Safeguarding and Child Protection policy

ADOPTION AND AMENDMENTS TO SAFEGUARDING AND CHILD PROTECTION POLICY

Section	Board of Directors Meeting or Committee
Whole Document	Board of Directors, May 2018
Legislation/advice reference update (P4); Staffing updates Sept'18	n/a
Whole Document	Board of Directors, July 2019
Middleton Primary School Safeguarding & Wellbeing Governor update	n/a; Updated 20/09/2019
Whole Document	Board of Directors, July 2020
Whole Document	Board of Directors, July 2021
Oakgrove School Safeguarding & Wellbeing Governor update	n/a; Updated 07/09/21; 19/10/21
Whole Document	Board of Directors, July 2022
Oakgrove School Safeguarding & Wellbeing Governor update	n/a; 28/09/2022
Oakgrove School – change of deputy safeguarding lead	n/a; 25/04/2023
Whole Document	Board of Directors, July 2023
Whole Document – Hockliffe joining Trust	Board of Directors, December 2023
Interim review – to incorporate Willow Grove and edits for consistency	Board of Directors, March 2024
Kents Hill Park School – update to DSL and Deputy DSL	n/a; 17/05/2024
Whole Document	Board of Directors, June 2024
Fulbrook School information included wef 01/09/2024	n/a; 04/09/2024; 19/09/2024
Oakgrove School – change of Safeguarding Governor (P9)	n/a; 07/10/2024
Contact details for Local Authorities updated (p13) Middleton Primary School – update to school contacts (P9)	n/a; 28/02/2025
Fulbrook School – update to school contacts (P8)	n/a; 30/04/2025
Whole Document	Board of Directors, July 2025
Email update (P9); Clarification of procedure (bottom of page 13)	n/a; 29/08/2025
Interim review – Photograph clarification (page 18)	11/12/2025
Contact details updated for Middleton Primary School	13/01/2026
Whole Document	16/07/2026
Whole Document updated following final KCSIE changes and Restrictive Interventions Guidance 2026 (interim review)	9/09/2026 out of committee via Governor Hub
Next review: 2026/2027	

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KINGSBRIDGE EDUCATIONAL TRUST (KET): THE CONTEXT OF EACH SCHOOL

FULBROOK SCHOOL

Fulbrook is located in Woburn Sands, Bedfordshire. It joined the Trust in 2024. Fulbrook is a Year 5 to Year 11 school and therefore unique within the Trust and the local area. At the heart of the local community, Fulbrook's vision is that every single young person who joins the school is offered all the opportunities to Learn, Experience and Achieve what they need and want, to build a fulfilled life. Fulbrook is a joyful, kind and hard-working community, where students enjoy learning, and flourish in an inspiring environment.

HOCKLIFFE LOWER SCHOOL

Hockliffe Lower School is a small, friendly village school, set in the attractive Bedfordshire countryside. Hockliffe Lower school joined the Trust in 2023.The beauty of the school grounds provides a wide range of outdoor areas, which are a source of inspiration for our children's learning. It is an inclusive school that values, nurtures and supports each and every child. Some pupils need additional support or challenges to achieve and succeed - in understanding that, equality does not mean treating every child in the same way. Every pupil in Hockliffe follows the Meerkat Principles and learning behaviours to enable them to make positive life and learning choices, so that they can succeed in the future.

KENTS HILL PARK SCHOOL

Kents Hill Park was opened in 2018 in Milton Keynes. It is an all-through (4-16 years) school and strives to provide education for all, acknowledging that the society in which we live is enriched by diversity. We recognise and celebrate the diversity within our school community where everyone is equally valued and treats one another with respect, fairness and dignity. The school's ethos is 'confident, independent, forward thinking' and has always been built around high academic expectations and traditional values. We expect every member of our community to work hard and be kind.

MIDDLETON PRIMARY SCHOOL

Middleton Primary School is in Milton Keynes. The core values at Middleton School are 'Resilience; Empathy; Self-awareness; Positivity; Excellence; Communication and Teamwork'. We regularly teach and model these values, along with the core British Values and we believe that this empowers the children to be effective learners and good citizens. The values help pupils develop their character, to know that individual differences should be valued, to be resilient and to have empathy and respect for one another. Middleton Primary is consistently one of the highest performing schools in Milton Keynes as well as in the top 100 in the country.

MONKSTON PRIMARY SCHOOL

Monkston Primary School first opened in 2001 in Milton Keynes. Monkston Primary strives to create a very special community, in which pupils and staff feel challenged to contribute at the highest level and feel valued for their efforts. School staff are determined to provide the very best pastoral care and the very best learning opportunities for all pupils, as they progress through our school; working in strong partnership with parents and carers. Monkston Primary School's pupils have devised the 'Monkston Values', which they believe are important to being a great citizen, these include integrity, compassion, resilience, collaboration, respect and curiosity.

OAKGROVE SCHOOL

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Oakgrove School, an 'all-through' 3-19 years school at the heart of learning, proudly serving our local community in Milton Keynes. Oakgrove School was established in 2005, and the school built its ethos around its core values of 'Excellence, Innovation and Respect'. The Primary and Nursery opened in September 2016. Our shared vision is to enable learners in our all-through school to achieve the highest levels of academic progress. All students have the opportunity to demonstrate excellence in all areas of school life, enjoy innovation centred on teaching and learning, and exhibit the highest levels of respect in our school community. Oakgrove school is consistently one the highest performing schools in Milton Keynes.

WILLOW GROVE PRIMARY SCHOOL

Willow Grove Primary School is a dynamic learning community with high standards of behaviour, academic excellence and creativity at its core. It is a newly built school opening in September 2024 in the new development of Wixams, Bedford and is not yet at full capacity. Through rigorous academic standards, school staff prepare pupils for success in a rapidly changing world. The school's vision and ethos is 'Be Creative, be Authentic, Be Your Best'. The aim is to develop intrinsic motivation for a lifelong love of learning.

1. STATEMENT OF INTENT

Safeguarding is **everybody's responsibility** and Kingsbridge Educational Trust (KET) is committed to the vital contribution we all make to safeguard our pupils, staff and visitors, and to a culture of vigilance. We recognise that all adults, including teaching and support staff, temporary staff (ancillary, supply, self-employed staff, contractors) volunteers, governors and visitors, have a full and active role to play in protecting our pupils from harm. The child's welfare is our paramount concern.

We aim to ensure that child protection concerns and referrals are handled sensitively, professionally and in ways that support the specific needs of the individual child. Through providing a caring, safe and stimulating environment which promotes the social, physical and moral development of all our pupils, we aim to foster an atmosphere of trust, respect and security.

We recognise that, for children, high self-esteem, confidence, risk awareness, independence and good lines of communication help to reduce risks. We recognise that, for some children, school may be the only stable, secure and consistent environment in their lives.

The aims and purpose of this policy are:

- To provide an environment in which pupils feel safe, secure, valued, respected and confident. They should know how to approach adults, if they are in difficulties, and know that they will be effectively listened to.
- Through regular training and updates, to raise the awareness of all teaching and non-teaching staff of the need to safeguard pupils and of their responsibilities in the early help process of identifying and reporting possible cases of abuse.
- To provide a systematic means of monitoring pupils known or thought to be at risk of harm, and ensure the Trust and the individual school contribute to assessments of need and support packages for those children.
- To emphasise the need for good levels of communication between all members of staff and between staff and governors.
- To develop a structured procedure within each individual school, which will be followed by all members of the school community in cases of suspected abuse.

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- To develop and promote effective working relationships with parent/carers and other agencies, especially the Police, PREVENT, Health Care providers (CAMHs, GPs), Social Care, Milton Keynes Council, Central Bedfordshire Council and Bedford Borough Council.
- To ensure that all governors and all staff employed within our school, who have access to pupils, have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory DBS check (*Protection of Freedoms Act 2012*) and a central record is kept for audit.
- To ensure that any contractors or visitors to the school are always accompanied whilst on site, unless they are regular visitors and therefore have had the necessary DBS checks.

The policy is consistent with all the Kingsbridge Educational Trust (KET) school policies adopted by the Local Governing Bodies and should be read in conjunction with the KET Code of Conduct policy, the KET Whistleblowing policy and each school's Behaviour Policy.

2. DEFINITIONS THAT STAFF NEED TO KNOW

Safeguarding and promoting the welfare of children is defined 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 and ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children and taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework. *(Working Together to Safeguard Children and Keeping Children Safe in Education)*

Child protection is a part of safeguarding and promoting welfare. This refers to activity that is undertaken to protect specific children who are suffering or likely to suffer significant harm. *(Keeping Children Safe in Education)*

Early Help means providing support as soon as a problem arises to assist families and young people before their needs become acute and social care or other specialist intervention may be necessary. This can be as simple as; an adult listening to and giving some quality time to a child, providing some breakfast or a drink if the child is hungry or thirsty. A quick catch up with a parent/carer is often enough, but we recognise that we might need to speak to the Multi-Agency Safeguarding Hub (MASH) / Integrated Front Door (IFD) for advice before talking to parents/carers or to ask which service would be the most appropriate to signpost them towards.

We might need to liaise with medical staff or specialist teaching staff to ensure that we are providing appropriate care and personalised learning opportunities that will allow the child to feel safe and cared for.

Any child may benefit from universal services and community-based **Early Help**, or the **Targeted Early Help** level of **Family Help**, but all school staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs

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- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is pregnant or a parent themselves
- 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 education, home or care
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, or is in Alternative Provision
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation (CCE/CSE)
- is at risk of being radicalised into terrorism
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child*. (Keeping Children Safe in Education)*

We ensure that children are nurtured through a curriculum which helps them to develop as an individual, as part of a family and as part of a community, with British values.

The close monitoring of attendance, lateness, general appearance, behaviour and disposition make sure that all staff are in a position to identify children who may benefit from early help.

All Kingsbridge Educational Trust staff are made aware that abuse, neglect, exploitation 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.

All staff should be aware of the indicators of abuse, neglect, exploitation and modern slavery, understanding that children can be at risk of harm inside and outside the home, and online. Children may also cause harm to other family members, often referred to as child-to-parent or caregiver abuse. Staff should recognise and respond to this as a safeguarding concern where appropriate
Staff should exercise **professional curiosity** and know what to look out for as this is vital for the early identification of abuse and neglect and be able to offer support for a child in need of help or protection.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children*. (Keeping Children Safe in Education)*

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

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a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. *(Keeping Children Safe in Education)*

Emotional abuse: the persistent emotional maltreatment of a child, such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include verbal abuse, such as the persistent criticism, belittling, or name-calling as well as not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child 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. *(Keeping Children Safe in Education)*

Sexual abuse: Sexual abuse involves forcing, causing or inciting a child to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact such as acts of penetration, whether that is with part of a person's body or an object, and non-penetrative acts such as masturbation, kissing, rubbing and touching over clothing. Sexual abuse may also include non-contact activities, such as involving children in looking at or in the production of sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online as well as offline. *(Keeping Children Safe in Education)*

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

Risk factors for Abuse:

Not all children may feel ready or know how to tell someone that they are being abused, exploited or neglected or they may not recognise their experiences as harmful. For example, they may feel embarrassed, humiliated or are being threatened. This could be due to their vulnerability, disability, and/or sexual orientation or language barriers. This should not prevent staff from having that **professional curiosity** and speaking to the Designated Safeguarding Lead if they have concerns about a child.

Safeguarding incidents and /or behaviours can be associated with factors outside the school and/or can occur between children outside the school. **All staff**, but especially the Designated Safeguarding Lead (or deputy DSL) should consider whether children are at risk of abuse or exploitation in situations outside their families. This is known as **contextual safeguarding**, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. **Extra-familial** harms take a variety of different forms and children can be vulnerable to multiple harms

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including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. *(Keeping Children safe in Education).*

The following behaviours and indicators can be signs that children are at risk:

- drug taking and or/alcohol misuse
- unexplainable and/or persistent absences from education
- serious violence, criminal exploitation (including that linked to county lines) and radicalisation
- consensual and non-consensual sharing of self-generated intimate images including those generated using AI e.g. deepfakes and/or videos
- children on part-time timetables, repeatedly removed from the classroom and/or experiencing multiple suspensions
- risk of exploitation – child sexual exploitation or child criminal exploitation.

More details of typical signs of abuse and of other risks that children and adults can experience can be found in the appendix to this document.

3. WHAT STAFF SHOULD BE AWARE OF

Staff need to be aware that children can abuse other children (**child-on-child abuse**) it can happen both inside and outside of school. All staff need to understand that even if there are no reports in their schools it does not mean it is not happening. Staff need to be alert to when children might be at highest risk around the school day.

Particular vigilance will be exercised in respect of pupils who are subject to a **Child Protection Plan** (section 47), this also includes the **ROTH pathway for Child Protection** (Risk Outside The Home) for Milton Keynes MASH, **Child in Need** (section 17) **or Children who are Looked After** (CLA). Any incidents or concerns involving these pupils must be reported immediately to the Designated Safeguarding Lead (DSL) and will be reported to the allocated Social Worker.

If a pupil discloses that they have seen, heard or experienced **domestic abuse**, or it is suspected that they may be living in a household which is affected by family violence, this will be referred to the Designated Safeguarding Lead (DSL) or the Deputy Designated Safeguarding Lead (DDSL) as a safeguarding issue of emotional abuse. Domestic abuse can also include teenage sexual relationship, physical and emotional abuse, stalking as well as financial exploitation. **Operation Encompass** helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the DSL) in school to ensure the school can enable support to be given to the child according to their needs.

We will always ascertain the views and feelings of all pupils. Kingsbridge Educational Trust acknowledges the additional need for support and protection of pupils who are vulnerable by virtue of **disability, having a particular Special Educational Need and/or an EHCP, homelessness, refugee/asylum seeker status, the effects of substance abuse within the family, young carers, mid-year admissions, pupils where English is an additional language,** (particularly for very young pupils, using the translation service if necessary), **at risk of trafficking, modern slavery, child sexual or child criminal exploitation and radicalisation.** Staff should also recognise that children who have, or have previously had, a social worker may face additional safeguarding and educational vulnerabilities and require enhanced pastoral support.

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Children are also increasingly being exploited and trafficked to sell drugs in rural towns and cities. Known as **county lines.** Another form of exploitation is cuckooing, which refers to the practice where criminals take over a vulnerable person's home though force, deception or coercion to use it as a base for illegal activities such as dealing drugs, storing weapons or running brothels. A child cannot give control of their home away. In law, they will be viewed as a victim if cuckooing occurs.

We acknowledge that pupils who are **affected by abuse, neglect or exploitation** may demonstrate their needs and distress through their words, actions, behaviour, demeanour, or work. Kingsbridge Educational Trust has a strong commitment to an anti-bullying policy **and will not tolerate any form of bullying or harassment.** Kingsbridge Educational Trust will consider all coercive acts and inappropriate **child-on-child** behaviour and sexual activity within a Child Protection context. Staff need to recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and simply not reported.

All Staff must consider the additional safeguarding challenges **SEND children** face and the potential barriers to identifying abuse and neglect in this group of children, including assumptions that indicators of abuse such as behaviour, mood and injury relate to the child's disability without further exploration. There is a potential for children with SEND or **certain medical conditions** being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs. These children can be more prone to peer group isolation or bullying (including prejudice-based bullying) than other children and have communication barriers and difficulties in managing or reporting these challenges. To help overcome these challenges schools provide additional pastoral support (such as key, or one-to-one, workers) and attention for these children working with them closely helps know their individual needs and potential barriers.

Children who are **LGBTQ+** can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQ+ can be just as vulnerable. Risks are often compounded where children who are LGBTQ+ lack a trusted adult. Staff must endeavour to reduce the additional barriers faced and provide a safe space for children to speak out and share their concerns.

Staff should recognise that prejudice-based harm, including racism, faith-based prejudice, misogyny, misandry and other discriminatory behaviour, may significantly impact on a child's welfare, wellbeing and sense of safety and should be considered within safeguarding practice where appropriate.

All staff should also be aware that **mental health problems** can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, 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.

Where it comes to our notice that a child under the age of 13 is, or may be, **sexually active**, whether or not they are a pupil of this Trust, this will result in an immediate referral to MASH/IFD. In the case of a young person between the ages of 13 and 16, MASH/IFD will be contacted for advice to determine how and when information will be shared with parents and the investigating agencies.

The law requires that Milton Keynes Council, Central Bedfordshire Council or Bedford Borough Council are notified of **private fostering** arrangements. Any privately fostered pupils, i.e. pupils under the age of 16 (under 18, if disabled) who are cared for 28 days or more by someone who is not their parent or a close

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relative, that come to our attention will be referred to Children's Services, for them to check the arrangement is suitable and safe for the child. Close relatives are defined as step parents, grandparents, brothers, sisters, uncles or aunts (whether of full blood, half blood or by marriage).

In the Local Authority guidance, **Children Missing in Education (CME)** is defined as Children of compulsory school age whose whereabouts and circumstances **are known** to the Local Authority but who have, for whatever reason, been out of education for 20 school days or more or children of compulsory school age whose whereabouts and circumstances **are unknown** to the Local Authority.

Following reasonable enquiry, if the child's whereabouts are unknown, a referral should be made to the Children Missing Education team. The KET schools must inform the Local Authority CME team when:

- A child on roll fails to attend without explanation, or
- A child who is expected to join a school fails to start

If a child is not attending school and/or has not been seen in school for 3 days without a reasonable reason for the absence, then the KET school must conduct a welfare check. This can be a face-to-face home visit, a telephone call with the child, or an online visual meeting. If absence continues for a prolonged period of time, then welfare checks should be conducted regularly (perhaps every two weeks). *Refer to the school's attendance policy for more details.*

Schools have an obligation to safeguarding **children who are questioning their gender**. These children may need sensitive and thoughtful involvement from their school and together with appropriate parental involvement and attention to any clinical input, the school's involvement can help to avoid safeguarding issues arising. Guidance in this area must be focused on the best interests of the child as well as the legal duties of the school *(Keeping Children Safe in Education)*. KET schools provide separate toilets for the opposite biological sex (boys and girls aged 8 years and over), staff do not allow children into toilets designated for the opposite biological sex (this includes where schools are responding to a request to support any degree of social transition for children who are questioning their gender). Schools can consider whether they can provide an alternative toilet facility for children who do not want to use the toilet designated for their biological sex. Where a KET school provides mixed-sex toilets in addition to single-sex toilets, these are open directly onto public areas such as a corridor.

More details of risks that children and adults can experience can be found in the appendix to this document.

4. ROLES AND RESPONSIBILITIES

We recognise that all staff, regardless of their role, have a duty to safeguard children and promote their welfare. Our policy applies to the whole school community: all teaching and non-teaching staff, governors, trustees, pupils and volunteers and visitors working in the school. The Board of Directors and Designated Safeguarding Leads (DSLs) will have particular responsibility for safeguarding and child protection within the school, this also includes online safety and understanding the filtering and monitoring systems and process in place, for instance Fortigate, and /or Impero/Classroom Cloud. There should be regular training for all staff and induction for new staff, to ensure these responsibilities are known. All governors and trustees will receive safeguarding and child protection training (including online safety) on induction and regular updates thereafter to enable effective strategic challenge.

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All adults working within the Kingsbridge Educational Trust (including governors, visiting staff, volunteers and pupils on placement) are required to report instances of actual or suspected child abuse, neglect or exploitation to the Designated Safeguarding Lead (DSL) in each school:

- The Kingsbridge Educational Trust Safeguarding Trustee is **Cathy Cornes.**
- The Kingsbridge Educational Trust Safeguarding Director is **Emma Harris.**

School/Role	Designated Safeguarding Lead (DSL)	Deputy DSL (DDSL)	Prevent (SPOC)	Mental Health Lead	Online Safety Lead	Safeguarding governor
Fulbrook	**Jon Wall** (Deputy Headteacher)	**Simon Thomas** (DT & Computing Subject Leader; MIS Manager & EVC) **Collette Waters** (Deputy DSL)	**Jon Wall** (Deputy Headteacher)	**Jon Wall** (Deputy Headteacher)	**Simon Thomas**	**Clive Cowmeadow**
Hockliffe Lower School	**Amelia Makinson** (Head of School)	**Christine Carter** (SENDCO) **Helen Mulberry**	**Amelia Makinson** (Head of School)	**Helen Mulberry** (Deputy DSL)	**Amelia Makinson** (Head of School)	**Marisa Smart**
Kents Hill Park Primary and Nursery	**Emma Harris** (Assistant Headteacher)	**Katy Tough** (Deputy Headteacher)	**Emma Harris** (Assistant Headteacher)	**Emma Harris** (Assistant Headteacher)	**Emma Harris** (Assistant Headteacher)	**Gary Taylor**
Kents Hill Park Secondary	**Emma Harris** (Assistant Headteacher)	**James Pilgrim** (Headteacher)	**Emma Harris** (Assistant Headteacher)	**Emma Harris** (Assistant Headteacher)	**Emma Harris** (Assistant Headteacher)	**Gary Taylor**
Middleton Primary	**Kim Young** (DSL and attendance officer)	**Ellis Higgs** (deputy Headteacher)	**Kim Young** (DSL and attendance officer)	**Kim Young** (DSL and attendance officer)	**Cameron Restall**	**Sam Summers**
Monkston Primary	**Hannah Williams** (Headteacher)	**Lauren Hamer** (Senior Assistant Headteacher)	**Hannah Williams** (Headteacher)	**Gaby Wood / Hannah Williams**	**Tori Priestly** (Computer Lead)	**Jon Everitt**
Oakgrove Primary and Nursery	Moyo Beckley (DSL)	**Verity Walsh** (Assistant Headteacher) Sue Vickers (Deputy Headteacher)	**Verity Walsh** (Assistant Headteacher)	Hannah Radley (KS2 Pastoral Lead)	**Charlie James**	**Mark Taylor**
Oakgrove Secondary	Moyo Beckley (DSL)	**Ben Robinson** (KS3 Lead) **Georgina Smith** (KS4 Lead)	**Caroline Forster** (Head of Year)	**Nicola Irwin-Morris** (Head of School)	**Vusa Ndlovu**	**Mark Taylor**
Willow Grove	**Lisa Kennedy** (Headteacher) **Clare Ward** (Assistant Headteacher)	**Lisa Kennedy** (Headteacher)	**Clare Ward** (Assistant Headteacher)	**Clare Ward** Assistant Headteacher)	**Clare Ward** (Assistant Headteacher)	**Michelle Allen**

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Designated Safeguarding Lead contact details for each Kingsbridge Educational Trust School:

School	Telephone	Email
Fulbrook	01908 582022	safeguarding@fulbrook.school
Hockliffe Lower School	01525 210330	office@hockliffelowerschool.co.uk
Kents Hill Park Primary	01908 533290	safeguarding@kentshillpark.school
Kents Hill Park Secondary	01908 533290	safeguarding@kentshillpark.school
Middleton Primary	01908 604851	kim.young@middletonschool.org office@middletonschool.org
Monkston Primary	01908 671034	safeguarding@monkston.org office@monkston.org
Oakgrove Primary	01908 545300	mbeckley@oakgrove.school svickers@oakgrove.school vwalsh@oakgrove.school oakgrove@oakgrove.school
Oakgrove Secondary	01908 545300	brobinson@oakgrove.school mbeckley@oakgrove.school gsmith@oakgrove.school oakgrove@oakgrove.school
Willow Grove	01234 581150	lkennedy@willowgrove.school cward@willowgrove.school

The role of the Designated Safeguarding Lead in each school is as follows:

- Ensuring that child protection procedures are in place and updated as appropriate.
- Ensuring that all staff are aware of KET's policy and procedures and the policy is available to the public on each individual school's website.
- Being available to provide advice/support to staff for confidential discussions about concerns.
- Being available to provide support to pupils.
- Promote supportive engagement with parents/carers including where families may be facing challenging circumstances.
- Liaison with the Headteacher to keep him/her informed regarding child protection procedures.
- Liaison with Social Services, Milton Keynes Council/Central Bedfordshire Council/Bedford Borough Council, MASH (MK Multi-Agency Safeguarding Hub) or the IFD (Integrated Front Door (previously known as MASH) for Central Bedfordshire and Bedford Borough) and other relevant agencies.
- Liaise with the Mental Health Support Team, where safeguarding concerns are linked to mental health.
- Ensuring any concerns/suspected cases of abuse/referrals are recorded on MyConcern (electronic platform) in the appropriate manner and detail, even if there is no need to make an immediate referral to external agencies.
- Ensuring that all records are kept confidentially, securely and on a need to know basis. These records are separate from pupil records, until the child's 25th birthday and are copied onto the child's next school or college.
- Being the first point of contact for external agencies who are pursuing Child Protection investigations or school checks.
- Co-ordinating arrangements through MyConcern for monitoring of pupils on roll who have been identified as being in need of protection via Early/Community Help, Early Targeted Help, Child in Need and Child Protection.

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- Co-ordinating the school's representation at Child Protection conferences and Core Group meetings and the submission of written reports for conferences.
- Keeping an up to date list of all pupils on the Child Protection register.
- Keeping an up to date list of Children Looked After (CLA)
- Ensuring that any pupil currently on the Child Protection register, who is absent from school without explanation for two days, is referred to Social Services.
- Ensuring that the DSL and DDSLs undertake formal safeguarding training at least every two years and refresh their knowledge and skills regularly and at least annually
- Ensuring that all relevant staff (and Governors/trustees) have up-to-date training on safeguarding issues including Signs and Types of abuse, FGM, Prevent, CSE/CCE, Online Safety, Domestic Violence, Mental Health (this list is not exhaustive).
- Conducting safeguarding inductions to new staff who join the school mid-year.
- Ensuring that staff receive regular safeguarding updates.
- To have an understanding of the school's filtering and monitoring systems for online safety.
- Meeting with the school's Safeguarding Governor and produce safeguarding reports to governors.
- Meeting termly with the KET Designated Safeguarding Director. A report of the meeting is given to the KET Safeguarding Trustee.
- Ensuring that all necessary reports to the school's Local Authority are completed and compliant.

5. SUPPORTING PUPILS AND STAFF

We recognise that a child who is abused or sees, hears or experiences violence may find it difficult to develop and maintain a sense of self-worth.

- We recognise that a child in these circumstances may feel helpless and humiliated
- We recognise that a child may feel self-blame
- We recognise that the KET school may provide the only stability in the lives of pupils who have been abused or who are at risk of harm
- We accept that research shows that the behaviour of a pupil in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

Kingsbridge Educational Trust will support all pupils by:

- Encouraging high self-esteem and self-assertiveness and not condoning acts of aggression or bullying
- Promoting a caring, safe and positive environment within the KET schools
- Liaising and working together with all other support services and those agencies involved in the safeguarding of pupils (Multi-agency approach)
- Notifying Social Services via the designated member of staff if there is a significant concern
- Providing continuing support to any pupils of concern who leave a Kingsbridge Educational Trust school, by ensuring the appropriate information is forwarded under confidential cover to the new site of education.
- Providing individual, and often bespoke, support strategies such as corridor cards, mentoring, buddies, external specialist agencies.

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Kingsbridge Educational Trust recognises that staff working in the school who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting. We will support such staff by providing an opportunity to talk through their anxieties with the DSL and seek further support as appropriate.

6. STAFF RESPONSIBILITIES IN HANDLING DISCLOSURES

All staff should be aware that children may not feel ready or know how to tell someone they are being abused, exploited or neglected and/or they may not recognise their experiences as harmful. Children may feel embarrassed, humiliated or are threatened 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. It is important staff build trusted relationships with children which facilitate communication.

Staff need to be aware of **trauma informed practice** and **ACEs (Adverse Childhood Experiences)** which refer to potentially traumatic events that occur during childhood and can have a lasting negative impact on a child's well-being and development. Understanding a child's complexities of behaviour, forming healthy relationship and their ability to regulate is crucial to support and safeguard them.

Staff must take into account **adultification** which is a type of bias that skews the perception of certain children leading to professionals viewing them as more grown up than their peers which can lead to lapses in safeguarding and unfair treatment. Staff must also be aware of their own **unconscious bias**. This is when bias can influence which people are offered support and the support is delivered. Individuals might not receive the appropriate cultural or linguistic support if biases lead to assumptions about their needs or their relevance of their cultural back ground in safeguarding scenarios. All staff and pupils within the Trust are equal and we celebrate our cultural diversity.

If a pupil begins to confide any matter involving alleged abuse, or neglect, whether physical, emotional or sexual, to a member of staff, they should follow the following guidelines:

- Don't make any promises to the pupil
- Stay calm and re-assuring
- Explain that you cannot promise to keep what they tell you as a secret. This is in their own interest, as you may have to inform the Designated Safeguarding Lead (DSL)
- Listen to the child rather than directly question them
- Do not press them for details or ask leading questions
- Ask the pupil if they have told anyone else
- Write a detailed account, in the pupil's own words, dated, timed and signed
- Inform the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead, this may be done via a face to face conversation but must also be uploaded onto MyConcern as this may be needed as evidence in court.
- Assure the pupil that they have done the right thing and you know how difficult it is to talk about such experiences.

The key task at this moment is to listen to the pupil, not to interrupt while he or she is freely recalling significant events and to make a note of all that is said, which is to be passed to the designated member of staff. Staff

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should also be aware that noted recordings of the discussion may need to be used in any subsequent court proceedings and may be made available to the pupil's parents/carers at the Child Protection conference.

The welfare of the pupil is paramount; therefore, all situations must be treated with sensitivity. The teacher should not reveal his/her own feelings to the pupil.

7. REPORTING AND RECORD KEEPING

When an individual concern, or incident is seen by, or brought to the attention of, a member of staff it is reported using the secure electronic platform of **MyConcern**. This automatically raises a notification email to the DSL team in the school, who will action early help intervention/advice for the child and/or family. When considering appropriate actions, the views and wishes of the child are taken into account, but staff will be alert to the dangers of colluding with secrets.

All staff are trained to use and report concerns using MyConcern. Reports should be objective and based on evidence and should distinguish between fact, observation, allegation and opinion. The note should record the time, place and people present as well as what was said. Supporting evidence (letters, pupil work, pupil statements, meeting minutes, including those from Social Care) can be uploaded to specific cases.

Some members of SLT who are DSL trained have heightened access to their school's MyConcern data base of cases.

The Designated Safeguarding Lead (DSL) and the Deputy Designated Safeguarding Lead (DDSL) in each Trust school have full access to all information on their MyConcern data base.

The Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025 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.

If a referral is determined as the appropriate action, the DSL will either contact MASH (Multi-Agency Safeguarding Hub) or the IFD (Integrated Front Door) for either Milton Keynes, Central Bedfordshire or Bedford Borough, for telephone advice from the duty desk team, or complete a MARF (Multi-Agency Referral Form in Milton Keynes, or a BIC100 form for Central Bedfordshire and Bedford Borough) and/or an EHA (Early Help Assessment) and send it via secure electronic mail to the relevant MASH or the IFD. MASH ~~or~~ /IFD/DSL will determine the **levels of need** and Family Help support and/or appropriate agency services

These services can be provided at:

- Targeted Early Help (under Section a 10 and 11 of the Children's Act 2024)
- Statutory services delivered under a Section 17 of the Children's Act 1989: Children in Need (CIN)
- Statutory services delivered under Section 47 of the Children's Act 1989: Child Protection (CP).
- Statutory services delivered under Section 31 of the Children's Act 1989: Care and Supervision orders
- Statutory services delivered under Section 20 of the Children's Act 1989: duty to accommodate a child

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Local Authority	Contact Details
Bedford Borough (Willow Grove)	Children's Social Care: Integrated Front Door (IFD) Tel: 01234 718700 (office hours) Tel: 0300 300 8123 (out of office hours to access the Emergency Duty team) Portal access for a referral: https://www.bedford.gov.uk/social-care-and-health/children-and-families/safeguarding-children-harm-and-child-protection-0
Central Bedfordshire (Fulbrook, Hockliffe Lower)	Children's Social Care: Integrated Front Door (IFD) Tel: 0300 300 8585 (office hours) Tel: 0300 300 8123 (out of office hours to access the Emergency Duty Team) Email: for professionals reporting only IFD@centralbedfordshire.gov.uk
Milton Keynes (Kents Hill Park, Middleton, Monkston, Oakgrove, Fulbrook).	Children's Social Care: Tel: 01908 253169 or 253170 (office hours) Tel: 01908 265545 (out of office hours to access the Emergency Duty Team) Email: children@milton-keynes.gov.uk

The DSL team would usually inform parents or carers (and the child depending on their age and level of understanding) that they are going to make a referral. However, if the concern involves alleged or suspected child sexual abuse, FGM, honour-based abuse, fabricated or induced illness or where the DSL has reason to believe that informing the parent at this stage might compromise the safety of the child or a staff member, nothing should be said to the parent/carer ahead of the referral. Rationale of this decision must be noted on the referral form.

The DSL team must be confident to challenge decisions made by MASH/IFD and other agencies if they feel that a child remains in need, or at risk. Staff and DSLs will utilise local escalation procedures where concerns remain unresolved or where decisions made by another agency do not appear to adequately safeguard the child.

Any child protection referral process should not delay any administration of first aid or emergency medical assistance. If a child is thought to be at immediate risk, perhaps because of parental violence, intoxication, substance abuse, mental illness or threats to remove the child from the school, urgent Police involvement will be requested.

Teachers/the DSL have a legal duty to report to Social Services/Police (by calling 101 immediately) all suspected incidents where:

- a child sustains physical injury or is distressed as a result of reported chastisement, or
- alleges that they have been chastised by the use of an implement or substance,

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- there is evidence to suggest that the child is suffering/has suffered through Child Sexual Exploitation, Female Genital Mutilation, Forced Marriage, Honour Based Violence, Domestic Abuse or Child Abuse through faith or belief or radicalisation.

The DSL must also consider whether any incident involving sexual harassment via child-on-child abuse should be reported to the Police/Social Services.

If a teacher has any suspicion that any of these incidents listed may have occurred, they must report this immediately to the Designated Safeguarding Leads (DSLs). Some KET schools have produced a very clear and direct letter to parents/carers explaining the legal position on child abuse and specifically addressing the question of physical chastisement. The letter is available on the schools' websites.

Whilst pupils are participating in trips and visits, including residential trips, the Kingsbridge Educational Trust Safeguarding Policy will apply. Direct contact details of the DSL or a senior member of staff will be available for direct reporting or advice whilst on the trip.

Parents/carers will be encouraged to report incidents where they suspect a child is being treated badly or not looked after properly to the school. In situations where pupils sustain injury or are otherwise affected by an accident or incident whilst they are the responsibility of the Trust, parents will be notified as soon as possible and in all cases within 24 hours.

8. THE TRANSFER OF CHILD PROTECTION FILES

When pupils transfer from one educational establishment to another, either at the normal transfer stage or as a result of a move, and records of child protection/welfare concerns exist. Child protection files will be transferred within five school days for in-year transfers or within the first five school days of a new term. Receipt will be obtained and recorded.

The DSL/DDSL or member of the pastoral team should share any information indicating a child may pose a risk to themselves or others, by speaking directly with the DSL/DDSL or pastoral team member of the receiving school. This transfer should be arranged separately from the main pupil file in line with the DfE guidance *Keeping Children Safe in Education*. If pupils are transferring between the KET schools, safeguarding or child protection records will be securely transferred electronically via MyConcern.

Where pupils are dual registered (e.g. on roll at a mainstream school, but receiving education in another establishment), any existing child protection records should be shared with the new establishment prior to the child starting, to enable the new establishment to risk assess appropriately.

It is important that all child protection records are transferred at each stage of a child's education, up until the age of 18, or in some cases, beyond. The responsibility for transfer of records lies with the originating setting, as the receiving setting might not otherwise know that child protection concerns exist.

If a pupil joins a KET school in-year, a letter is sent to the originating setting for confirmation of any current/past safeguarding concerns. A receipt is retained and dated.

9. SAFE SCHOOL, SAFE STAFF (SAFER RECRUITMENT)

We will maintain an environment in which children feel safe and learn, develop and have a voice by:

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- Ensuring that our building and site are secure and that visitors to the KET schools are properly checked and supervised.
- Having a Health & Safety policy (policy may differ between schools) and procedures and ensuring that they are understood by all staff.
- Ensuring that all staff are risk aware and routinely conduct risk assessments, as appropriate to their individual role and responsibilities and to the activities undertaken. This will include risks within the wider school environment and any CP/Safeguarding issues will be considered both on site and when off-site, for example, planning day visits, fixtures and residential visits.
- Having policies for dealing with behaviour, bullying and racist and other discriminatory incidents (*KET Code of Conduct policy*) and ensuring that staff adhere to these policies and promote the principles of value, respect, excellence, tolerance, equality and acceptable behaviour amongst our pupils (*Behaviour Policy* for each KET school).
- Ensuring that all staff, governors, volunteers and regular visitors are made aware of, and work in accordance with, the current Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings, together with the Trust Code of Conduct.
- Operating safer recruitment procedures in each school, ensuing that there is at least one person on every recruitment panel that has completed Safer Recruitment training.
- Subjecting all staff and governors recruited by Kingsbridge Educational Trust to appropriate identity, qualification and eligibility checks. References will be verified and appropriate criminal record checks (Disclosure and Barring Services (DBS) checks), barred lists checks and prohibition checks will be undertaken. The level of DBS check required will depend on the role and duties of an applicant to work in a KET school, as outlined in Part Three of the DfE guidance *Keeping Children Safe in Education.*
- Only using employment agencies which can demonstrate that they actively vet their supply staff. We will report any alleged misconduct by temporary or agency staff to the employment agency concerned and to the Local Authority.
- Ensuring staff joining a Kingsbridge Educational Trust school receive a copy of this policy, the school's Behaviour policy, the Code of Conduct policy and the latest copy of Keeping Children Safe in Education document as part of their induction.
- Ensuring that any parent or other person/organisation engaged by Kingsbridge Educational Trust to work in a voluntary capacity with pupils is subjected to all reasonable vetting procedures and Criminal records Checks, including DBS checks.
- Ensuring that any young person undertaking work experience in our schools is safeguarded and supervised in accordance with the guidance in *Keeping Children Safe in Education*. There will be one member of staff in each school responsible for coordinating work experience placements.
- Maintaining an environment where children feel safe, equal and valued, and are encouraged to talk and are listened to. Our schools enhance this through form tutoring, pupil voice, the PSHE curriculum pastoral/pupil welfare services, buddy/mentoring/peer support schemes, 'worry boxes', displays of information such as Childline & NSPCC & CEOP posters & contact details and CP/Safeguarding – this list is not exhaustive.
- Adopting a Lettings policy for each school which seeks to ensure the suitability of adults working with children on school sites at any time.
- Making Community users, who organise activities for children, aware of the Kingsbridge Educational Trust's child protection guidelines and procedures.

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- Giving all visitors, governors and new staff, joining a KET school a bespoke safeguarding leaflet which names the Designated Safeguarding Leads (DSLs) to report a concern to and explains how to make a referral, how to deal with a disclosure and whistle blowing procedures.

10. COMPLAINTS/ALLEGATIONS MADE AGAINST STAFF

We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so. All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues.

All low-level concerns are recorded confidentially. The Headteacher will consider whether an onward referral to the LADO is required. If the DSL or Headteacher are in any doubt about whether the concern meets the harm threshold, then the LADO should be consulted. Any safeguarding or child protection concerns or allegations against adults working (including supply staff) or volunteering in the school, or former employees, will be considered by the Headteacher as to whether an onward referral to the LADO (Local Authority Designated Officer) is required. Any member of staff found not to be suitable to work with children will be notified to the Disclosure and Barring Service (DBS). *(KET Whistle-blowing policy)*

Local Authority	LADO contact Details
Bedford Borough (Willow Grove)	Tel: 01234 726693 Email: lado@bedford.gov.uk
Central Bedfordshire (Fulbrook, Hockliffe Lower)	Tel: 0300 300 8142 Email: lado@centralbedfordshire.gov.uk
Milton Keynes (Kents Hill Park, Middleton, Monkston, Oakgrove, Fulbrook)	Tel: 01908 254300 / 01908 254307 Email: lado@milton-keynes.gov.uk

Whistle-blowing reports concerning the Headteacher should be made to the Chair of the Local Governing Body or the Trust's CEO whose contact details are readily available to staff through Governor Services or on each school's website. Alternatively, the LADO can be contacted directly.

Where a staff member feels unable to raise an issue with their employer, or feels that genuine concerns are not being addressed, other whistleblowing may be open to them. The *NSPCC's what you can do to report abuse* dedicated helpline is one such alternative route. Staff can call 0800 0280285 the line is available from 08:00am to 08:00pm Monday to Friday and email help@nspcc.org.uk.

11. ONLINE SAFETY AND SOCIAL MEDIA

Online Safety encompasses internet technologies, but also electronic communication platforms such as mobile phones, tablets, audio and wireless technology. Online Safety also encompasses the use of artificial intelligence (AI) technologies, including generative AI tools, chatbots, image-generation tools and emerging AI-powered applications. The school and Trust recognises that AI presents both educational opportunities and safeguarding risks and will ensure that students, staff and parents are appropriately educated regarding safe, ethical and responsible use. It highlights the need to educate students, young adults and staff about the benefits, risks and responsibilities of using information technology. *(Online Safety policy)*

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Kingsbridge Educational Trust schools use appropriate software that prevents unauthorised access to illegal websites. It also prevents access to inappropriate websites; what is appropriate, or inappropriate is determined by the age of the user and is reviewed in response to an incident.

Fortigate is used by the Trust schools to filter online content whereas **Classroom Cloud** provides reports to the DSL of internet usage of safeguarding themes (such as self-harm, depression, radicalisation). Individual concerns are reported via Classroom Cloud on MyConcern to the DSL immediately for further investigation.

KET ensures that each school's filtering and monitoring systems meet the published filtering and monitoring standards. These standards are to support schools to meet their duty to have appropriate and effective filtering and monitoring systems in place. An annual review of the effectiveness of the filtering and monitoring systems will take place by KET; this will include checks that the filtering is working properly on internet-connected devices in all relevant locations, and a record is kept of those checks.

All staff must retain a professional profile on any website or social media as follows:

- Staff should at no time post anything regarding pupils, their parents/carers/families, or other staff.
- Staff must be conscious at all times of the need to keep personal and professional lives separate and maintain professionalism whilst using social media networking sites.
- Staff should not accept friends' requests from a person believed to be a parent, a pupil, or an ex-pupil, except in circumstances where a member of staff already has personal contact with a parent outside of school (e.g. through a club).
- Anyone posting remarks which breach confidentiality or are deemed to be of a detrimental nature to any of the Kingsbridge Educational Trust schools or other employees may be subject to disciplinary proceedings.
- Any employee, who becomes aware of social networking activity that would be deemed distasteful, should make a member of the Senior Leadership Team aware.

Kingsbridge Educational Trust recognises that staff, pupils, and volunteers may wish to have their personal mobile phones at work for use in case of emergency. In some of the KET schools' staff personal mobile phones are stored in a central, secure location. Personal mobile phones should only be used off-site or when the owner is located in a staff /work room and only during breaks or outside of working hours.

Each KET school will have their own policy with regards to mobile phone use as of September 2026. Phones must not be used or seen at any time when on school site. How pupil phones are stored on school site will be explicit in the mobile phone policy. Staff, pupils, or volunteers who break these rules will face disciplinary action in line with the school's disciplinary/behaviour policies.

It is illegal to share intimate photographs or films without consent online (Section 188 of the Online Safety Act 2023). Illegal images include consensual and non-consensual self-generated intimate images and/or videos including those generated using AI (known as deepfakes, face swaps and nudification). Intent does not matter; fake images are criminal. Staff will not ask to see an image when investigating a disclosure of this nature. In most cases staff will report such incidents to the DSL, and then potentially the police and MASH/IFD.

Where there is suspicion that material on a mobile phone may be unsuitable, or may constitute evidence relating to a criminal offence, the guidelines set out in the Disciplinary Procedure for School Staff other than the Headteacher will be followed.

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Some of the KET schools provide mobile phones, cameras, tablets and recording equipment for staff, pupils, and volunteers to use to support their work with children. To ensure the appropriate use of this equipment, and to safeguard children, the following guidance is recommended:

- Only the mobile phones, cameras, tablets and recording equipment belonging to the school may be used to take appropriate and relevant images of children, i.e. observations, photographs of activities and events.
- Images must be used in accordance with the Data Protection Act 1998.
- Mobile phones, cameras, tablets and recording equipment should only be used where two or more staff members are present and not in areas where intimate care is carried out.
- If a written request is made from MASH/IFD or a social worker for school staff to take a photograph of a visible bruise or injury on a child without the consent of the parent/carer, in order for them to determine all safeguarding actions are considered (i.e. whether police intervention is required), then the following precautions should be followed: the child must consent to the photograph if they are able to and are age appropriate, two adults must be present when the photograph is taken, the image must be taken on a school devise (NOT a personal devise), the image will be deleted once it has been uploaded to MyConcern and sent securely to social care, an image should only be taken if the bruise/injury is visible without the removal of any clothing (sleeves on arms, trousers on legs can be lifted), the MyConcern body map will be used to identify the location of the bruise/injury as seen by staff or described by the child. The bruise/injury needs to be described in terms of size and colour in a MyConcern file note.
- School mobile phones, cameras, tablets and recording equipment remain the property of the school at all times

Pupils receive ongoing education through Relationships, Sex and Health Education (RSHE) or PSHE, assemblies, thematic days and teaching about the risks of social media in relation to keeping safe online. Contact with parents/carers is used to reinforce the importance of pupils being safe online. With emerging technology there is a real potential for abuse. Risks associated with user interactive services are:

- Sharing of personal data
- Inappropriate on-line contact with adults/strangers
- Potential or actual incidents of grooming
- Cyber-bullying and use of social media
- AI-generated sexual imagery, including deepfake and nudified images;
- The creation, sharing or possession of AI-generated nude or semi-nude images
- AI-enabled grooming, exploitation or manipulation
- Emotional dependency or inappropriate emotional attachment to AI chatbots
- Exposure to AI-generated extremist, harmful or misleading content
- Over-reliance on AI tools that may impact learning, critical thinking, help-seeking behaviours or safeguarding disclosures.
- Grooming and potential abuse by online predator
- Exposure to inappropriate content, including racist and self-hate content as well as pornography
- Exposure to youth produced sexual imagery (sexting)
- Privacy issues associated with posting personal information that can identify and locate a child
- Privacy issues associated with adults posing as young people and using social media to contact other young people and inappropriate contact with a young person by a trusted adult.

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The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

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

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

Conduct: online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images e.g. consensual and non-consensual sharing of self-generated intimate images and/or videos including those generated using AI e.g. deep fakes, sharing other explicit images and online bullying.

Commerce: risks such as line gambling, inappropriate advertising, phishing and or financial scams.

Each Kingsbridge Educational Trust school has maintained individual school/department/subject X and Facebook accounts and a website which are used to share information relating specifically to school activities and events. Even with a controlled site there are difficulties, and information needs to be considered and appropriate. KET is mindful of the importance that:

- Information displayed should follow normal conventions of safe behaviour. There should be no postings that will compromise staff, governors' or volunteers' own personal information boundaries and relationships
- Anything that is posted as text, photos, pictures and video clips on sites may be shared with and saved by people other than those for whom it was intended
- Once information is posted online individuals have little control over it and it could go well beyond the original purpose
- There should be no images of young people on the site without prior permission.

All staff need to be aware of **cybercrime** which is a criminal activity using computers and/or the internet. It is categorised as either **cyber-enabled** (crimes that can happen off-line but are enabled at scale and at speed on-line) or **cyber-dependent** (crimes that can e committed only by using a computer).

Cyber-dependent crimes include:

- Unauthorised access to computers (illegal 'hacking') for example accessing a school's computer network to look for test paper answers or change grades awarded.
- Denial of Service (DoS) attacks or 'booting'. These are attempts to make a computer network or website unavailable by overwhelming it with internet traffic from multiple sources.
- Making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

Reporting requirements: Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. Concerns of this nature should be referred to the DSL and recorded on Concern. It should be considered to refer to the **Cyber Choices programme**. This

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is a nationwide preventative police programme supported by the Home Office and led by the National Crime agency.

Each school has an *Online Safety policy.* Also see the **appendix** for further details of cyber bullying.

12. MENTAL HEALTH AND WELLBEING

Mental Health is a state of wellbeing, in which every individual realises his or her own potential, can cope with the normal stresses of life, can work productively and fruitfully and is able to make a contribution to his or her community. *(World Health Organisation)*

Kingsbridge Educational Trust (KET) aims to promote positive mental health for every member of our staff and pupil body. We pursue this aim using both whole school approaches and specialist, targeted approaches aimed at vulnerable pupils. In addition, we aim to recognise and respond to mental ill health. In an average classroom there will be 3 children suffering from a diagnosable mental health issue. By developing and implementing practical, relevant and effective mental health policies, early help practices and procedures we can promote a safe and stable environment for the pupils affected both directly and indirectly by mental ill health. All KET schools work in partnership with the MHST (Mental Health Support Teams) to provide early, targeted support for child with a mental health need. The MHST also support mental health leads in schools to develop their whole school approach to mental health and wellbeing and give timely advice, liaising with external specialists, providing tailored staff training for school staff/parents and carers, assemblies for children and group workshops.

Mental ill health issues can include self-harm, anxiety, panic attacks, phobias, obsessions, compulsions, depression, suicidal feelings and eating problems (this is not an exhaustive list). These indicators could be an indicator a child has suffered or is at risk of suffering abuse, neglect or exploitation.

There may be cause for concern if staff notice certain changes in a pupil's appearance or behaviour such as:

In primary and nursery pupils:

- Unusual play in the playground
- Unusual drawings
- Tendency to isolate themselves
- Compulsive lying
- Attention seeking, loud and disruptive behaviour
- Pulling out hair (self-harm), hurting other children
- Hiding lunch, over/under eating
- Soiling

In secondary pupils:

- Noticeable weight loss or gain
- Physical injuries that may appear repeated or non-accidental
- Change in personality i.e. mood swings, sleeping habits, activities
- Frequently missing lessons, in particular PE/Sport
- Change in clothing e.g. wearing long sleeves in warm weather
- Social isolation and secretive behaviours

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- Lethargy and disinterest
- Tearfulness or appearing anxious
- Lack of focus in class or a change in educational performance
- Abusing drugs or alcohol
- Self-harm and suicidal ideation

Reporting requirements: Any member of staff who is concerned about the mental health or wellbeing of a child or young person should speak to the Designated Safeguarding Lead (DSL) and complete a report on MyConcern. If there is fear that the child or young person is in danger of immediate harm then the DSL will make an immediate referral to the Multi-Agency Safeguarding Hub (MASH) / Integrated Front Door (IFD) and/or to the Mental Health Support Team (MHST) or Children's and Adolescent Mental Health Services (CAMHS). If the pupil presents a medical emergency, then normal medical emergency procedures should be followed by contacting 999/111. Parent/carers will be routinely contacted as part of this procedure and advised accordingly regarding specialist help referrals.

Where a referral to MHST, CAMHS or another mental health support agency is required this will be led by either the DSL or DDSL, with parental/carer awareness.

Staff will receive regular training and updates about recognising and responding to mental health issues to enable them to keep the children and themselves safe from harm. The KET Schools promote wellbeing sessions for staff which include a variety of activities which staff can voluntarily attend.

PHYSICAL INTERVENTION, REASONABLE FORCE AND RESTRICTIVE INTERVENTIONS

Kingsbridge Educational Trust recognises that there are limited circumstances in which it may be appropriate for staff to use reasonable force, restraint or other restrictive interventions to safeguard children and maintain a safe environment. Staff will always seek to minimise the need for restrictive interventions through positive relationships, effective communication, early intervention, reasonable adjustments, behaviour support planning and de-escalation strategies.

Reasonable force means using no more force than is necessary, for the least amount of time, to prevent a pupil from:

- causing injury to themselves or another person;
- committing a criminal offence;
- damaging property; or
- causing serious disorder within the school environment.

The decision to use reasonable force is a matter of professional judgement and will always depend on the individual circumstances of the situation. Staff will consider whether the intervention is:

- necessary;
- proportionate;
- in the best interests of the child and others involved; and
- the least restrictive option available.

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Kingsbridge Educational Trust does not operate a "no contact" policy. There are occasions when appropriate physical contact is necessary and entirely appropriate, for example when administering first aid, comforting a distressed child, guiding a child to safety, supporting a child with SEND, or demonstrating a physical activity.

Where pupils have SEND, communication difficulties, medical conditions, sensory needs, trauma backgrounds or identified behavioural needs, staff will take account of known triggers, behaviour support plans, reasonable adjustments and de-escalation strategies before considering any restrictive intervention. The Trust will work collaboratively with parents/carers and relevant professionals to identify proactive approaches that reduce risk and support positive behaviour.

Staff must never use force as a punishment. Restrictive interventions must never intentionally restrict a pupil's breathing, obstruct an airway, apply pressure to the neck, chest or abdomen, or place a child face down. Any intervention that creates a risk to breathing, circulation or physical safety is prohibited.

Where a restrictive intervention or use of reasonable force is required, staff will:

- use the least restrictive intervention necessary;
- maintain the dignity and welfare of the child;
- stop the intervention as soon as the risk has reduced;
- seek medical support where appropriate;
- provide post-incident support for the pupil and staff involved; and
- review incidents to identify learning and preventative strategies for future practice.

Recording and Reporting

Any significant incident involving the use of reasonable force, restraint or seclusion will be recorded as soon as practicable, ideally on the same day, using the school's recording system. Records will include:

- the name of the pupil and staff involved;
- date, time and location;
- the circumstances leading to the intervention;
- de-escalation strategies attempted;
- the reason the intervention was considered necessary;
- any injuries sustained; and any follow-up support provided.

Parents/carers will be informed of significant incidents involving the use of force or restrictive intervention as soon as practicable and, where possible, on the same day.

Following any significant incident, staff will consider whether behaviour support plans, risk assessments or safeguarding plans require review and whether any additional support is needed for the child.

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13. STAFF TRAINING

The DSL and DDSLs will undertake formal safeguarding training at least every two years and their knowledge and skills will be refreshed at regular intervals, and at least annually, through updates, briefings and safeguarding developments. All new staff are required to attend a safeguarding induction session with the Designated Safeguarding Lead. All staff will receive regular safeguarding training throughout the academic year on current issues such as female genital mutilation (FGM), Prevent, Child Sexual or Criminal exploitation (CSE/CCE), online safety, signs and types of abuse, substance abuse, mental health – this list is not exhaustive. The DSL will use updates from Andrew Hall Safeguarding, the Local Authority and NSPCC to keep staff informed of current safeguarding issues, policy changes and resources to maintain a culture of vigilance around safeguarding and early help.
Staff on contracts to companies supplying contracted services, for example catering and cleaning staff, will receive basic safeguarding training from the DSL in the school to complement that supplied by their employer.

14. LOCKDOWN

Whilst Kingsbridge Educational Trust is unable to cover every possible scenario regarding the need to implement a lockdown procedure, the following guidance is intended to provide some structure and advice in the event of a lockdown and therefore minimise and mitigate risk. The school will always act in the best possible way to protect all stakeholders and act on the most reliable and up-to-date information available to ensure we safeguard and discharge our duty of care to staff, pupils and visitors.

Lockdown procedures may be activated in response to any number of situations, but some of the more typical may be:

- A reported incident in the local community (with the potential to pose a risk to staff and pupils in the school)
- An intruder on the school site (with the potential to pose a risk to staff and pupils)
- A warning being received regarding a risk locally, of air pollution (smoke plume, gas cloud etc.)
- A major fire in the vicinity of the school (fire evacuation procedures, regular practices take place)
- The close proximity of a dangerous dog roaming loose.

The Lockdown Procedure will be shared with staff and pupils. The written details of the procedure will be held with the Headteacher and Chair of Governors.

15. THE ROLE OF THE GOVERNING BODY

The Kingsbridge Educational Trust (KET) Board of Directors and each Local Governing Body (LGB) will ensure that they comply with their duties under legislation and that the policies, procedures and training in the Trust schools are effective and comply with the law at all times. All governors and trustees will receive safeguarding and child protection training (including online safety) on induction and regular updates thereafter to enable effective strategic challenge.KET will ensure that each school contributes to inter-agency working in line with statutory guidance *Working Together to Safeguard Children* and that the KET schools' safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by Milton Keynes Safeguarding Board.
The Governing Body has formally adopted this policy and will **review its contents annually** or sooner if any legislative or regulatory changes are notified to it by the designated governor, the Headteacher or DSL.

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The DSL in each KET school will provide a termly report to the Local Governing Body which will include:

- Any updates on safeguarding from the DfE
- Updates on training undertaken by the designated staff, all staff and volunteers
- Confirmation that all new staff and volunteers have been recruited safely and records of vetting that have been recorded on the Single Central record (SCR) are correct
- Confirmation that all new staff have received the safeguarding induction training
- MyConcern data – an overview of the type of safeguarding issues raised
- Total numbers of Child Protection referrals made to Children's Services, number on Child Protection plans, Looked After Children (CLA/LAC) register (no pupil names are shared)
- Total number of LADO referrals made
- Details of any incidents when physical restraint of pupils has been used.

These reports will be recorded, but will respect all issues of confidentiality and will not therefore identify any person(s) by name. As good practice, the nominated governor will meet on a regular basis with the DSL to monitor both the volume and progress of cases where a concern has been raised to ensure that both the school and KET are meeting their safeguarding duties.

16. MONITORING THE SAFEGUARDING POLICY

Our Safeguarding and Child Protection policy and procedures will be monitored and evaluated by:

- Governing Body and Board of Director visits to the school
- Safeguarding and Welfare Governor visits to the school and annual report
- KET Safeguarding review of each school's procedures and practices
- SLT 'drop ins' and discussions with children and staff
- Pupil surveys and questionnaires
- Scrutiny of Attendance data
- Scrutiny of range of risk assessments
- Scrutiny of Local Governing Body (LGB) and Board of Directors (BOD) minutes
- MyConcern data analysis of current safeguarding concerns as well as bullying/racist/behaviour incidents for SLT and LGB to monitor
- Review of parental concerns and parent questionnaires
- Review of the use of the support for vulnerable pupils at break/lunchtimes. We recognise that the school plays a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection. The school community will therefore:
- Work to establish and maintain an ethos where children feel secure, are encouraged to talk and are always listened to.
- Include regular consultation with children e.g. through safety questionnaires, participation in anti-bullying week, school council meetings, learning ambassador/prefect consultations
- Ensure that all children know an adult in the school, whom they can approach if they are worried or in difficulty.
- Include safeguarding across the curriculum, including opportunities in PSHE which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help. In particular this will include anti-bullying work, online safety and personal safety.

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The Safeguarding and Child Protection policy is submitted annually, or following any significant changes, to the Kingsbridge Educational Trust Board of Directors and the Local Governing Bodies. The Board of Directors and the Safeguarding and Welfare Governor in each school will ensure that any recommendations are implemented by the DSLs following the KET annual safeguarding review.

Up to date guidance and support on specific safeguarding issues will be disseminated to all staff, parent/carers and pupils (as deemed appropriate) via staff training, school websites, newsletters, and staff update emails. Current safeguarding issues highlighted in *Keeping Children Safe in Education* that schools need to be aware of include:

- Children missing from home/care/education
- Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)
- County lines
- Domestic violence
- Drugs / substance abuse
- Fabricated illness
- Faith abuse
- Forced Marriage
- Gangs and youth violence
- Gender based violence
- Harmful Sexual Behaviours
- Honour based violence
- Mental health
- Misogyny
- Online safety – AI, Deep Fakes, Cyberbullying
- Child-on-child abuse
- Private fostering
- Preventing radicalisation
- Relationship abuse
- Sexual abuse and Harassment
- Trafficking

17. LEGISLATION AND GUIDANCE

This policy draws upon duties conferred by the following legislation and advice, and is applicable to all on and off-site activities undertaken by pupils whilst they are the responsibility of the Kingsbridge Educational Trust (KET):

- CHILDREN'S ACT 2004
- THE CHILDREN ACT 1989
- CHILDREN'S WELLBEING AND SCHOOL ACT 2026
- COUNTER TERRORISM AND SECURITY ACT 2015
- CRIME AND POLICING ACT 2026
- DATA PROTECTION ACT 2018
- DISABILITY DISCRIMINATION ACTS 1995 & 2005 & 2010
- EDUCATION ACT 2002
- EQUALITY ACT 2010

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- FREEDOM OF INFORMATION ACT 2000
- HEALTH & SAFETY AT WORK ACT 1974
- HUMAN RIGHTS ACT 1998 (Articles 3, 8, 14, Protocol 1 Article 2)
- KEEPING CHILDREN SAFE IN EDUCATION, September 2026
- MENTAL HEALTH and BEHAVIOUR IN SCHOOLS: 2018
- MULTI-AGENCY STATUTORY GUIDANCE ON FEMALE GENITAL MUTILATION: April 2016
- PUBLIC SECTOR EQUALITY DUTY
- SEXUAL OFFENCES ACT 2003
- THE MANAGEMENT OF HEALTH & SAFETY AT WORK REGULATIONS 1999
- WORKING TOGETHER TO SAFEGUARD CHILDREN -2026
- UK GDPR and Data (Use and Access) ACT 2025
- RESTRICTIVE INTERVENTIONS GUIDANCE 2026

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APPENDIX

1. SIGNS AND TYPES OF ABUSE

a) Signs of Physical Abuse

This involves physical injury to a child, including deliberate poisoning, where there is definite knowledge or a reasonable suspicion, that the injury was inflicted or knowingly not prevented. Typical signs of Physical Abuse are:

- **Bruises and abrasions** – especially about the face, head, genitals or other parts of the body where they would not be expected to occur given the age of the child. Some types of bruising are particularly characteristic of non-accidental injury especially when the child's explanation does not match the nature of injury, or when it appears frequently.
- **Slap marks** – these may be visible on cheeks or buttocks
- **Twin bruises on either side of the mouth or cheeks** – can be caused by pinching or grabbing, sometimes to make a child eat or to stop a child from speaking
- **Grip marks on arms or trunk** – gripping bruises on arm or trunk can be associated with shaking a child. Shaking can cause one of the most serious injuries to a child; i.e. a brain haemorrhage, as the brain hits the inside of the skull. X-rays and other tests are required to fully diagnose the effects of shaking. Grip marks can also be indicative of sexual abuse
- **Black eyes** – are most commonly caused by an object, such as a fist, coming into contact with the eye socket. N.B. An accidental heavy bang on the nose can also cause bruising to spread around the eye, but a doctor will be able to tell if this has occurred
- **Damage to the mouth** – e.g. bruised/cut lip or torn skin where the upper lips join the mouth
- **Bite marks**
- **Fractures**
- **Poisoning or other misuse of drugs** – e.g. overuse of sedatives
- **Burns and/or scalds** – a round, red burn on tender, non-protruding parts, like a mouth; inside arms and on the genitals will almost certainly have been deliberately inflicted. Any burns that appear to be cigarette burns should be cause for concern. An experienced person will notice skin splashes caused when a child accidentally knocks over a hot cup of tea. In contrast, a child who has been deliberately 'dipped' in a hot bath will not have splash marks.

b) Sexual Abuse

The involvement of dependent, developmentally immature pupils and adolescents in sexual activities they do not truly comprehend, to which they are unable to give informed consent, or that violate the social taboos of family roles. Typical signs of Sexual Abuse are:

- **Detailed sexual knowledge** inappropriate to the age of the child
- **Behaviour that is excessively affectionate or sexual** towards other pupils or adults
- **Attempts to inform,** by making a disclosure about the sexual abuse - often by the initial sharing of limited information with an adult. It is also very characteristic of such pupils that they have an excessive pre-occupation with secrecy and try to bind the adults to secrecy or confidentiality
- **Fear of medical examinations**
- **Fear of being alone –** this applies to friends/family/neighbours/baby-sitters etc.
- **Sudden loss of appetite, compulsive eating, anorexia nervosa or bulimia nervosa**

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- **Excessive masturbation**
- **Promiscuity**
- **Sexual approaches or assaults** – on other pupils or adults
- **Urinary tract infections (UTI) and/or sexually transmitted disease (STD)** are cause for immediate concern in young pupils, or in adolescents if his/her partner cannot be identified
- **Bruising** to the buttocks, lower abdomen, thighs and genital/rectal areas. Bruises may be confined to grip marks where a child has been held so that sexual abuse can take place
- **Discomfort or pain** particularly in the **genital** or **anal areas**
- **Drawing of pornographic** or **sexually explicit images.**

c) Emotional Abuse

Emotional abuse is defined as the severe and adverse effect on the behaviour and emotional development of a child caused by persistent or severe emotional ill treatment or rejection. All abuse involves some emotional ill treatment – this category should be used where it is the main or sole form of abuse.

d) Physical Neglect

Physical neglect is defined as the persistent or severe neglect of a child (for example, by exposure to any kind of danger, including cold and starvation), which results in serious impairment of the child's health or development, including non-organic failure to thrive. Persistent stomach aches, feeling unwell and apparent anorexia can be associated with physical neglect. However, typical signs of Physical Neglect are:

- **Underweight** – a child may be frequently hungry or pre-occupied with food, or in the habit of stealing food or procuring food. There is a particular cause for concern where a persistently underweight child gains weight when away from home, for example, when in hospital or on a school trip. Some pupils also lose weight or fail to gain weight during school holidays when school lunches are not available and this is a cause for concern
- **Inadequately clad** – a distinction needs to be made between situations where pupils are inadequately clad, dirty or smelly because they come from homes where neatness and cleanliness are unimportant, and those where the lack of care is preventing the child from thriving.

Physical neglect is a difficult category because it involves the making of a judgement about the seriousness of the degree of neglect. Much parenting falls short of the ideal but it may be appropriate to invoke safeguarding procedures in the case of neglect where the child's development is being adversely affected.

2. CHILD-ON-CHILD ABUSE

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse). All staff need to recognise that it is more likely that girls will be victims and boys' perpetrators, but all child-on-child abuse is unacceptable and will be taken seriously. Staff need to understand that even if there are no reports in their school it does not mean it is not happening. Staff need to be alert to when children might be at highest risk around the school day.

Child-on-child abuse is most likely to include, but may not be limited to:

- **Bullying** (including cyberbullying, prejudice-based and discriminatory bullying)
- • discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice based incidents,
- Abuse in intimate personal relationships between children (sometimes known as **'teenage relationship abuse'**)

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- **Physical abuse** such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse.)**Serious physical assault** and harm, or the threat of harm with a weapon
- **Sexual violence**, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- **Sexual harassment**, such as sexual comments, remarks, jokes and online sexual harassment which may be stand alone or part of a broader pattern of abuse
- **Causing someone to engage in sexual activity without consent** such as forcing someone to strip, touch themselves sexually or to engage in sexual activity with a third party.
- **Consensual and non-consensual sharing of self-generated intimate images** and /or video including those generated using AI e.g. deep fakes
- **Upskirting,** which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to gain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender can be a victim. The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019.It is a criminal offence.
- **Initiation/hazing** type violence rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Harmful Sexual Behaviour (HSB) exists on a continuum from developmentally inappropriate behaviour through to abusive and violent behaviour. All incidents of HSB will be considered within a safeguarding context and responded to proportionately.

There are procedures in place for pupils to report allegations of child-on-child abuse such as email addresses, and speaking to trusted members of staff. Pupils (and parents/carers) are encouraged to report in the knowledge that all allegations will be treated seriously, dealt with promptly and investigated fully. Encouragement to report is promoted through PSHE, assemblies. This forms part of the culture of vigilance promoted in the KET schools.
It is essential that all victims are reassured that they are taken seriously, regardless of how long it has taken for them to come forward and that they are supported and kept safe. In certain safeguarding circumstances, the school may temporarily separate pupils to manage safeguarding risks whilst investigations are undertaken and protective measures are implemented. Such arrangements will be proportionate, reviewed regularly and consistent with safeguarding and equalities duties.

Reporting requirements: Staff report any allegations of child-on-child abuse on MyConcern or behaviour logs and the school's safeguarding and behaviour policies will be followed. Support for the victim and perpetrator is provided internally (for instance via workshops, restorative justice, mentoring) and/or externally via referrals to MASH/IFD, or Service Six as examples.

3. CHILD SEXUAL EXPLOITATION (CSE) and CHILD CRIMINAL EXPLOITATION (CCE)

Both Child Sexual Exploitation (CSE) and Child Criminal exploitation (CCE) are forms of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity e.g. working in cannabis factories, shoplifting or pickpocketing. A child who has been exploited, abused or trafficked should be treated as a victim, they cannot give consent to be involved.

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CSE or Sexual abuse may involve physical contact, including assault by penetration (for example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexualised activities, encouraging children to behave in a sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. School staff also need to be aware of the terminology for **Financially motivated sexual exploitation (FMSE)** often referred to as **sextortion.**

This power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. Young people in exploitative situations and relationships may receive gifts, money, drugs, alcohol, increased status or affection in exchange for taking part in sexual or criminal activities.

CSE can affect any child, including 16 and 17 year olds who can legally consent to have sex. The CSE and CCE abuse can be perpetrated by groups or individuals, males or females, children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

Young people may be tricked into believing they are in a loving, consensual relationship. They often trust their abuser and do not understand that they are being abused. They may depend on their abuser or be scared to tell anyone what is happening. They may be invited to parties and given drugs and alcohol before being sexually exploited. They can also be **groomed** and exploited online. With CCE victims are not always recognised can be criminalised for actions they take whilst under coercion.

Some children and young people are **trafficked** into or within the UK for the purpose of sexual or criminal exploitation. Sexual and criminal exploitation can also happen to young people in **gangs**. CSE and CCE can involve violent, humiliating and degrading sexual assaults and involve multiple perpetrators.

CSE and CCE can be very difficult to identify. Warning signs can easily be mistaken for ‘normal’ teenage behaviour. The experience of girls who are criminally exploited can be very different to that of boys although the indicators can be the same.

Young people who are being sexually exploited may:

- Go missing from home, care or education
- Be involved in abusive relationships, appearing intimidated and fearful of certain people or situations
- Hang out with groups of older people, or anti-social groups, or with other vulnerable peers
- Get involved in gangs, gang fights, gang membership
- Have older boyfriends or girlfriends
- Suffer from sexually transmitted diseases or become pregnant
- Spend time at places of concern, such as hotels or known brothels
- Not know where they are, because they have been moved around the country
- Be involved in petty crime such as shoplifting
- Have access to drugs and alcohol
- Have new things, such as clothes and mobile phones which they can’t or won’t explain

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- Have unexplained physical injuries.

Reporting requirements: All staff should report concerns on MyConcern. Support for all parties involved is provided from internal and/or external agencies as necessary.

4. SEXUAL VIOLENCE AND SEXUAL HARASSMENT

Staff need to have the attitude that Sexual violence and/or sexual harassment **'could happen here'. Consent** is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity, and each time activity occurs.

Sexual violence and harassment can occur between children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is a form of **child-on-child abuse**. KET recognises that child-on-child abuse is a safeguarding issue for both the victim and the alleged perpetrator and that both may require safeguarding support and intervention.
The sexual violence and harassment may occur online or offline (both verbal and physical) and is never acceptable. It is important that all victims are taken seriously and offered appropriate support. All Kingsbridge Educational Trust staff should make it aware that sexual violence, sexual harassment or child-on-child abuse is not acceptable, will never be tolerated and is not an inevitable part of growing up. It will not be dismissed as 'banter' or 'part of growing up', 'just having a laugh' or 'boys being boys'. Challenging behaviour such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts is not acceptable, and dismissing or tolerating such behaviour risks can normalise them. Such behaviour can lead to an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it is as normal and not coming forward to report it.*(Keeping Children Safe in Education)*

When responding to reports of sexual violence or sexual harassment the adult should report the disclosure to the Designated Safeguarding Lead / deputy on MyConcern and follow the following procedures:

- listen carefully to the child
- be non-judgemental
- be clear about boundaries
- do not ask leading questions
- explain how the report will be progressed.

The DSL should carefully consider:

- the wishes of the victim on how to proceed
- the nature of the alleged incident, including whether a crime may have been committed
- the ages of the children involved
- the developmental stages of the children involved
- any power imbalance between the children. For example, if the alleged perpetrator is older, more mature, or more confident? Does the victim have a disability or learning difficulty?
- if the alleged incident is a one-off or part of a sustained pattern of abuse
- are there any ongoing risks to the victim, other children, adult pupils or school staff?

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- other wider contextual safeguarding

Reporting requirements: The DSL will manage any report on a case-by-case basis and will make the required referrals to MASH/IFD for Children's Social Care or the Police. Support will be provided for all parties involved.

5. SERIOUS VIOLENCE

Serious violence is a safeguarding concern. It may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying and it can be associated with criminal exploitation (CCE). All staff play an important role to protect children from violence, safeguarding victims and well as those who may be at risk or are involved in violence and should be alert to the signs that a child is at risk of being, or is, involved in serious violence. Signs may include a significant decline in academic performance, signs of self-harm, a significant change in wellbeing, signs of assault or unexplained injuries, a drop in school attendance, change or peer friendship groups or increased conflict with peers. Unexplained gifts or new possessions could also indicate that children have been approached by or are involved with individuals associated with criminal networks or gangs. These signs may be higher for children with disrupted education (e.g. suspensions, permanent exclusions, time in alternative provision) or a history of offending.

Early Help, evidence-based support for those considered at risk is vital, this includes access to trusted adults, social and emotional skills support, and targeted interventions or therapeutic support where available. Milton Keynes LA provides the ROTH pathway for support.

Reporting requirements: Staff should report any concerns about a child carrying or using a weapon (or expressing the intent to do so) to the DSL (or Deputy) who will assess the risk and take appropriate action support the child and also de-escalate peer conflict. A report must be added to MyConcern. The police and MASH may be contacted for additional support interventions and advice.

6. BULLYING AND CYBERBULLYING

Bullying is the repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power. Bullying can be physical, verbal or psychological. It can be face to face or online. (*Behaviour policy and Online Safety policy– school variations will apply).* Bullying includes:

- verbal abuse, such as name calling
- non-verbal abuse, such as hand signs or glaring
- emotional abuse, such as threatening, intimidating or humiliating someone
- exclusion, such as ignoring or isolating someone
- undermining, by constant criticism or spreading rumours
- controlling or manipulating someone
- racial, sexual or homophobic language
- physical assaults, such as hitting and pushing
- making silent, hoax or abusive phone calls.

Bullying can happen anywhere – at school, at home or online. When bullying happens online it can involve social networks, games and mobile devices. Online bullying can also be known as **cyberbullying**.

Cyberbullying includes:

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- sending threatening or abusive text messages
- 'sexting' which specifically refers to creating or sharing nude and semi-nude images and/or videos
- 'trolling' - sending menacing or upsetting messages on social networks, chat rooms or online games
- excluding children from online games, activities or friendship groups
- setting up hate sites or groups about a particular child
- encouraging young people to self-harm
- voting for or against someone in an abusive poll
- creating fake accounts, hijacking or stealing online identities to embarrass a young person or cause trouble using their name
- Sextortion - online blackmail when criminals threaten to share sexual pictures, videos, or information about you unless you pay money

Spotting the signs of bullying and cyberbullying
It can be hard to know whether or not a child is being bullied. They might not tell anyone because they're scared that the bullying will get worse. They might also think that the bullying is their fault.

No one sign indicates for certain that a child is being bullied, but you should look out for:

- belongings getting ‘lost’ or damaged
- physical injuries such as unexplained bruises
- being afraid to go to school, being mysteriously 'ill' each morning, or skipping school
- not doing as well at school as they previously did
- asking for, or stealing, money (to give to a bully)
- being nervous, losing confidence or becoming distressed and withdrawn
- problems with eating or sleeping
- bullying others.

Reporting requirements: Pupil allegations of bullying or cyberbully should be taken seriously, investigated and reported on MyConcern or behaviour logs. Support will be provided to both the victim and the perpetrator. In some cases, the police or Family Help may become involved.

7. DOMESTIC ABUSE

Domestic or family violence adversely affects pupils, whether or not it is significant enough to warrant action under Child Protection Procedures. Domestic Abuse is any type of controlling, bullying, threatening or violent behaviour between people who are or were in an intimate relationship. There are different types of abusive behaviours that can occur as a single incident or a pattern of incidents, including emotional, sexual, financial, psychological and physical abuse.

In situations of domestic abuse, both males and females can be abused or be the abusers. It can happen in relationships regardless of age, sexuality, gender identity or orientation, race or religious identity.

Children’s exposure to domestic abuse between parents and carers is child abuse. Children can be directly involved in incidents of domestic abuse or they may be harmed by seeing or hearing abuse happening. The developmental, behavioural, health and well-being impact of witnessing domestic abuse is similar to experiencing direct abuse. This exposure can cause suffering of domestic abuse in their own intimate relationships (teenage relationship abuse). Children in homes where there is domestic abuse are also at risk of other types of abuse or neglect.

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Children who witness domestic abuse may:

- Become aggressive
- Display anti-social behaviour
- Suffer from depression or anxiety
- Not do well at school, due to difficulties at home or disruption of moving to and from refuges. (*NSPCC: Definitions and signs of child abuse. Dec 2017)*

Reporting requirements: Any Operation Encompass notifications received from Thames Valley Police to state they have attended a domestic incident at a pupil's home address will be recorded on MyConcern and the instructions in the notification followed with regards to contact with the child/family and support provided. Schools will make contact/referrals to MASH/IFD as domestic abuse is recognised as a form of emotional abuse for a child. Adult Social Services may also be contacted to support the adults in the situation.

8. FEMALE GENITAL MUTILATION (FGM)

All staff need to be aware of the circumstances and occurrences that may point to FGM happening, or being planned, as well as signs and symptoms that may indicate the child has already undergone FGM.

Female genital mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons. It's also known as female circumcision or cutting. The age at which FGM is carried out varies. It may be carried out when a girl is newborn, during childhood or adolescence, just before marriage or during pregnancy (*Home Office, 2016*). Religious, social or cultural reasons are sometimes given for FGM.

However, FGM is child abuse. It's dangerous and a criminal offence. There are no medical reasons to carry out FGM. It doesn't enhance fertility and it doesn't make childbirth safer. It's used to control female sexuality and can cause severe and long-lasting damage to physical and emotional health.

Spotting the signs of female genital mutilation: A girl at immediate risk of FGM may not know what's going to happen. But she might talk about or you may become aware of:

- a long holiday abroad or going 'home' to visit family
- relative or cutter visiting from abroad
- a special occasion or ceremony to 'become a woman' or get ready for marriage
- a female relative being cut – a sister, cousin or an older female relative such as a mother or aunt
- missing school repeatedly or running away from home.

A girl who has had FGM may:

- have difficulty walking, standing or sitting
- spend longer in the bathroom or toilet
- appear withdrawn, anxious or depressed
- have unusual behaviour after an absence from school
- be particularly reluctant to undergo normal medical examinations
- ask for help, without being explicit about the problem, due to embarrassment or fear.

Reporting requirements: Regulated health and social care professionals and teachers in England and Wales must report 'known' or suspected cases of FGM in under-18s to the police (Home Office, 2016). The

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DSL/DDSL will also contact MASH/IFD to provide external support appropriate to the allegations. All actions are recorded in MyConcern.

9. CHILD TRAFFICKING

Child trafficking involves moving children across or within national borders for the purposes of exploitation. Exploitation includes children being used for sex work, domestic work, restaurant/sweatshop, drug dealing, shoplifting and benefit fraud. The use of 'county lines' is often prominent.

Reporting requirements: Where a school is made aware of a child who is suspected of or actually being trafficked/exploited, we will report our concerns to the appropriate agency which will include MASH/IFD and the police. All concerns are recorded on MyConcern.

10. HONOUR BASED ABUSE

Honour based abuse is a crime or incident, which has or may have been committed to protect or defend the honour of the family and/or community. It is important to be alert to the signs of distress and indications such as self-harm, absence from school, truancy, infections resulting from female genital mutilation, isolation from peers, close monitoring by the family, not participating in school activities and unreasonable restrictions at home.

Reporting requirements: Where it is suspected that a child/young person is at risk from honour based abuse, the DSL/DDSL will report those concerns to the appropriate agency in order to prevent this form of abuse taking place. All actions are recorded in MyConcern.

11. FORCED MARRIAGE

This is an entirely separate issue from arranged marriage. A forced marriage where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used to coerce them. It is a human rights abuse and falls within the Crown Prosecution Service definition of domestic/child abuse violence.

The pressure put on people to marry against their will can be **physical** (including threats, actual physical and sexual violence) or **emotional and psychological** (for example, when someone is made to feel that they are bringing shame on their family). **Financial abuse** (taking a person's wages or not giving them any money) can also be a factor. No faith supports the idea of forcing someone to marry without his/her consent.

Whistleblowing may come from younger siblings. Other indicators may be detected by changes in adolescent behaviours.

Reporting requirements: Any concerns of forced marriage are reported on MyConcern for appropriate timely action and support from external agencies. The DSL will contact MASH/IFD and the police in the first instance.

12. FABRICATED OR INDUCED ILLNESS

Fabricated or Induced Illness (FII)/Munchausen's by proxy is a form of child abuse whereby a parent or carer exaggerates or deliberately causes symptoms of illness in the child. The term FII is preferred because it places emphasis on the person carrying out the abuse, rather than the victim. FII covers a range of cases

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and behaviours involving parents seeking healthcare for a child, from extreme neglect (failing to seek medical care) to induced illness. Symptoms of FII include:

- A parent or carer who convinces their child they are ill when they are perfectly healthy
- A parent or other carer who exaggerates or lies about their child's symptoms
- A parent or other carer who manipulates test results to suggest the presence of illness – For example, by putting glucose in urine samples to suggest the child has certain disorders
- A parent or other carer who deliberately includes symptoms of illness – for example, by poisoning the child with unnecessary medication or other substances.

Reporting requirements: Where there are concerns that FII is occurring, the Designated Safeguarding Lead should be notified immediately and recorded on MyConcern. A referral to MASH/IFD will enable a Team Around the Family (TAF) approach to support of the child as well as family members.

13. COUNTY LINES

Gangs use children to traffic drugs, using dedicated mobile phones or "lines". The gangs will target children who are vulnerable, for instance those in care, seeking attention, disaffected or dissatisfied, through coercion, intimidation, violence and weapons to ensure their compliance. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes.

Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs.

Reporting requirements: If a child is suspected to be at risk of or involved in county lines, a referral to MASH/IFD and the police will be completed together with consideration of local services/ who offer support to victims of county lines exploitation. This may lead to a child being placed on Child Protection via the ROTH pathway in Milton Keynes. All concerns, actions and support are recorded in school on MyConcern.

14. PREVENT AND RADICALISATION

All staff receive training on the Prevent Duty and on making a referral.

Since the publication of the Prevent Strategy, there has been an awareness of the need to safeguard children, young people and families from violent extremism. Kingsbridge Educational Trust values the freedom of speech and the expression of beliefs/ideology as fundamental rights, underpinning our society's values. Both children and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and the harm of others goes against the moral principles in which freedom of speech is valued.

Each of the KET schools has a Single Point of Contact (SPOC) to whom staff can report any concerns regarding extremism and radicalisation. This is in addition to using MyConcern to report the concern to the

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DSL. The SPOC will immediately contact the Prevent Duty Police Officer to report the concern and seek advice as to how to proceed. A referral to the Channel panel may be required.

The Counter-Terrorism and Security Act 2015 places a duty on local authorities to ensure Channel panels are in place. The panel must include the local authority and chief officer of the local police. Panels will assess the extent to which identified individuals are vulnerable to being drawn into terrorism. Following a referral from the police, where considered appropriate and once necessary consent has been obtained, they will arrange for support to be provided to those individuals. The Act requires partners of Channel panels to cooperate with the panel in the carrying out of its functions and with the Police in undertaking the initial assessment as to whether a referral is appropriate. Schools and colleges which are required to have regard to Keeping Children Safe in Education are listed in the Act as partners of the panel.

Reporting requirements: Concerns may be raised directly to Thames Valley Police or Bedfordshire Police by dialling 101.

The Department of Education has a dedicated telephone helpline: 020 7340 7264

email: counter.extremism@education.gsi.gov.uk

If you are concerned that a child's life is in immediate danger, or that they may be imminently planning to travel to Syria or Iraq dial 999 or call the confidential Anti-Terrorist Helpline on 0800 789321

Further details can be found in The KET *Radicalisation and Extremism policy*.

15. RACIST INCIDENTS:

The Crown Prosecution Service which defines a racist incident as: "*Any incident/crime which is perceived by the victim or any other person to be motivated by hostility or prejudice based on a person's race or perceived race.*"

Racism is not just about intentional attitudes or behaviour. A lack of intention does not stop the impact of racism being felt by individuals and communities. It is important to recognise that racist incidents are often complex and interrelated with other events and may involve group as well as individual behaviour. In any circumstances, racism is unacceptable and must be dealt with effectively and with sensitivity.

Examples of obvious racism

- Racist comments, name-calling, chants and jokes.
- Imitating accents.
- Racist graffiti, cartoons or any other written insult.
- Bringing into school racist materials such as badges and literature or any attempt to recruit people into racist organisations.
- Threatened and physical assault against a person or group because of colour or ethnicity.
- Isolating people because of colour or ethnicity.

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Examples of less obvious racism

- Unacceptable stereotype views and images.
- A curriculum that does not acknowledge racism and thus perpetuates it.
- Not following up racist incidents vigorously, thus condoning it.
- Staff not being fully aware of how racism and stereotyping may affect the decisions they make.

Prevention

Kingsbridge Educational Trust staff are actively encouraged to report all incidents involving racism. Kingsbridge Educational Trust will actively work towards the prevention of racist incidents through:

- The utilisation of the Equality Policy (2010).
- The delivery of assemblies and preparing students for Life in Modern Britain.
- The inclusion of Racism as part of the rigorous work the schools carry out with regards to anti-bullying.
- Inclusion into the delivery of PSHE at each Key Stage.
- The delivery of a curriculum which recognises and celebrates diversity.

Reporting Racist incidents

- It is important that there is a prompt response to each racist incident.
- Staff will emphasise that the school has appropriate procedures and that there will be a structured follow up to the allegation or incident.
- Staff will make a written record of details in relation to any incident seen or reported to them on MyConcern and flagged as racist or racist incident. The incident will be fully investigated to establish the facts. It is likely additional witness statements will be required.
- During the investigation staff will apply the definition of racism adopted by the school and will reinforce the expectation that racism in any form will not be tolerated.
- Parent/carers will be informed of the incident and reminded of the procedures that follow which will be in line with the school's Behaviour policy and the Equality policy.
- Allegations made against staff involving racism must be passed onto the DSL or the Headteacher for immediate investigation. These incidents will be recorded on the school's low level staff concerns spreadsheet and the LADO contacted.

Support processes

- Treat all claims seriously.
- Make certain that the victim is fully informed of the procedure and the subsequent chain of events.
- Explain the action that will be taken and state the School's position regarding racism and racist behaviour.
- Talk through the incident. All involved must be interviewed.
- Establish counselling and support as appropriate.

Reporting requirements: Staff to raise the concern verbally as well as recording it on MyConcern. The behaviour policy will be followed for sanctions. Support will be provided to the victim and the perpetrator, this could be in form of one-to-one discussion, agency support or police involvement and education.

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16. CHILDREN ABSENT FROM EDUCATION

Children being absent from education for unexplained and/or persistent absences of children from education for prolonged periods and/or repeat occasions can act as vital warning signs to a range of safeguarding issues including neglect and criminal exploitation and county lines. KET schools know the children that are persistently absent as attendance is regularly monitored to identify those at possible risk of such abuse. Where notification is received that a child has moved into temporary accommodation, the DSL will consider any safeguarding, attendance, welfare and educational implications and ensure appropriate support is provided. Early Help strategies help prevent the risk of absent pupils becoming a child missing education in the future.

Reporting requirements: The KET schools will notify the Local Authority before a child is missing for 20 days or more. Key staff will work with families and appropriate agencies to improve attendance. Tool kits such as those recommended by Milton Keynes Council, Central Bedfordshire Council and Bedford Borough Council for children with EBSA (Emotional Based School Avoidance) are used to support a child's return to education. After 15 days or more of absence for illness (physical or mental illness) a referral will be made to the Local Authority to support the provision of education for the individual (see the school's attendance policy for more detail).

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