ST EDMUND'S SCHOOL
CANTERBURY

Safeguarding & Online Safety Whole School Policy (Including Early Years)

Designated Safeguarding Lead: Ross Underwood (Assistant Head, Safeguarding)

Head: Edward O'Connor

Published date: September 2026

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

Date written: September 2026

Date agreed and ratified by Governing Body Sept 2026

Date of next review: September 2027

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

Key Contacts

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Key External Safeguarding contacts:

For advice on safeguarding issues please call your area office on the numbers listed below.

If your call is urgent, i.e. a child is in immediate danger, and you cannot be connected to the team, you should call the Integrated Front Door on 03000 411111 or the Police on 999.
Out of Hours Number: 03000 419191

Kent Police
NPCC When to call the police - guidance for schools and colleges
Home | Kent Police
Telephone 101 or 999 if there is an immediate risk of harm

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

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

Front Door Service Consultation: 03000 411111

Kent LADO Education Safeguarding Advisory Service (LESAS)
Local Authority Designated Officer (LADO) - Kent Safeguarding Children Multi-Agency Partnership
To refer to the LADO, complete a referral on the Kent Integrated Children's Services Portal:
https://kccchildrens.kent.gov.uk/web/portal/pages/home

For strategic education safeguarding or online safety advice, or to enquire about LESAS commissioned services/support, please use the LESAS enquiry form.
To enquire if a LADO referral should be made, please use the LESAS enquiry form:
https://forms.cloud.microsoft/pages/responsepage.aspx?id=DaJTMjXH_kuotz5qs39fkC8yfR_WZe1AiKruQPRg6jJUM0lVQlg1TVYwTjIxT0RLREo3N01SMFg1SyQlQCN0PWcu&route=shorturl

East Kent Assistant Director Education
Robert Veale
Telephone: 03000 41 85 75
Email: Robert.Veale@kent.gov.uk

What to do if you have a welfare concern at St Edmund's

Why are you concerned?
For example:
- Something a child has said - e.g. an allegation of harm.
- Child's appearance - may include unexplained marks as well as dress.
- Behaviour change
- Witnessed concerning behaviour (either by the young person or behaviour directed toward the young person).

Inform the Designated Safeguarding Lead

Ross Underwood

Safeguarding Lead

- Consider whether the child is at immediate risk of harm e.g. unsafe to go home.
- Access the Kent Safeguarding Support Level Guidance document and procedures: www.kscmp.org.uk
- Refer to other agencies as appropriate e.g. Early Help. LADO, Police, Request for Support through the Front Door at Integrated Children's Services.
- Consult with the Front Door - 03000 411111 or Out of Hours - 03000 419191

If you are unhappy with the response:

Staff:

Follow local escalation procedures
Follow Whistleblowing procedures

Child and Parents:

Follow School Complaints Procedures (link on school website)

Record decision making and action being taken on Cpoms as a safeguarding incident

Monitor

- Record updates as actions on Cpoms

Review and request further support (if necessary)

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

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1. Introduction and Ethos

- At St Edmund's we recognise our statutory responsibility to safeguard and promote the welfare of all children. Safeguarding is everybody's responsibility and all those directly connected (staff, volunteers, governors, leaders, parents, families and pupils) are an important part of the wider safeguarding system for children and have an essential role to play in making this community safe and secure.

- Staff working with children at St Edmund's are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.

- St Edmund's recognises the importance of providing an inclusive ethos and environment within the school that will help children to be safe and feel safe. At St Edmund's, children are respected and encouraged to talk openly. St Edmund's will always consider the best interests of the child. All our staff understand safe professional practice and adhere to our safeguarding policies.

- Our core safeguarding principles are:

  - **Prevention**
    Positive, supportive, safe culture, curriculum and pastoral opportunities for children, safer recruitment procedures.

  - **Protection**
    Following the agreed procedures, ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns.

  - **Support**
    For all pupils, parents and staff, and where appropriate specific interventions are required for those who may be at risk of harm.

  - **Working with parents and other agencies**
    To ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.

- St Edmund's expects that if any member of our community has a safeguarding concern about any child or adult, they should act and 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 2026' (KCSIE) which requires individual schools 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 2026.

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 Keeping Children Safe in Education 2026 (KCSIE) Link to KCSIE 2026
  - Working Together to Safeguard Children 2026 (WTSC)
  - Link to Working Together to Safeguard Children (2026)Ofsted: Education Inspection Framework
  - 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 2026 (EYFS)
  - The Education Act 2002
  - The Education (Independent School Standards) Regulations 2014
  - The Non-Maintained Special Schools (England) Regulations 2015
  - The Human Rights Act 1998
  - Prevent Duty Guidance (2023)
  - Relationships and Sex Education (RSE) and Health Education (2021)
  - Working Together to Improve School Attendance (2024)
  - Generative AI in Education (2025)
  - The Equality Act 2010 (including the Public Sector Equality Duty)
  - Public Interest Disclosure Act 1998

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

3. Definition of Safeguarding

- In line with KCSIE 2026, safeguarding and promoting the welfare of children is defined for the purposes of this policy as:
  - providing help and support to meet the needs of children as soon as problems emerge
  - protecting children from maltreatment, whether that is within or outside the home, including online
  - preventing impairment of children's mental and physical health or development
  - ensuring that children grow up in circumstances consistent with the provision of safe and effective care
  - taking action to enable all children to have the best outcomes

- St Edmund's acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):
  - Abuse, neglect and exploitation
  - Bullying (including cyberbullying)
  - Children with family members in prison
  - Children who are absent from education (including unexplainable and/or persistent absences from education).
  - Child missing from home or care
  - Child Sexual Exploitation (CSE)
  - Child Criminal Exploitation
  - Contextual Safeguarding (Risks outside the family home)
  - County Lines
  - Domestic abuse

- Drugs and alcohol misuse
- Fabricated or induced illness
- Faith abuse
- Female Genital Mutilation (FGM)
- Forced marriage
- Gangs and youth violence
- Gender based abuse and violence against women and girls
- Hate
- Homelessness
- Honour based abuse
- Human trafficking and modern slavery
- Mental health

Missing children and adults

- Online safety
- Child abuse
- Preventing radicalisation and extremism
- Private fostering
- Relationship abuse
- Serious Violence
- Sexual Violence and Sexual Harassment
- Upskirting

self-generated intimate images and/or videos (including nude and semi nude, and AI-generated intimate images or deepfakes)
(Also see Annex B within 'Keeping Children Safe in Education' 2026)

4. Related Safeguarding Policies

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

  - Acceptable Use of Technology Policies
  - Anti-Bullying
  - Attendance
  - Behaviour management, linked to the use of physical intervention
  - Complaints
  - Emergency Procedures
  - Educational Visits
  - First Aid and Accidents
  - Health and Safety
  - Image use
  - Low Level Concerns Policy
  - Managing allegations against staff
  - Personal and intimate care
  - Privacy Notice (Data Protection & Information Sharing)
  - Relationship and Sex Education (RSE)
  - Risk assessments (e.g. school trips, use of technology, re-opening)
  - Safer Recruitment
  - Searching, screening and confiscation
  - Staff behaviour policy and Code of Conduct, Staff Handbook and Staff Duty of Care including AUP
  - Whistleblowing

5. Policy Compliance, Monitoring and Review

- St Edmund's will review this policy at least annually. The policy will be revised following any national or local policy updates, any local child protection concerns and/or any changes to our procedures.

- All staff (including temporary staff and volunteers) will be digitally provided with a copy of this policy. . All staff, including those who do not work directly with children, will read and understand Part One of KCSIE 2026. Annex A is no longer used. All staff receive and understand Part One on induction and annually thereafter.
- Parents/carers can obtain a copy of the St Edmund's Safeguarding policy and other related policies on request. Additionally, our policies can be viewed via the St Edmund's website and on the staff portal and parent portal.

- The policy forms part of our St Edmund's strategic and development plans and will be reviewed annually by the governing body/Senior Leadership team which has responsibility for oversight of safeguarding and child protection systems. The policy will be updated also whenever needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt.

- The Designated Safeguarding Lead and Head will ensure regular reporting on safeguarding activity and systems to the governing body. The governing body will not receive details of individual pupil situations or identifying features of families as part of their oversight responsibility.

6. Key Responsibilities

- The Governing Body have read, understood and will follow KCSIE 2026.

- The designated governor for safeguarding is Chris Nickols. The nominated governor will support the DSL and have oversight in ensuring that the St Edmund's has an effective policy which interlinks with other related policies; that locally agreed procedures are in place and being followed; and that the policies are reviewed at least annually and when required.

- The Governing Body and leadership team will ensure that the Designated Safeguarding Lead has appropriate status, skills and experience and is supported in their role.

- The Governing Body will undertake regular safeguarding training as advised by the DSL and/or the Head.
- The Governing Body maintains a rigorous oversight of safeguarding matters through a range of information including Annual Safeguarding Review by DSL, termly Heads' reports, regular training and ongoing feedback from the DSL and Head on incidents and/or patterns of concern and updates on serious cases.
- The governing body is aware of and understand their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements set out by the Kent Safeguarding Children Multi-Agency Partnership (KSCMP).
  This includes but is not limited to safeguarding all members of the school community (for example, staff, pupils, parents/carers and other family members) identified with protected characteristics within the Equality Act; age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.

6.1 Designated Safeguarding Lead (DSL)

- St Edmund's has appointed a member of the leadership team (Ross Underwood, Assistant Head) as the Designated Safeguarding Lead (DSL). Additionally, the School has appointed Deputy DSLs (Alex Ward, Head of Foundation, Sharon Scally (Safeguarding Officer), Catherine Shearer (Deputy Head Pastoral), James Clapp (Head of Boarding) and Kathleen Davis (Head of Junior School) who will have delegated responsibilities and act in the DSLs absence.

- The DSL has overall responsibility for the day-to-day oversight of safeguarding and child protection systems in St Edmund's. Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.

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

- The Head will be kept informed of any significant issues by the DSL.

- The DSL (and deputies) will be provided with sufficient time so they can provide appropriate support to staff and children regarding any new safeguarding and welfare concerns. This may include handling of referrals to integrated social care and working with other agencies where appropriate. A key aspect of the role is the oversight of online safety.

- The DSL role will follow that which is outlined in Annex C of KCSIE 2026.

Key aspects of this will include:

- Act as the central contact point for all staff to discuss any safeguarding concerns
- Maintain a confidential recording system for safeguarding and child protection concerns
- Coordinate safeguarding action for individual children
- When supporting children with a social worker or looked after children the DSL should have the details of the child's social worker and the name of the virtual school head in the authority that looks after the child (with the DSL liaising closely with the designated teacher)
- Liaise with other agencies and professionals in line with KCSIE 2026 and WTSC 2026
- Ensure that locally established procedures as put in place by the three safeguarding partners (KSCMP), including referrals, are followed, as necessary.
- Represent, or ensure that, St Edmund's is appropriately represented at multi-agency safeguarding meetings (including Child Protection conferences)
- Manage and monitor the school's role in any multi-agency plan for a child.
- Understand and evaluate the filtering and monitoring systems and processes by means of weekly reports from the IT Support Officer (who is DSL trained) on network usage and matters of concern related to pupil and staff online activity
- Be available during term time for staff in the school to discuss any safeguarding concerns.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and St Edmund's leadership staff.
- Oversee and respond to children who have unexplainable and/or persistent absences from education by means of weekly attendance reviews and liaison with key pastoral staff where additional information and/or interventions may be necessary

- Ensure adequate and appropriate DSL cover arrangements in response to any closures and out-of-hour and/or out-of-term activities.
- Ensure all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE (2026)

In the absence of the DSL (for example due to ill health), the safeguarding@stedmunds.org.uk address is accessed and managed by Deputy DSLs, EOC, CJS and KD.

6.2 Members of Staff

All members of staff have a responsibility to:

- Provide a safe environment in which children can learn.
- Be aware of the indicators of abuse, neglect and exploitation so that they can identify cases of children who may need help or protection.
- Know what to do if a child tells them that he or she is being abused or neglected and understand the impact abuse, neglect and exploitation can have upon a child.
- Maintain a high level of vigilance regarding pupil attendance, liaising with key pastoral staff and the DSL as necessary.
- Be able to identify and act upon indicators that children are, or at risk of developing mental health issues.
- Be prepared to identify children who may benefit from early help and Family Help services. The School will work with universal services and targeted early help, including Family Help arrangements where these are in place locally, to ensure children and families receive timely and appropriate support before concerns escalate.
- Understand the early help and Family Help services process and their role in it.
- Understand the school/college safeguarding policies and systems.
- Undertake regular and appropriate training which is regularly updated.
- Be aware of the local process of making referrals to children's social care and statutory assessment under the Children Act 1989.
- Know how to maintain an appropriate level of confidentiality.
- Reassure children who report concerns that they are being taken seriously and that they will be supported and kept safe. No victim will be given the impression that they are creating a problem by reporting abuse.

6.3 Children and Young People

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

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

6.4 Parents and Carers

Parents/carers have a responsibility to:

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

7. Recognising Indicators of Abuse, neglect and exploitation

- All staff at St Edmund's are made aware of the definitions and indicators of abuse, neglect and exploitation as identified by Working Together to Safeguard Children (2026) and Keeping Children Safe in Education 2026. This is outlined locally within the Kent Support Levels Guidance (https://www.kscmp.org.uk/guidance/kent-support-levels-guidance)

- St Edmund's School recognises that when assessing whether a child may be suffering actual or potential harm there are four categories of abuse:

  - Physical abuse
  - Sexual abuse
  - Emotional abuse
  - Neglect

- Exploitation is a form of abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into any activity

- in exchange for something the victim needs or wants, and/or
- for the financial or other advantage of the perpetrator of facilitator and/or
- through violence or the threat of violence.

- Exploitation is included in KCSIE 2026 to remind us that abuse might not just occur in the home, but it may also occur outside of the home environment, even online. Exploitation can include instances where a child or young person may be groomed to become involved in sexual or criminal activity.

  For further information, see Appendix 1 of this policy

- Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This is particularly relevant when children see, hear or experience domestic abuse and its effects.

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

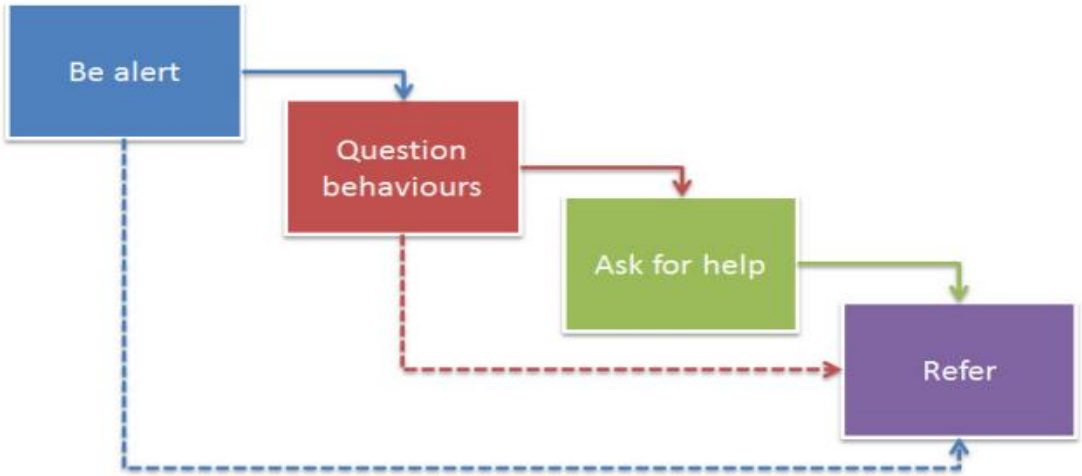
St Edmund's recognises abuse, neglect, exploitation and safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label alone. In many cases, multiple issues will overlap with one another, therefore staff will always be vigilant and always raise concerns with a DSL. Parental behaviours can indicate child abuse, neglect or exploitation, so staff will 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.

- Safeguarding incidents and/or behaviours can be associated with factors and risks outside the School. Children can be at risk of abuse or exploitation in situations outside their families; extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines. Technology can be a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face and in many cases, abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online.

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

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



Child abuse concerns: guide for practitioners - GOV.UK

- **In all cases, if staff are unsure, they must always speak to the DSL or Deputy.**

- Members of staff are aware that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of child abuse, neglect and exploitation can vary from child to child. Children develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child.

- It is important to recognise that indicators of abuse, neglect and exploitation (including children who have unexplainable and/or persistent absences from education) 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. St Edmund's will work with local authority children's services where school absence indicates safeguarding concerns.

- Parental behaviors' may also indicate child abuse, neglect or exploitation 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.

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

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

- All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

- St Edmund's School recognises that children missing education (CME) can be a vital warning sign of a range of safeguarding issues, including neglect, abuse, child sexual or criminal exploitation, forced marriage, honour-based abuse, trafficking, or radicalisation. In line with Keeping Children Safe in Education 2026, the School has robust systems in place to monitor attendance daily and to identify pupils who are absent from education for prolonged or repeated periods without a valid reason. Those members of staff with responsibility for attendance and the DSL work closely to ensure that unexplained or persistent absence is followed up swiftly, with contact made to parents/carers on the first day of absence. Where concerns remain, or a child is identified as missing education, referrals will be made to the Local Authority in accordance with statutory duties. The School will also inform the Local Authority of any pupil removed from the admissions register at a non-standard transition point. Timely sharing of information with the Local Authority and other safeguarding partners ensures that children missing from education are quickly identified and supported, reducing the risk of harm. Staff should also refer to the Attendance (including CME) policy.

8. Child Protection Procedures

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

  - listen carefully to the concern and be non-judgmental.
  - only use open questions to clarify information where necessary, e.g. who, what, where, when or Tell, Explain, Describe (TED).
  - not ask leading questions

- not promise confidentiality as concerns will have to be shared further, for example, with the DSL and potentially Integrated Children's Services.
- be clear about boundaries and how the report will be progressed.
- record the concern in line with school/college record keeping requirements.
- inform the DSL (or deputy), as soon as practically possible.

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

- St Edmund's will respond to concerns in line with the Kent Safeguarding Children Multi-Agency Partnership procedures (KSCMP).

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

- Where a child is suffering, or is likely to suffer from significant harm, or is in immediate danger, a 'request for support' will be always be made immediately to Integrated Children's Services (via the 'Front Door') also to the police if a crime may have been committed.

  - St Edmund's recognise that in situations where there are immediate child protection concerns for a child as identified in line with Support Level Guidance, it is NOT to investigate as a single agency, but to act in line with KSCMP guidance which may involve multi-agency decision making**.**
  - The DSL may seek advice or guidance from their Area Education Safeguarding Advisor from the Education Safeguarding Service before deciding next steps.
  - They may also seek advice or guidance from a social worker at the Front Door service who are the first point of contact for Integrated Children's Services (ICS).

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

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

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

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

- If, after a request for support or any other planned external intervention, a child's situation does not appear to be improving or there is a concern regarding decisions made, the DSL will consider following KSCMP 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.

- St Edmund's is an Operation Encompass School. This means we work in partnership with Kent Police to provide support to children experiencing domestic abuse.

9. Record Keeping

- All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child. These records will be stored on CPOMs with original copies of notes given to the DSL.
- Records should include:

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

- If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy).

- All safeguarding concerns, discussions and decisions, and reasons for those decisions, will be recorded in writing on the St Edmund's safeguarding system, CPOMs.

- A body map will be completed on CPOMs if injuries have been observed. In some cases, a photograph may be used with permission from Head or DSL.

- Records will be completed as soon as possible after the incident/event, using the child's words and will be signed and dated by the member of staff, and/or uploaded as an incident onto CPOMs. If there is an immediate concern the member of staff should consult with a DSL before updating CPOMs as reporting urgent concerns takes priority.

- Safeguarding records are kept for individual children and are maintained separately from all other records relating to the child in the St Edmund's. Safeguarding records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL on CPOMs. Safeguarding records are shared with staff on a 'need to know' basis only.

- Keeping Children Safe in Education 2026 requires that those working with children and young people should record "all concerns, discussions and decisions made including the rationale for those

decisions. These recordings should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc."

- All safeguarding records will be transferred in accordance with data protection legislation to the child's subsequent school, under confidential and separate cover, or via Cpoms transfer.

- In addition to the child protection file, the DSL will also consider if it would be appropriate to share any information with the DSL at the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue to provide support.

- If a child is identified as being susceptible to harm, tracking and record keeping will take place through Cpoms.

10. Multi-Agency Working

- St Edmund's recognises and is committed to its responsibility to work within the KSCMP multi-agency safeguarding arrangements. The leadership team and DSL will work to establish strong and co-operative local relationships with professionals in other agencies in line with statutory guidance.

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

11. Confidentiality and Information Sharing

- St Edmund's recognises our duty and powers to hold, use and share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE 2026.

- All staff must be aware that they cannot promise confidentiality in situations which might compromise a child's safety or wellbeing.

- The Head or DSL will disclose information about a pupil on a '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 to safeguard children.

St Edmund's has an appropriately trained Data Protection Officer (DPO) as required by the General Data Protection Regulations (GDPR) to ensure that St Edmund's is compliant with all matters relating to confidentiality and information sharing requirements. Adam Kent (Bursar) is the St Edmund's Data Protection Officer – ajk@stedmunds.org.uk - In the Bursar's absence, this responsibility passes to the Head Edward O'Connor eoc@stedmunds.org.uk.

- On receipt of pupil files, the DSL must consider what information should be shared with staff.

- Where there is information a child has previously been involved in violent incidents (including those involving a knife or other weapon) the school will risk assess and put in place safety support for when the child arrives.
- The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children (KCSIE 2026).

- Staff should read and follow the guidance contained within Data Protection Guidance for schools (DfE 2026): https://www.gov.uk/guidance/data-protection-in-schools

- DfE Guidance on Information Sharing (May 2024) provides further detail: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf

- Medical staff are especially well-placed to recognise indicators of abuse and, because of their pastoral role, may well receive safeguarding disclosures from pupils. In providing medical and nursing care for a pupil (in line with professional obligations regarding patient confidentiality), it is recognised that when potential safeguarding issues arise, school medical staff must liaise with the DSL or the Head and that relevant information, ideally with the pupil's prior consent, will be passed on as necessary. If Medical Staff consider that it is in the pupil's best interests or necessary for the protection of the wider school community, to breach confidence and pass information to a relevant person or body (for example the school DSL or Area Safeguarding) they must do so.

- In all cases, information sharing decisions must be necessary, proportionate, relevant, adequate, accurate, timely and lawful, and made in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and relevant safeguarding guidance. Staff should seek advice from the Designated Safeguarding Lead (DSL) where appropriate; however, a lack of consent or uncertainty about information sharing must never delay action where a child is at risk of harm. Staff must ensure that the rationale for decisions to share, or not to share, information is clearly recorded, together with any advice received and the reasons for the decision, in accordance with the School's safeguarding recording procedures.

This is a link to the Information Commissioner's Office:**https://ico.org.uk/**

12. Complaints

- St Edmund's has a Complaints Procedure available to parents, pupils and members of staff and visitors who wish to report concerns. This can be found on the staff intranet and school website: **https://www.stedmunds.org.uk/about-us/policies-inspection-reports/**

- 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 under the specific Procedures for Managing Allegations against Staff policy**.** This can be found on the staff portal.

- Complaints about the Head go to Chair of Governors, Chris Nickols cmn@stedmunds.org.uk

13. Staff Induction, Awareness and Training

- All members of staff will be given information about the identity and contact details of the DSL (Ross Underwood) and deputies.

- All staff (including temporary staff and volunteers) will be digitally provided with a copy of this policy. All staff, including those who do not work directly with children, will read and understand Part One of KCSIE 2026. Annex A is no longer used.

- All members of staff have signed to confirm that they have read and understood KCSIE. For teaching staff, this is completed via Safeguarding Network and kept with the DSL.

- All new staff and volunteers will be provided with induction training that includes:
  - the school's child protection policy, including the policy and procedures to deal with child-on-child abuse and information about the identity and role of the DSL and any deputies;
  - the staff code of conduct/behaviour policy including the whistleblowing procedure and the acceptable use of technologies policy
  - the pupil behaviour policy
  - The anti-bullying policy
  - Mental and Emotional Health policy
  - the school's safeguarding response to children who are absent from education
  - on-line safety

  -
- All staff members (including agency and third-party staff) will receive appropriate child protection training to ensure they are aware of a range of safeguarding issues. The HR Manager will maintain a record. This training will include online safety and will take place at least annually.

- Induction training will cover the Acceptable Use of Technologies, Behaviour Management policy, and the school's safeguarding response to pupils absent from education.

- In addition to specific child protection training, all staff will receive regular safeguarding and child protection updates through pastoral/safeguarding meetings, emails and inset training at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

- All staff members (including agency and third-party staff) will be made aware of the St Edmund's expectations regarding safe and professional practice via the staff behaviour policy/code of conduct and Acceptable Use Policy (AUP).

- Staff will be encouraged to contribute to and shape St Edmund's safeguarding arrangements and child protection policies: this will be achieved via safeguarding/pastoral meetings and inset.

- The DSL and Head 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.

- Although the school has a nominated lead for the governing body (Chris Nickols), all members of the governing body will access appropriate safeguarding training which covers their specific strategic responsibilities on a regular basis.

Guidelines for Staff (see the school's Staff Code of Conduct)

- Avoid any physical contact with pupils which is not in accordance with DfE guidance on handling pupils (available in the Policies section of the school's intranet) and which is open to misinterpretation.

- All adults working with pupils in education settings are in positions of trust in relation to the young people in their care. There is potential for exploitation and harm of vulnerable young people. Staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

- Staff should always maintain appropriate professionalism and wherever possible, they should avoid behaviour which might be misinterpreted by others, and report and record any incident with this potential.

- **Where a person aged 18 or over is in a position of trust with a child under 18, or a pupil still at school even if they are over 18, it is an offence for that person to engage in sexual activity with or in the presence of that child, or to cause or incite that child to engage in or watch sexual activity.**

- **Where a person aged 18 or over is in a position of trust established with a person who has only recently left the school, any attempt to engage in sexual activity with that person will be a cause for concern and will be treated as a breach of trust established in that prior relationship.**

- This means that staff should not use their position to gain access to information for their own advantage and/or a pupil's or family's detriment, use their power to intimidate, threaten, coerce or undermine pupils, use their status and standing to form or promote a relationship with a pupil which is of a sexual nature or attempt to initiate a relationship of a sexual nature with a recent ex-pupil

- One-to-one tuition should only take place where both parties are visible e.g. through a window, or vision panel. Doors should not be secured.

- Care must be taken in one-to-one sports coaching, such that no action/comment might be misconstrued. Also, in specialist music lessons (e.g. with one-to-one lessons conducted by Peripatetics) and in teaching, due care should be taken to ensure that a child or adult does not find themselves in a situation which might cause awkwardness or misinterpretation, and care should be taken when there are movements of location.

- It is inappropriate for adults to offer lifts to a child or young person outside their normal working duties, unless this has been brought to the attention of the line manager and has been agreed with the parents/carers.

- There may be occasions where the child or young person requires transport in an emergency or where not to give a lift may place a child at risk. Such circumstances must always be recorded and reported to a senior manager and parents/carers.

- **Staff must only use official school systems for electronic communication with pupils. Any inappropriate communications contravenes the Staff Code of Conduct and is a serious disciplinary offence. Staff should not establish or seek to establish social contact with pupils, or their families, for the purpose of securing a friendship or to pursue or strengthen a relationship.** Even if a young person seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise her/his professional judgement in making a response but should always discuss this with a

member of SMT. Staff must be aware that social contact, in certain situations, could be misconstrued as grooming.

- **Staff must not give their personal details such as their home or e-mail address; social network sites, gamer tags or web pages to students unless the need to do so is agreed with senior leadership. Staff must not give lessons from their own residence. Where an online lesson must take place, it will do so with the permission from the Head and DSL and with a safeguarding risk assessment in place.**

- Mobile phones will not be used when staff are in contact with children except in an emergency e.g. on a trip, at Forest school or in Late Stay when it is the only way of communicating. Only official school electronic devices can be used to take photographs, and these photographs are not transferred to home computers. These devices are monitored.

- In exceptional circumstances, where there is immediate risk of injury, a member of staff may need to take any necessary action that is consistent with the concept of 'Restrictive interventions, including the use of reasonable force' to safeguard a pupil or others. Examples could be guiding a child to safety by the arm, or in more extreme circumstances, intervening to break up a fight or prevent physical injury.

- Before intervening physically, staff should, wherever practicable, tell the pupil who is misbehaving to stop, and what will happen if he or she does not. The staff member should continue to attempt to communicate with the pupil throughout the incident and should make it clear that physical contact or restraint will stop as soon as it ceases to be necessary. In such cases only the minimum force necessary will be used whilst maintaining a calm and measured approach. Staff should be particularly aware of children with SEND given the additional vulnerability of the group.

- Staff should read the details provided in the Behaviour Management policy on this issue which provides more detail and information on how such incidents should be recorded (found in the policies area of Teams).

- Staff must read the DFE advice on the use of Restrictive interventions, including the use of reasonable force in schools. The school notes its duty that all significant incidents must be reported to parents and governors: https://assets.publishing.service.gov.uk/media/6943dad6501cdd438f4cf5aa/Restrictive_interventions_including_use_of_reasonable_force_in_schools.pdf

- Staff should read the Safeguarding and associated policies (such as Suicide Prevention Policy) and offer feedback to the Head and DSL in a timely manner.

14. Safer Working Practice

- All members of staff are required to work within our clear guidelines on safer working practice as outlined in the St Edmund's Code of Conduct.

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

- All staff will be made aware of the professional risks associated with the use of social media and electronic communication (such as email, mobile phones, texting, social networking). Staff will adhere to relevant St Edmund's policies including staff behaviour policy, Acceptable Use Policies, and Social Media.

15. 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 school will provide appropriate supervision and support for all members of staff to ensure that:
  - All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children
  - All staff are supported by the DSL in their safeguarding role.
  - All members of staff have regular formal and informal reviews of their own practice and personal wellbeing to ensure they improve over time.
- The DSL will also put staff in touch with outside agencies for professional support if they wish. Staff can also approach organisations such as their Union, the Education Support Partnership or other similar organisations directly.
- The school will ensure that members of staff who are working within the foundation stage are provided with appropriate supervision in accordance with the statutory requirements of Early Years Foundation Stage (EYFS) 2026. https://assets.publishing.service.gov.uk/media/6a5f8e320dd52549f5f96c8c/EYFS_childminders_from_September_2026.pdf
- In line with the EYFS 2026 framework (Annex C), this policy outlines how safeguarding training is delivered across the setting and how all staff are supported to apply it in practice.
- All staff receive safeguarding training as part of their induction and are regularly updated through briefings, supervision, and case reviews.
- Training is tailored to individual roles and responsibilities and is aligned with the EYFS safeguarding training criteria annex.
- The Designated Safeguarding Lead (DSL) receives enhanced training, which is formally refreshed at least every two years.
- Staff are supported through access to the DSL team, reflective practice, and regular safeguarding updates to ensure confidence and competence in responding to concerns

16. Safer Recruitment

- Regulated Activity, Volunteers and DBS Checks
- St Edmund's will ensure that all appointments of staff, volunteers, governors, contractors and agency workers are made in accordance with the safer recruitment requirements set out in Keeping Children Safe in Education 2026. The School will determine whether an individual is engaged in regulated activity with children and will conduct the appropriate pre-appointment checks, including an enhanced Disclosure and Barring Service (DBS) check with children's barred list information where legally required. Individuals who are not undertaking regulated activity, including certain supervised

volunteers, will be subject to appropriate recruitment and safeguarding checks proportionate to their role, level of supervision and opportunity for contact with children. Supervision arrangements for volunteers will be risk assessed, clearly defined and regularly reviewed to ensure they remain effective in safeguarding children. No individual who is barred from engaging in regulated activity will be permitted to undertake such work within the School. The Head, Designated Safeguarding Lead, Head of Human Resources and Governing Body will ensure that recruitment decisions, DBS checking arrangements and supervision of volunteers comply with current statutory guidance, and that the School's Single Central Record is maintained accurately and reviewed regularly.

- The Governing Body and leadership team are responsible for ensuring that the school follows safer recruitment processes outlined within guidance.
- The School maintains an accurate Single Central Record (SCR) in line with statutory guidance.
- The Single Central Record (SCR) is managed by **Sarah Hudson**, Head of HR and reviewed half-termly by the SCR steering group.
- The Governing Body/Head will ensure that there is at least one of the persons who conducts an interview has completed safer recruitment training.
- St Edmund's is committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools.
- We advise all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands and warnings.
- We will ensure that all staff and volunteers have read the staff behaviour policy/code of conduct and understand that their behaviour and practice must be in line with it.
- Online checks will be made of candidates after shortlisting. These checks will be made by the Head of HR, Sarah Hudson to ensure consistency of process and the correct identity of the candidate.
- From 1st January 2021 (following BREXIT) the TRA Teachers Services system will no longer maintain a list of those teachers who have been sanctioned in European Economic Area member states. The school will therefore follow the procedures outlined in KCSIE 2026 to ensure that individuals who have lived outside the UK undergo the same pre-appointment checks as all other staff at the school. These include obtaining (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity) and where available criminal records checks for overseas applicants and obtaining a letter of professional standing from the professional regulating authority in the country in which the applicant has worked.

17. Allegations Against Members of Staff (including teachers, supply teachers, volunteers, contractors and governors)

St Edmund's will respond to allegations in line with the local Kent allegations arrangements and Part Four of KCSIE 2026.

Any concerns or allegations about staff, including those which do not meet the allegation/harm threshold will be recorded and dealt with appropriately in line with national and local guidance.

Ensuring concerns are dealt with effectively will protect those working in or on behalf of the school from potential false allegations or misunderstandings.

Advice will be sought via the Local Authority Designated Officer (LADO) Enquiry Line and/or the https://www.theeducationpeople.org/our-expertise/safeguarding/safeguarding-contacts/Front Door as appropriate and necessary.

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

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

Allegations against staff which meet this threshold, including the DSL, supply staff, contractors and volunteers will be referred immediately to the Head who will contact the LADO within one day to agree further action to be taken in respect of the child and staff member. In the Head's absence the Chair of Governors will contact the LADO. In the event of allegations of abuse being made against the Head, staff are advised that allegations should be reported to the chair of governors who will contact the LADO. If there is a conflict of interest in reporting the allegation to the Head, the matter should be referred directly to the LADO. Where the allegation is against the Head, the Head must not be informed of the allegation prior to contact with the Chairman and the LADO. The Chair must also liaise directly with the LADO without prior discussion with the Head.

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the St Edmund's safeguarding regime. The leadership team at St Edmund's will take all concerns or allegations received seriously.

All members of staff are made aware of the St Edmund'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.

In some circumstances St Edmund's will have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply because agencies will have their own policies and procedures; for example, supply teachers or contracted staff provided by an employment agency or business. St Edmund's will ensure allegations are dealt with properly and liaise with the LADO to determine a suitable outcome.

St Edmund's will remain responsible for gathering the facts and managing the safeguarding process working closely with the employing company.

Governing bodies and proprietors should discuss with the supply agency where the supply teacher is working across a number of schools of colleges, whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school or college, whilst they carry out their investigation. St Edmund's will act as required by the LADO and investigate when informed to do so.

When using a supply agency, St Edmund's will inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Staff can access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally.

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

St Edmund's has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person.

- If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or Schools Personnel Service.

The School will also abide by its duty to consider making a referral to the Teaching Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate.

The reasons such an order would be considered are: 'unacceptable professional conduct', conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'.

All policies can be found here: https://www.stedmunds.org.uk/about-us/policies-inspection-reports/ and on the staff area of Teams.

18. Safeguarding Children with Special Educational Needs and Disabilities

- St Edmund's acknowledges that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges as they may have an impaired capacity to resist or avoid abuse. The DSL will work closely with the Head of Learning Enhancement to plan support as required.

- St Edmund's will ensure that children with SEN and disabilities, specifically those with communication difficulties will be supported to ensure that their voice is heard and acted upon.
- The school recognises that additional barriers can exist when recognising abuse and neglect for those children with SEND. These can include: these children are more prone to peer isolation or bullying (including prejudice-based bullying) than other children; and cognitive understanding – being able to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school, or the consequences of doing so.

- Members of staff are encouraged to be aware that children with SEN and disabilities can be disproportionally impacted by safeguarding concerns, such as bullying and exploitation.

- All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour/mood change or injuries and not to assume that they are related to the child's disability and be aware that children with SEN and disabilities may not always outwardly display indicators of abuse. To address these additional challenges, our school will always consider extra pastoral support for children with SEN and disabilities.

- St Edmund's recognises that for any pupil accessing alternative educational provision, we will make the alternative setting aware of the additional risk of harm that the pupil may be vulnerable to. Additionally, St Edmund's will continue to be responsible for the safeguarding of that pupil in accordance with KCSIE 2026 and act in accordance with the Alternative Provision Guidance updated in February 2025 https://www.gov.uk/government/publications/alternative-provision

19. Boarding Matters

- Chris Nickols, our Safeguarding Governor is also Governor with responsibility for oversight of boarding.
- As a boarding school we closely monitor the presence of pupils to ensure their safety. In the event of the apparent disappearance of a pupil, school staff should consult the Missing Pupil Policy. All boarding staff will be made aware of action in the event of a missing pupil.
- The school has adopted and follows a Suitability to Board Policy.

In a boarding environment, safeguarding responsibilities extend beyond the school day and cover all aspects of pupils' residential life. Pupils living away from home may face unique vulnerabilities, including isolation from family, peer influence, and the challenges of communal living. All boarding staff receive specific safeguarding training to identify, report, and respond to concerns promptly, and clear procedures are in place to always ensure pupils' safety. The school maintains effective pastoral care, regular communication with parents or guardians, and appropriate supervision in line with the National Minimum Standards for Boarding Schools, ensuring a safe, supportive, and respectful boarding community.

- Staff must observe and notify the DSL or their Deputies if any relationship issues are having a negative impact upon a boarder's well-being or safety. It is important not to create an environment where young people feel the need to hide their emotions, but, at the same time, the school has a duty to individuals and to the wider community to know that our boarders are not encouraged to engage in risky behaviour as a result of lack of supervision or attention. An important part of our securing and patrolling the main building is to send a reassuring message that staff are alert and attentive and will report on.

20. Child on child abuse (including harassment and violence)

- The school adopts a zero-tolerance approach to sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour and other forms of physical violence and conflict.

- All members of staff at St Edmund's recognise that children can abuse their peers and challenge any abusive behaviour. St Edmund's believes that abuse is abuse and it will never be tolerated. All

children who may have been harmed will be taken seriously and offered appropriate support, regardless of where the abuse takes place.

- St Edmund's recognises that Child on child abuse (including harassment and violence) abuse can take many forms, and can take place from within or outside the school, or online 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 child who may have been harmed humiliation, distress or alarm
  - sharing self-generated intimate images and/or videos (including AI-generated intimate images or deepfakes)
  - initiation/hazing type violence and rituals

- St Edmund's recognises that disclosures of concern may come through channels other than direct disclosures; all concerns, no matter how they were disclosed will be reported to the DSL.

- St Edmund's recognises that Child on child abuse (including harassment and violence) abuse can take place between children (under 18) of any ages.

- St Edmund's recognises self-generated intimate images and/or videos (including AI-generated intimate images or deepfakes) as a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).

  - We will follow the advice as set out in the non-statutory UKCIS guidance: 'Sharing nude and semi-nude images in schools and colleges: responding to incidents and safeguarding young people' and the local KSCMP guidance: "Responding to youth produced sexual imagery".

- When responding to concerns relating to child-on-child sexual violence or harassment, St Edmund's will follow guidance outlined in part five of KCSIE 2026.

- Staff and leadership are mindful that some child-on-child abuse issues may be affected by gender, age, ability and culture of those involved but that all child-on-child abuse is unacceptable and will be taken seriously.

- The School recognises that two of the forms Child on child abuse (including harassment and violence) can take are abuse in intimate relationships between peers and causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

- All allegations of child-on-child abuse will be recorded, investigated, and dealt with in line with associated St Edmund's policies, including child protection, anti-bullying and behaviour.

- Systems exist for all children to confidently report abuse, knowing that their concerns will be taken seriously. Victims will be reassured that their concerns are being taken seriously.

- Children who may have been harmed, children who may have harmed and any other child affected by child-on-child abuse will be supported by:
  - providing pastoral support, working with parents/carers, and in cases of sexual assault, referring to the police and KSCMP via the Front Door.
  - St Edmund's School is committed to minimising the risk of child-on-child abuse. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

- The School recognises that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported.

More information can be found in Appendix 1 of this policy

21. Gangs, County Lines, Serious violence, Crime and Exploitation

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

- All staff have been trained and recognise the need to be vigilant for the signs that may include, but not exclusively:

  - Unexplained gifts/new possessions – these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs.
  - Children who go missing for periods of time or regularly come home late
  - Children who have unexplainable and/or persistent absences from education
  - Change in friendships/relationships with others/groups
  - Children who associate with other young people involved in exploitation
  - Children who suffer from changes in emotional well-being
  - Significant decline in performance
  - Signs of self-harm/significant change in wellbeing
  - Signs of assault/unexplained injuries
  - Problems travelling to and/or from school

22. Prevent

The Issue of Radicalisation

The school recognises its duty under the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent pupils from being drawn into terrorism or extremist ideologies. We are committed to protecting pupils from all forms of radicalisation, whether stemming from political, religious, or other extremist views, and understand that children and young people may be particularly vulnerable to influence through social media, peer groups, or external contacts. All staff receive regular Prevent training to recognise early warning signs, report concerns promptly to the Designated Safeguarding Lead, and work in partnership with parents, local safeguarding partners, and relevant authorities. Our curriculum

promotes critical thinking, mutual respect, and tolerance, equipping pupils to challenge extremist narratives and make safe, informed choices.

- The Counter-Terrorism and Security Act 2015, places a legal responsibility on schools to take every effort to protect members of their community from the threat of political radicalisation.

- The school will take all reasonable precautions to ensure that children are safe from terrorist and extremist material when accessing the internet in school. The school assesses the risk of children being drawn into terrorism and identifies children who may be at risk of radicalisation.

- If the school is concerned that a child or parent/carer may be at risk of radicalisation online, the Designated Safeguarding Lead will be informed immediately and action will be taken in line with the school Safeguarding Policy.

- If the school is concerned that member of staff may be at risk of radicalisation online, the Head will be informed immediately and action will be taken in line with the Staff Grievance and Disciplinary Procedures and the Staff Code of Conduct

We approach this issue in four ways:

Providing a safe online environment

- filters in place to block pupil access to violent or otherwise inappropriate materials. Pupils are required to sign up to an Acceptable Use of ICT policy that specifically prohibits them from seeking access to such sites. Internet usage is monitored on a weekly basis and pastoral and/or disciplinary responses may follow if a pupil's usage breaches our rules or raises concerns. The School will also seek to block specific sites and search terms if they appear to pose a risk to our pupils.

- These expectations apply to the use of all devices capable of accessing the internet or capturing, storing, or transmitting digital content. This includes school-owned and personal mobile devices such as smartphones, tablets, smartwatches, and smart glasses. The use of such devices on site is subject to the School's mobile device policy and may be restricted or prohibited in certain areas or at certain times to safeguard pupils and staff.

- Furthermore, pupils receive advice and instruction from teaching and pastoral staff on safe and responsible internet usage.

Assessment of Pupil Behaviours

- The pastoral monitoring systems of the School have a vital role to play in preventing radicalisation of pupils. At St Edmund's pupils are monitored closely by tutors and Housemasters and issues of concern are discussed at the weekly pastoral meeting and whole staff meeting on Tuesdays at 8am and Fridays at 11am respectively. Where necessary a pastoral intervention or even counselling may be provided. The School will also seek advice and support from the local authority when concerns regarding pupil radicalisation arise.

Staff Training and Information

- The School recognises that it has a responsibility to provide INSET to staff on the issue of radicalisation to ensure that they remain vigilant and informed on the issue. It will also ensure staff

are aware of how to respond appropriately if concerned about the possible radicalisation of a pupil.

- The school acknowledges its responsibility to ensure that all visiting speakers are suitable and that appropriate due diligence is undertaken to confirm that their content aligns with Fundamental British Values.

Promoting Fundamental Values

- The School will vigorously promote fundamental values such as fairness, democracy, tolerance and the rule of law through its PSHEE Programme, its Tutorial Programme, Chapels and Assemblies, the curriculum and all other daily interactions between pupils and staff.

Contacts and Resources

Government advice to schools on this issue can be accessed here:

https://www.gov.uk/government/publications/preventing-extremism-in-schools-and-childrens-services

The Government also provides contact details for alerting authorities to suspected terrorist activity. These include the DfE dedicated telephone helpline and mailbox for non-emergency advice for staff and governors: 020 7340 7264 and counter-extremism@education.gsi.gov.uk in addition to the local police and 101.

Concerns about a child, parent, member of staff, or visitor will be treated as safeguarding concerns and reported to the Designated Safeguarding Lead (DSL) without delay. The DSL will assess the concern and, where necessary, make a referral to the Kent "Front Door" or the local Prevent team, including the Channel programme, in line with national and local safeguarding procedures. Consent will be sought where appropriate, but referrals may proceed without consent if there is a safeguarding risk. Online safety measures, filtering and monitoring systems, and the promotion of fundamental British values underpin the School's approach to reducing the risk of exposure to extremist material or influence.

Whilst the referral is being assessed should any further or new information come to light this should also be passed to the Police.

23. Mental Health

- St Edmund's recognises that all children experience emotional wellbeing and mental health on a continuum and that, while mental health concerns can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation, they may also arise independently and require appropriate support. The School is committed to promoting positive mental health and wellbeing through a graduated approach, ensuring that pupils receive the right support at the right time. This may include universal support through the School's pastoral systems, curriculum and wellbeing initiatives; targeted early help for pupils experiencing emerging or additional needs; and referral to specialist services where a pupil requires more intensive assessment or intervention. Staff are well placed to identify changes in a pupil's presentation, behaviour, attendance or emotional wellbeing and should respond with professional curiosity, recording and reporting concerns to the Designated Safeguarding Lead (DSL) or other appropriate pastoral leads. Where a mental health concern is also identified as a safeguarding concern, it will be managed in accordance with the School's Safeguarding

Policy, with appropriate multi-agency working to ensure the safety, wellbeing and educational outcomes of the child.

- All staff will be made aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are aware of how children's experiences can impact on their mental health, behaviour and education.

  Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or a deputy.

- The School's Mental Health Policy can be found on the school intranet.

24. Gender Questioning Children

St Edmund's recognises that a child who is questioning their gender may experience vulnerability and may require appropriate pastoral support. The School will always consider the individual circumstances of each child, ensuring that safeguarding and the welfare of the child remain paramount in all decision-making. Staff should be alert to the possibility that gender questioning may, in some cases, be associated with bullying, harassment, discrimination, abuse, exploitation, mental health concerns, family difficulties, or other safeguarding risks, whilst recognising that this will not be the case for every child.

Any concerns regarding a gender questioning child should be discussed promptly with the Designated Safeguarding Lead (DSL), who will consider whether there are any safeguarding concerns requiring assessment or referral. The School will work in partnership with parents or carers wherever it is safe and appropriate to do so, recognising that there may be exceptional circumstances where involving parents could place a child at risk of significant harm. Decisions relating to confidentiality, information sharing, pastoral support, participation in school activities, and the use of facilities will be made on a case-by-case basis, taking account of the child's wishes and feelings, their age and understanding, safeguarding considerations, relevant legislation, and statutory guidance. Particular care will be taken with regard to the arrangements for school trips and visits.

The School will ensure that all children are treated with dignity and respect and will take appropriate action to prevent bullying, harassment or discrimination. Support for gender questioning children will be delivered through the School's pastoral and safeguarding systems, with advice sought from external agencies where appropriate, and all decisions will be recorded with a clear rationale in accordance with the School's safeguarding procedures.

25. Online Safety

It is recognised by St Edmund's that the use of technology presents challenges and risks to children and adults both inside and outside of St Edmund's. St Edmund's 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.

Roles and Responsibilities

Online Safety Co-ordinator
The school's Online Safety Co-ordinator is Mr Ross Underwood (DSL).

IT Support Officer
The IT Support Officer is Mr Luke Sutton. The school requires the incumbent of this role to be DSL trained. The IT Support Officer provides a weekly network usage review to the DSL covering pupil and staff activities across the 2-18 school, highlighting potential breaches of the ICT Code of Conduct, attempts to access inappropriate material, and other potential concerns. The DSL reviews this report and puts interventions in place according to relevant school policies (Safeguarding, Behaviour Management).

Board of Governors
The Board of Governors is responsible for the approval and annual review of the Safeguarding & Online Safety Policy and its effectiveness. Chris Nickols is the Online Safety Governor and holds overall responsibility for Safeguarding.

Head
The Head, Mr Edward O'Connor, holds duty of care for ensuring the safety (including Online Safety) of all members of the school community. Day-to-day responsibility is delegated to the Online Safety Co-ordinator.

Understanding Online Safety Risks

Online safety risks at St Edmund's are categorised under the updated "four Cs" framework:

- **Content:** Exposure to illegal, inappropriate, or harmful content including pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, extreme sexual and physical violence, disinformation (including fake news), and conspiracy theories.

- **Contact:** Harmful online interactions such as child-to-child pressure, commercial advertising, generative AI applications that simulate harmful online interactions and adults posing as children to groom or exploit.

- **Conduct:** Personal online behaviour that causes or increases harm risk, including sharing explicit images (nudes and semi-nudes), online bullying, and misuse of personal data.

- **Commerce:** Online risks such as gambling, inappropriate advertising, phishing, and financial scams.

Addressing Online Harm from Misinformation, Disinformation, and Conspiracy Theories

St Edmund's recognises that online harm extends beyond explicit material to include the spread of misinformation, disinformation (including fake news), and conspiracy theories. These risks can mislead pupils, disrupt trust, and pose safeguarding concerns.

In line with government guidance and **Educate Against Hate,** St Edmund's will:

- Begin education on online safety in primary school, integrated within the primary English curriculum and across other subjects.
- Explicitly include misinformation, disinformation, and conspiracy theories within the **Content** category of online risks.
- Build curriculum opportunities to address disinformation and conspiracy theories before harmful beliefs or behaviours develop.
- Embed media literacy and critical thinking into English Language, History, Religious Studies, Citizenship, Science, Computer Science, and Mathematics.
- Equip pupils with skills to critically evaluate information, understand disinformation motives, and safely challenge conspiracy theories.

Technology and Systems

St Edmund's uses a wide range of technology, including computers, tablets, internet access, Microsoft 365, Teams, intranet, and email systems. All devices and systems will be used per acceptable use policies, with appropriate safety and security controls.

The school uses Fortigate Firewall for filtering and monitoring web access. In addition, the school uses SENSO monitoring software to monitor online activity on school devices. SENSO provides real-time alerts and reporting to help safeguard pupils by identifying potential risks, including inappropriate content, safeguarding concerns, and misuse of technology.

The IT department and DSL regularly review filtering and monitoring settings. Filtering and monitoring are guided by Safer Internet's advice on appropriate filtering. The governing body receives an annual written report on the effectiveness of filtering and monitoring, with termly oversight via the safeguarding governor.

Internet logs and monitoring alerts are reviewed weekly by the DSL and IT specialists; concerns are promptly addressed.

Safe Use of Artificial Intelligence (AI)

The school recognises both the educational benefits and potential safeguarding risks associated with the use of Artificial Intelligence (AI) tools and applications. While AI can support learning, research, and creativity, it may also expose pupils to inappropriate content, bias, misinformation, data privacy breaches, or harmful online interactions. To safeguard pupils, all AI use must be age-appropriate, educationally justified, and supervised by staff. The school will provide guidance to pupils on the ethical, safe, and responsible use of AI, including awareness of data protection, academic integrity, and the importance of critical evaluation of AI-generated information. Staff will ensure that AI tools used in teaching comply with relevant legislation,

including the Data Protection Act 2026, and any concerns about content or pupil interaction with AI will be reported promptly to the Designated Safeguarding Lead.

St Edmund's follows the UK Government's advice for safe AI use in schools as outlined here.

- AI use by pupils will be supervised, appropriate, and risk assessed.
- Staff will follow government guidance to ensure AI tools are used safely and effectively.
- The school will educate pupils and staff on the risks and benefits of AI technology.

Safeguarding and Incident Reporting

Staff and pupils are required to report any concerns or incidents related to online safety immediately to the DSL, Mr Ross Underwood.

If inappropriate or harmful material or behaviour is discovered, pupils and staff should:

- Report to the DSL directly.

The school maintains a zero-tolerance approach to child-on-child abuse, including online abuse, and all concerns are taken seriously and investigated.

Safeguarding arrangements in the event of any future full or partial closure of the school

1. Designated Safeguarding Lead (and deputies)

During any school closure the Designated Safeguarding Lead, Mr Ross Underwood is contactable via 07719 555820 or mailto:rpu@stedmunds.org.uk and safeguarding@stedmunds.org.uk

The Head, Mr Edward O'Connor is also contactable at eoc@stedmunds.org.uk and is resident on the school site.

2. Attendance & Welfare monitoring

During any school closure period involving remote learning, pupil attendance at online lessons will be monitored by subject teachers.

Regular absence from Teams lessons will be recorded on CPOMS.

For those unable to attend a Teams lesson, a recording will be made available.

Tutor sessions and House Lines will continue through any period of remote learning and pastoral staff will be available to support pupils and families, addressing any concerns.

3. Reporting a concern

Where staff have a concern about a child, they should continue to follow the process outlined in the school Safeguarding Policy, this includes making a report via CPOMS, which can be done remotely.

If a member of staff cannot access their CPOMS from home, they should email or phone the Designated Safeguarding Lead directly. This will ensure that the concern is received and acted upon.
Staff are reminded of the need to report any concern immediately and without delay.

Where staff are concerned about an adult working with children in the school, they should contact the Head. Concerns about the Head should be passed onto Chair of Governors Air Marshal Chris Nickols at cmn@stedmunds.org.uk

4. Child on child abuse (including harassment and violence)

St Edmund's recognises that during the closure a revised process may be required for managing any report of such abuse and supporting children who may have been harmed. Where the school receives a report of Child on child abuse (including harassment and violence) abuse, the principles as set out in KCSIE 2026 and of those outlined within of the Safeguarding Policy, will be followed. The school will listen and work with the young person, parents/carers and any multi-agency partner required to ensure the safety and security of that young person. Concerns and actions must be recorded on CPOMS and appropriate referrals made.

5. Online safety

Where children are asked to learn online at home in response to a full or partial closure:
St Edmund's 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 St Edmund's provided or approved communication channels; for example, St Edmund's provided email accounts and phone numbers and/or agreed systems My School Portal and Microsoft 365/Teams.

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 St Edmund's behaviour policy/code of conduct and Acceptable Use Policies.
Staff and learners will be encouraged to report issues experienced at home and concerns will be responded to in line with our child protection and other relevant policies.

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. St Edmund's will continue to be clear who from the school 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.

The following resources are recommended to promote online safety:

- Internet matters - for support for parents and carers to keep their children safe online
- London Grid for Learning - for support for parents and carers to keep their children safe online
- Net-aware - for support for parents and careers from the NSPCC
- Parent info - for support for parents and carers to keep their children safe online
- Thinkuknow - for advice from the National Crime Agency to stay safe online
- UK Safer Internet Centre - advice for parents and carers

Pupils with online concerns can raise these with the Designated Safeguarding Lead (rpu@stedmunds.org.uk), or the following organisations:

- Childline - for support
- UK Safer Internet Centre - to report and remove harmful online content
- CEOP - for advice on making a report about online abuse

6. Vulnerable children

St Edmund's School continues to work with the KSCMP in supporting Vulnerable Children, those who have a social worker and those children and young people up to the age of 25 with EHC plans, during any period of closure.

7. Supporting children not in school

St Edmund's School is committed to ensuring the safety and wellbeing of our whole community.
The school pupil counselling service and pastoral support routes remain active through all the usual channels.

The school will share safeguarding messages on its website and social media pages and via email to both parents and pupils, including support with mental health.

Pupils identified as being on the edge of social care support, or who would normally receive pastoral-type support in school will receive regular communication, either directly or through parents/carers. This communication is likely to come from their Housemaster in the first instance. All concerns will be recorded on CPOMS.

25.1 Mobile Phones and Other Electronic devices

All use of personal devices and mobile phones (including iPads, tablets and Wearables) will take place in accordance with the law and other appropriate school policies, including, but not limited to: Anti-bullying, Behaviour and Safeguarding & E Safety.

All pupils from years 7-11 inclusive are required to secure their phones in a locker or a Yondr pouch for the duration of the school day.

The School recognises that mobile phones and other electronic devices can present several problems when not used appropriately:

- Mobile phones with integrated cameras could lead to child protection, bullying and data protection issues regarding inappropriate capture, use or distribution of images of pupils or staff

- Their use can render pupils or staff subject to cyberbullying

- Internet access on phones and personal devices could potentially allow pupils to bypass school security settings and filtering

- They are valuable items which may be stolen or damaged

- They can undermine classroom discipline as they can be used on “silent” mode

- The sending of abusive or inappropriate messages or content via mobile phones or personal devices is forbidden by any member of the school community and any breaches will be dealt with as disciplinary matters in conjunction with relevant school policies.

Staff

Members of staff will ensure that use of personal phones and devices takes place in accordance with the law, as well as relevant school policy and procedures: for example, Safeguarding, the Staff Code of Conduct and Acceptable Use of ICT policies.

- Staff must not give their mobile phone numbers to pupils or seek to contact pupils by non-school messaging systems

- Members of staff are not permitted to use their own personal phones or devices for contacting pupils or parents and carers.

- Staff will not use personal devices, such as mobile phones, tablets or cameras:

    - To take photos or videos of pupils and will only use work-provided equipment for this purpose.

    - Directly with pupils and will only use work-provided equipment during lessons/educational activities.

- In the EYFS, the use of personal electronic devices by all staff, volunteers, students or visitors for any purpose when in the company of children is prohibited. This applies to situations both on-site and off-site (e.g. on trips). When in the presence of children, personal electronic devices should be kept out of sight of pupils and set to silent. In an emergency, personal calls can be directed to the school’s landline number so that a message can be relayed to the member of staff.

- If a member of staff is thought to have illegal content saved or stored on a mobile phone or personal device or have committed a criminal offence, the police will be contacted.

- Use of School Mobile phones will always be professional and in strict accordance with the Staff Acceptable Use Policy.

- Staff should not access the school WIFI on any personal devices and only use official school phones, tablets or laptops.

Pupils

- Pupils will be educated regarding the safe and appropriate use of personal devices and mobile phones and will be made aware of boundaries and consequences.

- St Edmund’s School expects pupil’s personal devices and mobile phones to be switched off and kept out of sight during the normal school working day. In Years 7-11, phones are secured in lockers or Yondr pouches at the start of the school day and collected when school finishes.

- If a pupil needs to contact his/her parents or carers they will be allowed to use a school phone.

- Mobile phones or personal devices will not be used by pupils during lessons or formal school time unless as part of an approved and directed curriculum-based activity with consent from a member of staff.

- Mobile phones and personal devices must not be taken into examinations.

- Pupils found in possession of a mobile phone or personal device during an exam will be reported to the appropriate examining body. This may result in the pupil's withdrawal from either that examination or all examinations.

- If a pupil breaches the school policy, the phone or device will be confiscated and will be held in a secure place.

- School staff may confiscate a pupil's mobile phone or device if they believe it is being used to contravene the school's Behaviour or Bullying policy or could contain inappropriate imagery.

- Searches of mobile phone or personal devices will only be carried out in accordance with the school's Search policy.

- Pupils' mobile phones or devices may be searched by a member of the leadership team, with the consent of the pupil or a parent/ carer. Content may be deleted or requested to be deleted, if it contravenes school policies.

- Mobile phones and devices that have been confiscated will be released to parents or carers.

- If there is suspicion that material on a pupil's personal device or mobile phone may be illegal or may provide evidence relating to a criminal offence, the device will be handed over to the police for further investigation.

- Detailed rules and guidance for staff on mobile phones and electronic devices can be found in the Staff and Pupils Acceptable Use of ICT policies.

25.2 Managing Social Media

Staff:

- The safe and responsible use of social networking, social media and personal publishing sites will be discussed with all members of staff as part of staff induction and will be revisited and communicated via regular staff training opportunities.

- Teachers wishing to use social media tools with pupils as part of the curriculum should risk-assess the sites before use and check sites' terms and conditions to ensure the site is age-appropriate. If in any doubt, they should consult the DSL.

- Staff must not accept current school pupils as friends, followers or connections on any social media sites. Nor should they discuss the school or pupils of the school on any social media platform. Staff who use professional networking services such as LinkedIn should not accept any requests from current pupils. Staff should not accept any requests from former students under the age of 21 and must only accept requests with express permission from the Head or DSL. Failure to highlight requests could be seen to be a low-level concern.

- School social media accounts should be agreed with the DSL or Head,

- Use of school social media accounts will be monitored by the DSL, the Head and Sarah Booker, head of Marketing.

- All members of staff are advised to safeguard themselves and their privacy when using social media sites. This will include (but is not limited to):

  - Setting the privacy levels of their personal sites as strictly as they can

  - Being aware of location sharing services

  - Opting out of public listings on social networking sites

  - Logging out of accounts after use

  - Keeping passwords safe and confidential

  - Ensuring staff do not represent their personal views as that of the school

  - Members of staff are encouraged not to identify themselves as employees of St Edmund's School on their personal social networking accounts. This is to prevent information on these sites from being linked with the school and to safeguard the privacy of staff members.

Pupils:

- Safe and appropriate use of social media will be taught to pupils as part of an embedded and progressive education approach, via age-appropriate sites and resources.

- Any concerns regarding pupils' use of social media, both at home and at school, will be dealt with in accordance with existing school policies including anti-bullying and behaviour management. Concerns will also be raised with parents/carers as appropriate, particularly when concerning underage use of social media sites or tools.

Pupils will be advised:

- To consider the benefits and risks of sharing personal details on social media sites which could identify them and/or their location. Examples could include real/full name, address, mobile or landline phone numbers, school attended, other social media contact details, email addresses, full names of friends/family, specific interests and clubs.

- To only approve and invite known friends on social media sites and to deny access to others by making profiles private/protected.

- Not to meet any online friends without a parent/carer or other responsible adult's permission and only when a trusted adult is present.

- To use safe passwords.

- To use social media sites which are appropriate for their age and abilities.

- How to block and report unwanted communications and report concerns both within school and externally.

25.3 Response to Incidents of Concern

- All members of the school community will be informed about the procedures for reporting Online Safety concerns, such as breaches of filtering, cyberbullying, and accessing illegal content.

- The DSL will record all reported incidents and all actions taken.

- The School will manage Online Safety incidents in accordance with the school behaviour policy where appropriate.

- The School will inform parents and/or guardians of any incidents of concern as appropriate.

- Where there is a cause for concern that illegal activity has taken place then the DSL will report the concern to the police.

- If the School is unsure how to proceed with any incidents of concern, then the advice of the Kent County Council's Education Safeguarding Adviser (Online Protection) will be sought.

- Pupils and parents will be informed of the complaints procedure. Any complaint about staff misuse will be referred to the Head. Any complaint about misuse by the Head will be referred to the Chair of Governors.

25
.4 Reviewing Online Safety

- Network Security is a repeat agenda item at Online Safety Steering Group Meetings

- DSL and IT Support Officer to discuss system security at Online Safety Steering Group meetings

- The DSL and members of the Online Safety Steering Group will understand the filtering and monitoring systems in place.

- The School conducts a weekly review of internet usage and follows up immediately where there is cause for concern

- Staff must report Online safety concerns to the DSL using CPOMs

- Online safety will form part of the safeguarding report and policy review to the Board of Governors (at least annually and more regularly if necessary) including a review of the effectiveness of filtering and monitoring arrangements.

26. Safeguarding the School Premises

- St Edmund's recognises that safeguarding extends to the physical environment of the School and that the design, use and supervision of school premises contribute significantly to the safety and welfare of children. The School will ensure that all areas of the site, including classrooms, corridors, toilets, changing rooms, boarding accommodation, medical rooms and outdoor spaces, are appropriately supervised, risk assessed and maintained to minimise opportunities for abuse, bullying, harassment or other safeguarding concerns.

- Particular care will be taken to ensure that toilets, changing facilities and overnight accommodation provide children with appropriate privacy, dignity and security whilst maintaining suitable levels of supervision in accordance with pupils' age, developmental needs and relevant statutory guidance. Access to residential accommodation and other restricted areas will be appropriately controlled, with visitors and contractors managed in accordance with the School's safeguarding and security procedures.

- Regular premises inspections and safeguarding risk assessments will be undertaken, and any concerns relating to the safety or suitability of the School environment will be reported promptly and addressed without delay. Where safeguarding risks associated with the School premises are identified, appropriate action will be taken to reduce those risks, with oversight provided by the Designated Safeguarding Lead, the Head and the Governing Body as part of the School's wider safeguarding arrangements.

27. Curriculum and Staying Safe

- St Edmund's will ensure that children are taught about safeguarding, including online safety, as part of providing a broad and balanced curriculum.

- We recognise that the school play an essential role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour; what is 'safe'; to recognise when they and others close to them are not safe; and how to seek advice and support when they are concerned.

- Our curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that pupils have a range of age appropriate contacts and strategies to ensure their own protection and that of others.

- St Edmund's is aware of the most recent communication from the DfE on the mandatory implementation of Relationships Education, Relationships and Sex and Health Education and will ensure that this is embedded into the curriculum. The school curriculum explicitly teaches safeguarding themes including consent, healthy relationships, resilience to exploitation, and online critical thinking, in line with statutory RSHE requirements.

- Our school systems support children to talk to a range of staff. Children will be listened to and heard, and their concerns will be taken seriously and acted upon as appropriate.

28. The Use of Premises by Other Organisations

- When services or activities are provided by the St Edmund's School, under the direct supervision or management of school staff, our safeguarding arrangements will apply. However, where services or activities are provided separately by another body this is not necessarily the case. St Edmund's will, via the Lettings Manager, seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school or college on these matters where appropriate. St Edmund's will also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

- Allegations about a third-party individual or organisation providing activities for children on school premises will be responded to using our Safeguarding procedures and will be reported to the LADO/Police as appropriate.

- If this assurance is not achieved, an application to use premises will be refused.

- Marie Rollison, Operations Manager can be contacted here: mer@stedmunds.org.uk

29. Security

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

- Appropriate checks will be undertaken in respect of visitors and volunteers coming into St Edmund's as outlined within guidance. Visitors will be expected to sign in and out via the office visitor log and to display a visitor's badge whilst on site.

- Any visitor wishing to access the School's internet or IT facilities must follow the School's signing-in procedures and agree to abide by the School's Acceptable Use Policy (AUP) prior to being granted access. Internet access for visitors will be subject to the School's filtering, monitoring, and safeguarding systems.

- Any individual who is not known or identifiable on site should be challenged for clarification and reassurance.

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

30. Useful contacts:

- **Kent Police: Canterbury Police Station -** Old Dover Road, Canterbury, CT1 3JQ – Tel.101
- **Disclosure and Barring Service –** Disclosure helpline – customerservices@dbs.gsi.gov.uk – Tel 0870 909 0811
- **Kent County Council Safeguarding Contacts:**

Urgent Concerns and Making a Request for Support	
If a child may be at risk of **imminent harm,** submit an **urgent request for support** via the Kent Integrated Children's Services portal or call **Kent Police on 999** If your concerns may be considered level 3 (intensive support) or 4 (specialist support) in line with the Kent Support Levels Guidance, submit a request for support to the Front Door Service via the Kent Integrated Children's Services portal To request a 'no named' consultation with a social worker from the Front Door Service, call 03000 411 111 If you need to make contact out of working hours, please call the Out of Hours Services via 03000 41 91 91 **Early Help Unit Contacts** can be found at Early Help and Preventative Services **Kent Family Hubs Information** can be found at Kent Family Hubs	
LADO Education Safeguarding Advisory Service	
If you need to make a referral to the LADO regarding an allegation against a member of staff, please complete a LADO referral via the Kent Integrated Children's Services portal	
LADO or Strategic Education Safeguarding/Online Safety Enquiries	LESAS enquiry form

Assistant Director of Education
South Kent – David Adams 03000 412 309
East Kent – Rob Veale 03000 418 794
West Kent – Nick Abrahams 03000 410 058
North Kent – Ian Watts 03000 414 302

Prevent Education Officers
North/West/ Medway - Sally Green sally.green2@kent.gov.uk 03000 413 439
South/East - Rachel Murray Rachel.murray@kent.gov.uk 03000 412 431

Additional Contacts **NHS England: Kent and Medway Area Team** **Tel**: 01732 375 200 **Kent and Medway Fire and Rescue Service** **Tel**: 01622 692 121 **Kent and Medway Police** **Tel**: 101 and ask to speak to someone in the Child Abuse Investigation Unit **National Probation Service** **Tel**: 03000 47 63 25 **Kent, Surrey & Sussex Community Rehabilitation Company** **Tel**: 03000 47 30 00 **LADO Tel**: 03000 41 08 88 **Designated Nurse for Safeguarding Tel**: 01634 335 043 (Safeguarding Team Secretary) **CXK Tel**: 01233 224 244	

Key contacts:

NSPCC whistle blowing helpline – 0800 028 0285 / Email: help@nspcc.org.uk

Ofsted – 08456 404045 (reporting child welfare concerns in the context of boarding) 08456 404046 (Whistleblowing hotline, Mon-Fri 8am – 6pm), also via email: whistleblowing@ofsted.gov.uk and by texting 60086

Appendix 1: Categories of Abuse, Neglect and Exploitation

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

St Edmund's is committed to supporting children and families by identifying and responding to early signs of abuse, neglect, or radicalisation. We will take appropriate action and make referrals where necessary to ensure the safety and wellbeing of all children. Our approach aims to strengthen family resilience, improve outcomes, and prevent issues from escalating.

Abuse: a form of maltreatment of a child. Somebody may abuse, neglect or exploit a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children. It should be noted that abuse can be carried out both on and offline and be perpetrated by men, women, and children. Harm can include children witnessing the ill-treatment of others and this is particularly relevant when children **see, hear or experience domestic abuse and its effects.**

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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Signs that MAY INDICATE Sexual Abuse

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

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

Signs that MAY INDICATE physical abuse

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft area of the face such as the cheeks

- Fingertip bruising to the front or back of torso
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns
- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot
- Aggressive behaviour or severe temper outbursts.
- Injuries need to be accounted for. Inadequate, inconsistent, or excessively plausible explanations or a delay in seeking treatment should signal concern.

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

Signs that MAY INDICATE emotional abuse

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

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

Signs that MAY INDICATE neglect.

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing
- Frequent lateness or non-attendance
- Untreated medical problems
- Poor relationship with peers

- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight
- Low self esteem

Exploitation: Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)
Exploitation is a form of abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into any activity

- in exchange for something the victim needs or wants, and/or
- for the financial or other advantage of the perpetrator of facilitator and/or
- through violence or the threat of violence.

Exploitation is included in KCSIE 2026 to remind us that abuse might not just occur in the home, but it may also occur outside of the home environment, even online. Exploitation can include instances where a child or young person may be groomed to become involved in sexual or criminal activity.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation - where this is the case, it is important that the child perpetrator is also recognised as a victim.

CSE and CCE can affect children of any sex and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

The victim may have been exploited even if the activity appears consensual. CCE can include children being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of both, including children who:
(a) appear with unexplained gifts, money or new possessions;
(b) associate with other young people involved in exploitation;
(c) suffer from changes in emotional wellbeing;
(d) misuse drugs or alcohol;
(e) go missing for periods of time or regularly come home late; and
(f) regularly miss school or education or do not take part in education.

Child Sexual Exploitation: Child sexual exploitation, including violence and harassment, is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur using technology.

No school is immune to the risk of child sexual exploitation including online and it can affect both boys and girls. Children can be children who harm as well as children who may have been harmed.

Signs of Child Sexual Exploitation may include: -

- unexplained gifts and new possessions
- association with young people involved in exploitation

- having much older boyfriends or girlfriends
- suffering from sexually transmitted infections
- suffering changes in emotional well-being
- drug and alcohol misuse
- being absent for periods of time and regularly reaching home late missing education (including unexplainable and/or persistent absences from education.

The same indicators may suggest that children have been approached by or are involved with individuals associated with criminal networks or gangs. These children are at risk of being involved in serious violent crime. Further advice can be found in the DfE publications Preventing youth violence and gang involvement and Criminal exploitation of children and vulnerable adults, county lines.

The School will provide sensitive education on all aspects of abuse appropriate to the age on these issues in PSHE lessons, in ICT lessons and through tutor periods, Assemblies and Chapel services. The staff in the Medical Centre are also available to help raise awareness and provide guidance on issues surrounding sexual exploitation. These themes are also shared with parents so that they can support the School.

Female Genital Mutilation: Staff must be aware of the requirement for teachers to report to the police where they discover, either through disclosure by the child who may have been harmed or through visual evidence, that female genital mutilation appears to have been carried out on a girl under the age of 18. It will be rare to see evidence of it, as staff should not be routinely examining pupils. Unless there is good reason not to, the case should be discussed with the Designated Safeguarding Lead so that involvement of external agencies can be sought. Failing to report such cases is a criminal offence. Further useful information can be found in Mandatory Reporting of Female Genital Mutilation – procedural information, published by The Home Office in October 2015, updated December 2016.

Sharing self-generated intimate images and/or videos (including AI-generated intimate images or deepfakes). Young people who share such images may be committing a criminal offence, as it is a crime to: -

- take an indecent photograph or to allow an indecent photograph to be taken
- make an indecent photograph, including downloading or opening an image that has been sent by e-mail
- distribute or show such an e-mail
- possess with the intention of distributing images
- possess such images

Any disclosure relating to sharing self-generated intimate images and/or videos (including AI-generated intimate images or deepfakes) should be treated as any other safeguarding disclosure. Staff may:

- confiscate an electronic device if they have good reason so to do, **but must not view, copy or print any such imagery**
- Material should not be removed from one device to another, printed or saved
- The necessary referrals to the police or social care will be made
- Support for the child who may have been harmed, including counselling will be offered
- Parents and carers will be informed about the incident and the way in which it is being managed

Criminal Exploitation

Child Criminal Exploitation is common in county lines and occurs where an individual, or group, takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under

the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur using technology.

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line".

They are likely to exploit children and vulnerable adults to move, store and sell drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons. Children are increasingly being targeted and recruited online using social media.

Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Useful information can be accessed at https://eyes-open.co.uk/

Child on child abuse (including harassment and violence): child abuse can and does happen anywhere. Abuse may also be inflicted on another pupil by one or more pupils and **must never be tolerated.**
Children who are victims of sexual violence and sexual harassment are likely to find the situation stressful in a way that will adversely impact on their education attainment as well as their emotional well-being. Sexual violence and sexual harassment exist on a continuum and may overlap; they occur online and offline, both physically and verbally. Upskirting typically involves taking a picture under a person's clothing without them knowing to view their genitals or buttocks for sexual gratification or for humiliation, distress or alarm for the victim. Child on child abuse (including harassment and violence) abuse may take place online and/or in person. Any incidents of upskirting will be reported to the police.

Child on child abuse (including harassment and violence) may also include A_-generated intimate images, misogyny, coercive behaviours and image-based abuse.

Children who may have been harmed must be taken seriously and offered full support to avoid disruption to their education. Other children and staff should also be supported and protected as appropriate. The School's response will be risk assessed on a case-by-case basis by the Designated Safeguarding Lead or one of the Deputies. The options include managing the matter internally, seeking early help and Family Help services intervention, referring through the Front Door to Integrated Children's Services and reporting to the police.

The School provides a clear set of values and standards, as outlined in the Behaviour Management policy, pastoral support and a planned programme of evidence-based content delivered through the curriculum. There is not a one size fits all approach to the teaching of such issues; pastoral leaders, medical and the SEND departments are liaised with to tailor RSHE curriculum to vulnerable individuals.

The matter could constitute a serious breach of the behaviour policy and lead to permanent exclusion. Staff are appropriately trained to deal with child-on-child abuse and will be mindful of the indicators, which include:

- absence from school or disengagement from school activities
- physical injuries
- mental or emotional health issues

- becoming withdrawn – lack of self esteem
- lack of sleep
- alcohol or substance misuse
- changes in behaviour
- inappropriate behaviour for age
- abusive towards others

To try to prevent Child on child abuse (including harassment and violence) abuse we will:

- **Create an environment based on equality and informed choice** allowing children and young people to know their rights, what to do if they are unhappy with something and what it means to give true consent.
- **Ensure young people know the risks** – talk about child-on-child abuse in an age-appropriate way. Create opportunities for young people to weigh up risks and recognise that sometimes this means they will take risks we as adults and professionals disagree with. Our role is to be influencing young people to be making the healthiest long-term choices and to keep them safe from harm in the short term.

- **Check young people have safe relationships** – in their family, with their peers and with staff. Create the environment where it is OK to talk, even about the most difficult things.

- **Spot the signs and know what to do** – use our safeguarding procedures and be confident to raise Child on child abuse (including harassment and violence) as a possibility.

Further details can be found in KCSIE 2026.

Violence Against Women and Girls (VAWG)
St Edmund's recognises that violence against women and girls (VAWG) can affect children and young people of all ages and that harmful attitudes and behaviours may develop both online and offline. These may include misogyny, sexist language or behaviour, sexual harassment, coercive and controlling behaviour, image-based abuse, and the promotion of harmful ideologies, including incel ideology. Such behaviours are not tolerated and will always be treated as safeguarding concerns where appropriate. Staff are trained to recognise early indicators, challenge inappropriate attitudes and behaviours, and respond promptly in line with the school's safeguarding and behaviour policies. The School promotes a culture of respect, equality and inclusion through its curriculum, pastoral care and relationships education, enabling pupils to develop healthy, respectful relationships and to understand the importance of consent, dignity and mutual respect. Where concerns arise, they will be assessed by the Designated Safeguarding Lead (DSL), who will determine the appropriate response, including support for those affected and referrals to external agencies where necessary. The School recognises that online content and social media can contribute to the normalisation of harmful attitudes towards women and girls and will continue to educate pupils in critical thinking, digital literacy and safe online behaviour to reduce these risks.

Domestic abuse: Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse including physical, sexual, emotional abuse and stalking). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn (Domestic Abuse Act 2021).

Children who witness domestic abuse are at risk of significant harm to their wellbeing and understanding of healthy, positive relationships. The School is enrolled onto the Operation Encompass scheme and is alerted every day to all domestic abuse incidents that have been reported to Kent Police so that the right support can be put in place at the right time for children who are experiencing domestic abuse.

Young Carers

St Edmund's recognises that young carers may face additional challenges which can have a significant impact on their education, attendance, wellbeing and safeguarding. A young carer is a child or young person under the age of 18 who provides, or intends to provide, care for a family member who has a disability, long-term illness, mental health condition, substance misuse issue or other additional need. The school is committed to identifying young carers at the earliest opportunity and ensuring they receive appropriate pastoral support, reasonable adjustments and access to early help services where required. Staff will remain alert to indicators that a pupil may have caring responsibilities, including changes in attendance, punctuality, engagement, behaviour, attainment, fatigue or emotional wellbeing. Where concerns are identified, they will be discussed with the Designated Safeguarding Lead (DSL), who will collaborate with the pupil, their family and relevant external agencies to assess need and coordinate appropriate support. Attendance concerns relating to a young carer's responsibilities will always be considered within the wider safeguarding context, and the school will seek to remove barriers to education while promoting the pupil's welfare, educational achievement and overall wellbeing.

What to do if you become aware of abuse

Care must be taken when recognising abuse, neglect and exploitation in pupils with special educational needs or disabilities as they can be disproportionally impacted by things such as bullying. Additional barriers could be the assumption that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.

In a boarding environment especially, there is likely to be an enhanced risk that inappropriate relationships could develop. The School will be alert to any potential abuse by peers and may consider some aspects of bullying as a child protection matter. There may be reasonable causes to suspect that a child is suffering or is likely to suffer significant harm. In such cases it is probable that House Staff will be in the best position to assess the situation; House Prefects and Mediators will also be well-placed.

If you (or a pupil) have any worries or concerns share them immediately with one of the Safeguarding Leads. Immediate focuson identifying emerging problems and sharing information is crucial. If you do not, you could be allowing the child to be put at further risk, and vital information may not come to light. Staff **MUST NOT** keep secrets or make promises to the pupil that other appropriate adults (e.g. social care or police) will not be involved. Even if a pupil later retracts their statement, the referral could still be made. Particular attention should be given to a child who:

- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;

- is at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;

- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child; and is persistently absent from education, including persistent absences for part of the school day.
- is frequently missing/goes missing from education, home or care.
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit.
- has a parent or carer in custody or is affected by parental offending.

Ensure that the pupil is in a safe place, for example the Medical Centre or the boarding house. If a day pupil is involved encourage him/her to stay in School until all the information has been collected.

At all times when information is being gathered the Safeguarding Leads will be present, to support the pupil and explain what is taking place.

One of the Safeguarding Leads will liaise with the Head and telephone the appropriate services for advice; such contact will be made within 24 hours especially in the case of those who have suffered or who are likely to suffer significant harm. Children in need will be referred to the child's social care by one of the Safeguarding Leads, but this will be done immediately in the case of children at risk so that inter-agency assessments can take place. The police will be contacted if a crime has been committed. Contact may also need to be made if the case involves one of abuse perpetrated by one or more pupils against another.

If it is thought that there is a case to pursue, the police or other agency will come to the School and interview the pupil where the pupil feels safe. It is most important that the House Staff member is present, acting as guardian.

Designated teachers for Looked After Children are Ross Underwood and Alex Ward who have undertaken training for the responsiibility and have previous experience of overseeing LAC children.

Staff **MUST** remember: -

- that the priority is to protect the child
- to take the matter seriously in a supportive way
- when initially talking to the child not to ask leading questions or "put words in their mouth"
- to gather information on a "need to know" basis; you do not need the whole story, just sufficient to take the next step
- that the child is very vulnerable and to reassure the child that you have taken what they had to say seriously
- keep a record of the facts of the matter to pass on to the Designated Safeguarding Lead

Staff **MUST NOT**: -

- contact the parents any further
- interrogate the child or ask leading questions

- speak to anyone about whom the allegations are made
- promise to keep secrets or maintain confidentiality
- ask the child outright if they have suffered abuse

One of the most important things to do is to LISTEN to what a young person is telling you. They may want to tell you about abuse and your reaction to this is vital. Remain non-judgmental and reassure the child that we are taking them seriously.

Appendix 2: National Support Organisations

Support for staff

- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline
- Government Safeguarding Resource page: Safeguarding resources

Support for Pupils

- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- The Mix: www.themix.org.uk
- Shout: www.giveusashout.org
- Fearless: www.fearless.org

Support for adults

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

Support for Learning Disabilities

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

Domestic Abuse

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

Honour Based Abuse

- Forced Marriage Unit: www.gov.uk/guidance/forced-marriage
- FGM Factsheet: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf
- Mandatory reporting of female genital mutilation: procedural information: www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information

Contextual Safeguarding, Child on child abuse (including harassment and violence) **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

Substance Misuse

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

Mental Health

- Mind: www.mind.org.uk
- Moodspark: 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/

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

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

Courts and Tribunals

- KCSIE 2026 directs schools to two guides that support children in the court system, one for 5- to 11-year-olds (HM Courts and Tribunals Service, 2017 https://www.gov.uk/government/publications/young-witness-booklet-for-5-to-11-year-olds
- and the other for 12- to 17-year-olds (HM Courts and Tribunals Service, 2017b) https://www.gov.uk/government/publications/young-witness-booklet-for-12-to-17-year-olds

Appendix 3: Inclusivity

St Edmund's School has a zero-tolerance to any type of prejudice.

This is principally embodied in our Equality Policy which can be located here:

https://www.stedmunds.org.uk/about-us/policies-inspection-reports/

This policy has its legal basis in the Equality Act (2010)

https://www.legislation.gov.uk/ukpga/2010/15/contents

The following are protected characteristics in this legislation—

- age;
- disability;
- gender reassignment;
- marriage and civil partnership;
- pregnancy and maternity;
- race;
- religion or belief;
- sex;
- sexual orientation.

The School will not permit discrimination based on any of these characteristics within its community.

All our school policies are predicated on the principles of tolerance and inclusivity.

To achieve this, we

- Prioritise pupil and staff welfare and safety above all things
- Do not tolerate any forms of prejudicial behavior such as racism
- Promote tolerance and understanding of others through our curriculum and PSHEE programmes
- Encourage all members of our community to discuss ways we can eradicate prejudicial behaviours
- Promote listening, reasoned engagement, and positive action in response to injustice, while condemning aggression and violence in all its forms
- Are an Equal Opportunities employer and do not tolerate any form of discrimination or harassment in our workplace
- Recognise that some pupils can potentially be more vulnerable to harm or to being targeted by other children: for example, children who are lesbian, gay, bisexual, or gender questioning (KCSIE 2026, Part 2, Paragraphs 205-209).

We will:

- Consider ways in which we can further educate our community so that its members are empowered to act against discrimination in all its forms
- Engage further with those inside and beyond our community to understand their views and those of others on this topic
- Consider how we can amend our approach to further reflect our support for eradicating prejudicial behaviours

- **We ask everyone in the St Edmund's community to join us in challenging discriminatory behavior and ideas and holding ourselves and others to account.**

Appendix 4: Low Level Concerns Policy (Including Early Years)

1. Aims

"Having clear procedures for responding to low-level concerns is part of creating a school culture of openness and trust. It helps ensure that adults consistently model the school's values and helps keep children safe. It will also protect adults working in school from potential false allegations or misunderstandings."
https://learning.nspcc.org.uk/news/2021/october/responding-low-level-concerns-in-education

St Edmund's School understands the importance of acknowledging, recording and reporting all safeguarding concerns, regardless of their perceived severity. We also understand that, while a concern may be low level, that concern can escalate over time to become much more serious. Our school prides itself on creating a safe environment for pupils, and our staff are expected to adhere to high standards of behaviour when it comes to professional conduct regarding pupils. The school has clear professional boundaries which all staff are made aware of and will adhere to.

We are committed to ensuring that any safeguarding concerns are dealt with as soon as they arise and before they have had a chance to become more severe, to minimise the risk of harm posed to our pupils and other children.

This low-level concerns policy applies to all members of staff including trainee teachers, contractors and volunteers.

2. Legal Framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

DfE (2026) 'Keeping Children Safe in Education' 2026

DfE (2026) 'Working Together to Safeguard Children'

UK General Data Protection Regulation (UK GDPR)

Data Protection Act 2026

This policy also operates in conjunction with the following school policies:

Safeguarding

Staff Handbook

Staff Code of Conduct

Whistleblowing Policy

Privacy Notice

These can be found here: **Staff Policies**

3. Definitions

For the purposes of this policy, a *low-level concern* is defined as any concern had about an adult's behaviour towards, or concerning, a child that does not meet the harms threshold (see below) or is otherwise not serious enough to consider a referral at the time of its reporting.

Low-level concerns refer to behaviour on the part of a staff member towards pupils that is considered inappropriate in line with statutory safeguarding advice, the Staff Code of Conduct, and the Appropriate and Inappropriate Behaviour section of this policy.

The *harms threshold* is the point at which a concern is no longer low-level and constitutes a threat of harm to a child. This threshold is defined as accusations that an adult 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 in a way that indicates they may pose a risk of harm to children.

Behaved in a way that indicates they may not be suitable to work with children, including behaviour that has happened outside of school.

While low-level concerns are, by their nature, less serious than concerns which meet the harms threshold, the School understands that many serious safeguarding concerns, e.g. child sexual abuse, often begin with low-level concerns, e.g. being overly friendly with children. The School will ensure that all staff are aware of the importance of recognising concerns before they escalate from low level to serious, wherever possible.

4. Appropriate and Inappropriate Behaviour

The School will ensure that all staff members are aware of the standards of appropriate behaviour expected towards pupils. Staff will ensure they pay due regard to the fact that:

They are in a position of trust, care, responsibility, authority and influence in relation to pupils.

There is a significant power imbalance in the pupil–staff dynamic.

There are more stringent expectations regarding their behaviour regarding pupils due to their position as public professionals.

Staff will remember that all pupils under the age of 18 are children-in-law and will not assume maturity or engage with pupils as they would peers.

Examples of inappropriate behaviour that may constitute a low-level concern (not exhaustive):

Being overly friendly with children (e.g. using personal social media, allowing inappropriate conversations).

Having favourites (e.g. using pet names, buying gifts).

Taking photographs of children on personal devices.

One-to-one contact in secluded areas or behind closed doors (unless pre-approved and risk-assessed).

Humiliating children.

Using inappropriate, sexualised, intimidating or offensive language.

Staff will be aware that:

Some of these behaviours may, in certain contexts, meet the harms threshold (e.g. depending on the age or vulnerability of the child).

Some behaviours may be acceptable in context (e.g. an approved counselling session behind a closed door).

Intent does not remove the need to report — inadvertent or thoughtless actions still require reporting.

Staff will receive training in induction and refresher training as needed on appropriate behaviour and recognising/reporting concerns.

5. Reporting Concerns

The **Microsoft Form** for Low-Level Concerns is the *primary* reporting method. QR codes linking to the form will be displayed in staff areas.

If a staff member cannot access the form, they may submit their concern in writing to the Head. In such cases, it is the responsibility of the **Low-Level Concerns Sub-Committee** to log the concern on the Microsoft Form so that there is a complete record.

All safeguarding concerns will be reported to the Head immediately, without undue delay. If a concern involves the Head, it must be reported directly to the Chair of Governors (cmn@stedmunds.org.uk).

Where a concern involves supply or contract staff, it must also be reported to the Head, who will inform their employer.

6. Self-Reporting

Staff are encouraged to self-report if they believe they have:

Acted in a way that could be misinterpreted.

Acted in a way that could appear compromising.

Acted in a way that, on reflection, falls below the Staff Code of Conduct.

Self-reporting should be done via the **Microsoft Form** wherever possible.

Self-reporting will not result in more favourable treatment during investigation, but the school will consider the individual's self-awareness and intentions.

7. Evaluating Concerns
Concerns will be reviewed weekly at the Senior Leadership Team meeting. A **Low-Level Concerns Sub-Committee** (Head, Senior Deputy Head, DSL) will determine whether the concern is low-level or should be escalated as it meets the harms threshold.

If a concern may reach the harms threshold, the school will seek **LADO advice** before the SLT meeting.

The evaluation process may include:

Speaking to the reporter for further details.

Reviewing behaviour against the Staff Code of Conduct and law.

Checking for patterns of previous concerns.

Consulting external agencies if in doubt.

Speaking to the subject of the concern for their response.

Keeping accurate records of all discussions and decisions.

Decision making and rationale will be recorded as to whether a LADO referral is required.

8. Possible Responses

8.1 Concern Unfounded – Behaviour not in breach of the Code or law; discuss with subject and clarify to reporter to prevent deterrence from future reporting.

8.2 Low-Level Concern – DSL meets with subject to explain behaviour issues, discuss changes, and agree an action plan if required. May include training, supervision, or guidance. Pastoral support will be offered to any pupil affected.

8.3 Serious Concern – Escalate as an allegation under the Safeguarding Policy, which may include a **LADO referral**.

Suspension or other safeguarding measures may be applied **to protect both the child and the staff member from potential further allegations**. Support will be offered to suspended staff (e.g. Chaplain or school counsellor). Reports about supply staff and contractors will be reported to the agency/business so potential patterns of inappropriate behaviour are identified.

9. Record Keeping
The Head will ensure all low-level concern records include:

Clear summary of the concern.

Follow-up actions and outcomes.

Decisions made.

Name of reporter (unless anonymity requested, which will be respected where possible).

Records will be stored electronically, securely, and chronologically, managed by the HR Manager. The DSL will review records periodically for patterns.

Records will not be placed in personnel files unless multiple concerns arise about the same individual or concerns escalate to allegations.

Records will be retained securely with HR and destroyed after the staff member leaves the school, unless required for safeguarding history.

Appendix 5: Protocol & Risk Assessment: Transportation of St Edmund's School Choristers to Canterbury Cathedral

Purpose
To ensure the safe transportation, supervision, and safeguarding of St Edmund's School choristers travelling by minibus from St Edmund's School to Canterbury Cathedral for rehearsals and musical commitments.

This protocol applies to:

- All choristers participating in transportation to and from Canterbury Cathedral.
- St Edmund's School staff supervising the transportation and handover.
- Canterbury Cathedral staff receiving responsibility for choristers upon arrival.

Responsibilities
St Edmund's School

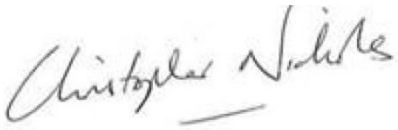
- Responsible for the **immediate safeguarding and welfare** of choristers from the time they depart St Edmund's School until the **formal handover** to Canterbury Cathedral staff.
- <u>Whilst at the Cathedral, choristers are under the care of Canterbury Cathedral staff who take over responsibility of safeguarding the choristers for the duration of time onsite in accordance with Cathedral Safeguarding policies.</u>
- At the end of rehearsals/commitments, responsibility is **resumed by St Edmund's School staff** upon collection from Canterbury Cathedral.
- Ensure:
    - All minibuses are roadworthy and compliant with safety legislation.
    - Staff drivers hold appropriate licences and have completed safeguarding checks (DBS, school safeguarding training).
    - Adequate staff-to-pupil supervision ratios are maintained during transportation.
    - Seat belts are always worn, with staff ensuring compliance.
    - Registers are taken before departure and after arrival.

Canterbury Cathedral

- Responsible for choristers' safeguarding and welfare **from the point of handover** by St Edmund's staff until the agreed time of collection.
- Cathedral staff will follow their own safeguarding procedures while the choristers are under their care.

Safeguarding Protocols

- While on Canterbury Cathedral premises and during Cathedral-led activities, the **safeguarding and welfare of choristers is the responsibility of Canterbury Cathedral**. The Cathedral will always apply its own safeguarding procedures and visitor protocols.
- **St Edmund's School staff** attending the Cathedral will respect and comply with Cathedral safeguarding policies and visitor requirements.
- **Communication of safeguarding concerns**:
  - Canterbury Cathedral staff will communicate any safeguarding concerns directly to those with **parental responsibility** for the choristers.
  - Where a chorister is a **boarder at St Edmund's School**, the Cathedral will also inform the school. Information sharing in such cases will be **appropriate, proportionate, and compliant with GDPR**, ensuring only the necessary details are shared to support the safety and wellbeing of the pupil.
- Designated Safeguarding Leads (DSLs):
  - **St Edmund's School DSL**
    - *Ross Underwood*
    - Email: rpu@stedmunds.org.uk
  - **Canterbury Cathedral DSL**
    - *Emma Pennington*
    - Email: Emma.Pennington@canterbury-cathedral.org



Signed:
Christopher Nickols
Chairman of Governors & Safeguarding Governor

Date: 1st September 2026
Review Date: September 2027

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Review Date: September 2026

Version Number	Date of Amendment	
1	September 2013	LJMH
2	May 2014	LJMH
3	October 2014	LJMH
4	December 2014	LJMH
5	January 2015	LJMH
6	September 2015	LJMH
7	May 2016	LJMH
8	September 2016	LJMH
9	March 2017	LJMH
10	September 2017	LJMH
11	February 2018	LJMH
12	September 2018	EOC
13	December 2018	EOC
14	September 2019	EOC
15	September 2020	EOC
16	February 2021	EOC
17	September 2021	EOC
18	September 2022	EOC
19	September 2023	EOC
20	September 2024	EOC
21	September 2025	EOC
22	September 2026	EOC