/

Online Safety

- NCA-CEOP: www.ceop.police.uk and www.ceopeducation.co.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk
- Childnet: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Report Harmful Content: https://reportharmfulcontent.com
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Matters: www.internetmatters.org
- NSPCC: www.nspcc.org.uk/onlinesafety
- Get Safe Online: www.getsafeonline.org
- Cyber Choices: https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices
- National Cyber Security Centre (NCSC): www.ncsc.gov.uk
- Gov.UK: https://kidsonlinesafety.campaign.gov.uk/
- Molly Rose Foundation: https://mollyrosefoundation.org

Mental Health

- KSCMP: www.kscmp.org.uk/guidance/children-and-young-peoples-mental-health
- KSCMP: Navigate Wellbeing: Mental Health Signposting for Education Settings
- Kooth: www.kooth.com
- Kent & Medway Children & Young People's Mental Health Services (CYPMHS): www.nelft.nhs.uk/services-kent-children-young-peoples-mental-health/
- Mind: www.mind.org.uk
- Moodspark:https://moodspark.org.uk
- Young Minds: www.youngminds.org.uk
- We are with you: www.wearewithyou.org.uk/services/kent-for-young-people/
- Anna Freud: www.annafreud.org/schools-and-colleges/
- MindEd: https://mindedforfamilies.org.uk/
- Kent Therapeutic Alliance and Therapeutic Support Service (KTATSS): https://ktatss.co.uk