

Safeguarding & Child Protection Policy

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Introduction

Turner Schools fully recognises its responsibilities for safeguarding and child protection. It is understood that safeguarding is broader than child protection, and includes protecting children from maltreatment, preventing impairment of children's health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes.

Our policy applies to all staff (including volunteers) and governors working in the school. There are five main elements to our policy:

- Practising safer recruitment in checking the suitability of staff and volunteers to work with children;
- Raising awareness of safeguarding and equipping children with the skills needed to keep them safe;
- Developing and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse;
- Supporting pupils who have been abused in accordance with their agreed child protection plan;
- Establishing a safe environment in which children can learn and develop.

We recognise that because of the day-to-day contact with children, school staff are well placed to observe the outward signs of abuse. The school will therefore:

- Strive to establish and maintain an environment where children feel secure, are encouraged to talk, and are listened to;
- Let children know that there are adults in the school who they can approach if they are worried;
- Include opportunities in the Personal Social Health curriculum for children to develop the skills they need to recognise and stay safe from abuse;
- Ensure a child-centred approach, where staff consider at all times what is in the best interests of the child, acting upon concerns about a child's welfare immediately.

We will follow the procedures set out by the Area Safeguarding Advisor for South Kent and the Kent Safeguarding Children Board (KSCB) and will have regard to statutory guidance issued by the Department for Education to achieve the following objectives:

- Ensuring we have a designated safeguarding lead and Deputy DSL appointed from the schools leadership team, who have received appropriate training and support for this role. This person will provide support to staff members to carry out their safeguarding duties and will liaise closely with other services. The Principal, advises, supports and monitors the work of the DSL's.

- Ensuring all staff, especially the DSL or deputy consider the context within which such safeguarding incidents and/or behaviour occur in line with contextual safeguarding.
- Staff induction will include the school's pupil behaviour policy, the child protection policy, staff code of conduct and the safeguarding response to children who go missing from education.
- Ensuring governors understand their role in appropriately monitoring safeguarding. The governing board will approve this policy at each review, ensure it complies with the law. All governors will read Keeping Children Safe in Education.
- Ensuring every member of staff, volunteer and governor knows the name of the DSL and Deputy DSL and their role.
- Giving appropriate information so that all staff and volunteers understand their responsibilities in relation to safeguarding.
- Giving appropriate information so that parents and visitors understand the school's roles and responsibilities relating to safeguarding.
- Allocating resources to enable the school to discharge its safeguarding responsibilities properly.
- Ensuring that all staff and volunteers are able to raise any concerns about poor or unsafe practice.
- Developing effective links with relevant agencies and co-operate as appropriate with their enquiries regarding child protection matters including attendance at case conferences.
- Acting upon concerns immediately and ensuring that staff are aware that in exceptional circumstances staff should consider speaking to a member of the Senior Leadership Team and/or Children's Social Care to discuss safeguarding concerns in the absence of the DSL or their Deputy.
- Keeping written records of concerns about children, even where there is no need to refer the matter immediately.
- Keeping all records securely, separate from the main pupil file, and in locked locations.
- Developing and then following procedures where an allegation is made against a member of staff or volunteer.
- Always following safer recruitment practices.
- Ensure that all our schools undertake an annual safeguarding audit and have a safeguarding action plan.
- Provide an annual report to the Trust board that summarises safeguarding incidents and highlights areas of strength as well as identifying where further training or support may be needed.
- Ensure that one member of the board has an overview of safeguarding and regularly updates the board on any issues.

The relevant statutory guidance 'Keeping Children Safe in Education (2019) can be found [here](#).

All staff will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.

This policy reflects the following Legislation and Statutory Guidance:

- [Children Acts 1989](#) and [2004 amendment](#)
- [Non-Maintained Special Schools \(England\) Regulations 2015](#)
- [Education \(Independent School Standards\) Regulations 2014](#)
- [Education Act 2002, Sections 175 and 157](#)
- [Working Together to Safeguard Children 2018](#)

- [Keeping Children Safe in Education 2019](#)
- [What to do if you are worried a child is being abused 2015](#)
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#)
- [EYFS 2017](#)
- [The Rehabilitation of Offenders Act 1974](#)
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#)
- [Statutory guidance on the Prevent duty](#)
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the “2018 Childcare Disqualification Regulations”) and [Childcare Act 2006](#), which set out who is disqualified from working with children
- Kent and Medway Safeguarding Children procedures 2014 www.kscb.org.uk 7

This policy also complies with our funding agreement and articles of association.

Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL (or deputy DSL)”.

Confidentiality

Our approach to confidentiality and data protection with respect to safeguarding is covered in our Data Protection & Information Policy.

Please note that:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share ‘special category personal data’, the DPA 2018 contains ‘safeguarding of children and individuals at risk’ as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child’s best interests
- The government’s [information sharing advice for safeguarding practitioners](#) includes 7 ‘golden rules’ for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)
- Confidentiality is also addressed in this policy with respect to record-keeping, and allegations of abuse against staff

Identifying abuse

Staff should maintain an approach of 'it could happen here' and always focus on what is in the best interests of the child. All school staff should be prepared to identify children who may benefit from **early help**. This means providing support as soon as a problem emerges at any point in a child's life. Staff should discuss early help requirements with the DSL/Deputy DSL in the first instance. If early help is required, staff should liaise with external agencies and consider setting up a multi-agency working assessment.

All school staff should be aware of the signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation. The descriptions below are taken from the DfE guidance 'Keeping children safe in education (2019)'. Additional guidance can be found in 'What to do if you're worried a child is being abused'. All staff should be aware that abuse, neglect and safeguarding issues are rarely stand alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

Staff should also be aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger.

Types of Abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

Physical abuse

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

- Unexplained injuries or burns
- Untreated injuries
- Bruises/abrasion around the face
- Bi-lateral injuries e.g. two bruised eyes
- Bite marks
- Bruising abrasions to lips, cheeks, outer ear

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children 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 the 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, though it may occur alone. Indicators include:

- Excessive overreaction to mistakes
- Continual self-deprecation
- Excessive rocking, thumb sucking, hair twisting
- Extreme compliance/aggression
- Drug, alcohol and substance misuse
- Significant peer relationship difficulties

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (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. Indicators include:

- Sexual awareness inappropriate to child's age, including provocative sexual behaviour
- Self-harm
- Pregnancy
- Sexually transmitted diseases
- Sudden changes in behaviour or school performance
- Fear of undressing for gym
- Depression/withdrawal
- Drug, alcohol, substance abuse

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

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

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

- Constant hunger, tiredness, and/or poor personal hygiene
- Untreated medical problems
- Destructive tendencies
- Social isolation
- Poor self-esteem and/or relationship with peers
- Excessive rocking, hair twisting, thumb sucking

Bullying

While bullying between children is not a discrete category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. All incidences of bullying should be reported and will be managed through our anti-bullying procedures. All pupils and parents receive a copy of the anti-bullying procedures on joining the school and the subject of bullying is addressed at regular intervals in the personal, social and health education (PSHE) curriculum. If the bullying is particularly serious, or the anti-bullying procedures are deemed to be ineffective, the head teacher and the Designated Safeguarding Lead will consider implementing child protection procedures.

DfE advice on Cyberbullying can be found here:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/374850/Cyberbullying_Advice_for_Headteachers_and_School_Staff_121114.pdf

Child Sexual Exploitation (CSE)

CSE involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops.

Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse. Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or do not take part in education.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and deputies] will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

So called 'honour-based' violence (HBV)

HBV encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the DSL. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

Female Genital Mutilation (FGM)

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

If a teacher discovers that an act of FGM appears to have been carried out on a girl under 18, they must report this to the police. All teachers should raise any FGM related concerns with the DSL (or deputy) and involve children's social care as appropriate.

The government guidance on FGM and the reporting is set out here:

<https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

Breast Ironing

Much like FGM, Breast Ironing is a harmful cultural practice and is child abuse. Professionals working with children and young people must be able to identify the signs and symptoms of girls who are at risk of or have undergone breast ironing. Similarly to FGM, breast ironing is classified as physical abuse therefore professionals must follow their Local Safeguarding Children's Board Procedures.

Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any form of coercion is used to cause a person to enter into a marriage.

Radicalisation and Extremism

We recognise that we must have regard to the Prevent Duty "to prevent people from being drawn into terrorism". Protecting children from the risk of radicalisation is part of schools' wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways.

As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a referral to the Channel programme.

If a member of staff has a concern about a particular pupil they should follow the school's normal safeguarding procedures, including discussing the matter with the school's DSL, and where deemed necessary, with children's social care.

Staff should familiarise themselves with the Department for Education's guidance on the Prevent Duty which is found here:

<https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty>

Peer on peer abuse

Turner Schools recognises that children are capable of abusing their peers. Safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to, bullying (including cyber-bullying), gender based violence/sexual assaults and sexting. Such cases of abuse will not be tolerated or passed off as "banter" or "part of growing up".

At Turner Schools we continue to ensure that any form of abuse or harmful behaviour is dealt with immediately and consistently to reduce the extent of harm to the young person, with full consideration to impact on that individual child's emotional and mental health and well-being.

Procedures have been put in place to ensure that all staff are trained in dealing with such incidents and to minimise the risk of peer on peer abuse. These include:-

- procedures to minimise the risk of peer on peer abuse;
- how allegations of peer on peer abuse will be recorded, investigated and dealt with;
- clear processes as to how victims, perpetrators and any other child affected by peer on peer abuse will be supported;
- a clear statement that abuse is abuse and should never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”;
- recognition of the gendered nature of peer on peer abuse (i.e. that it is more likely that girls will be victims and boys perpetrators), but that all peer on peer abuse is unacceptable and will be taken seriously; and
- the different forms peer on peer abuse can take, such as:
 - sexual violence and sexual harassment. Part 5 of Keeping Children Safe In Education 2019 sets out how schools and colleges should respond to reports of sexual violence and sexual harassment;
 - upskirting typically involving taking a picture under a person’s clothing without them knowing to obtain sexual gratification or cause humiliation.
 - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
 - sexting (also known as youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children : the policy should include the school or college’s approach to it. The department provides searching screening and confiscation advice for schools. The UK Council for Child Internet Safety (UKCCIS) Education Group has published advice for schools and colleges on responding to sexting incidents; and
 - initiation/hazing type violence and rituals.

For the procedures on how we expect staff to deal with this, please see our Peer on Peer Abuse Procedures.

For further advice about how to prevent and respond to reports of sexual violence and harassment between children, please see the latest DfE guidance:-

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/667862/Sexual_Harassment_and_Sexual_Violence_-_Advice.pdf

Prejudiced Behaviour

The term prejudice-related bullying refers to a range of hurtful behaviour, physical or emotional or both, which causes someone to feel powerless, worthless, excluded or marginalised, and which is connected with prejudices around belonging, identity and equality in wider society - in particular, prejudices to do with disabilities and special educational needs, ethnic, cultural and religious backgrounds, gender, home life, (for example in relation to issues of care, parental occupation, are at risk due to either their own or a family member’s mental health needs, poverty and social class) and sexual identity (homosexual, bisexual, transsexual).

Sexting

Sexting is a child protection issue. Even if explicit material is sent or elicited without malicious intent the consequences can be serious and put those involved at risk of serious harm. Having or sending explicit material on digital devices is also a criminal offence for those under 18. The school takes incidences of sexting extremely seriously, and deals with them in accordance with its safeguarding procedures.

The UK Council for Child Internet Safety (UKCCIS) Education Group has recently published sexting advice for schools and colleges which can be found [here](#).

Child Criminal Exploitation

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Domestic Abuse

The cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological
- physical
- sexual
- financial and
- emotional

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

Advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

[NSPCC- UK domestic-abuse Signs Symptoms Effects](#)

[Refuge what is domestic violence/effects of domestic violence on children](#)

[Safelives: young people and domestic abuse](#)

Specific categories of children:

Children Missing Education

A child going missing from education is a potential indicator of abuse or neglect, and such children are at risk of being victims of harm, exploitation or radicalisation. All children, regardless of their circumstances, are entitled to a full time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area.

The School's policy and procedure for dealing with children that go missing from education, particularly on repeat occasions, is set out in the Attendance Policy. It is important that the procedure is followed in all circumstances so as to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future. If a member of staff is in any doubt at all he/she should contact the DSL.

Further information can be found in ['Children missing from education: statutory guidance for local authorities' \(September 2016\)](#).

Children with Special Educational Needs and Disabilities

Children with special educational needs and disabilities can face additional safeguarding challenges. Staff must be alert to the fact that additional barriers can exist when recognising abuse and neglect in this group of children. These may include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further explanation;
- Children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these barriers.

Homestay

Should Turner Schools make arrangements for children to have learning experiences where, for short periods, the children may be provided with care and accommodation by a host family, either in the UK or abroad, to whom they are not related, Turner Schools will consider their safety and how best to minimise risk of harm to those children during the exchange visit. Arrangements for such visits will be undertaken in accordance with Annex E of Keeping Children Safe in Education (2019)

Looked After/Previously Looked After Children

The school will ensure that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after or previously looked after by the local authority. This includes ensuring that a designated member of staff has responsibility for their welfare and progress, has up to date assessment information from the local authority, the most recent care plan and contact arrangements .

Private Fostering

Private fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or a 'close relative'. This is a private arrangement made between a parent and a carer, for 28 days or more. Close relatives are defined as step-parents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half blood or marriage/affinity). Where the school becomes aware of a private fostering arrangement it must inform the Local Authority.

The role of the Designated Safeguarding Lead

The school has appointed a DSL, and deputy DSL(s) to contact in his/her absence. The DSL is a member of the school's senior leadership team with the necessary status and authority to take responsibility for child protection matters.

The DSL will take lead responsibility for safeguarding and child protection. This responsibility cannot be delegated. This will be explicit in the role holder's job description. The DSL will provide advice and support to other staff on child welfare and child protection matters, take part in strategy discussions and interagency meetings, and/or support other staff to do so, and contribute to the assessment of children.

The DSL will ensure that there is always cover for their role, including for any out of hours, out of term activities, and that arrangements for cover are communicated clearly to staff.

If there is a risk of immediate harm, a referral should be made immediately. If a child's situation does not appear to be improving, the DSL should press for the case to be escalated following LSCB procedures.

For looked after children, the DSL will have the details of the child's social worker and name of the virtual school head in the authority that looks after the child.

For further information about the role of the DSL, please see annex B of [Keeping Children Safe in Education \(2019\)](#).

The full responsibilities of the DSL and deputies are set out in their job description.

Taking Action

Safeguarding is everyone's responsibility. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children. Everyone who works with our pupils should make sure that their approach is child-centred, that is that they consider at all times what is in the best interests of the child.

Any concerns about pupils must be discussed with the DSL (or Deputy in their absence) as soon as possible, and latest by the end of the day and the Child Protection Policy must be followed. Wherever practicable, the DSL (or Deputy DSL in their absence) will decide whether to make a referral to children's social care. However, anyone can make a referral, and **if a child is in immediate danger or at risk of harm, a referral should be made to children's social and/or the police immediately**. Where a referral is made by someone other than the DSL, the services should be informed as soon as possible.

If staff members have concerns about a child they must raise these with the school's DSL as a matter of urgency and follow the local child protection procedure for each school. Verbal conversations are not encouraged unless written up before hand.

The Use of Reasonable Force

In certain circumstances, it is appropriate for staff to use reasonable force to safeguard children and young people:- this covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. In more extreme circumstances such as breaking up a fight or restraining a young person to prevent violence or injury, reasonable, in these circumstances means using no more force than is needed. The decision on whether or not to use reasonable force to control or restrain a child is down to the professional judgement of the staff concerned dependant on individual circumstances.

When using reasonable force in response to risks presented by incidents involving children with SEN, disabilities or with medical conditions, consideration of the risks will be given to the additional vulnerability of these groups. Consideration will be given to their duties under the Equality Act 2010 in relation to making reasonable adjustments, non-discrimination and their public sector equality duty. Turner Schools aims to reduce the occurrence of challenging behaviour and the need to use reasonable force through planning positive and proactive behaviour support.

Early Help

All staff have a duty to identify children who may benefit from Early Help with consideration for those who have a specific need as outlined in Paragraph 18 of Keeping Children Safe In Education September 2019. Action will also be taken to promote the welfare of a child in need of additional support, even if they are not suffering or at immediate risk. The school recognises the importance of children receiving the right help at the right time to address risks and prevent issues escalating, the importance of acting on and referring the early signs of abuse and neglect, keeping clear records, listening to the views of the child, reassessing concerns when situations do not improve, sharing information quickly and challenging inaction. Where it is considered that a child would benefit from coordinated support from more than one agency there should be a multi agency working assessment for early help. All staff are aware of their local Early Help process and understand their role in it; the DSL's of each school will take the lead on Early Help cases.

Information sharing

As part of meeting children's needs, governors and leaders recognise the importance of information sharing between professionals and local agencies. Further information can be found in Chapter one of Working Together to Safeguard Children, and in Information Sharing: Advice for practitioner. Concerns about sharing information cannot stand in the way of the need to promote the welfare and protect safety of children.

Online safety

Children will receive education in relation to online safety as part of the curriculum. The school will also ensure that appropriate filters and monitoring systems are in place for online safety. Further information can be found at Annex C of Keeping Children Safe.

Detailed information about the school's approach to online safety and acceptable use of technologies can be found in the school's Online Safety and Acceptable Use Policy.

Listening to children

When a child approaches a member of staff or other adult about a child protection issue that adult must follow these rules:

- Do not promise complete confidentiality. Explain you might have to tell other people to help keep the child or other children safe.
- Listen positively and reassure the child that speaking to you is the right thing to do.
- Do not jump to conclusions, put words in the child's mouth, or ask questions that point towards a particular answer.
- Write a record of the conversation as soon as possible, also noting any action taken.
- Do not try to investigate or take any action beyond the agreed procedures.
- Always act in the best interests of the child.

The member of staff should explain that they need to share the information with the DSL and reassure the child that the information will only be disclosed to other people who need to know.

Allegations against staff

The case manager for dealing with allegations of abuse made against school staff members is the Principal. The case manager for dealing with allegations against the Principal is the CEO of Turner Schools. The procedure for managing allegations if there is an allegation of abuse against a member of staff is dealt with under a separate policy, and is in accordance with Part 4 of Keeping Children Safe in Education (2019).

Where a staff member feels unable to raise an issue with their employer or feels that their genuine concerns are not being addressed, other whistleblowing channels are available, and the NPSCC whistleblowing helpline is available on 0800 028 0285 or by email to help@nspcc.org.uk.

If there is a risk of immediate serious harm to a child a referral should be made immediately to children's social services.

If an allegation is made against a member of staff, this will be managed under the Managing Allegations Against Staff Policy.

Any allegations will be referred to the LADO within 24 hours for advice before any investigation takes place.

Recording

When you receive any report of a child protection related matter, make a written record of what happened and what action was taken. Notes should include the date, time, place and context of any disclosure or concern, set out where possible the exact words used, and the note signed and dated. Such notes should distinguish between fact and opinion, record any injuries or bruises, and include reference to any 'non-verbal' behaviour.

These must be stored by the DSL, separate from the child's main school file with a note on that file to indicate the existence of a separate child protection file for that pupil.

Any minutes from a child protection conference should also be put in that separate file.

Ongoing Pupil Support

We recognise that children who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. The school may be the only stable, secure and predictable element in the lives of children at risk. When at school their behaviour may be challenging and defiant or they may be withdrawn. The school will endeavour to support the pupil through:

- The content of the curriculum.
- The school ethos which promotes a positive, supportive and secure environment and gives pupils a sense of being valued.
- The school behaviour policy which is aimed at supporting vulnerable pupils in the school. The school will ensure that the pupil knows that some behaviour is unacceptable but they are valued and not to be blamed for any abuse which has occurred.
- Liaison with other agencies that support the pupil such as social services, Child and Adult Mental Health Service, education welfare service and educational psychology service.
- Where a pupil on the child protection register leaves, transferring their information to the new school immediately and informing the child's social worker. Where children leave the school the DSL will consider if it is appropriate to share information with a new school in advance of a pupil leaving. Where children join the school the DSL and SENDCo are aware of the requirements set out in Keeping Children Safe In Education September 2019 about transferring a child protection file to a new school.

Safer Recruitment

We are committed to ensure that all steps are taken to recruit staff and volunteers who are safe to work with our pupils and have their welfare and protection as the highest priority. The Directors, Local Governing Body and School Leadership Team are responsible for ensuring that the school follows safe recruitment processes outlined within Guidance, including accurate maintenance of the Single Central Record; and an application, vetting and recruitment process for internal and external recruitment which places safeguarding at its centre, regardless of employee or voluntary role.

The Directors, Local Governing Body and Principals will ensure that the Vice Principals and other senior staff responsible for recruitment and one member of the Governing Body complete accredited Safer Recruitment Training in line with government requirements.

We are committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools. Schools and local authorities must have regard to it when carrying out their duties to safeguard and promote the welfare of children under section 175, of the Education Act 2002, paragraph 79(b) of Schedule 1 to the Education (Independent School Standards) Regulations 2014 and paragraph 3 of the Schedule to the Education (Non-Maintained Special Schools)(England) Regulations 2011.

The use of school premises by other organisations

Where services or activities are provided separately by another body using the school's premises, a representative of the Trust Board and Principals or Vice Principals will seek assurance that the organisation concerned has appropriate policies and procedures in place with regard to safeguarding children and child protection and that relevant safeguarding checks have been made in respect of staff and volunteers. If assurance is not achieved, an application to use premises will be refused.

Staff Training

The school will ensure that all staff receive adequate training in child protection at least annually and are aware of systems within the school which support safeguarding. The school's induction programme for new staff includes child protection training. All staff are required to familiarise themselves with Part 1 of the Keeping Children Safe in Education Guidance (2019).

The DSL and deputy DSL will undergo child DSL training every two years. The DSL will receive additional updates to their formal training at regular intervals to keep up to date with any developments relevant to their role.

The Principals and all staff members will undergo child protection training which is updated regularly, in line with advice from the LSCB. The wealth of knowledge developed by staff in dealing with safeguarding issues is recognised, and staff will have the opportunity to contribute to shaping the school's safeguarding arrangements.

The Principals are responsible for ensuring that safeguarding training is kept up to date.

Linked School Policies

The following policies and procedures are relevant for the child protection and safeguarding policy and procedures:

Code of Conduct/Staff Behaviour Policy
Safer Recruitment Policy
Managing Allegations against Staff Policy
Online Safety and Acceptable Use Policy
Reasonable Force Policy
Whistleblowing Policy
External Visitors / Contractors Policy
Attendance Policy
Peer on Peer Abuse Procedures
Equality and Diversity Policy
Data Protection & Information Policy

Legislation

Turner Schools practices the advice and guidance set out in the Sexual Violence & Sexual Harassment between Children in Schools & Colleges 2018 document, as part of our approach to protect children from sexual violence and sexual harassment. This includes:

Keeping Children Safe in Education 2019
Working Together to Safeguard Children
Sex & Relationship Educations and the Equality Act 2010
Guidance for Safer Working Practice for Those Working With Young People in Educational Settings
The Prevent Duty
Sexual Offences Act 2003
Protection of Children Act

Monitoring

This policy will be reviewed by the Trust Board annually.
The policy will be on Turner Schools' website.

Appendix 1

FOLKSTONE ACADEMY (PRIMARY PHASE)		
Designated Safeguard Lead Assistant Principal	Mrs Grimmett	01303 842400
Deputy Designated Safeguarding Leads Co-Principal Assistant Principal/SENCo Family Liaison Officer Kindergarten Teacher	Miss Feaver Miss Beck Miss Cunningham Mrs Sammonds	01303 842400
FOLKSTONE ACADEMY (SECONDARY PHASE)		
Designated Safeguard Lead Vice Principal	Mrs Coppins	01303 842400
Deputy Designated Safeguarding Leads Assistant Principal PA to the Principal Multi Agency Lead CiC Co-ordinator	Mr Fountain Mrs Atkins Miss J Stokes Miss C Stokes	01303 842400
Nominated Governor for Safeguarding and Child Protection	Mr Pearce	clerk@turnerschools.com
Chair of Governors	Mr Buchanan	clerk@turnerschools.com
MARTELLO PRIMARY		
Designated Safeguarding Lead Principal	Mrs Sowden-Mehta	01303 847540
Deputy Designated Safeguarding Lead SENDCo	Mrs Speed	01303 847540
Other Members of Safeguarding Team Family Liaison Officer	Miss Prescott	01303 847540
Nominated Governor for Safeguarding and Child Protection	Mrs Brown	clerk@turnerschools.com
Chair of Governors Martello Primary and Morehall Primary	Mrs King	clerk@turnerschools.com

MOREHALL PRIMARY		
Designated Safeguarding Lead Principal	Mrs Sowden-Mehta	01303 275128
Deputy Designated Safeguarding Lead Family Liaison Officer	Mrs Buckle	01303 275128
Other Members of Safeguarding Team Vice Principal SENDCo	Miss Barrow Mrs Palmer	01303 275128
Nominated Governor for Safeguarding and Child Protection	Mrs Brown	clerk@turnerschools.com
Chair of Governors Martello Primary and Morehall Primary	Mrs King	clerk@turnerschools.com

TURNER FREE SCHOOL		
Designated Safeguarding Lead (Vice Principal)	Mr Chapman	01303 842400
Deputy Designated Safeguarding Leads Principal Senior Pastoral Leader SENDCo	Mrs Yates Miss Tyler Miss Baker	01303 842400
Nominated Governor for Safeguarding and Child Protection	Mrs Luke	clerk@turnerschools.com
Chair of Governors	Mrs Luke	clerk@turnerschools.com

Any concerns relating to a Principal or member of the central team should be escalated to the Senior DSL – Mr S Murphy.

Concerns about Mr Murphy in respect of safeguarding should be referred to the Chief Executive Officer – Dr. J Saxton

TURNER SCHOOLS CENTRAL TEAM		
Senior Designated Safeguarding Lead Deputy Chief Executive Officer	Mr S Murphy	clerk@turnerschools.com 01303 842400
Chief Executive Officer	Dr J Saxton	ceooffice@turnerschools.com 01303 842400

Other Contacts

Channel Referral Contact Details Prevent and Channel Strategic Manager nick.wilkinson@kent.gov.uk	Nick Wilkinson	03000 417201 07785 341727
NSPCC Whistleblowing helpline		0800 028 0285