



Safeguarding & Child Protection Policy

This is a core policy that forms part of the induction for all staff. It is a requirement that all members of staff have access to this policy and can demonstrate they have read and understand their safeguarding responsibilities.

Person responsible for this document:	
Inclusions VP	
Reviewed by:	Date:
E Perkin	September 2023
Approved by:	Date:
W Walters	September 2023

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Reviewed Policy Ratified by Governors	December 2022

This policy will be reviewed at least annually and/or following any updates to national and local guidance and procedures.

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	<u>Contents</u>	Page no.
1	Introduction and Ethos	3
2	Policy Context	5
3	Definition of Safeguarding	5
4	Policy Compliance, Monitoring and Review	6
5	Key Responsibilities	6
	5.1 Governing Body	6
	5.2 Designated Safeguarding Lead (DSL)	7
	5.3 Members of Staff	9
	5.4 Children and Young People	9
	5.5 Parent and Carers	10
6	Recognising Indicators of Abuse and Neglect	10
7	Specific Safeguarding Issues	12
	7.1 Child-on-Child Abuse	12
	7.2 Child-on-Child Sexual Violence	14
	7.3 Nude and/or Semi-Nude Image Sharing by Children	15
	7.4 Gangs, County Lines, Serious Violence, Crime and Exploitation	16
	7.5 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)	17
	7.6 Mental Health	17
	7.7 Online safety	18
	7.8 Children Missing Education (CME)	20
	7.9 Domestic Abuse	22
	7.10 So called 'Honour Based violence' (FGM, Forced Marriage and Breast Ironing)	22
	7.11 Preventing Radicalisation	23
	7.12 Children in care, previously Cared for children and care leavers	24

8	Child Protection Procedures	25
9	Record Keeping	26
10	Child Protection files	27
11	Multi Agency Working	28
12	Confidentiality and Information Sharing	28
13	Complaints	29
14	Staff Induction, Awareness and Training	29
15	Safe Working Practice	30
16	Staff Supervision and Support	31
17	Safer Recruitment	32
18	Allegations Against Members of Staff and Volunteers	33
	18.1 Concerns that do not meet the 'harms threshold'	34
	18.2 Whistle Blowing	36
19	Safeguarding Children with Special Educational Needs and Disabilities	36
20	Curriculum and Staying Safe	36
21	The Use of School Premises by Other Organisations	37
22	Security	37
23	Monitoring and Review	39
24	Local Support	39
25	National Support	40
	Appendix 1 - Definitions of Forms of abuse/ Specific Safeguarding Issues	41
	Appendix 2 – Related Safeguarding Policies	44
	Appendix 3 – Procedure for dealing with disclosures	45
	Appendix 4 - Sexual Violence and Harassment Policy	46
	Appendix 5 - What to do if you have a welfare concern flow chart	52

1. Introduction and Ethos

- Chatham Grammar recognises our statutory responsibility to safeguard and promote the welfare of all students. Safeguarding is everybody's responsibility and all those directly connected (staff, volunteers, governors, trustees, leaders, parents, families, and learners) are an important part of the wider safeguarding system for students and have an essential role to play in making this community safe and secure.
- Chatham Grammar recognises the importance of providing an ethos and environment within the Academy that will help students to be safe and feel safe. In our Academy students are respected and encouraged to talk openly. All students (defined as those up to the age of 18) have a right to be heard and to have their wishes and feelings considered and all students regardless of age, gender, ability, culture, race, language, religion, or sexual identity, have equal rights to protection.
- Staff challenge any form of derogatory and sexualised language or behaviour. They are vigilant to sexualised/aggressive touching/grabbing. We recognise that groups at particular risk include girls, students who identify as Lesbian, Gay, Bisexual, Transgender, Queer+ (LGBTQ+), or are perceived by peers to be LGBTQ+, and students with SEND (Special Educational Needs and Disabilities). We recognise that these children can be targeted by other students and acknowledge the importance of a safe space for them to speak out or share their concerns with members of staff. Students are protected from upskirting, bullying (+ cyber), homophobic, biphobic and transphobic behaviour, racism, sexism, and all other forms of discrimination. Any discriminatory behaviours are challenged, and children are supported to understand how to treat others with respect. We also have a statutory duty to

report and record any of the above incidents. Staff have familiarity with the Equality Act 2010 and the Public Sector Equality Duty (PSED), the Human Rights Act 1998 and recent reforms to the Act and how they apply to safeguarding.

- Our Academy acknowledges the need to treat everyone with equity, with fairness, dignity, and respect. We recognise that unconscious bias may impact upon our perceptions and expectations of children, particularly those from minority groups and that this may influence the safeguarding actions we take. We seek to educate and challenge all members of the academy community to address equality of access and opportunity for all children, by highlighting inequalities and increasing awareness.
- Through their day-to-day contact with students and their direct work with families, all staff and volunteers in the Academy have a crucial role to play in noticing indicators of possible abuse or neglect at an early stage. Our Academy may be the only secure, stable, and predictable element in their lives.
- Chatham Grammar will endeavor to support the welfare and safety of all students through:
 - Ensuring that the child's welfare is of paramount importance.
 - Training all staff to recognise the signs and symptoms of abuse and are aware of the Academy's procedures and lines of communication.
 - Ensuring that children's mental and physical health or development is not impaired.
 - Providing children, a balanced curriculum including PSHE (Personal, Social and Health Education) and RSE (Relationships and Sex Education) (Relationships and Sex Education) to help students stay safe, recognise when they do not feel safe and identify who they might / can talk to.
 - Working with parents to ensure they understand the Academy's legal responsibility to safeguard ensure the welfare of all students including the need for referral to other agencies in some situations.
 - Keeping confidential records which are stored securely and shared appropriately with other professionals.
 - Ensuring the voice of the child is evident in individual case files and informs Academy policy developments.
 - Ensuring that the Academy practices safer recruitment processes in checking the suitability of staff, supply staff, volunteers, visitors/contractors, and parents about expected behaviour and our legal responsibility to safeguard and promote the welfare of all our students at our Academy.
- Chatham Grammar expects that if any member of our community has a safeguarding concern about any child or adult, they will act immediately.
- This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, 'Keeping Children Safe in Education' 2023 (KCSIE) which requires individual academies and colleges to have an effective child protection policy.
- The procedures contained in this policy apply to all staff, including governors, temporary or third-party agency staff and volunteers and are consistent with those outlined within KCSIE 2023.

2. Policy Context

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes:

- DfE (Department for Education) Keeping Children Safe in Education 2023(KCSIE)
- Working Together to Safeguard Children 2018 (WTSC)
- Ofsted: Education Inspection Framework 2019
- Framework for the Assessment of Children in Need and their Families 2000)
- Kent and Medway Safeguarding Children Procedures (Online)
- Early Years and Foundation Stage Framework 2021 (EYFS (Early Years and Foundation Stage))
- The Education Act 2002
- The Education (Independent School Standards) Regulations 2014
- The Non-Maintained Special Schools (England) Regulations 2015
- [Sections 175 and 157 of the Education Act 2002](#) require Academy Governing bodies, proprietors, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are students at the Academy, or who are students under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.
- Chatham Grammar put measures in place to fully safeguard students in response to coronavirus (Covid-19), in accordance with KCSIE 2021 and related Government guidance, we will continue to follow Government guidance and continue to review safeguarding procedures and amend this policy to support the response to the pandemic if necessary.

3. Definition of Safeguarding

- Safeguarding children is defined in Keeping Children Safe in Education 2023 as:
 - protecting children from maltreatment
 - preventing impairment of children's mental and physical health or development
 - ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
 - taking action to enable all children to have the best outcomes (Children includes everyone under the age of 18)
- Chatham Grammar acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):
 - Abuse and neglect
 - Bullying, including cyberbullying
 - Children with family members in prison
 - Children Missing Education (CME)
 - Child missing from home or care
 - Child Sexual Exploitation (CSE)
 - Child Criminal Exploitation (CCE)
 - Contextual safeguarding (risks outside the family home)
 - County lines and gangs
 - Domestic abuse

- Drugs and alcohol misuse
- Fabricated or induced illness
- Faith abuse
- Gender based abuse and violence against women and girls
- Hate
- Homelessness
- Human trafficking and modern slavery
- Mental health
- Nude or semi-nude image sharing, aka youth produced/involved sexual imagery or “Sexting”
- Online safety
- Child-on-child abuse
- Preventing radicalisation and extremism
- Private fostering
- Relationship abuse
- Serious Violence
- Sexual Violence and Sexual Harassment
- So-Called honour-based abuse including Female Genital Mutilation (FGM) and forced marriage
- Upskirting

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

4. Policy Compliance, Monitoring and Review

- Chatham Grammar will review this policy at least annually. The policy will be revised following any national or local policy updates, any significant national events, local child protection concerns and/or any changes to our procedures.
- The Governing Body has strategic leadership responsibility for Chatham Grammar’s safeguarding arrangements to ensure that the Academy complies with their duties under legislation. They ensure policies, procedures and training in the Academy is effective and always complies with the law.
- The Designated Safeguarding Leads / Executive Principal will ensure regular reporting on safeguarding activity and systems in the Academy to the Governing Body. The Governing Body will not receive details of individual situations or identifying features of families as part of their oversight.
- This policy is available on our Academy website and is available on request from the Academy office. We also inform parents and carers about this policy when their children join our Academy and through our Academy newsletter.

5. Key Responsibilities

5.1 Governing Body

- The Governing Body, Trustees, CEO, and staff have read, understood, and will follow Keeping Children Safe in Education 2023.
- The Governing Body, Trustees, CEO, and leadership team have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation.

- The Governing Body, Trustees and CEO will ensure that all governors/trustees receive appropriate safeguarding and child protection (including online) training at induction. This training will be regularly updated. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole Academy approach to safeguarding.
- Vicky Webster is the nominated governor for safeguarding, who will take the lead role in ensuring that the Academy has an effective policy which interlinks with related policies; that locally agreed procedures are in place and being followed; and that the policies are reviewed at least annually and when required.
- The Governing Body/proprietor will ensure they facilitate a whole Academy approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. All systems, processes and policies should operate with the best interests of the child at their heart.
- The Governing Body, Trustees and CEO will regularly review the effectiveness of academies filters and monitoring systems. They will ensure that the leadership team and relevant staff are:
 - Be aware of and understand the systems in place
 - Manage them effectively
 - Know how to escalate concerns when identified
- The Governing Body, Principal and Leadership Team will ensure that the DSL is suitably supported in their role and has the appropriate status, authority, funding, resources, and training and is assured that the DSL understands they have the responsibility in leading safeguarding and child protection across the Academy

5.2 Designated Safeguarding Lead (DSL)

- The Designated Safeguarding lead will carry out their roles in accordance with Keeping Children Safe in Education 2023.
- The Academy has appointed Emma Perkin as the Designated Safeguarding Lead (DSL), they are a member of the senior leadership team. The DSL has the overall responsibility for the day-to-day oversight of safeguarding and child protection systems in the Academy.
- Chatham Grammar has appointed Deputy DSLs who will have delegated responsibilities and act in the DSL's absence.
 - Paula Knight – DSL -Operational/SENCO/Careers
 - Michelle Marshall - Assistant Principal for 6th form and DDSL
 - Bisi Kadejoh – Pastoral Manager (Years 7-8) and DDSL
 - Tracy Rose – Pastoral Manager (9,10 and 11) and DDSL
 - Elizabeth Franquiera – Pastoral Manager (Year 12 and 13) and DDSL
- 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 Designated Safeguarding Lead and any deputies will undergo appropriate training to provide them with the knowledge and skills required to carry out their role.
- The Principal will be kept informed of any significant issues by the DSL.
- The DSL and any deputy DSL's training will be updated formally every two years, but their knowledge and skills will be updated through a variety of methods (e-bulletins, conferences, local meetings, other training etc.) at regular intervals and at least annually, to keep up with any developments relevant to their role.

Availability - during term time the DSL (or a DDSL) will always be available (during academy hours) for academy staff to discuss any safeguarding concerns. Adequate and appropriate cover arrangements will be made for any out of hours/out of term activities.

- During Academy holidays, the DSL will provide appropriate emergency contact details to the MASH (Multi Agency Safeguarding Hub) Education Lead on the understanding that these will only be used if absolutely necessary and will not be shared elsewhere.
- It is the role of the DSL to:
 - Act as main contact point for all Academy staff to discuss any safeguarding concerns
 - Manage and maintain the confidential paper/electronic case management systems to record concerns about students to ensure the quality of information is accurate, proportionate, and timely, also assessment/referrals are made appropriately
 - Coordinate safeguarding action for individual students. In the case of Children in Care, the DSL should have the details of the child's social worker and the name of the virtual academy head in the authority who looks after the child (with the DSL liaising closely with the designated teacher.)
 - liaise with the principal to inform them of issues - especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This includes being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - [PACE Code C 2019](#) (Police and Criminal Evidence).
 - To liaise with safeguarding partners, other agencies, and staff in line with KCSIE 2023 and WTSC 2018
 - Ensure that Medway referral procedures are followed as necessary (see referral process page 2)
 - As required represent and liaise appropriately with other professionals and ensure the Academy is represented at multi agency safeguarding meetings (including child protection conferences)
 - Act as a source of support, advice, and expertise for all staff during term time for staff in the Academy to be able to discuss any safeguarding concerns.
 - Understand the importance of information sharing both within the Academy and with other academies and agencies.
 - To encourage a culture of listening to students and taking account of their wishes and feelings, among all staff; this will assist with any measures the Academy may put in place to protect them
 - Ensure all staff access appropriate safeguarding training and relevant updates in line with the recommendations within Keeping Children Safe in Education 2023

For further details and information about the DSL role please refer to KCSIE 2023 **Annex C p.162**

5.3 Members of Staff

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

• 5.4 Children and Young People

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

5.5 Parents and Carers

Parents/carers have a responsibility to:

- Work in partnership with the Academy to safeguard and promote the welfare of child/ren and understand Chatham Grammar's statutory responsibilities in this area.
- Read and adhere to the relevant Academy policies and procedures.

- Talk to their children about safeguarding issues with their children and support the Academy in their safeguarding approaches.
- Identify behaviours which could indicate that their child is at risk of harm including online
- Seek help and support from the Academy, or other appropriate agencies.

We are committed to working with parents positively, openly, and honestly. We ensure that all parents are treated with respect, dignity, and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission, or it is necessary to do so to safeguard a child/ren.

However, the welfare and safety of children is the responsibility of all staff in academies and ANY concern for a student's welfare MUST be reported to the Designated Safeguarding Lead.

6. Recognising Indicators of Abuse and Neglect

- As an academy we are aware that abuse, neglect, and safeguarding issues are rarely individual events that can be covered by one definition or label. In most cases multiple issues will overlap with one another, for further guidance: [Responding to Abuse and Neglect](#). This is outlined locally with the [Medway Threshold Guidance](#).
- Knowing what to look for is vital to the early identification of abuse and neglect. If staff are unsure, they should always speak to the Designated Safeguarding Lead (or a deputy).
- All staff in the Academy should be aware of the definitions and indicators of abuse and neglect. There are four categories of abuse:
 - **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
 - **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only as far as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the 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.
 - **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images,

watching sexual activities, encouraging children to behave in sexual 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 commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education. Please see more detailed procedures further in this this policy.

- **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, because 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.

The most up to date definitions and possible indicators and signs of abuse are found in Appendix 1 of this document. Staff should also refer to [What to do if you are worried a child is being abused 2018.](#)

- All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the Academy and/or can occur between children outside of these environments. Indicators of abuse and neglect do not automatically mean a child is being abused, however all concerns should be taken seriously and explored by the DSL on a case-by-case basis.
- The warning signs and symptoms of child abuse and neglect can vary from child to child. Children also develop and mature at different rates, so what appears to be worrying behaviours for a younger child might be normal for an older child.
- Chatham Grammar recognises that some children have additional or complex needs and may require access to intensive or specialist services to support them.
- All staff, but especially the Designated Safeguarding Lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.
- Parental behaviours may also indicate child abuse or neglect, so staff should also be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.
- Children may report abuse happening to themselves, their peers, or their family members. All reports made by children to staff will be taken seriously and will be responded to in line with this policy.

- By understanding the warning signs, we can respond to problems as early as possible and provide the right support and services for the child and their family. It is important to recognise that a warning sign does not automatically mean a child is being abused.

7. Specific Safeguarding Issues

- Chatham Grammar is aware of environmental factors which may impact on a child's welfare and safety and understand safeguarding in the wider context.
- Chatham Grammar staff are mindful that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care (such as a child in need or a child with a protection plan).
- All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education, homelessness, county lines, children with family members in prison, children in the court system, truancing and sharing nudes or semi-nude images (also known as youth produced sexual imagery) put children in danger. The categories/issues that follow are by no means an exhaustive list but gives an indication of the current themes in safeguarding and protecting children. All staff are aware of the Designated Safeguarding Lead who is expert in our Academy to support staff, volunteers, and the Trustees for further support.

7.1 Child-on-Child Abuse

- Chatham Grammar recognises that children are capable of abusing their peers This is referred to as child-on-child abuse and can take many forms. Further guidance on child-on-child abuse and our procedures can be found in our behaviour policy on our website. [CG Behaviour Policy Link](#)
- Chatham Grammar believes that abuse is abuse and it will never be tolerated or passed off as "banter," "just having a laugh" or "part of growing up." All victims will be taken seriously and offered appropriate support, regardless of where the abuse takes place.
- Chatham Grammar recognises that child-on-child abuse can take many forms, including but not limited to:
 - Bullying, including cyberbullying
 - Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
 - Sexual violence and sexual harassment
 - 'Upskirting,' which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm
 - Nude or semi-nude image sharing (also known as 'sexting' or youth produced/involved sexual imagery)
 - Initiation/hazing type violence and rituals
- Staff and leadership recognise that that some child-on-child abuse issues may be affected by gender, age, ability, and culture of those involved, (i.e., for gender-based abuse, girls are

more likely to be victims and boys more likely to be perpetrators) however, all child-on-child abuse is unacceptable, and all reports will be taken seriously.

- To minimise the risk of child-on-child abuse, we will:
 - Reinforce our zero tolerance to child-on-child abuse through every aspect of the Academy, from our child centred ethos through to staff and student training; to a robust anti-bullying policy; and an age and ability appropriate RSE and PSHE curriculum delivered through PPD lessons and Personal Tutoring sessions.
 - Raising awareness of expectations in staff and student bulletins, assemblies, personal tutoring, poster campaigns etc.
 - Ensuring a range of reporting mechanisms for staff and students through, dedicated reporting emails, staff and student Support App, Pastoral posters with QR codes in classrooms to link to online form, all of which are monitored regularly throughout the day by the safeguarding team.
 - Safeguarding logo around the Academy so that students know where they can go if they need to speak to someone/someone to report to - in addition to the safeguarding and pastoral teams.
 - Monitoring of data from reports to identify specific aspects/themes that need to be addressed, revisited, through a timely and appropriate response to improve the awareness of and minimise the risk of child-on-child abuse.
- Chatham Grammar will not tolerate, dismiss, or minimise any harmful behaviours in the Academy and will take swift action to intervene when this occurs. All allegations of child-on-child abuse will be recorded, investigated, and dealt with in line with associated academy policies, including child protection, anti-bullying, and behaviour.
- Alleged victims, perpetrators and any other child affected by child-on-child abuse may be supported by:
 - Reports will be taken very seriously, and the students will be listened to carefully (avoiding victim blaming).
 - Pastoral Support will be provided (such as daily check ins, and/or provide a mentor) and staff who work with the students will be asked to monitor the situation following a report.
 - A risk assessment will be considered to support anyone involved - these will be recorded electronically and there will be a clear schedule to monitor and measure the impact.
 - Working with parents and carers to inform of issues and support individuals involved.
 - Review educational approaches, and adapt, amend, and demonstrate flexibility in the curriculum to address issues that may arise.
 - Seek advice/support from other agencies (including external support) such as: counselling, student social work, signposting to online support or local/national support networks etc.
 - In cases of sexual assault inform the police and/or First Response.
- The Academy will take steps to ensure that appropriate curriculum time is dedicated to enable children to develop an awareness and understanding of abusive behaviour and minimise the risk of all forms of child-on-child abuse. We will also ensure that children recognise warning signs and supports, both within the Academy and externally (such as Kent Police, ChildLine etc.).

7.2 Child-on-Child Sexual Violence or Harassment

- Chatham Grammar follows the guidance outlined in part five of KCSIE 2022 which has now merged with the content of DfE guidance '[Sexual Violence and Sexual Harassment Between Children in Schools and Colleges](#)'. When responding to concerns relating to child-on-child sexual violence or harassment
 - If DSLs are unsure how to proceed, advice will be sought from the Education Safeguarding Service.
 - Follow the [Child-on-Child Sexual Violence and Harassment Policy](#) and the [flow chart](#) for Child-on-Child Sexual Violence or Harassment at the end of this document.
- Chatham Grammar recognises that staff must be vigilant and recognise that information may come from overheard conversations or observed behaviour changes.
- It is essential that all victims of sexual violence or sexual harassment are reassured that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment or be made to feel ashamed for making a report.
- Immediate consideration will be given as to how best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted).
- When there has been a report of sexual violence or harassment, the DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis. The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children, adult students (if appropriate) and staff and any actions that are required to protect them.
- Where possible KCSIE 2023 recommends that two members of staff manage reports of sexual violence and harassment.
- Reports will initially be managed internally by the DSL and safeguarding team (all DSL trained) at the Academy and where necessary will be referred to Integrated Children's Services and/or the Police.
- The decision making and required action taken will vary on a case by case basis, but will be informed by the wishes of the victim; the nature of the alleged incident (including whether a crime may have been committed); the ages and developmental stages of the children involved; any power imbalance between the children; if the alleged incident is a one-off or a sustained pattern of abuse; if there are any ongoing risks to the victim, other children, adult students or Chatham Grammar staff; and, any other related issues or wider context.
- We will reassure and teach our students to understand that the law is in place to protect children and young people rather than criminalise them.
- Chatham Grammar will regularly review decisions and actions to update and improve policies and practice.

- The Academy will consider the physical and mental health implications for both the victim and perpetrator. It is identified that both individuals will need additional support and provision of further information about harmful sexual behaviours and may need signposting to further sources of support.

7.3 Nude and/or Semi-Nude Image Sharing by Children

- DSLs will respond to concerns as set out in the non-statutory UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) (Updated December 2020)
- The term ‘sharing nudes and semi-nudes’ is used to mean the sending or posting of nude or semi-nude images, videos, or live streams of/by young people under the age of 18. Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents complex.
- When made aware of concerns involving nude or semi-nude image taking/sharing involving students, staff are advised to:
 - Report any concerns involving nude or semi-nude image sharing involving children to the DSL immediately.
 - Never view, copy, print, share, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already viewed the imagery by accident (e.g., if a child has shown it to them), this will be immediately reported to the DSL.
 - Not delete the imagery or ask the young person to delete it.
 - Not say or do anything to blame or shame any children involved.
 - Explain to child(ren) involved that they will report the issue to the DSL and reassure them that they will receive appropriate support and help.
 - Not ask the child or children involved in the incident to disclose information regarding the imagery and not share information about the incident with other members of staff, the child(ren) involved or their, or other, parents and/or carers. This is the responsibility of the DSL.
- Chatham Grammar recognises that nude and semi-nude sharing (also known as youth produced/involved sexual imagery or sexting”) is a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputies).
- the DSL (or deputies) will hold an initial review meeting with appropriate staff and will speak with the children involved if appropriate.
- parents and carers will be informed at an early stage and involved in the process to best support children, unless there is good reason to believe that involving them would put a child at risk of harm.
- a referral will be made to CS and/or the police immediately if:
 - the incident involves an adult (over 18).
 - there is reason to believe that a child has been coerced, blackmailed, or groomed, or there are concerns about their capacity to consent (for example, age of SEND).
 - the image/videos involve sexual acts and a child under the age of 13, depict sexual acts which are unusual for the child’s developmental stage, or are violent.
 - a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes.

- All decisions will be recorded in line with our child protection procedures and will be based on the consideration of the best interests of any child involved. The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date.
- If DSLs are unsure how to proceed, advice will be sought from the Education Safeguarding Service.

7.4 Gangs, County Lines, Serious Violence, Crime and Exploitation

- Chatham Grammar acknowledges the impact of gangs, county lines, serious violence, crime, and exploitation. Any concerns regarding gangs, county lines, serious violence, crime, and exploitation will be reported and responded to in line with other child protection concerns.
- The initial response to child victims is important and staff will take any allegations seriously and work in ways that support children and keep them safe.
- Criminal exploitation of young and vulnerable people is a common feature in the facilitation of county lines drugs supply, whether for the storage or supply of drugs, the movement of cash, or to secure the use of dwellings held by vulnerable people, in the rural marketplace this is commonly referred to as cuckooing.
- All staff have been trained and recognise the need to be vigilant for the signs and aware of risk factors which may increase the likelihood of involvement in serious violence, exploitation, and gang activity including but not limited to:
 - Being male – however girls who are exploited can be quite different to that of boys, indicators may not be the same, but professionals need to be aware that girls are just as much at risk as boys.
 - Children who associate with other young people involved in exploitation
 - Children who go missing for periods of time or regularly come home late
 - Change in friendships/relationships with others/groups
 - Having been frequently absent or permanently excluded from the Academy
 - having experienced child maltreatment
 - Unexplained gifts/new possessions – these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs.
 - Signs of self-harm/notable change in wellbeing
 - having been involved in offending, such as theft or robbery

Further advice for academies and colleges is provided in the [Home Office's Preventing youth violence and gang involvement](#) and its [Criminal exploitation of children and vulnerable adults: county lines guidance](#). [County Lines Toolkit For Professionals](#) - The Children's Society in partnership with Victim Support and National Police Chiefs' Council.

7.5 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

- Chatham Grammar recognises both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity.

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

Where an exploitation concern has been identified, the form linked below is to be used to provide intelligence to the police to get a better understanding of local exploitation concerns and issues.

- Through this portal you can report Perpetrators of child exploitation, Places and Spaces where Child Exploitation is suspected of taking place and vehicles believed to be connected to exploiting children. Please use the link to - [Report an Exploitation Concern Online](#).

This is for Child Exploitation specifically. But for general vulnerability concerns, they still need to be reported directly to the police in the usual way (101 or 999).

Please note, this portal is also not suitable for reporting crime as it is not monitored 24/7.

- Chatham Grammar will make referrals to Children's Social Care and the police. Should we have reason to believe a student has become involved in this activity.

7.6 Mental Health

- Chatham Grammar will ensure that all staff have an awareness of mental health problems and be aware in some cases, that it can be an indicator that a child has suffered or is at risk of suffering abuse, neglect, or exploitation. Staff are aware of how children's experiences, can impact on their mental health, behaviour, and education.
- Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences (ACES), this can have a lasting impact throughout childhood, adolescence and into adulthood. It is important that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.
- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are 'well placed' to identify behaviour suggestive of a mental health problem or being at risk of developing one.

- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the child protection policy, and speaking to the designated safeguarding lead or a deputy.

7.7 Online Safety

- It is recognised by Chatham Grammar that the use of technology presents challenges and risks to children and adults both inside and outside of the Academy.
- The use of technology has become a significant component of many safeguarding issues. With child exploitation, radicalisation, sexual predation, bullying for example, technology often provides the platform that facilitates harm.
- Chatham Grammar will empower, protect, and educate the community in their use of technology and establish mechanisms to identify, intervene in, and escalate any incident where appropriate.
- The DSL has overall responsibility for online safeguarding within the Academy but will liaise as necessary with other members of staff.
- The DSL and leadership team and Governing body have read, understood, and acted upon all guidance regarding Online Safety within 'Keeping Children Safe in Education' 2023.
- Chatham Grammar identifies the breadth of issues within online safety can be considerable, but they can be broadly categorised into four areas of risk:
 - **Content:** being exposed to illegal, inappropriate, or harmful material
 - **Contact:** being subjected to harmful online interaction with other users
 - **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm
 - **Commerce** – being exposed to online gambling, inappropriate advertising, phishing and or financial scams.
- Chatham Grammar recognises the specific risks posed by mobile phones and cameras, and, in accordance with KCSIE 2023, has appropriate policies in place that are shared and understood by all members of the Academy community. Further information regarding the specific approaches relating to this can be found in the Academy Online Safety Policy, Acceptable Use Policy, Mobile Phone Policy, and Image Use Policy which can be found in the staff Intranet and website.
- Chatham Grammar uses a wide range of technology. This includes computers, laptops, iPads and other digital devices, the internet, our learning platform, intranet, and email systems.
 - All Academy owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.
- All members of staff have access to appropriate, regular, and up-to-date online safety information as part of their safeguarding training.
- Chatham Grammar ensures that all staff receive training on the expectations, applicable roles and responsibilities, in relation to our filtering and monitoring systems and processes.

- Chatham Grammar will ensure that appropriate filtering and monitoring systems are in place on Academy equipment and systems used by students and staff, including Academy devices used by students at home. ([Acceptable Use Policy](#) and Online Safety policy).
- Filtering and monitoring are an important part of Academies online safety responsibilities, but they are only one part of our approach to online safety. Students and adults may have access to systems external to the Academies control, such as mobile phones and other internet enabled devices and technology. Where concerns are identified, appropriate action will be taken.
- Chatham Grammar recognises that many students and parents will have unlimited and unrestricted access to the internet via mobile phones and other enabled devices, this is external to the Academies control. Where concerns are identified appropriate action will be taken.
- Chatham Grammar will ensure a comprehensive whole Academy curriculum is developed and in place to enable and equip all Students with the knowledge needed to make the best use of the internet and technology in a safe, considered, and respectful way, so they are able to reap the benefits of the online world and manage the risks effectively. DSLs and SLT (Senior Leadership Team) may find it helpful to access UK Council for Internet Safety (UKCIS) '[Education for a Connected World Framework](#)' and DfE '[Teaching online safety in school](#)' in Academy guidance.
- The Academy will also support parents and the wider Academy community (including all members of staff) to become aware and alert to the need to keep children safe online. We will share information with parents/carers about:
 - what systems are in place to filter and monitor online use,
 - what children do online as a part of their learning, including the sites they may be asked to access,
 - who from the Academy or college (if anyone) their child is going to be interacting with online, as a part of remote learning.
- The DSL will respond to online safety concerns in line with this and other associated policies such as anti-bullying and behaviour.
 - Internal sanctions and/or support will be implemented as appropriate.
 - Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.

Where children are asked to learn online at home in response to a full or partial closure:

- Chatham Grammar will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements.
- All communication with learners and parents/carers will take place using Chatham Grammar provided or approved communication channels; for example, Chatham Grammar provided email accounts and phone numbers and/or agreed systems e.g., Microsoft Office 365 including TEAMS and other programmes provided by the academy.

- Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.
- Staff and learners will engage with remote teaching and learning in line with existing behaviour principles as set out in our Academy. Behaviour Policy/code of conduct and [Acceptable Use Policy](#).
- Staff and learners will be encouraged to report issues experienced at home and concerns will be responded to in line with our child protection and other relevant policies.
-
- When delivering remote learning, staff will follow our Remote Learning Acceptable Use Policy (AUP) and guidelines (for further information refer to the remote learning hub on our website).
- Parents/carers will be made aware of what their children are being asked to do online, including the sites they will be asked to access. Chatham Grammar will be informed who from the Academy their child is going to be interacting with online.
- Parents/carers will be encouraged to ensure children are appropriately supervised online and that appropriate parent controls are implemented at home.

7.8 Children Missing Education (CME)

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

Authorised and Unauthorised Absence

- UK law is quite clear about absence from the Academy. The Academy must differentiate between authorised and unauthorised absence.
- Authorised absence is where the Academy has either given approval in advance for a student of compulsory Academy age to be out of the Academy or has accepted an explanation offered afterwards as satisfactory justification for absence. All other absences must be treated as unauthorised. (ref. DFES 0628-2003).

- Unauthorised absences are those which the Academy does not consider reasonable and for which no "leave" has been given. This type of absence can lead to the Local Authority using sanctions and/or legal proceedings. This includes when your child does not arrive at the Academy, or leaves before the advertised leaving time, which is classed as truancy. Internal, or post-registration, truancy is classed as absence and will be dealt with through the behaviour policy.
- Unauthorised absence includes:
 - Parents/Carers keeping children off the Academy Day unnecessarily
 - Truancy before or during the Academy Day
 - Absences which have never been properly explained
 - Children who arrive late after the close of registration
 - Shopping, looking after other children or birthdays
 - Day trips and holidays in term time
- Whilst any child may be off during the Academy Day because they are ill, sometimes they can be reluctant to attend the Academy. Any problems with regular attendance are best sorted out between the Academy, the parents/carers, and the student. If your child is reluctant to attend, it is never better to cover up their absence or to give in to pressure to excuse them from attending. This gives the impression that attendance does not matter and usually makes things worse.
- Parents/carers cannot authorise absences, only the Academy can do this. However, parents/carers can provide reasons for absence for the Academy to consider.
- Parentally condoned absence can be a problem as it means disruption to a child's education and provides the student with mixed messages with regards to attendance.
- It is reasonable for members of staff to ask questions regarding a child's attendance and punctuality and when appropriate, request evidence to support the reason for absence from Academy.
- Academy staff need not accept a parental explanation for a child's absence whether written, telephoned or given in person.
- The Department for Education publishes an annual Academy league table of all absences (this is an overall total of both authorised and unauthorised absences), and all these absences count against the Academy statistics.
- The Academy's Attendance Manager will closely monitor attendance and punctuality. Ongoing concerns will result in telephone contact, text messages and/or home visits by the Inclusion Team or other designated staff. Should attendance/punctuality not improve a referral will be made to the Attendance Advisory Service Academies (AASSA) at an early stage.
- This could result in court action or if there are 10 or more unauthorised absences within a 6-week period a penalty notice may be issued. If issued the penalty notices will require the recipient to pay a fine, currently £60 (per parent/carer) if paid within 21 days, or £120 (per parent/carer) if paid within 28 days. Non-payment of these penalty notices will result in court action being taken.

Leavers and children who cease to attend without prior notice (CME) procedures

- Parents/carers must inform the Academy in writing if they are planning to remove their child from the Academy. This must include the details of the new Academy the child is planning to attend or that they are exercising their right to educate their child otherwise. All Education Otherwise information will be passed into Home Education part of the Inclusions Team at Medway Council, who are responsible for monitoring all children who are educated otherwise. If after ten days' continuous absence the Academy has been unable to ascertain the whereabouts of a student, they will refer the child's details to Children Missing Education, AASSA at Medway Council, to perform further checks that are not available to the Academy. For more detail - the Attendance Policy can be found on our website.

7.9 Domestic Abuse

- Domestic abuse is any type of controlling, bullying, threatening or violent behaviour between people in a relationship. Seeing, hearing, or experiencing the effects of domestic abuse and/or experiencing it in their own intimate relationships, can have a serious, long-lasting impact upon children and is a form of child abuse.
- Chatham Grammar recognises that domestic abuse can encompass but is not limited to psychological, physical, sexual, financial, and emotional abuse.
- In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

7.10 So called 'Honour based violence' (FGM, Forced Marriage and Breast Ironing)

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

Female Genital Mutilation (FGM):

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

- Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. It will be rare for teachers to see visual evidence, and they should not be examining students.
- The duty does not apply in relation to at risk or suspected cases (i.e., where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence). In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty [FGM Fact Sheet](#).
- Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the Academy Designated Safeguarding Lead (or deputy) and involve children's social care as appropriate.

Forced Marriage

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

Breast Ironing

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

7.11 Preventing radicalisation

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

7.12 Children in care, previously Cared for children and care leavers

- Chatham Grammar acknowledges and understand the common reason for children becoming cared for is as a result of abuse and/or neglect and a previously cared for child potentially remains vulnerable.
- The Academy has a 'designated teacher' (Paul Knight – DSL/SENCO/Careers) who works with local authorities to promote the educational achievement of registered students who are in care or who have been previously in care.
- The designated teacher plays a crucial role leading the responsibility for helping Academy staff understand the things which affect how children in care learn and achieve.
- The designated teacher should:
 - Promote a culture of high expectations and aspirations for how children in care should learn
 - Make sure the young person has a voice in setting learning targets and be a source of advice for staff about differentiated teaching strategies appropriate for individual children in making full use of Assessment for Learning
 - Ensure that children in care are prioritised in one-to-one tuition arrangements and that carers understand the importance of supporting learning at home.

- Has the lead responsibility for the development and implementation of the child's personal education plan (PEP) within the Academy
- The designated teacher will work with the DSL to ensure appropriate staff have the information they need in relation to a child's in-care legal status, contact arrangements with birth parents or those with parental responsibility, care arrangements and the levels of authority delegated to the carer by the authority looking after them.
- Chatham Grammar understands their responsibility to inform the Local Authority via First Response of Private fostering arrangements when they believe that a child is being cared for as part of a private fostering arrangement. (When a child under 16, or 18 if they are disabled is cared for and lives with an adult who is not a relative for 28 days or more).

8 Child Protection Procedures

- Chatham Grammar adheres to the MSCP Safeguarding Children Procedures. The full MSCP procedures and additional guidance relating to specific safeguarding issues can be found on the MSCP website <https://www.medwayscp.org.uk/mscb/>.
- If staff have any concerns about a child's welfare, they should act on them immediately. See page 52 and 53 for a flow chart setting out the process for staff when they have concerns about a child.
- If a child is at risk of imminent danger or harm, concerns will need to be referred by telephone to First Response 01634 334466 and/or the police.

If it is an emergency the police need to be called on 999.

- **If there are child protection concerns the role of the Academy is NOT to investigate but to recognise and refer.**
- **Less urgent concerns or requests for support will be referred to Children's social care and Early Help via the Medway online form [\(the portal\)](#).**
- Once staff have spoken to the DSL the options the DSL will take will then include:
 - managing any support for the child internally via the Academies own pastoral support processes.
 - a Family Solutions referral or Early Help Assessment
 - Make a referral for statutory services, for example as the child might be in need, is in need or suffering or likely to suffer harm.
 - All information and actions taken including the reasons for any decision/actions made, will be fully documented on a child's record. Actions will be assigned to a specific member of the safeguarding team and will have a review date.
- All staff are aware of the process for making request for support referrals for statutory assessments under the Children Act 1989, along with the role they might be expected to play in such assessments.
- Wherever possible the Academy will share safeguarding concerns, or the intention to refer a child to Children's social care, with parents or carers. However, staff will not do so where it is

felt that to do so could place the child at greater risk of harm or impede a criminal investigation. On occasions it may be necessary to consult with First Response and/ or the police for advice on when to share information with parents/carers.

- If the DSL is not available to discuss an immediate and urgent concern, staff can seek advice from the Deputy DSL's. They may also seek advice from the consultation from the 'No Name' consultation line at Medway First Response (9:30-12:30) on 01634 331662. If anyone other than the DSL makes a referral to external services, then they will inform the DSL, and Headteacher, as soon as possible.
- Staff may pass information about a child to the DSL but remain anxious about action subsequently taken. Staff should feel able to check the progress of a case with the DSL so that they can reassure themselves the child is safe, and their welfare is being considered. If following this process, the staff member remains concerned it is the responsibility of that staff member to follow the Academies escalation or whistleblowing process.
- If a child's situation does not appear to be improving, then the DSL (or the person that made the request for support) will consider a re-referral.
- If, after a request for support or any other planned external intervention, a child's situation does not appear to be improving, the DSL will consider following [MSCP escalation procedures](#) to ensure their concerns have been addressed and, most importantly, that the child's situation improves. DSLs may request support with this via the Education Safeguarding Service.
- All members of staff are made aware of the internal and local Early Help/Family Solutions support services. Where a child is being offered or receiving Family Solutions support, staff will be supported to understand their role in any Early Help assessment or intervention. This includes identifying emerging problems, liaising with other professionals, and in some cases acting as the lead practitioner.
- The DSL will keep all Early Help cases under constant review and consideration will be given to a request for support to the First Response if the situation does not appear to be improving or is getting worse (in liaison with the early help practitioner).
- Chatham Grammar is an Operation Encompass Academy. This means we work in partnership with Kent Police to provide support to children experiencing domestic abuse. All staff know what Operation Encompass is and there is a clear process for managing notifications in the Academy (including cover if a named individual is absent).
- All Operation Encompass Notifications are received by the Operational DSL and uploaded to a student's CPOMS record alerting the DSL / DDSL's.
- 1. Where a student is recorded as having been present the DSL or DDSL will check in with the student to ensure appropriate support is in place.
- 2. Where a student is recorded as not present either the DSL/DDS� or member of pastoral will check in with the student to ascertain any concerns or support that may be required remaining mindful that the student may not be aware of the incident.
- 3. The Operational DSL will notify the Attendance Manager to monitor unusual or non-attendance and to alert the safeguarding team in such cases.

- 5. Where necessary teaching and other staff may be made aware of concerns without details if necessary to ensure student is supported. This will only ever be authorised by the DSL.

The child's wishes

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

9 Record Keeping

- Well-kept records are essential to good child protection practice. Our Academy is clear about the need to record any concern about a child or children within our Academy and when these records should be shared with other agencies.
- All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing on the Academy's safeguarding system: CPOMS-this will be completed by the safeguarding team. Staff/Visitors must report via the following email safeguardingcg@universityofkentacademiestrust.org.uk , or the student or staff 'Support App' or the online form accessible by the QR Code in every classroom, or the paper referral form kept in your lanyards and handed in to reception or the safeguarding team. These will then be recorded with subsequent decisions and actions on to CPOMS. If in doubt about recording requirements, staff should discuss with the Designated Safeguarding Lead (or deputy).
- Child Protection records will record facts and not personal opinions. A body map will be completed if injuries have been observed.
- Photographs of injuries should **NOT** be taken by staff; staff should use body maps to detail concerns. Taking photos of injuries can be traumatic and distressing for children and staff. Staff should not examine a child and should only record what they can see.
- If photos of injuries are required for evidence purposes, this should be directed/carried out by the Police. If you are asked to take photos of an injury by a social worker or police officer clearly state in the records who asked you to do this, name, date, time, and ensure you record the individual's rationale behind this decision. Staff can challenge this request if they do not feel comfortable and wait for a social worker/ police officer to attend.
- Records will be completed as soon as possible after the incident/event, using the child's words, and will be signed and dated by the member of staff. If members of staff are in any doubt about recording requirements, they will discuss their concerns with the DSL.
- Safeguarding records are kept for individual children and are maintained separately from all other records relating to the child in the Academy. Safeguarding records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL. Safeguarding records are shared with staff on a 'need to know' basis only.
- All safeguarding records will be transferred in accordance with data protection legislation to the child's subsequent Academy/setting, under confidential and separate cover. These will

be given to the new DSL, within 5 days of the child starting at their new school and a receipt of delivery will be obtained.

10 Child protection files

- Where children leave the Academy (including in year transfers) the designated safeguarding lead will ensure their child protection file is transferred to the new Academy or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main student file, ensuring secure transit, and confirmation of receipt should be obtained.

Receiving Academies and colleges should ensure key staff such as designated safeguarding leads and SENDCOs, or the named person with oversight for SEND in colleges, are aware as required.

- In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new Academy or college in advance of a child leaving. For example, information that would allow the new Academy or college to continue supporting victims of abuse and have that support in place for when the child arrives.
- If a child is subject to a child protection plan or there are other ongoing concerns at the time of transfer, then it is strongly recommended that the transferring DSL arrange to meet with the receiving DSL in person to ensure there is effective transition and handover of information.
- Child protection files should always be kept by the education setting where the child is on role. Transferring settings do not need to keep copies of child protection files, but if there is reason to, they do they must be kept in accordance with data retention (see section 7). In cases where there may be ongoing involvement from transferring settings, for example if any siblings still attend your setting, DSLs may wish to take copies of chronologies etc.
- When students leave Chatham Grammar at the age of 18 or without any onward route, we will ensure records are kept until 25 years from the student's date of birth.

11 Multi-agency Working

- Chatham Grammar identifies that they have a pivotal role to play in multi-agency safeguarding arrangements. Governing bodies and proprietors should ensure that the Academy or college contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children 2018.
- Chatham Grammar recognises and is committed to its responsibility to work within the MSCP multi-agency safeguarding arrangements. The leadership team and DSL will work to establish strong and co-operative local relationships with professionals in other agencies in line with statutory guidance.
- Chatham Grammar will endeavour to identify those children and families who may benefit from the intervention and support of external professionals and will seek to enable referrals (in discussion with parents/carers) as appropriate.

- Chatham Grammar recognises the importance of multi-agency working and will support attendance at relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.

12 Confidentiality and Information Sharing

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

13 Complaints

- Chatham Grammar has a compliment, comments, and complaints procedure. [The Complaints Policy](#) this can also be found in the on the intranet, website and upon request from the office. As an Academy we encourage children and families to raise complaints, concerns, or comments with us. We have a robust internal investigation process.
- The compliment, comments, and complaints policy clearly states where to escalate concerns following completion of process either through Ofsted or the Education Skills Funding Agency (ESFA).
- Whilst we encourage members of our community to report concerns and complaints directly to us, we recognise this may not always be possible. Children, young people, and adults who have experienced abuse at Chatham Grammar can contact the NSPCC 'Report Abuse in Education' helpline on [0800 136663](tel:0800136663) or via email: help@nspcc.org.uk.

- Safeguarding concerns should be raised with the Academy immediately. If a concern or a child is at immediate risk, then the individual needs to contact First Response 01634 334466 or the police on 101. All visitors are given a safeguarding leaflet (in their lanyard) that outlines how to share concerns and code of conduct expected by visitors/contractors. This information can also be found on our website.
- All reported concerns will be taken seriously and considered within the relevant and appropriate process.
 - Anything that constitutes an allegation against a member of staff or volunteer will be dealt with in line with section 19 of this policy.

14 Staff Induction, Awareness and Training

- All members of staff have been provided with a copy of Part One of “Keeping Children Safe in Education” (20223 which covers Safeguarding information for all staff.
- Academy leaders including the DSL will read the entire document. Academy leaders and all members of staff who work directly with children will read Annex B within Keeping Children Safe in Education 2023. Training and policies are reviewed annually or when required to ensure compliance with current statutory guidelines and advice. All staff will be advised of any changes in a timely fashion and requested to read and sign to confirm understanding.
- All members of staff sign to confirm that they have read and understood Part One and Annex B or Annex A if deemed appropriate. This is completed online through IAMs (an online tool to keep records as well as is kept in a central register listing all statutory training linked to safeguarding).
- The DSL will ensure that all new staff and volunteers (including agency and third-party staff) receive child protection training and information to ensure they are aware of the Chatham Grammar internal safeguarding processes as part of their induction. These will be via an induction pack, online or face-to-face training via Microsoft teams, safeguarding specific procedures inside lanyard as well as attendance to termly ‘catch up sessions’ for staff.
- All staff undergo safeguarding and child protection training (including online safety) at induction. The training is regularly updated. Induction and training are in line with advice from the Medway Safeguarding Children Partnership.
- In addition to child protection training all members of staff receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings/briefings and termly CPD) as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- All staff members (including temporary/supply staff) will be made aware of the Academies expectations regarding safe and professional practice via the staff behaviour policy (or code of conduct) and Acceptable Use Policy. This will be achieved by a requirement to read the policy that is tracked on iAMs, specific training, and updates in staff briefings.
- Governing bodies and proprietors recognise the expertise staff build through undertaking safeguarding training and managing safeguarding concerns daily. Opportunity should

therefore be provided for staff to contribute to and shape safeguarding arrangements and child protection policy.

- The DSL and Principal will provide an annual report to the Governing Body detailing safeguarding training undertaken by all staff and will maintain an up-to-date register of who has been trained.
- Chatham Grammar has a nominated Safeguarding lead for the Governing Body, Vicky Webster, who ensures that all members of the Governing Body will access appropriate safeguarding training which covers their specific strategic responsibilities at induction and on a regular basis. Training will provide them with the knowledge to ensure their academies safeguarding policies and procedures are effective. This includes Governors' strategic responsibility for online safety.

15 Safe Working Practice

- All adults who come in to contact with our students have a duty of care to safeguard and promote their welfare. There is a legal duty placed upon us to ensure that all adults who work with or on behalf of our students are competent, confident, and safe to do so.
- All our staff including supply teachers/volunteers will be provided with a copy of our Academy's Code of Conduct at induction. They will be expected to know our Academy's Code of Conduct and policy for positive handling of students; they carry out their duties in accordance with this advice. There may be occasion when some form of physical contact is inevitable, for example if a child has an accident, is hurt or in a situation of danger to themselves or others around them. However, at all times the agreed policy for de-escalation/safe restraint must be adhered to.
- A list of staff that have accessed physical intervention training will be kept by the Principal/Designated Safeguarding Lead and updated in-line with [use of reasonable force](#) DfE guidance. All incidents will be recorded in-line with guidance.
- There may be circumstances when it is appropriate for staff to use reasonable force to safeguard children from harm. Further information regarding our approach and expectations can be found in our UKAT Positive Handling Policy 2022 2023.
- The DSL will ensure that all staff and volunteers have read the child protection policy and staff behaviour policy/code of conduct and understand that their behaviour and practice must be in line with it.
- If staff, visitors, volunteers, or parent helpers are working with children alone they will, wherever possible, be visible to other members of staff. They will be expected to inform another member of staff of their whereabouts in the Academy, who they are with, for how long. Doors, ideally, should have a transparent glass panel in them and be left open.
- Guidance about acceptable conduct and safe practice will be given to all staff and volunteers during induction. These are sensible steps that every adult should take in their daily professional conduct with children. This advice can be found in the [Safer Recruitment Consortium website](#). All staff and volunteers are expected to carry out their work in

accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.

- Staff should be particularly aware of the professional risks associated with the use of electronic communication (e-mail; mobile phones; texting; social network sites) and should familiarise themselves with advice and professional expectations outlined in the academies [Acceptable Use Policy](#).

16 Staff Supervision and Support

- Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL.
- The induction process will include familiarisation with child protection responsibilities and procedures to be followed if members of staff have any concerns about a child's safety or welfare.
- The Academy will provide appropriate supervision and support for all members of staff to ensure that:
 - All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children
 - All staff will be supported by the DSL in their safeguarding role.
 - All members of staff have regular reviews of their own practice to ensure they improve over time.
- The DSL will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union, the Education Support Partnership, or other similar organisations directly.

17 Safer Recruitment

- Chatham Grammar values the importance of developing a safe culture and is committed to ensure that all steps are taken to recruit staff and volunteers who are safe to work with our students and staff.
- Chatham Grammar will use the recruitment and selection process to deter, identify and reject unsuitable candidates. We will ensure that detailed checks are carried out and evidence is provided e.g., criminal record checks (Disclosure and barring Service (DBS) checks), barred list checks and prohibition checks, together with references and interview information this will aid the Academy in deciding about the suitability of the prospective employee.
- The Academy will carry out an online search on shortlisted candidates to help identify any issues that are publicly available online which may be relevant to their suitability to work with children and/or may have an impact on the Academy's reputation.
- The Governing Body will ensure that the CEO/Principal and at least one of the persons who conducts the interview has completed safer recruitment training. At all times, the Principal and Governing Body will ensure that safer recruitment practices are followed in accordance with the requirements of '[Keeping Children Safe in Education](#),' DfE (2023). The Academy will

ensure that at least one member of the interviewing panel has attended and passed the Safer Recruitment Training. Safer Recruitment and DBS Policy.

- Safer recruitment procedures will include the requirement for appropriate checks in line with national guidance (see: [Safeguarding Children and Safer Recruitment](#)).
- The Academy maintains an accurate Single Central Record (SCR) in line with statutory guidance. Guest visitors will also be checked in-line with statutory requirements and risk assessed robustly. The Governance Body/DSL will check the SCR on a regular basis and record inaccuracy and actions; reporting this to the Senior Leadership Team and Governance.
- Where appropriate we are committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in Academies.
- We advise all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands, and warnings.
- Where the Academy places a learner with an alternative provision provider, the Academy will continue to be responsible for the safeguarding of that child. The Academy will undertake appropriate checks to ensure the provider meets the needs of the student, including written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment.

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

- Chatham Grammar recognises that allegations sometimes arise from a differing understanding of the same event, but when they occur, they are distressing and difficult for all concerned. We also recognise that many allegations are genuine and there are some adults who deliberately seek to harm or abuse children.
- All staff, contractors and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the Academy's safeguarding regime. Such concerns or allegations will always be taken seriously by the senior leadership team.
- Chatham Grammar understands the duty to refer to the LADO where it is alleged that anyone working in the Academy has:
 - behaved in a way that has harmed a child or may have harmed a child.
 - possibly committed a criminal offence against or related to a child.
 - behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
 - behaved or may have behaved in a way that indicates they may not be suitable to work with children.

- We will always ensure that the procedures outlined by Medway Safeguarding Children's Board Protocol: Managing Allegations of abuse Against Persons who work with Children and the role of the LADO and Part 4 of 'Keeping Children Safe in Education' DfE (2022) are adhered to and will seek appropriate advice from the Local Authority Designated Officer (LADO).
- If staff have safeguarding concerns, or an allegation is made about another member of staff (including volunteers/supply staff/visitors) posing a risk of harm to children, then:
 - Allegations should be referred immediately to the CEO/Principal or SLT DSL in their absence who will first contact the Local Authority Designated Officer (LADO) to agree further action to be taken in respect of the child and staff member. Please refer to the Medway LADO Leaflet if you need further information.
 - In the event of allegations of abuse being made against the CEO/Principal then staff are advised that allegations should be reported to the Chair of Governors who will contact the LADO in the first instance.
 - Any member of staff or volunteer who does not feel confident to raise their concerns with the CEO/Principal or Chair of Governors should contact the LADO directly on 01634 331065.
 - The CEO/Principal or Chair of Governors will seek advice from the LADO within 24 hours of the alleged incident. No member of staff or the Governing Body will undertake further investigations before receiving advice from the LADO.
- Where Principals are unsure how to respond, for example, if the Academy is unsure if a concern meets the harm 'thresholds', advice will be sought via the Local Authority Designated Officer (LADO) Enquiry Line and/or the Education Safeguarding Service.
- The Academy has a legal duty to refer to the Disclosure and Barring Service anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person.
 - If these circumstances arise in relation to a member of staff at our Academy, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR.

18.1 Concerns that do not meet the 'harms threshold'

- The University of Kent Academies Trust has policies and processes in place to deal with low-level concerns and allegations that do not meet the 'harm threshold.' See (KCSIE Sept 2022)
- Chatham Grammar's Staff Code of Conduct explains what a low-level concern is and the importance of sharing concerns. [Code of Conduct Staff UKAT](#). We have clear reporting procedures for children, parents, and other people to report concerns or complaints, including abusive or poor practice. We also acknowledge that low-level concerns can arise in several ways from various sources, e.g., suspicion, complaint, or a disclosure. Procedures in

place for confidentially sharing, recording, and handling of low-level concerns are outlined below.

- A low-level concern is any concern (no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt') that a member of staff has acted in a way that:
 - is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
 - does not meet the allegations threshold or is not considered serious enough to refer to the local authority designated officer (LADO).
- Low-level concerns can exist on a wide spectrum, from the inadvertent and thoughtless, through to behaviour which is intended to enable abuse. Examples of inappropriate behaviour that would constitute a low-level concern that should be reported to the Principal/Executive Principal or the DSL (who will inform the Principal/Executive Principal) are:
 - Being over friendly with children – this could include, but is not limited to, communicating with a child through social media or allowing inappropriate conversations or enquiries to occur with students e.g., conversations that are about a staff member's personal life or are of a sexual nature.
 - Having favourites- this could include, but is not limited to, calling students by pet names or terms of endearment, or buying students gifts.
 - Taking photographs of children on their personal mobile phones or devices.
 - Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
 - Using inappropriate, sexualised, intimidating or offensive language.
 - Staff will be aware that some of the above low-level concerns may meet the terms of the harm's threshold depending on certain factors, e.g., the age or needs of the child or the context of exchanged messages, and that some the above incidents may not be concerns in context e.g., one-to-one meeting with a child behind a closed door between the child and an Academy counsellor who has received appropriate safety checks.
 - Staff will also be made aware that behaviour which raises concerns may not be intentionally inappropriate, and that does not negate the need to report the behaviour. Staff who engage in low-level inappropriate behaviour in relation to students inadvertently will be made aware and supported to correct this behaviour in line with the Staff Code of Conduct. The Principal will also evaluate whether additional training would be beneficial for any staff members exhibiting concerning behaviour.
- Low-level concerns should be reported to the Principal/Executive Principal or DSL (who will report to the Principal) Where the low-level concerns reported are linked to safeguarding, the Principal should share or liaise with the LADO Service: 01634 331 065.
- The Medway LADO policy states that all allegations, including low level are considered with the LADO particularly when linked to the safeguarding of students and staff.

- All low-level concerns will be recorded, including the details of the concern, how the concern arose, and the actions taken.
- Record forms (kept by the Principal and DSL) and follow-up information will be stored securely within the Academy's safeguarding systems, with access only by the Executive Principal and DSL. This will be stored in accordance with the Academy's GDPR and data protection policies. The staff member(s) reporting the concern must keep the information confidential and not share that concern with others apart from the Executive Principal and/or DSL.
- Low level concerns will not be referred to in to references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.
- Whenever staff leave the Trust, any record of low-level concerns which are stored about them will be reviewed as to whether that information needs to be kept. Consideration will be given to:
 - 1) Whether some or all the information contained with any record may have any value in terms of potential historic employment or abuse claims to justify keeping it, in line with normal safeguarding records practice.

Or

 - 2) if on balance, any record is not considered to have any value, still less actionable concern, and ought to be deleted.

18.2 Whistleblowing Procedure

- All staff and volunteers should feel able to raise concerns about poor or unsafe practice and such concerns will always be taken seriously by the leadership team. All members of staff are made aware of the Academy's [Whistleblowing procedure](#). It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk.
- Staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.

19 Safeguarding Children with Special Educational Needs and Disabilities

- Chatham Grammar understands that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. These children may have an impaired capacity to resist or avoid abuse. The DSL will work closely with the SENDCO to plan support as required.
- All staff will ensure that children with SEN and disabilities will be able to overcome the barriers that exist for this group of children and specifically ensure that those with communication difficulties will be supported to make sure that their voice is listened to and acted upon.

- It is important that all staff are aware that children with SEN and disabilities may not always outwardly display indicators of abuse and that some children can be disproportionately impacted by things like bullying and exploitation without outwardly showing signs.
- All members of staff will be encouraged to appropriately explore indicators of abuse such as behaviour/mood change or injuries and not to assume that they are related to the child's disability and be aware that children with SEN and disabilities may not always outwardly display indicators of abuse. To address these additional challenges, our Academies will always consider extra pastoral support for children with SEN and disabilities.

20 Curriculum and Staying Safe

- [Working Together to Safeguard Children \(2018\)](#) states that the curriculum should ensure opportunities for “developing children’s understanding, awareness and resilience”.
- Academies play a pivotal and essential role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour; what is ‘safe;’ to recognise when they and others close to them are not safe; and how to seek advice and support when they are concerned. It is the responsibility of every staff member, supply staff, volunteer, and regular visitor to carry out the requirements of this policy so that we can provide a safe learning environment in which children can learn, this is covered in induction. Through the Academy’s website there is guidance for Parents and Carers and students on Online–Safety (E-safety advice for parents/carers and students). The Academy also offers online E-Safety training sessions for parent/carers.
- Throughout our curriculum we will provide activities and opportunities for children to develop the skills they need to identify risks and stay safe. This will also be extended to include material that will encourage our children to develop essential life skills. In the early years of the Academy this is covered through induction into the Mini Academy system, Leadership and Challenge lessons and PPD. Assemblies are held regularly and are based around identifying risks and staying safe covering online safety, mental wellbeing, road safety, behaviour when socialising etc. Guest speakers such as the local police team are invited in to give bespoke talks on any issues that are prevalent.
- The Academy uses the PSHE and RSE curriculum to increase self-esteem, self-awareness and social and emotional understanding, assertiveness and decision making; this ensures that our students have a range of strategies to ensure their own protection and that they can also protect others. Online safety is also integrated into the curriculum.
- The Academy ensures that teachers that teach the PPD (incorporates PSHE) curriculum have been trained and equipped to deliver high quality PSHE education in a safe way. For further information and training on Medway PSHE programs please follow the link: [School PSHE programmes](#)
- As an Academy we are passionate in the ways we encourage children to learn and share their views. Children feel they can talk to a range of staff when they are worried and can feedback about their Academy experience. Children at Chatham Grammar will be listened to, heard and their concerns will be taken seriously and acted upon as appropriate.

- There is an extensive pastoral team who all students develop strong working relationships with, a student voice who meet regularly to discuss issues students would like to raise around the Academy and a personal tutor set up for each child, where daily meetings are held and act as a further opportunity for students to raise ideas or concerns.
- Other systems that exist outside of expected day to day classroom interaction and support include: our anti-bullying policy, dedicated year group leads for pastoral, safe spaces clearly identified by the 'safeguarding umbrella' logo around the Academy, student reporting app, pastoral posters in every classroom, other student voice outlets such as Academy parliament, equalities committee and questionnaires.

21 The Use of Academy Premises by Other Organisations

- Services or activities provided separately by another organisation from time to time may seek to use the Academy premises. The Principal or Governing Body will seek written assurance that the organisations concerned have suitable policies and procedures in place regarding safeguarding children and that relevant safeguarding checks have been made for all staff and volunteers.
- The Trustees and governing body will therefore seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the Academy on these matters where appropriate.
- Without this assurance then an application to use the premises will be refused.
- If Chatham Grammar receives an allegation relating to an incident that happened when an individual or organisation was on Academy premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities), Chatham Grammar will follow their safeguarding policies and procedures, including informing the LADO as they would with any safeguarding allegation.

22 Security

- Chatham Grammar provides a secure site that is controlled by clear management directives, but the site is only as secure as the people who use it. Therefore, all staff and people on the site have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may become known.
- Laxity can cause potential problems to safeguarding; Health and Safety Act 1989 and 2004.

Therefore:

- Gates are kept closed during the Academy Day and visitors can only gain access through the Visitors reception at the main entrance.
- Students must only enter through the two main entrances. Any student arriving after the start of the Academy Day, can only enter the site via the Visitor's reception.
- Parents, carers, or relatives attending functions have access only through the main entrance with tickets for visitors for appropriate events.

- Children will only be allowed home with adults with parental responsibility or confirmed permission.
 - Empty classrooms should have closed windows and doors.
 - Children should never be allowed to leave the Academy alone during Academy hours unless collection by an adult such as a parent who is doing so for a valid reason. They should report to the office to do this.
 - Health and safety audits to be completed annually with risk assessment developed in line with prevent duty. This will form part of the Trustees annual report. Risk management of the site security is managed by Senior Leadership/Governance; the Academy has a clear system of risk assessments and timescales.
- Visitors and volunteers must only enter through the main entrance and after signing in at the office will be issued with an Academy lanyard or visitor's pass. The Academy has a clear system of ensuring visitors are to be accompanied/supervised by [regulated staff member](#).
- The Academy will undertake risk assessment and use their professional judgement and experience when deciding whether to seek an enhanced DBS for any volunteer not engaging in regulated activity. We follow guidance for non-regulated activities. (DBS Policy Section 4 page 12). In doing so we will consider:
 - What we know about the individual/company, including formal and informal information offered by staff, parents, other establishments, or volunteers.
 - Whether the individual/company has other employment or undertakes voluntary activities where references can be sought, and suitability recorded.
 - Whether the role is eligible for an enhanced DBS check
 - We will clearly have decided the level of supervision required through risk assessment – the supervision will be “reasonable in all the circumstances to ensure the protection of children” as stated in KCSIE 2023
 - We have clear visitors' procedures that enables us to offer students experiences of meeting other professionals to extend knowledge and curriculum. This clearly states whether They are supervised or unsupervised within the Academy. All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.
 - If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.
 - Visitors are expected to sign in and wear a visitor's Badge.
 - All visitors to our setting, including visiting speakers, will be always accompanied by a member of staff.
- We will not invite into the Academy any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using Academy facilities is not seeking to disseminate extremist views or radicalise students or staff. Visitors' policy links with the Prevent duty.
- This policy links with the [Prevent Duty](#).
- Chatham Grammar will not tolerate or accept the behaviour of any individual (parent or other) that threatens Academy security or leads others (child or adult) to feel unsafe. This type of behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the Academy site.

- Any individual on site who is not known or identifiable by a visitor's pass may be challenged by any staff member for clarification and reassurance.

23 Monitoring and Review

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

24 Local Support

- All members of Staff at Chatham Grammar are made aware of local support available.
- **If a child may be at risk of imminent harm, you should call Children's Services First Response Team on 01634 334466 and/or the Police on 999**

Contact details:

- **Education Safeguarding Officer (Education Safeguarding Service)**
 - Kate Barry (Non-working day Wednesday)
 - 01634 331017
 - kate.barry@medway.gov.uk
 - educsafeguarding@medway.gov.uk
- **Education Safeguarding Officer**
 - Fiona Veitch (Non-working day- Friday)
 - **01634 331464**
 - Fiona.veitch@medway.gov.uk
- **Operational LADO and Education Safeguarding Manager**
 - Maisie Adkins
 - 01634 331065
 - maisie.adkins@medway.gov.uk

- **Education Lead in MASH – For MASH Enquiries only.**
 - Harriet O'Brien
 - 01634 331025
 - harriet.obrien@medway.gov.uk

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

- **Children's Social Work Services**
 - First Response: 01634 334466 (Monday to Friday from 9am to 5pm)
 - Out of Hours: 03000 419 191

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

- **Medway Safeguarding Children Partnership (MSCP)**
 - mscp@medway.gov.uk
 - 01634 336 329

25 National Support

Support for staff

- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline

Support for Students

- NSPCC: www.nspcc.org.uk
- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- Young Minds: www.youngminds.org.uk
- The Mix: www.themix.org.uk
- Shout: www.giveusashout.org
- Fearless: www.fearless.org
- Kidscape: www.kidscape.org.uk

Support for adults

- Family Lives: www.familylives.org.uk
- Crime Stoppers: www.crimestoppers-uk.org
- Victim Support: www.victimsupport.org.uk
- Kidscape: www.kidscape.org.uk
- The Samaritans: www.samaritans.org
- Mind: www.mind.org.uk
- NAPAC (National Association for People Abused in Childhood): napac.org.uk

- MOSAC: www.mosac.org.uk
- Action Fraud: www.actionfraud.police.uk
- Shout: www.giveusashout.org

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

Definitions of Forms of Abuse

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

- **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.
- **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
Please click on the hyper link for further information, advice, and guidance: [NSPCC Physical Abuse](#)
- **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only as far as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
Please click on the hyper link for further information, advice, and guidance: [NSPCC Emotional Abuse](#)
- **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by

adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education. Please click on the hyper link for further information, advice, and guidance: [NSPCC Sexual Abuse](#)

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

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

Specific Safeguarding Issues

Please see below links to information and guidance about specific safeguarding issues. You will find further information in Annex B: Keeping Children Safe in Education 20223

Mental Health

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

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

- Mind: www.mind.org.uk
- Mood spark: <https://moodspark.org.uk>
- Young Minds: www.youngminds.org.uk
- We are with you (formerly Addaction): www.wearewithyou.org.uk/services/kent-for-young-people/
- Every mind matters <https://www.nhs.uk/oneyou/>

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

Support for Learning Disabilities

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk

Domestic Abuse

- Refuge: www.refuge.org.uk
- Domestic abuse services: www.domesticabuseservices.org.uk
- Women's Aid: www.womensaid.org.uk

- Men's Advice Line: www.mensadvice.org.uk
- Mankind: <https://www.mankind.org.uk/>
- National Domestic Abuse Helpline: www.nationaldahelpline.org.uk
- Respect Phonenumber: <https://respectphonenumber.org.uk>

Honour based Violence (FGM and Breast Ironing)

- Forced Marriage Unit: <https://www.gov.uk/guidance/forced-marriage>
- Information and resources <https://www.gov.uk/government/collections/female-genital-mutilation>
- FGM Factsheet: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf
- Mandatory reporting of female genital mutilation: procedural information: www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information
- National FGM Centre <http://nationalfgmcentre.org.uk/fgm/>

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

- Contextual Safeguarding Network: <https://contextualsafeguarding.org.uk>
- National Crime Agency: www.nationalcrimeagency.gov.uk/who-we-are
- Rape Crisis: <https://rapecrisis.org.uk>
- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Brook: www.brook.org.uk
- Victim Support: www.victimsupport.org.uk
- Anti-Bullying Alliance: www.anti-bullyingalliance.org.uk
- Disrespect Nobody: www.disrespectnobody.co.uk
- Upskirting – know your rights: www.gov.uk/government/news/upskirting-know-your-rights
- [Supporting practice in tackling child sexual abuse - CSA \(Child Sexual Abuse\) Centre](#)

Substance Misuse

- Drugs advice for Academy: [Gov.uk Drugs advice for schools](http://Gov.uk/Drugs%20advice%20for%20schools)
- Talk to Frank <https://www.talktofrank.com/>
- We are with you (formerly Addaction): www.wearewithyou.org.uk/services/kent-for-young-people/

Online Safety

- CEOP: www.ceop.police.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk
- Think U Know: www.thinkuknow.co.uk
- ChildNet: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Report Harmful Content: <https://reportharmfulcontent.com>
- Parents Info: www.parentinfo.org
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Matters: www.internetmatters.org
- NSPCC/ Net Aware: www.nspcc.org.uk/onlinesafety and www.net-aware.org.uk
- Get safe Online: www.getsafeonline.org

- Stop it Now! www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- [Harmful online challenges and online hoaxes](#) - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support.
- LGFL (London Grid for Learning) '[Undressed](#)' provided Academy advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.

Radicalisation and hate

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

APPENDIX 2: Related Safeguarding Policies

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

- Staff Code of Conduct
- Preventing Extremism & Radicalisation Policy
- Anti-Bullying (including cyber bullying indicators)
- Behaviour Policy
- Use of reasonable force (physical intervention)
- Recruitment & Selection
- Whistleblowing
- Code of conduct
- Educational visits – EVOLVE
- Site Security
- Attendance
- Online safety – IT code of conduct
- Health and Safety including site security
- Harassment and discrimination including racial abuse
- Meeting the needs of pup students with medical conditions
- Dignity and care
- First aid
- Medical
- Educational visits including overnight stays (homestay)
- RSE and RSHE policy

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

1. Receive:

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

2. Reassure:

Reassure the child, but only as far as is honest and reliable. Do not make promises that you cannot be sure to keep, e.g., "everything will be all right now".

Do not promise confidentiality – never agree to keep secrets. You have a duty to report your concerns.

Tell the child that you will need to tell some people, but only those whose job it is to protect children.

Acknowledge how difficult it must have been to talk and reassure them they have done the right thing.

3. React:

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

4. Record:

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

5. Remember:

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

6. Relax

- Get some support for yourself

APPENDIX 4: Child-on-Child Sexual Violence and Harassment Policy

- Chatham Grammar is committed to providing a safe environment for all its students and staff, free from discrimination on any ground and from harassment including sexual harassment. Chatham Grammar will operate zero tolerance for any form of sexual harassment. Behaviours or language that seek to normalise sexual harassment or violence will be challenged swiftly and incidents involving allegations of sexual harassment will be treated seriously and will be promptly investigated. Sanctions will be applied in accordance with our behaviour and safeguarding policy.

- Anyone can be a victim of sexual harassment, regardless of their gender and of the gender of the harasser. Chatham Grammar recognises that sexual harassment may also occur between people of the same sex. What matters is that the sexual conduct is unwanted and unwelcome by the person against whom the conduct is directed.
- Chatham Grammar recognises that sexual harassment is a manifestation of power relationships and often occurs within unequal relationships.
- All reports of sexual harassment will be taken seriously and treated with respect and in confidence. No one will be victimised for reporting an incident.

Definitions of sexual violence and sexual harassment

Sexual violence and sexual harassment can occur between two people of any sex. They can also occur through a group of people sexually assaulting or sexually harassing a single young person or group of students.

Young people who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing, thus likely to adversely affect their educational attainment. Our aim is to support our students to access their education and to receive the appropriate specialist support, working in partnership with the police and children's services.

Sexual Violence:

- For the purpose of this policy, when referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:
- Rape: A person (A) commits an offence of rape if: they intentionally penetrate the vagina, anus, or mouth of another person (B) with their penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- Assault by Penetration: A person (A) commits an offence if: they intentionally penetrate the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- Sexual Assault: A person (A) commits an offence of sexual assault if: they intentionally touch another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

Sexual Harassment:

- Is the unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated that can occur online and offline. It includes situations where a person is asked to engage in sexual activity as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient. When referring to sexual harassment, it is in the context of child-on-child sexual harassment and is likely to violate a child's dignity.
- Sexual harassment can involve one or more incidents and actions constituting harassment may be physical, verbal, and non-verbal. Examples of conduct or behaviour which constitute sexual harassment include, but are not limited to:

Physical conduct

- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, tickling or inappropriate touching
- Physical violence, including sexual assault

- Physical contact, e.g., touching, pinching, brushing against someone, interfering with someone's clothes

Verbal conduct

- Comments on someone's appearance (clothes), age, private life, etc.
- Sexual comments, stories, and jokes, calling someone sexual names.
- Sexual advances
- Repeated and unwanted social invitations for dates or physical intimacy
- Insults based on the gender
- Condescending or paternalistic remarks
- Sending sexually explicit messages (by phone or by email)

Non-verbal conduct

- Sending sexually explicit or suggestive material
- Display of sexually explicit or suggestive material
- Sexually suggestive gestures
- Whistling
- Leering

Online conduct

- Non-consensual sharing of sexual images and videos (sexting)
- Sharing of sexual images and videos (sexting)
- Inappropriate comments on social media
- Exploitation, coercion, and threats

It is important to note that they are not exhaustive, and that sexual harassment can include any conduct of a sexual nature which is unwanted and unwelcome by the recipient.

Consent

- To consent to something means to agree to it. It can be verbal or written.
- A person is consenting if they agree to something when they have the capacity to make the choice. This needs to be an independent and informed choice when it comes to sexual consent as well as physical or close contact. An individual can also withdraw their consent at any time.

Response to reports of sexual violence and sexual harassment

If a victim cannot directly approach an alleged harasser and/or want to report the incident, he/she can approach a trusted adult or a member of the Safeguarding Team or use the student 'Support App' or the email address refernowcg@universityofkentacademiestrust.org.uk

When the Inclusions team receive the report of sexual harassment or violence, they will delegate one of the safeguarding trained members of staff to:

- Immediately record the dates, times and facts of the incident(s) and gather appropriate statements
- Ascertain the views of the victim as to what outcome he/she wants
- Ensure that the victim understands the Academy's procedures for dealing with the complaint
- Inform Parents/Carers of Victim and perpetrator
- Keep a confidential record of all discussions
- Respect the choice of the victim
- Ensure that the victim and perpetrator know that they can report to the Police

All concerns, discussion, decisions, and reasons for decisions will be kept.

Dealing with reports of sexual violence and harassment both online and offline, will require tough decisions to be made with the complexities that each incident/case will present. Carefully considered decisions will be made on a case-by-case basis using the DFE guidance along with our effective safeguarding practices. The Designated Safeguarding Leads (DSLs) will take the leading role and will use their professional judgement, supported by other agencies such as the police and children's social care as required. Important considerations will include:

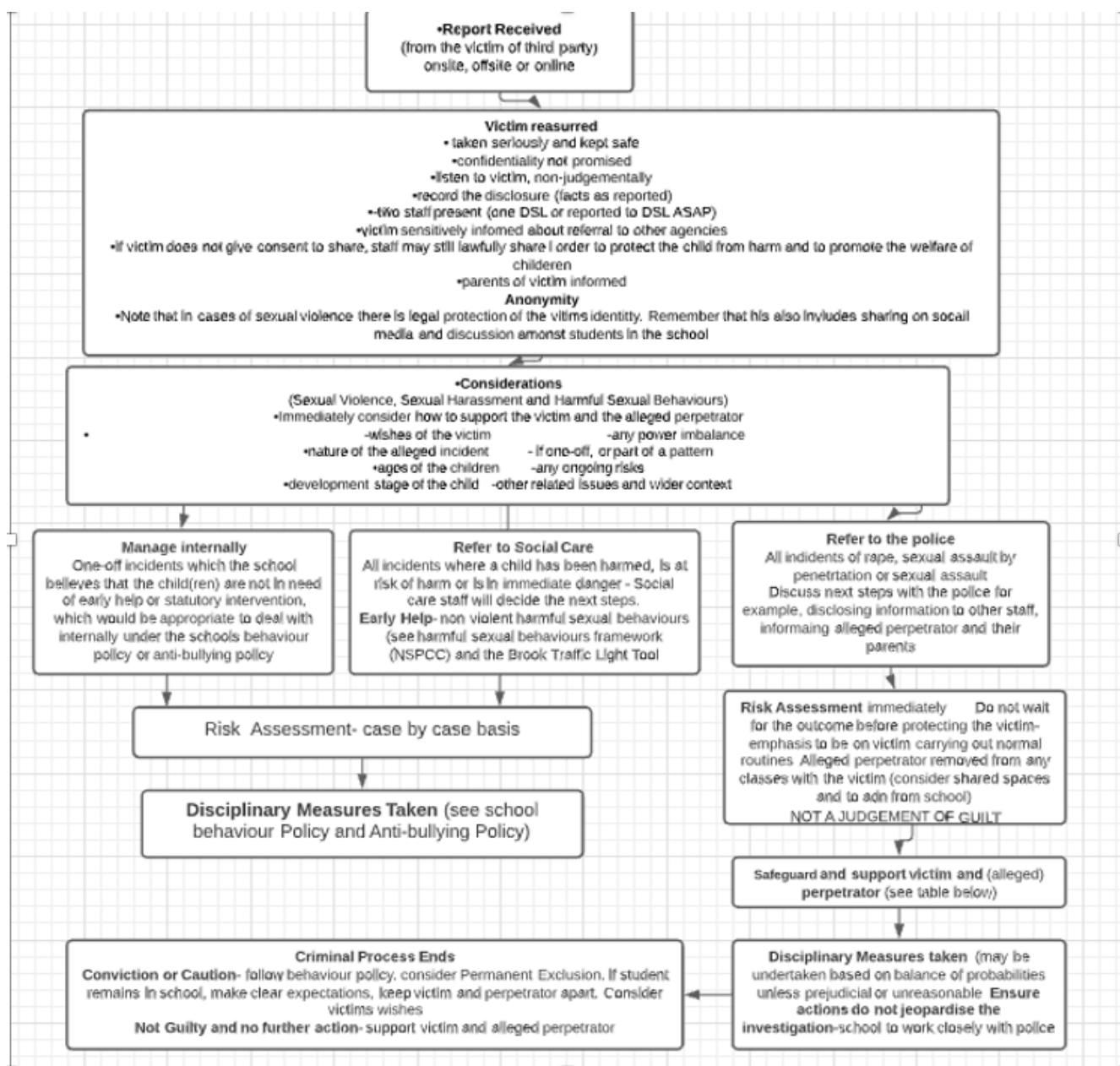
- The wishes of the victim in terms of how they want to proceed and their voice to be considered throughout the process of investigations, sanctions and support required.
- The nature of the alleged incident (s), including whether a crime has been committed and consideration of harmful sexual behaviour.
- The ages of the children involved
- The developmental stages of the children involved
- Any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature, more confident? Does the victim have a disability or learning difficulty?
- If the alleged incident is a one-off or a sustained pattern of abuse.
- Are there ongoing risks to the victims, other children, adult students, or Academy staff; and
- Other related issues and wider context (see contextual safeguarding). Advice should be taken, as appropriate, from children's social care, specialist sexual violence services and the police.

The following statutory points must influence decision making if they apply to an incident:

- A child under the age of 13 can never give consent to any sexual activity
- The age of consent is 16
- Sexual intercourse without consent is rape
- Rape, assault by penetration and sexual assault are defined by law
- Creating and sharing sexual photos and videos of under 18s is illegal (sexting). This includes children making and sharing sexual images and videos of themselves.

As always when concerned about the welfare of a child, staff will act in the best interest of the child. In all cases, Academy/colleges will follow general safeguarding principles as set out throughout this policy. Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted). Throughout this process and beyond the victim and alleged perpetrator are entitled to be supported by a counsellor within the Trust.

Flow Diagram to illustrate the response to a report of sexual violence and harassment:



Safeguarding and supporting victims and alleged perpetrators

Victim	Alleged Perpetrator	Other children
<ul style="list-style-type: none"> • Needs and wishes of victim are paramount • Not made to feel they are the problem • Consider proportionality of response • Aim for the victim to carry out normal routine • Recognise they may struggle in class and may need time out (if they wish) • Be aware that they may not disclose the whole picture immediately • Prepare for support over a lengthy period and consider who is involved (internal and external) • If victim moves Academy the Designated Safeguarding Lead (DSL) informs the new Academy of the need for continued support 	<ul style="list-style-type: none"> • Possible tension between discipline and support (these are not mutually exclusive) • Consider age, developmental stage. Any SEND • Proportionate response • Consider unmet need (for example, harmful sexual behaviours (HBVs) in younger children may be a sign of abuse or trauma • If (alleged) perpetrator moves Academy, the DSL to inform the new Academy of the issues and transfers the child protection file. 	<ul style="list-style-type: none"> • Witnesses may need support (especially in cases of sexual violence) • Avoid allowing students to take sides • Minimises potential for bullying or victimisation in Academy and on transport • Be aware of any social media use and inappropriate or even illegal posts (especially in cases of criminal investigation where anonymity is legally guaranteed) • Develop safeguarding culture • Constantly review reporting procedures and responses

APPENDIX 5 – What to do if you have a welfare concern flow chart?

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

Please report any concern or hunch you may have, however significant as this will form part of the bigger picture for an individual

More information means we can support an individual more swiftly and appropriately

Immediately record and report your concern by: emailing: SafeguardingCG@universityofkentacademiestrust.org.uk or using the staff or student safeguarding support App on your ipad or scan the QR code from the posters around the Academy to complete your concerns

If you do not have electronic access, complete the student concern paper form in your lanyard and immediately hand to reception (who will contact the safeguarding team) or to the safeguarding team or
Speak directly to the safeguarding team.

If a student is making a disclosure to you, please reassure them and explain that you will need to share the information to the safeguarding team.

If a student is making a disclosure to you, please reassure them and explain that you will need to share the information to the safeguarding team.

Clarity concerns if necessary (TED, Tell, Explain and Describe)

Use the words of the child (including offensive language if used) and only use facts.

Date, time, where and when as well as names of anyone involved (if known) if appropriate at the time of reporting

All referrals are monitored constantly by the safeguarding team:
Emma Perking – Vice Principal for Inclusion and Designated Safeguarding Lead (DSL)
Paula Knight – SENDCo and DSL
Michelle Marshall – Assistant Principal and DDSL
Shirley Dexter – Executive Administrator for Inclusions

Designated Safeguarding Lead and team then must consider the following:
If the student is at immediate risk of harm e.g., unsafe to go home, or unsafe to self or other, the MSCP Inter-Agency Threshold Criteria for student in need should be used if further guidance is required
If the student is at imminent risk of harm, a referral will be made to first response – 01634 334466
If the student is Not as imminent risk of harm, then a referral will be made via the first response portal
If unsure, then a 'No Name consultation' can be made 9:30-12:30pm (01634 331662) or first Response on (01634 334466)

Updates and what to do if you're unhappy with a response:

Due to the nature of child protection, you may not always be provided with the details of the next step in the decision-making process owing to all information being on a 'need to know' basis. You should receive a receipt from the safeguarding team.

If you are unhappy with the response

Staff:

- Speak to the safeguarding team
- Follow the local escalation procedures
- Procedures via the website

Student:

Speak to the safeguarding team
follow the Academy complaints

RECORD all decisions marking and actions taking in the student's child protection/safeguarding file information to be shared with appropriate staff on a 'need to know' basis

Monitoring

'Check in' meetings are held with the key pastoral staff and safeguarding staff every other morning to regularly discuss students/patterns of concern.
The safeguarding team formally meet weekly, and more regularly specific individuals are added to their safeguarding/child protection files.

The following re considered on a case-by-case basis during the monitoring process:

- What are you monitoring e.g., Behaviour trends appearances etc (ensure this is clear at all points)
- How long will a case/theme be monitored
- Where, How, Who are feeding back and how is it recorded.

Review and request further support (if necessary)

Chatham Grammar has a multi-agency approach to ensure effective support for our young people. We will seek support/advice from other appropriate agencies when it comes to ensuring our staff and stud