The Duke of York's Royal Military School

Safeguarding and Child Protection Policy
(Including Vulnerable Students Policy and Anti-Radicalisation Policy)

Date of Approval	24/01/2024
Approved By	Col Andy Thorne
Role	Chairman of Trustees
Signed	

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Next Review	January 2025

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Key Contact Personnel in School

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

This policy will be reviewed <u>at least </u>annually and/or following any updates to National and local guidance and procedures, any significant events, or local child protection concerns.

What to do if you have a welfare concern

Why are you concerned?

For example
- Something a child has said – for example, an allegation of harm
- Child's appearance – may include unexplained marks as well as dress
- Behaviour change
- Witnessed concerning behaviour

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

Follow the school procedure (Using "CPOMS" to log any concerns)
- Reassure the child
- Clarify concerns, using open questions if necessary (**TED**: **T**ell, **E**xplain, **D**escribe)
- Use child's own words, record facts not opinions.
- Sign and date your records
- Seek support for yourself if required from DSL (Ed Pallant)

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Inform the Designated Safeguarding Lead (Ed Pallant)
or a Deputy DSL (Sarah Fox / Stu Hall)

Designated Safeguarding Lead

- Consider whether the child is at immediate risk of harm: are they safe to go home?
- Access KSCMP guidance and procedures: www.kscmp.org.uk
- Refer to other agencies as appropriate, for example, Internal or community services, Early Help open access, LADO, Police or make a Request for Support via Integrated Children's Services or county specific Social Services
- If unsure, consult with the Education Safeguarding Service (03000 423154) or Kent Integrated Children's Services Portal: Childrens Portal (kent.gov.uk)

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If you are unhappy with the response
Staff:
- Follow local escalation procedures
- Follow whistleblowing procedures

Students and Parents:
- Follow the school's Complaints Procedure available on the school website. Policies (doyrms.com).

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Record decision making and action taken in the student child protection file

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Monitor

Be clear about:
- What you are monitoring. For example behaviour trends, appearance.
- How long you will monitor
- Where, how and to whom you will feedback and how you will record

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Review and request further support if necessary

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

1. Child Focused Approach to Safeguarding

1.1 Introduction

- The Duke of York's Royal Military School recognises our statutory responsibility to safeguard and promote the welfare of all children. Safeguarding is everybody's responsibility and all those directly connected (staff, volunteers, trustees, leaders, parents, families, and students) are an important part of the wider safeguarding system for children and have an essential role to play in making this community safe and secure.

- We believe that the best interests of children always come first. All children (defined as those up to the age of 18) have a right to be heard and to have their wishes and feelings taken into account and all children regardless of age, gender, ability, culture, race, language, religion, sexual identity or orientation, have equal rights to protection.

- Staff working with children at this school will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child and if any member of our community has a safeguarding concern about any child or adult, they should act, and act immediately.

- The Duke of York's Royal Military School recognises the importance of providing an ethos and environment that will help children to be safe and to feel safe. In our school children are respected and are encouraged to talk openly. We will ensure children's wishes and feelings are taken into account when determining what safeguarding action to take and what services to provide.

- Our core safeguarding principles are:

    Prevention: positive, supportive, safe culture, curriculum and pastoral opportunities for children, safer recruitment procedures.

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

    Support: for all students, parents and staff, and where appropriate specific interventions are required for those who may be at risk of harm.

    Collaborating with parents and other agencies: to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.

- The procedures contained in this policy apply to all staff, including trustees, temporary or third-party agency staff and volunteers, and are consistent with those outlined within KCSIE 2023.

1.2 Policy Context

- This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, 'Keeping Children Safe in Education' 2023 (KCSIE) which requires individual schools and colleges to have an effective child protection policy.

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

    o Keeping Children Safe in Education 2023 (KCSIE)
    o Working Together to Safeguard Children 2018 (WTSC)
    o Ofsted: Education Inspection Framework'
    o Framework for the Assessment of Children in Need and their Families
    o Kent and Medway Safeguarding Children Procedures

- o The Education Act
- o Education and Inspections Act
- o The Education (Independent School Standards) Regulations
- o The Non-Maintained Special Schools (England) Regulations
- o The Human Rights Act
- o The Equality Act (including the Public Sector Equality Duty)
- o National Minimum Boarding Standards

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

- The Duke of York's Royal Military School will continue to follow government guidance in response to the coronavirus (Covid-19) pandemic; regardless of the action required, our safeguarding principles will always remain the same. We will amend this policy and our approaches, as necessary.

- We recognise that as a result of the Covid-19 pandemic, some members of our community may have been exposed to a range of adversity and trauma including bereavement, anxiety and in some cases experienced increased welfare and/or safeguarding risks. We will work with local services, such as health and the local authority, to ensure necessary support is in place.

1.3   Definition of Safeguarding

- In line with KCSIE 2023, safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

  - o protecting children from maltreatment
  - o preventing impairment of children's mental and physical health or development
  - o ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and
  - o taking action to enable all children to have the best outcomes.

- The school acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):

  - o Abuse and neglect
  - o Bullying, including cyberbullying
  - o Child Criminal Exploitation (CCE)
  - o Child missing from home or care
  - o Child Sexual Exploitation (CSE)
  - o Child-on-child abuse
  - o Children with family members in prison
  - o Children Missing Education (CME)
  - o Contextual safeguarding (risks outside the family home)
  - o County lines and gangs
  - o Domestic abuse
  - o Drugs and alcohol misuse
  - o Fabricated or induced illness
  - o Faith abuse
  - o Gender based abuse and violence against women and girls
  - o Hate
  - o Homelessness
  - o Human trafficking and modern slavery
  - o Mental health
  - o Nude or semi-nude image sharing, aka youth produced/involved sexual imagery or "Sexting"

- o Online safety
- o Preventing radicalisation and extremism
- o Private fostering
- o Relationship abuse
- o Serious violence
- o Sexual violence and sexual harassment
- o So-called 'honour-based' abuse, including Female Genital Mutilation (FGM) and forced marriage
- o 'Upskirting'

(Also see Part One and Annex B within 'Keeping Children Safe in Education' 2023)

1.4 Related Safeguarding Policies

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

  - o Anti-Bullying
  - o Anti-Radicalisation
  - o Behaviour
  - o CCTV
  - o Data Protection and Information Sharing
  - o Equality, Diversity and Inclusion
  - o First Aid
  - o Freedom of Information
  - o Health and Safety
  - o Imagery Use
  - o IT and Online Acceptable Use
  - o Lone Working
  - o Low-Level Concerns
  - o Managing Allegations of Abuse Against Teachers and Other Staff
  - o Medical Care
  - o Positive Handling
  - o PSHEE and Relationship, Sex and Health Education (RSHE)
  - o Risk Assessments
  - o Safer Recruitment procedure
  - o Searching, Screening and Confiscation
  - o SEND
  - o Staff Code of Conduct
  - o Supporting Students at School with Medical Conditions
  - o Vulnerable Students
  - o Whistleblowing

1.5 Policy Compliance, Monitoring and Review

- This policy will be reviewed at least annually (as a minimum) and will be updated as needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. The policy will also be revised following any national or local updates, significant local or national safeguarding events and/or learning, and/or any changes to our own procedures.
- All staff (including temporary staff and volunteers) can access this policy via the school website: Policies (doyrms.com). They will be provided with Parts One and Five of KCSIE 2023 as appropriate.
- Parents/carers can obtain a copy of this, and other related policies, on request. Additionally, our policies can be viewed via the school website: Policies (doyrms.com)
- The policy forms part of our development plan and will be reviewed annually by the trustee with responsibility for oversight of safeguarding.
- The Designated Safeguarding Lead and Principal will ensure regular reporting on safeguarding activity and systems to the trustee with responsibility for safeguarding. The trustee with

responsibility with safeguarding will not receive details of individual student situations or identifying features of families as part of their oversight responsibility.

2. Key Responsibilities

2.1 Governance and Leadership

- The school's nominated trustee with responsibility for safeguarding is **Stu Graham**. The nominated trustee will support the DSL and have oversight in ensuring that the school has an effective policy which interlinks with other related policies, that locally agreed procedures are in place and being followed, and that the policies are reviewed at least annually and when required.

- The trustee with responsibility for safeguarding and the school's leadership team have a strategic responsibility for the school's safeguarding arrangements and will comply with their duties under legislation. The Trustee with responsibility for safeguarding will have regard to the KCSIE guidance and will ensure our policies, procedures and training is effective and complies with the law at all times.

- The trustee with responsibility for safeguarding will facilitate a whole-school approach to safeguarding which involves everyone. They will ensure that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development, so that all systems, processes, and policies operate with the best interests of the child at their heart.

- The trustee with responsibility for safeguarding is aware of their obligations under the Human Rights Act, the Equality Act, (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements set out by the Kent Safeguarding Children Multi-Agency Partnership (KSCMP) or relevant county to the child.

- The trustee with responsibility for safeguarding and the Senior Leadership Team will ensure that there are policies and procedures in place to ensure appropriate action is taken in a timely manner to safeguard and promote children's welfare.

- The trustee with responsibility for safeguarding will ensure an appropriate senior member of staff, from the Senior Leadership Team, is appointed to the role of designated safeguarding lead and will ensure that the DSL is supported in their role and provided with sufficient time so they can provide appropriate support to staff and children regarding any safeguarding and welfare concerns.

2.2 Designated Safeguarding Lead (DSL)

- The school has appointed **Ed Pallant** as the Designated Safeguarding Lead (DSL).

- The DSL has overall responsibility for the day-to-day oversight of safeguarding and child protection systems (including online safety) in school. Whilst the activities of the DSL may be delegated to the Deputy DSLs, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.

- The school has also appointed **Sarah Fox and Stu Hall** as the Deputy DSLs, who have delegated responsibilities and will act in the DSL's absence.

- The DSL (and deputies) will be more likely to have a complete safeguarding picture and will be the most appropriate people to advise staff on the response to any safeguarding concerns.

- It is the role of the DSL to carry out their functions as identified in Annex C of KCISE 2023. This includes but is not limited to:

  - Acting as the central contact point for all staff to discuss any safeguarding concerns.
  - Maintaining a confidential recording system for safeguarding and child protection concerns.
  - Co-ordinating safeguarding action for individual children.

- When supporting children with a social worker or looked after children, the DSL should have the details of the child's social worker and the name of the virtual school head in the authority that looks after the child, with the DSL liaising closely with the designated teacher.
  - Liaising with other agencies and professionals in line with KCSIE 2023 and WTSC 2018.
  - Ensuring that locally established procedures as put in place by the three safeguarding partners as part of the Kent Safeguarding Children Multi-Agency Partnership (KSCMP) procedures, including referrals, are followed, as necessary.
  - Representing, or ensuring the school is appropriately represented at multi-agency safeguarding meetings (including child protection conferences)
  - Managing and monitoring the school's role in any multi-agency plan for a child.
  - Being available during term time (during school hours) for staff in the school to discuss any safeguarding concerns.
  - Helping promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and the Senior Leadership Team.
  - Ensuring adequate and appropriate DSL cover arrangements in response to any closures and out of hours and/or out of term activities.
  - Ensuring all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE.
  - Liaising with the Principal to inform him of any safeguarding issues, especially ongoing enquiries under Section 47 of the Children Act 1989 and Police investigations. This includes being aware of the requirement for children to have an Appropriate Adult (PACE Code C 2019).

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

2.3 Members of Staff

- Our staff play a particularly important role in safeguarding as they are in a position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating.

- All members of staff have a responsibility to:

  - provide a safe environment in which children can learn and live.
  - be aware of the indicators of abuse and neglect so that they can identify cases of children who may need help or protection.
  - know what to do if a child tells them that they are being abused, neglected, or exploited and understand the impact abuse and neglect can have upon a child.
  - be able to identify and act upon indicators where children may be at risk of developing mental health issues.
  - be prepared to identify children who may benefit from Early Help.
  - understand the Early Help process and their role in it.
  - understand the school's safeguarding policies and systems.
  - undertake regular and appropriate training which is regularly updated.
  - be aware of the local process of making referrals to children's social care and statutory assessment under the Children Act 1989.
  - know how to maintain an appropriate level of confidentiality.
  - reassure children who report concerns that they are being taken seriously and that they will be supported and kept safe.
  - act in line with Teachers' Standards which state that teachers (including the Principal) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
  - Act in line with National Minimum Boarding Standards.

- Staff at the school recognise that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as being abusive or harmful. This should not prevent staff from having professional curiosity and speaking to a DSL if they have any concerns about a child.

- Staff at the school will determine how best to build trusted relationships with children, young people and parents/carers which facilitate appropriate professional communication in line with existing and relevant policies.

2.4   Children and Young People

- Children and young people have a right to:

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

2.5   Parents and Carers

- Parents/carers have a responsibility to:

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

3. Child Protection Procedures

3.1 Recognising Indicators of Abuse and Neglect

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

- All staff are made aware of the definitions and indicators of abuse and neglect as identified by Working Together to Safeguard Children (2018) and Keeping Children Safe in Education 2023. This is outlined locally within the [Kent Support Levels Guidance](#).

- The school recognises that when assessing whether a child may be suffering actual or potential harm there are four categories of abuse (for more in-depth information, see Appendix 1):

  - Physical abuse
  - Sexual abuse
  - Emotional abuse
  - Neglect

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

- All members of staff are expected to be aware of and follow the below approach if they are concerned about a child:
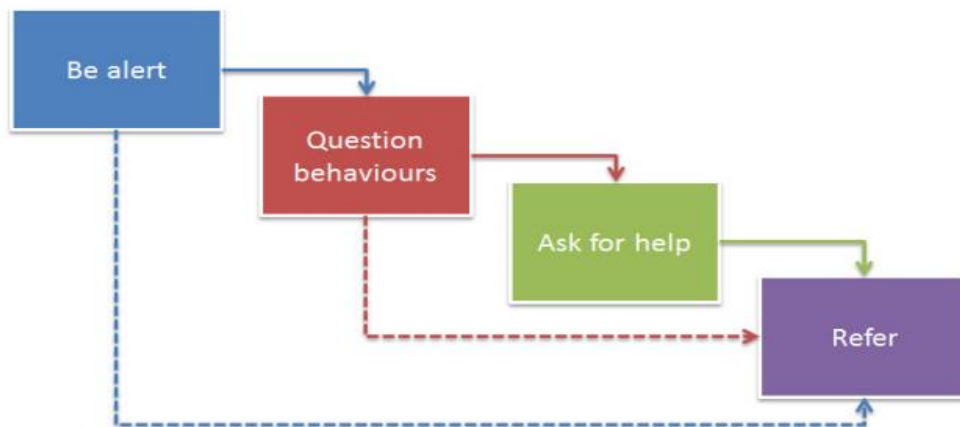
Taken from '[What to do if you are worried a child is being abused'](#) 2015

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

- The school recognises abuse, neglect, and safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label alone. In many cases, multiple issues will overlap with one another, therefore staff will always be vigilant and always raise concerns with a DSL.

- Parental behaviors can indicate child abuse or neglect, so staff will be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.

- Children may report abuse happening to themselves, their peers or their family members. All reports made by children to staff will be taken seriously and will be responded to in line with this policy.

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

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

- The school recognises that some children have additional or complex needs and may require access to intensive or specialist services to support them.

- Following a concern about a child's safety or welfare, the searching and screening of children and confiscation of any items, including any electronic devices, will be managed in line with the school's Behaviour and Searching, Screening and Confiscation policies, which are informed by the DfE '[Searching, screening and confiscation at school](#)' guidance.
- The SLT will be consulted regarding carrying out a search where there are reasonable grounds to suspect a student is in possession of a prohibited item as listed in our Behaviour and Searching, Screen and Confiscation policies. The SLT will consider the circumstances of the student who has been searched to assess the incident against any potential wider safeguarding concerns.
- Staff will involve the DSL or a deputy without delay if they believe that a search has revealed a safeguarding risk.

3.2   Responding to Child Protection Concerns

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

  - listen carefully to the child, reflecting back the concern.
  - use the child's language.
  - be non-judgmental.
  - avoid leading questions; only prompting the child where necessary with open questions to clarify information where necessary. For example, who, what, where, when or Tell, Explain, Describe (TED).
  - not promise confidentiality as concerns will have to be shared further, for example, with the DSL and potentially Integrated Children's Services.
  - be clear about boundaries and how the report will be progressed.
  - record the concern on CPOMS, using the facts as the child presents them, in line with the school's record keeping requirements.
  - inform the DSL (or deputy), as soon as practically possible.

- If staff have any concerns about a child's welfare, they are expected to act on them immediately. If staff are unsure if something is a safeguarding issue, they must speak to the DSL (or deputy).

- The DSL or deputy will always be available to discuss safeguarding concerns. If in exceptional circumstances, the DSL or deputy DSL are not available, this should not delay appropriate action being taken by staff. Staff should speak to a member of the Senior Leadership Team, take advice from the Education Safeguarding Service or have a consultation with a social worker via the Front Door

(for contact information, see page 35). In these circumstances, any action taken will be shared with a DSL as soon as is possible.

- All staff are aware that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to other agencies. Staff must not assume a colleague, or another professional will act and share information that might be critical in keeping children safe.

- The school will respond to safeguarding concerns in line with the Kent Safeguarding Children Multi-Agency Partnership procedures (KSCMP).   The full KSCMP procedures and additional guidance relating to reporting concerns and specific safeguarding issues can be found on their website: www.kscmp.org.uk

- In Kent, Early Help and Preventative Services and Children's Social Work Services are part of Integrated Children's Services (ICS). Specific information and guidance to follow with regards to accessing support and/or making referrals in Kent can be found here: www.kelsi.org.uk/support-for-children-and-young-people/integrated-childrens-services

- Where it is identified a child may benefit from Early Help support , the DSL (or a deputy) will generally lead as appropriate and make a request for support via the Front Door. The DSL will keep all Early Help cases under constant review and consideration will be given to escalating concerns to the Front Door or seeking advice via the Education Safeguarding Service if the situation does not appear to be improving or is getting worse.

- All staff are aware of the process for making referrals to Integrated Children's Services and for statutory assessments under the Children Act 1989, especially Section 17 (children in need) and Section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

- Where a child is suffering, or is likely to suffer from harm, or is in immediate danger (for example, under Section 17 or 47 of the Children Act), a 'request for support' will be made immediately to Kent Integrated Children's Services (via the 'Front Door') and/or the Police, in line with KSCMP procedures.

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

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

- If, after a request for support or any other planned external intervention, a child's situation does not appear to be improving, or concerns regarding receiving a decision or the decisions made, staff or the DSL will re-refer (if appropriate) and/or DSLs will follow the KSCMP escalation procedures to ensure their concerns have been addressed and, most importantly, that the child's situation improves. DSLs may request support with this via the Education Safeguarding Service.

3.3 Recording Concerns

- All safeguarding concerns, discussions, decisions, and reasons for those decisions, will be recorded using the school's safeguarding platform, CPOMS, and will be escalated, without delay, to the DSL. Our records will include a clear and comprehensive summary of any concerns, details of how concerns were followed up and resolved, and a note of any action taken, decisions reached and outcomes.

- Records will be completed as soon as possible after the incident/event, using the child's words. Child protection records will record facts and not personal opinions. A body map will be completed if visible injuries have been observed.

- If there is an immediate safeguarding concern the member of staff will consult with a DSL before recording on CPOMS, as reporting urgent concerns takes priority.

- If members of staff are in any doubt about recording requirements, they must discuss their concerns with the DSL.

- Child protection records will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and details regarding any action taken, decisions reached and the outcome.

- Child protection records will be kept confidential and stored securely. Child protection records will be kept for individual children and will be maintained separately from all other records relating to the child in the school. Child protection records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL.

- All child protection records will be transferred in accordance with data protection legislation to the child's subsequent school, as per KCSIE guidance. Child protection files will be transferred securely to the new DSL, separately to the child's main file, and a confirmation of receipt will be obtained.

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

- Where the school receives child protection files from another setting, the DSL will ensure key staff such as the child's housemaster/mistress and Special Educational Needs Co-Ordinator (SENDCo), **Avril Saunderson**, will be made aware of relevant information as required.

- Where a student joins the school and no child protection files are received, the DSL will proactively seek to confirm from the previous setting whether any child protection files exist for the student, and if so, if the files have been sent.

3.4 Multi-Agency Working

- The Duke of York's Royal Military School recognises the pivotal role we have to play in multi-agency safeguarding arrangements and is committed to its responsibility to work within the KSCMP multi-agency safeguarding arrangements as identified within 'Working Together to Safeguard Children'.

- The Senior Leadership Team, Trustee with responsibility for Safeguarding and DSL will work to establish strong and co-operative local relationships with professionals in other agencies, including the safeguarding partners in line with local and national guidance.

- The school recognises the importance of multi-agency working and is committed to working alongside partner agencies to provide a co-ordinated response to promote children's welfare and protect them from harm. This includes contributing to KSCMP processes as required, such as, participation in relevant safeguarding multi-agency plans and meetings, including Child Protection

Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.

- The school will allow access for Kent Children's Social Work Service and, where appropriate, from a placing local authority, to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.

- The Principal and DSL are aware of the requirement for children to have an Appropriate Adult (PACE Code C 2019) where there is a need for detention, treatment and questioning by Police officers and will respond to concerns in line with our school's Searching, Screening and Confiscation and Behaviour policies, which are informed by the DfE 'Searching, screening and confiscation at school' guidance.

3.5   Confidentiality and Information Sharing

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

- The school has an appropriately trained Data Protection Officer (DPO) as required by the UK General Data Protection Regulations (UK GDPR) to ensure that we are compliant with all matters relating to confidentiality and information sharing requirements. The school's DPO is **Adam Kent**.

- Staff will have due regard to the relevant data protection principles, which allow them to share and withhold personal information. The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children (KCSIE 2023). KCSIE 2023, the Information Commissioner's Office (ICO) and the DfE ''Information sharing advice for safeguarding practitioners'' guidance provides further details regarding information sharing principles and expectations.

- The Principal and DSL will disclose relevant safeguarding information about a student with staff on a 'need to know' basis.

- All members of staff must be aware that whilst they have duties to keep information confidential, in line with this policy and our Confidentiality and Information Sharing policy, staff also have a professional responsibility to be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children; this may include sharing information with the DSL and with other agencies as appropriate.

- In regard to confidentiality and information sharing staff will only involve those who need to be involved, such as the DSL (or deputy) and Kent Integrated Children's Services. All staff are aware they cannot promise a child that they will not tell anyone about a report of any form of abuse, as this may not be in the best interests of the child.

3.6   Complaints

- All members of the school community should feel able to raise or report any concerns about children's safety or potential failures in the school safeguarding regime. The school has a Complaints Policy available to parents, students and members of staff and visitors who wish to report concerns or complaints. This can be found here: Policies (doyrms.com).

- Whilst we encourage members of our community to report concerns and complaints directly to us, we recognise this may not always be possible. Children, young people, and adults who have experienced abuse at school can contact the NSPCC 'Report Abuse in Education' helpline on 0800 136 663 or via email: help@nspcc.org.uk

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

  o Staff can call 0800 028 0285 or email help@nspcc.org.uk.

- The Senior Leadership Team will take all concerns reported to the school seriously and all complaints will be considered and responded to in line with the relevant and appropriate process.

  o Anything that constitutes an allegation against a member of staff or volunteer will be dealt with in line with Section 8 of this policy.

4. Specific Safeguarding Issues

- The Duke of York's Royal Military School is aware of the range of specific safeguarding issues and situations that can put children at greater risk of harm. In addition to Part One, DSLs, and other key staff who work directly with children will read Part Five of KCSIE 2023 which contains important additional information about safeguarding issues.

- Where staff are unsure how to respond to specific safeguarding issues, they should follow the processes as identified in this policy and speak with the DSL or the deputy.

4.1 Child-on-Child Abuse

- All members of staff at the school recognise that children can abuse other children (referred to as child-on-child abuse, previously known as 'peer-on-peer' abuse), and that it can happen both inside and outside of school and online.

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

  o Bullying, including cyberbullying, prejudice-based and discriminatory bullying.
  o Abuse in intimate personal relationships between children.
  o Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
  o Sexual violence and sexual harassment.
  o Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery).
  o 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.
  o Upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.
  o Initiation/hazing type violence and rituals.

- Any allegations of child-on-child abuse will be recorded, investigated, and dealt with in line with this policy and KCSIE 2023.

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

- All staff have a role to play in challenging inappropriate behaviours between children. Staff recognise that some child-on-child abuse issues may be affected by gender, age, ability, and culture of those involved. For example, for gender-based abuse, girls are more likely to be victims and boys more likely to be perpetrators.

- The school recognises that even if there are no reported cases of child-on-child abuse, such abuse is still likely to be taking place and it may be the case that it is just not being reported. As such, it is important that staff speak to the DSL (or deputy) about any concerns regarding child-on-child abuse.

- In order to minimise the risk of child-on-child abuse, the school:

  o Employs a range of policies, including Behaviour and Anti-Bullying,
  o provides an age/ability appropriate PSHEE and RSHE curriculum,
  o provides a range of reporting mechanisms, including the use of Senso, peer mentors, house staff, Medical Centre staff, Prefects, Independent Persons and maintains an open-door policy to all staff.

- The school wants children to feel able to confidently report abuse and know their concerns will be treated seriously. All allegations of child-on-child abuse will be reported to the DSL and will be recorded, investigated, and dealt with in line with associated school policies, our Safeguarding, anti-bullying, and Behaviour policies. Students who experience abuse will be offered appropriate support, regardless of where the abuse takes place.

- Concerns about student behaviour, including child-on-child abuse taking place off-site will be responded to as part of a partnership approach with students and parents/carers. Off-site behaviour concerns will be recorded and responded to in line with existing appropriate policies, for example Anti-Bullying, Acceptable Use, Behaviour and Safeguarding and Child Protection.

- Alleged victims, alleged perpetrators and any other child affected by child-on-child abuse will be supported by:

  o Taking reports seriously
  o listening carefully
  o avoiding victim blaming
  o providing appropriate pastoral support
  o working with parents/carers
  o reviewing educational approaches
  o following procedures as identified in other policies, for example, the school's Anti-Bullying, Behaviour and Safeguarding policies
  o informing the Police and/or ICS.

4.2   Child-on-Child Sexual Violence and Sexual Harassment

- When responding to concerns relating to child-on-child sexual violence or harassment, the school will follow the guidance outlined in Part Five of KCSIE 2023.

- The school recognises that sexual violence and sexual abuse can happen anywhere, and all staff maintain an attitude of 'it could happen here.' The school recognises sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children and can occur online and face to face (both physically and verbally). Sexual violence and sexual harassment is never acceptable.

- **All** victims of sexual violence or sexual harassment will be reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, or ever be made to feel ashamed for making a report.

- Abuse that occurs online or outside of the school will not be dismissed or downplayed and will be treated equally seriously and in line with relevant policies/procedures, for example Anti-Bullying, Behaviour, Safeguarding and Child Protection, Online safety.

- The school recognises that the law is in place to protect children and young people rather than criminalise them, and this will be explained in such a way to students that avoids alarming or distressing them.

- The school recognises that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory, so children may not be able to recall all details or timeline of abuse. All staff will be aware certain children may face additional barriers to telling someone, for example because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation.

- The DSL (or deputy) is likely to have a complete safeguarding picture and will be the most appropriate person to advise on the initial response.

  o The DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator, and any other children involved/impacted, in line with Part Five of KCSIE 2023 and relevant local/national guidance and support, for example KSCMP procedures and support from the Education Safeguarding Service.
  o The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children and staff and any actions that are required to protect them.
  o Any concerns involving an online element will take place in accordance with relevant local/national guidance and advice.

- Reports will initially be managed internally by the school and where necessary will be referred to Integrated Children's Services (Early Help and/or Children's Social Work Service) and/or the Police. Important considerations which may influence this decision include:

  o the wishes of the victim in terms of how they want to proceed.
  o the nature of the alleged incident(s), including whether a crime may have been committed and/or whether Harmful Sexual Behavior has been displayed.
  o the ages of the children involved.
  o the developmental stages of the children involved.
  o any power imbalance between the children.
  o if the alleged incident is a one-off or a sustained pattern of abuse - sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature.
  o that sexual violence and sexual harassment can take place within intimate personal relationships between children.
  o understanding intra familial harms and any necessary support for siblings following incidents.
  o whether there are any ongoing risks to the victim, other children, or school staff.
  o any other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

- The school will in most instances engage with both the victim's and alleged perpetrator's parents/carers when there has been a report of sexual violence; this might not be necessary or proportionate in the case of sexual harassment and will depend on a case-by-case basis. The exception to this is if there is a reason to believe informing a parent/carer will put a child at additional risk. Any information shared with parents/carers will be in line with information sharing expectations, our Confidentiality and Information Sharing policy, and any data protection requirements, and where they are involved, will be subject to discussion with other agencies (for example Children's Social Work Service and/or the Police) to ensure a consistent approach is taken.

- If at any stage the DSL is unsure how to proceed, advice will be sought from the Education Safeguarding Service.

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

- The term 'sharing nudes and semi-nudes' is used to mean the sending or posting of nude or semi-nude images, videos or live streams of/by young people under the age of eighteen. Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents complex. The UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people' guidance outlines how schools should respond to all incidents of consensual and non-consensual image sharing.

- The Duke of York's Royal Military School recognises that consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as youth produced/involved sexual imagery

or "sexting") can be a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).

- When made aware of concerns involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos by children, staff are advised:

  o to report any concerns to the DSL immediately.
  o never to view, copy, print, share, forward, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already inadvertently viewed imagery, this will be immediately reported to the DSL.
  o not to delete the imagery or ask the child to delete it.
  o to avoid saying or doing anything to blame or shame any children involved.
  o to reassure the child(ren) involved and explain that the DSL will be informed so they can receive appropriate support and help. Students should not be promised confidentiality, as other agencies may need to be informed and be involved.
  o not to investigate or ask the child(ren) involved to disclose information regarding the imagery
  o to not share information about the incident with other members of staff, children/young people, or parents/carers, including the families and child(ren) involved in the incident; this is the responsibility of the DSL.

- DSLs will respond to concerns in line with the non-statutory UKCIS guidance: 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' and the local KSCMP guidance. When made aware of a concern involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos:

  o The DSL will hold an initial review meeting to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child involved. This may mean speaking with relevant staff and the children involved as appropriate.
  o Parents/carers will be informed at an early stage and be involved in the process to best support children, unless there is good reason to believe that involving them would put a child at risk of harm.
  o All decisions and action taken will be recorded in line with the school's child protection procedures.
  o A referral will be made to ICS and/or the Police immediately if:

    ▪ the incident involves an adult (over 18).
    ▪ there is reason to believe that a child has been coerced, blackmailed, or groomed, or there are concerns about their capacity to consent, for example, age of the child or they have special educational needs.
    ▪ the image/videos involve sexual acts and a child under the age of thirteen, depict sexual acts which are unusual for the child's developmental stage, or are violent.
    ▪ a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes.

  o The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date.
  o If DSLs are unsure how to proceed, advice will be sought from the Education Safeguarding Service.

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

- The school recognises that both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

- The school recognises that children can become trapped in CCE as perpetrators can threaten victims and their families with violence or entrap and coerce them into debt. Children involved in criminal exploitation often commit crimes themselves which can mean their vulnerability as victims is not always recognised (particularly older children) and they are not treated as victims, despite the harm they have experienced. The experience of girls who are criminally exploited can also be very different to that of boys. We also recognise that boys and girls being criminally exploited may be at higher risk of child sexual exploitation (CSE).

- The school recognises that CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities and includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited, for example they may believe they are in a genuine romantic relationship.

- If staff are concerned that a child may be at risk of CSE or CCE, immediate action should be taken by speaking to the DSL or a deputy.

4.5 Serious Violence

- All staff are aware of the indicators which may signal children are at risk from or are involved with serious violent crime. These may include unexplained gifts or new possessions, increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. 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 and may be at risk of CCE.

- Any concerns regarding serious violence will be reported and responded to in line with other child protection concerns by speaking with a DSL or deputy. The initial response to child victims is important and staff will take any allegations seriously and work in ways that support children and keep them safe.

4.6 So-called Honour Based Abuse (HBA)

- So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.

- All forms of HBA are abuse, regardless of the motivation, and concerns will be responded to in line with Section 3 of this policy. Staff will report any concerns about HBA to the DSL (or deputy). If there is an immediate threat, the Police will be contacted.

- Whilst all staff will speak to the DSL (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the Police. The DSL will support the teacher through this procedure.

4.7 Preventing Radicalisation

- The school is aware of our duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), to have "due regard to the need to prevent people from being drawn into terrorism", also known as the Prevent duty and the specific obligations placed upon us as an education provider regarding risk assessments, working in partnership, staff training, and IT policies.

- The school recognises that children are vulnerable to extremist ideology and radicalisation and staff will be alert to changes in children's behaviour which could indicate that they may be in need of help or protection.

- Staff will report any concerns to the DSL (or deputy), who is aware of the local procedures to follow. If there is an immediate threat, the Police will be contacted via 999.

4.8 Cybercrime

- The school recognises that children with particular skills and interest in computing and technology may inadvertently or deliberately stray into 'cyber-enabled' (crimes that can happen offline but are enabled at scale and at speed online) or 'cyber dependent' (crimes that can be committed only by using a computer/internet enabled device) cybercrime.

- If staff are concerned that a child may be at risk of becoming involved in cyber-dependent cybercrime, the DSL, or deputy, will be informed, and consideration will be given to accessing local support and/or referring into the Cyber Choices programme, which aims to intervene when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

- Where there are concerns about 'cyber-enabled' crime such as fraud, purchasing of illegal drugs online, child sexual abuse and exploitation, or other areas of concern such as online bullying or general online safety, they will be responded to in line with our Safeguarding and other appropriate policies.

4.9 Domestic Abuse

- The school recognises that domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial, or emotional abuse. Children can be victims of domestic abuse and may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). Domestic abuse can have a detrimental and long-term impact on children's health, well-being, development, and ability to learn.

- The Duke of York's Royal Military School is an Operation Encompass school. This means we work in partnership with Kent Police to provide support to children experiencing domestic abuse.

- If staff are concerned that a child may be at risk of seeing, hearing, or experiencing domestic abuse in their home or in their own intimate relationships, immediate action should be taken by speaking to the DSL or deputy.

4.10 Mental Health

- All staff recognise that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

- Staff are aware that children's experiences, for example where children have suffered abuse and neglect, or other potentially traumatic Adverse Childhood Experiences (ACEs), can impact on their mental health, behaviour, and education.

- Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or deputy.

5. Supporting Children Potentially at Greater Risk of Harm

- If there are significant concerns, inclusive of a parent/carer/guardian withholding safeguarding and behavioural concerns from previous institutions or agencies, which could have a detrimental effect on their child's or other's safeguarding or welfare, the school may, at times, need to review a student's "suitability to board". This will be in line with such policies including the Behaviour policy, Admissions policy, and Medical Care policy.

- Whilst **all** children should be protected, the school acknowledges that some groups of children are potentially at greater risk of harm.

- This can include the following groups:

5.1 Children with Special Educational Needs or Disabilities (SEND)

- The school acknowledges that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges and barriers for recognising abuse and neglect.

- The school recognises that children with SEND may face additional communication barriers and experience difficulties in managing or reporting abuse or challenges. Children with SEND will be supported to communicate and ensure that their voice is heard and acted upon.

- All members of staff are encouraged to appropriately explore potential indicators of abuse such as behaviour, mood changes or injuries and not to assume that they are related to the child's disability. Staff will be mindful that children with SEND, or certain medical conditions may be disproportionally impacted by behaviours such as bullying, without outwardly showing any signs.

- Members of staff are encouraged to be aware that children with SEND can be disproportionally impacted by safeguarding concerns, such as exploitation, peer group isolation or bullying including prejudice-based bullying.

- To address these additional challenges, the school will always consider implementing extra pastoral support and attention for children with SEND. The DSL works closely with the SENDCo, **Avril Saunderson**, to plan support as required.

- Our school has robust intimate/personal care policies. The Medical Centre Lead, **Kate Stone**, will ensure that the health, safety, independence, and welfare of children is promoted, and their dignity and privacy are respected. Arrangements for intimate and personal care are open and transparent and accompanied by robust recording systems. Further information can be found on our website and via our policies: Policies (doyrms.com).

5.2 Children Requiring Mental Health Support

- The school has an important role to play in supporting the mental health and wellbeing of our students. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

- Staff can raise concerns regarding possible mental health problems of students via the following methods:

  o Completion of a triage form for the Medical Centre (via Teams) or
  o Completion of a wellbeing referral for the Wellbeing Team (via Teams).

  If there is an immediate concern staff should contact a member of the safeguarding team and complete a CPOMS entry.

- Age/ability appropriate education will be provided to our students to help promote positive health, wellbeing, and resilience.

5.3 Children Missing from Education (CME)

- Children missing from education, particularly persistently, can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse, and child sexual and criminal exploitation - particularly county lines. A robust response to children missing from education will support the identification of such abuse and may help prevent the risk of children going missing in the future.

- Where possible, the school will hold more than one emergency contact number for each student, so we have additional options to make contact with a responsible adult if a child missing education is also identified as being a welfare and/or safeguarding concern.

- Where the school has concerns that a child is missing from education, we will respond in line with our statutory duties (DfE: Children missing education) and local policies. Local support is available via the PRU, Inclusion and Attendance Service (PIAS).

5.4 Elective Home Education (EHE)

- Where a parent/carer expresses their intention to remove a child from school with a view to educating at home, we will respond in line with national Elective Home Education guidance and local Kent guidance. We will work together with parents/carers and other key professionals and organisations to ensure decisions are made in the best interest of the child.

5.5 Children Who Need a Social Worker (Child in Need and Child Protection Plans)

- The DSL will hold details of social workers working with children in the school so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes.

- Where children have a social worker, this will inform school decisions about their safety and promoting their welfare, for example, responding to unauthorised absence and provision of pastoral and/or academic support.

5.6 Looked After Children, Previously Looked After Children and Care Leavers

- The school recognises the common reason for children becoming looked after is as a result of abuse and/or neglect and a previously looked after child also potentially remains vulnerable.

- The school has designated teachers, **Sarah Fox**, **Amy Carey** and **Jennifer Norman**, who work with local authorities, including the Virtual School Kent (including the virtual school head), to promote the educational achievement of registered pupils who are looked after or who have been previously looked after.

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

- Where a child is looked after, the DSL will hold details of the social worker and the name of the virtual school head in the authority that looks after the child.

- Where the school believe a child is being cared for as part of a private fostering arrangement (occurs when a child under 16 or 18 if the child is disabled is cared for and lives with an adult who is not a

relative for 28 days or more) there is a duty to recognise these arrangements and inform the Local Authority via the Front Door.

- Where a child is leaving care, the DSL will hold details of the local authority Personal Advisor appointed to guide and support them and will liaise with them as necessary regarding any issues of concern.

5.7   Children who are Lesbian, Gay, Bi, or Trans (LGBT)

- The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm, however, the school recognises that children who are LGBT or are perceived by other children to be LGBT (whether they are or not) can be targeted by other children or others within the wider community.

- The school recognises risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. LGBT is included within our Relationship and Sex Education and Health Education curriculum, and our staff will endeavour to reduce the additional barriers faced and provide a safe space for children to speak out or share any concerns.

- We fully embrace the Equalities Act and the importance that all children and young people are treated equally and that protected characteristics are recognised. We also take our legal obligations to safeguard, protect and promote the welfare of all children very seriously.

- Whilst these two priorities are predominantly complementary, they do on occasion provide conflicting challenges. There is provision under the Equality Act which allows mixed-sex schools to admit boarders of one sex only. There are also general exceptions which allow the provision of separate facilities for girls and boys in school for reasons of privacy and decency. Of particular relevance to boarding schools is the exception relating to residential accommodation.

- Our single sex boarding houses, communal dormitories and shared washing facilities pose a significant challenge in catering for transgender students, particularly where we are restricted in terms of separate facilities and rooms available within the single sex houses. A move to a different boarding house where gender is identified as different to that of biological sex at birth, is not possible.

- Though schools are not obliged to provide separate bed spaces or allow transgender pupils to sleep in boarding houses appropriate to their gender identity, DOYRMS will consider what reasonable adjustments can be made to accommodate and support them in all other areas of the school. We will work in partnership to ensure the fullest inclusive experiences possible are available to all students, whilst maintaining our safeguarding obligations.

- Carrying out an appropriate risk assessment will assist in informing what reasonable adjustments the school can make to accommodate the student. Such an assessment will consider the wishes of the individual student, any requests from the student as to confidentiality, any health and safety considerations and the potential implications of any proposed adjustments on other students and the wider school community.

6. Online Safety

- It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. The Duke of York's Royal Military School will adopt a whole school approach to online safety which will empower, protect, and educate our students and staff in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.

- The school will ensure online safety is considered as a running and interrelated theme when devising and implementing our policies and procedures, and when planning our curriculum, staff training, the role and responsibilities of the DSL and parental engagement.

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

  o Content: being exposed to illegal, inappropriate, or harmful content. For example, pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
  o Contact: being subjected to harmful online interaction with other users. For example, child-on-child 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.
  o Conduct: personal online behaviour that increases the likelihood of, or causes, harm. For example, making, sending, and receiving explicit images (including consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying.
  o Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

- The Principal and Vice Principal (Pastoral) will be informed of any online safety concerns by the DSL, as appropriate. The trustee with responsibility for Safeguarding will report on online safety practice and incidents, including outcomes, on a regular basis to the wider trustee body.

- The school will:

  o Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year.

  o Support and educate parents/carers about online safety via our website, communications sent directly to them and during parents' days. We will also share clear procedures with them, so they know how to raise concerns about online safety.

  o Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

    ▪ Staff will not take pictures or recordings of pupils on their personal phones or cameras.

  o Make all students, parents/carers, staff, volunteers, and trustees aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology.

  o Explain the sanctions we will use if a student is in breach of our policies on the acceptable use of the internet and mobile phones.

  o Make sure all staff, students and parents/carers are aware that key staff have the power to search students' phones, as set out in the DfE's guidance on searching, screening and confiscation

  o Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.

- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community.

- This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our IT and Online Acceptable Use and Imagery Use policies.

6.1 Policies and Procedures

- The DSL has overall responsibility for online safety within the school but will liaise with other members of staff, for example IT technicians and curriculum leads as necessary.

- The DSL will respond to online safety concerns in line with our Safeguarding and other associated policies, including our Anti-Bullying, IT and Online Acceptable Use, Imagery Use and Behaviour policies.

  o Internal sanctions and/or support will be implemented as appropriate.
  o Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.

- The school uses a wide range of technology. This includes: computers, laptops, tablets and other digital devices, the internet, our learning platform, intranet and email systems.

o All school owned devices and systems will be used in accordance with our IT and Online Acceptable Use and Imagery Use policies and with appropriate safety and security measures in place.

- The school recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras, and wearable technology. In accordance with KCSIE 2023. The school has appropriate policies in place, which are shared and understood by all members of the community. These policies can be found on the here: Policies (doyrms.com)

6.2 Appropriate Filtering and Monitoring

- We employ appropriate filtering and monitoring on school devices and school networks and will do all we reasonably can to limit children's exposure to online risks through School provided IT systems.
- Our monitoring system is Senso, which is monitored by the DSL and Vice Principal (Pastoral) with risk assessed daily and revisited on a weekly basis.
- Our leadership team and relevant staff have an awareness and understanding of the filtering and monitoring provisions in place, manage them effectively and know how to escalate concerns when identified.
- All users will be informed that use of our systems can be monitored, and that monitoring will be in line with data protection, human rights, and privacy legislation.
- Filtering breaches or concerns identified through our monitoring approaches will be recorded and reported to the DSL who will respond as appropriate.
- Any access to material believed to be illegal will be reported immediately to the relevant agencies, such as the Internet Watch Foundation and the Police.
- When implementing appropriate filtering and monitoring, the school will ensure that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.
- Whilst filtering and monitoring is an important part of our online safety responsibilities, it is only one part of the school's approach to online safety.
- Students will use appropriate search tools, apps and online resources as identified by staff, following an informed risk assessment.
- Internet use will be supervised by staff as appropriate to age and ability.
- Students will be directed to use age/ability appropriate online resources and tools by staff.

6.3 Information Security and Access Management

- The school is responsible for ensuring an appropriate level of security protection procedures are in place, to safeguard our systems as well as staff and students. The policies listed below are available here Policies (doyrms.com) and in the staff shared area: -

  o IT and Online Acceptable Use Policy
  o Imagery Use Policy
  o Data Protection and Information Sharing Policy

- The school will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

6.4 Remote/Online learning

- The school will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements and any local/national guidance.

- All communication with students and parents/carers will take place using school provided or approved communication channels; for example, school provided email accounts and phone numbers and agreed systems. Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.

- Staff and students will engage with remote teaching and learning in line with existing behaviour principles as set out in the school's Behaviour, Staff Code of Conduct and IT and Online Acceptable Use policies.

- Staff and students will be encouraged to report issues experienced at home and concerns will be responded to in line with our Safeguarding and other relevant policies.

6.5 Staff Training

- The Duke of York's Royal Military School will ensure that all staff receive online safety training as part of induction and that ongoing online safety training and updates for all staff will be integrated, aligned, and considered as part of our overarching safeguarding approach. See section 7 for more information.

6.6 Educating Students

- The Duke of York's Royal Military School will ensure a comprehensive whole school curriculum response is in place to enable all students to learn about and manage online risks effectively as part of providing a broad and balanced curriculum. See section 9 for more information.

6.7 Working with Parents/Carers

- The school will build a partnership approach to online safety and will support parents/carers to become aware and alert of the potential benefits and risks and to reinforce the importance of children being safe online by using information available through National College.

- The school will ensure parents and carers understand what systems are used to filter and monitor their children's online use at school, what their children are being asked to do online, including the sites they will be asked to access and who from the school (if anyone) their child is going to be interacting with online. This is achieved by:

- Providing information on our school website and relevant policies, including the IT and Online Acceptable Use policy and through existing communication channels.

- Where the school is made aware of any potentially harmful risks, challenges and/or hoaxes circulating online, national or locally, we will respond in line with the DfE 'Harmful online challenges and online hoaxes' guidance to ensure we adopt a proportional and helpful response.

7. Staff Engagement and Expectations

7.1 Staff Awareness, Induction and Training

All training is provided annually and is governed through the PD days at the beginning of the year with updates given throughout ensuring:

- All relevant members of staff have been provided with a copy of Parts One and Five of 'Keeping Children Safe in Education' 2023 which covers safeguarding information for staff.

  - o The Senior Leadership Team, and the Deputy DSLs will read KCSIE in its entirety.
  - o All members of staff sign to confirm that they have read and understood the national guidance shared with them. This is stored on the Single Central Record.

- All new staff and volunteers receive safeguarding and child protection training (including online safety), including information to ensure they are aware of the school internal safeguarding processes, as part of their induction. This training is delivered through meeting with DSL/deputy DSL and is followed up with online training through the National College programme. This training is regularly updated and is in line with advice from the safeguarding partners.

- All trustees receive appropriate safeguarding and child protection (including online safety) training at induction. This training equips them with the knowledge to provide strategic challenges to test and assure that our safeguarding policies and procedures are effective and support the delivery of a robust whole school approach to safeguarding. This training is regularly updated.

- All staff members will receive appropriate child protection training (including online safety) to ensure they are aware of a range of safeguarding issues. This training will be updated at least annually.

- Online safety training for staff will be integrated, aligned, and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning.

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

- The school recognises the expertise staff build by undertaking safeguarding training and from managing safeguarding concerns on a daily basis and staff are encouraged to contribute to and shape safeguarding arrangements and policies.

- The DSL and Principal will provide an annual report to Trustees detailing safeguarding training undertaken by all staff and will maintain an up-to-date record of who has been trained.

7.2 Safer Working Practice

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

- The DSL will ensure that all staff have read our Safeguarding policy and are aware of school expectations regarding safe and professional practice via the Staff Code of Conduct, IT and Online Acceptable Use and Imagery Use policies. All staff will be made aware of the professional risks associated with the use of social media and electronic communication (such as email, mobile phones, texting, social networking).

- Staff will be made aware of the School's Behaviour policy. Staff will manage behaviour effectively to ensure a good and safe educational environment and will have a clear understanding of the needs of

all children. Any physical interventions and/or use of reasonable force will be in line with our agreed policy and procedures, and national guidance.

7.3   Supervision and Support

- The induction process will include familiarisation with safeguarding responsibilities and procedures to be followed if members of staff have any concerns about a child's safety or welfare.

- The School will provide appropriate supervision and support for all members of staff to ensure that:
  - All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children.
  - All staff are supported by the DSL in their safeguarding role.
  - All members of staff have regular reviews of their own practice to ensure they improve over time.

- Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL.

- The DSL will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union, the Education Support Partnership, or other similar organisations directly.

8.   Safer Recruitment and Allegations Against Staff

8.1   Safer Recruitment and Safeguarding Checks

- The school is committed to ensure that we develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our students and staff.

  o The school will follow relevant guidance in Keeping Children Safe in Education 2023 (Part Three, 'Safer Recruitment') and from The Disclosure and Barring Service (DBS)
  o Trustees and the Senior Leadership Team are responsible for ensuring that the school follows safe recruitment processes as outlined within guidance.
  o Trustees will ensure that at least one of the persons who conducts an interview has completed safer recruitment training.

- The School maintains an accurate Single Central Record (SCR) in line with statutory guidance.

- The school is committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations and related obligations under the Childcare Act in schools.

- We advise all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, reprimands, and warnings.

- Where the school places a student with an alternative provision provider, the school will continue to be responsible for the safeguarding of that child.

- The school will undertake appropriate checks to ensure the provider meets the needs of the student, including written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment.

8.2   Allegations/Concerns Raised in Relation to Staff, Including Supply Teachers, Volunteers and Contractors

- Any concerns or allegations about staff will be recorded and dealt with appropriately in line with national (Part Four of KCSIE 2023) and local (Kent) allegations arrangements. In depth information can be found within our Managing Allegations against Staff' and Staff Code of Conduct policies. These can be found here Policies (doyrms.com)

- Any concerns or allegations about staff will be recorded and dealt with appropriately in line with national (Part Four of KCSIE) and local guidance. Ensuring concerns are dealt with effectively will protect those working in or on behalf of the school from potential false allegations or misunderstandings.

- Where the Principal is unsure how to respond, for example if the school is unsure if a concern meets the harm 'thresholds', advice will be sought via the Local Authority Designated Officer (LADO) Enquiry Line and/or the Education Safeguarding Service.

- In all cases where allegations are made against staff or low-level concerns are reported, once proceedings have been concluded, the Principal (and if they have been involved, the LADO) will consider the facts and determine whether any lessons can be learned and if any improvements can be made.

8.2.1 Concerns that meet the 'harm threshold'

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

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

- Allegations against staff which meet this threshold will be responded to and managed in line with Part Four of KCSIE. Allegations that meet the harm threshold will be referred immediately to the Principal who will contact the LADO to agree further action to be taken in respect of the child and staff member. In the event of allegations of abuse being made against the Principal, these should be reported to the Chair of Trustees, who will contact the LADO.

8.2.2 Concerns That Do Not Meet the 'Harm Threshold'

- The school may also need to take action in response to 'low-level' concerns about staff. Additional information regarding low-level concerns is contained with our Staff Code of Conduct/Low-Level Concerns policies. This includes what a low-level concern is, the importance of sharing these and the confidential procedure to follow when sharing them.
- The School has an open and transparent culture in which all concerns about all adults working in or on behalf of the school are dealt with promptly and appropriately; this enables us to identify inappropriate, problematic or concerning behaviour early, minimise the risk of abuse and ensure that adults working in or on behalf of the school are clear about and act within appropriate professional boundaries, and in accordance with our ethos and values.
- A 'low-level' concern does not mean that it is insignificant; a low-level concern is any concern that an adult working in or on behalf of the School may have acted in a way that is inconsistent with our Staff Code of Conduct, including inappropriate conduct outside of work and does not meet the 'harm threshold' or is otherwise not serious enough to consider a referral to the LADO.
- Low-level concerns may arise in several ways and from several sources. For example, suspicion, complaints, or allegations made by a child, parent, or other adult within or outside of the organisation, or as a result of vetting checks.
- It is crucial that all low-level concerns are shared responsibly, recorded, and dealt with appropriately to protect staff from becoming the subject of potential false low-level concerns or misunderstandings.
- Low-level concerns should be shared confidentially with the Principal, in line with our Low-Level Concerns and Staff Code of Conduct Policies

    o Where low-level concerns are reported to the school, the Principal will be informed of all low-level concerns and is the ultimate decision maker in respect of the response to all low-level concerns.
    o The Principal will share concerns and liaise with the LADO enquiries officer via the LADO Enquiry Line.
    o Low-level concerns shared about supply staff and contractors will be shared with their employers so any potential patterns of inappropriate behaviour can be identified.
    o If the school is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, we will consult with the LADO.

- Low-level concerns will be recorded in writing and reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified.

- o Records will be kept confidential and will be held securely and retained and in compliance with the Data Protection Act and the UK General Data Protection Regulation (UK GDPR) and other relevant policies and procedures (for example data retention policies).
- o Where a pattern is identified, the School will implement appropriate action, for example consulting with the LADO enquiry line and following our disciplinary procedures.

8.3 Safe Culture

- As part of our approach to safeguarding, the school has created and embedded a culture of openness, trust and transparency in which our values and expected behaviour as set out in our Staff Code of Conduct are constantly lived, monitored and reinforced by all staff (including supply teachers, volunteers and contractors) and where all concerns are dealt with promptly and appropriately.

- Staff are encouraged and should feel confident to self-refer, if they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards. This includes where concerns may be felt to be deliberately invented or malicious; such allegations are extremely rare and as such all concerns should be reported and recorded.
- All staff and volunteers should feel able to raise any concerns about poor or unsafe practice and potential failures in the school's safeguarding regime. The Senior Leadership Team will take all concerns or allegations received seriously.

- All members of staff are made aware of the school's Whistleblowing procedure. It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk.

- Staff can access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 or email help@nspcc.org.uk

- The school has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person.   If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or Principal.

9. Opportunities to Teach Safeguarding

- The school will ensure that students are taught about safeguarding, including online safety, as part of providing a broad and balanced curriculum. This will include covering relevant issues through Relationships and Sex Education and PSHEE.

- We recognise that the school plays an essential role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour, what is 'safe,' to recognise when they and others close to them are not safe, and how to seek advice and support when they are concerned. Our curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness, and decision making so that students have a range of age-appropriate contacts and strategies to ensure their own protection and that of others.

- The school recognises the crucial role we must play in preventative education. Preventative education is most effective in the context of a whole-school approach which prepares students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment.

- The school has a clear set of values and standards, upheld, and demonstrated throughout all aspects of school life which are underpinned by our Behaviour policy and pastoral support system, as well as by a planned programme of evidence based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. Our programme is fully inclusive and developed to be age and stage of development appropriate.

- The school recognises that a "one size fits all" approach will not be appropriate for all students, and a more personalised or contextualised approach, tailored to the specific needs and vulnerabilities of individual children might be needed, for example children who are victims of abuse and children with SEND.

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

10. Physical Safety

10.1 Use of 'Reasonable Force'

- There may be circumstances when it is appropriate for staff to use reasonable force to safeguard children from harm. Further information regarding our approach and expectations can be found in our Behaviour and Positive Handling policies and is in line with the DfE 'Use of reasonable force in School's guidance.

10.2 The Use of Premises by Other Organisations

- Where services or activities are provided separately by another body using the school's facilities/premises, the Principal and Trustee with responsibility for Safeguarding will seek written assurance that the organisation concerned has appropriate policies and procedures in place regarding safeguarding children and child protection, and that relevant safeguarding checks have been made in respect of staff and volunteers. If this assurance is not achieved, an application to use the premises will be refused.

- Safeguarding requirements will be included in any transfer of control agreement (such as a lease or hire agreement), as a condition of use and occupation of the premises. Failure to comply with this will lead to termination of the agreement.

10.3 Site Security

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

- Appropriate checks will be undertaken in respect of visitors and volunteers coming into school as outlined within national guidance. Visitors will be expected to sign in and out using the Visitor's Log (available in Reception or Facilities) and to display a visitor's badge whilst on site.

- Any individual who is not known or identifiable on site should be challenged for clarification and reassurance. Students should report any concerns to a member of school staff who can also liaise with the School's Head of Security, **Lt Col. Mark Ellis**.

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

Categories of Abuse

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

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. They may be abused by an adult or adults or another child or children. It should be noted that abuse can be carried out both on and offline and be perpetrated by men, women, and children.

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

Signs that MAY INDICATE Sexual Abuse

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

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

Signs that MAY INDICATE physical abuse

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft area of the face such as the cheeks
- Fingertip bruising to the front or back of torso.
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns
- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot
- Aggressive behaviour or severe temper outbursts.

- Injuries need to be accounted for. Inadequate, inconsistent, or excessively plausible explanations or a delay in seeking treatment should signal concern.

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

Signs that MAY INDICATE emotional abuse

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

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

Signs that MAY INDICATE neglect.

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing
- Frequent lateness or non-attendance
- Untreated medical problems
- Poor relationship with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight
- Low self esteem

Local Support

Education Safeguarding Service

- **Senior Safeguarding Advisor**   Tel: 03000 423 169

- **Safeguarding Area Office**   Tel: 03000 423 154

- **Online Safety**   Tel: 03000 423 164

Other Key Kent Contacts

- **Integrated Front Door**   Tel: 03000 411 111
  (Out of Hours)   Tel: 03000 419 191

- **LADO Team**   Tel: 03000 410888
    Email: kentchildrenslado@kent.gov.uk

- **Area Education Officers**
    South Kent   Tel: 03000 410 199
    East Kent   Tel: 03000 418 794

- **Prevent Education Officer**   Tel: 03000 413 565
    Email: jill.allen@kent.gov.uk

- **Early Help**

  www.kelsi.org.uk/special-education-needs/integrated-childrens-services/early-help-and-preventative-services

- **Kent Police**   Tel: 101 **or 999 if there is an immediate risk of harm**

  PCSO Mark BALL, Youth Engagement Officer   Email: Mark.Ball@kent.police.uk
   Dover Community Safety Unit:

  PC Joel Ruddock Child Centred Policing Team   Email: Joel.Ruddock@kent.police.uk

- **Kent Safeguarding Children Multi-Agency Partnership (KSCMP)**   Email: kscmp@kent.gov.uk
    Website: www.kscmp.org.uk

- **Kent Adult Safeguarding**   Tel: 03000 41 61 61
    Email: social.services@kent.gov.uk

Further Support Organisations

NSPCC 'Report Abuse in Education' Helpline
- 0800 136 663 or help@nspcc.org.uk

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

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

Support for Students
- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- The Mix: www.themix.org.uk
- Shout: www.giveusashout.org
- Fearless: www.fearless.org
- Victim Support: www.victimsupport.org.uk

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

Support for Learning Disabilities
- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk
- Council for Disabled Children: https://councilfordisabledchildren.org.uk

Contextual Safeguarding Network
- https://contextualsafeguarding.org.uk/

Kent Resilience Hub
- https://kentresiliencehub.org.uk/

Substance Misuse
- We Are With You (formerly Addaction): www.wearewithyou.org.uk/services/kent-for-young-people/
- Talk to Frank: www.talktofrank.com

Domestic Abuse
- Domestic abuse services: www.domesticabuseservices.org.uk
- Refuge: www.refuge.org.uk

- Women's Aid: www.womensaid.org.uk
- Men's Advice Line: www.mensadviceline.org.uk
- Mankind: www.mankindcounselling.org.uk
- Respect Phoneline: https://respectphoneline.org.uk

Criminal and Sexual Exploitation
- National Crime Agency: www.nationalcrimeagency.gov.uk/who-we-are
- It's not okay: www.itsnotokay.co.uk
- NWG Network: www.nwgnetwork.org
- County Lines Toolkit for Professionals: www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit

Honour Based Abuse
- Karma Nirvana: https://karmanirvana.org.uk
- Forced Marriage Unit: www.gov.uk/guidance/forced-marriage
- FGM Factsheet: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf
- Mandatory reporting of female genital mutilation: procedural information: www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information
- The right to choose - government guidance on forced marriage: www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage

Child-on-Child abuse, including bullying, sexual violence and harassment
- Rape Crisis: https://rapecrisis.org.uk
- Brook: www.brook.org.uk
- Disrespect Nobody: www.disrespectnobody.co.uk
- Upskirting – know your rights: www.gov.uk/government/news/upskirting-know-your-rights
- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Stop it Now! www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- Anti-Bullying Alliance: www.anti-bullyingalliance.org.uk
- Diana Award: www.antibullyingpro.com/
- Kidscape: www.kidscape.org.uk

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

Mental Health
- Mind: www.mind.org.uk
- Moodspark: https://moodspark.org.uk

- Young Minds: www.youngminds.org.uk
- Anna Freud: www.annafreud.org/schools-and-colleges/

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

Children with Family Members in Prison
- National information Centre on Children of Offenders (NICCO): https://www.nicco.org.uk/

Vulnerable Students Policy

1. Introduction

This policy outlines the steps the school will take to systematically identify vulnerable students and the measures that will then be implemented to maximise the success of these students.

2. Initial indicators of students being at risk of underachievement or of disengagement

Students at The Duke of York's Royal Military School may be considered vulnerable and/or at risk of underachievement or disengagement if they:

- Have an identified learning difficulty/disability.
- Are from a minority ethnic group.
- Use English as an additional language.
- Children/young people who have current support from social services and other safeguarding services due to having been assessed to be at risk of harm.
- Children/young people who have previously been identified as being vulnerable or at risk of harm by health, education, or partner agencies.
- Are late starters to their academic year.
- Have a clinically diagnosed chronic health condition which may impact on their outcomes if it cannot be safely and effectively managed.
- Have parents who are deployed overseas in politically sensitive areas.
- Young carers.
- Students with parents who have chronic or life-limiting medical conditions.
- Students with a diagnosis of mental ill-health/ students requiring significant support with their emotional health.
- Other reason (specify).

3. How risk will be determined

Initial risk will be determined at the start of the student journey. Admission documentation is reviewed by the clinical team at the Medical Centre to establish indicators of vulnerability. An individual health care plan will be created in partnership with parents and, where appropriate, clinical specialist teams, where a health need is identified. These are shared with staff who have responsibility for the student whilst at school and are reviewed annually or as needs/ treatment changes, whichever is the soonest. Safeguarding needs are reviewed by the Designated Safeguarding Lead. The school team will work in partnership with Local Authorities, previous schools, and partner agencies to ensure the early identification of vulnerability. Confidentiality is paramount and care will be taken to ensure information is only shared in the best interests of the student, where it can be shown it is for the purpose of providing appropriate support to minimise the barriers faced by those defined as vulnerable and/or at risk of underachievement or disengagement.

5. How information about vulnerable students will be communicated and monitored

The DSL will conduct regular student meetings with individual housemasters/mistresses to identify students requiring support and to review the progress of vulnerable students.

Information about a student's support needs and vulnerability may be confidential and may be of a sensitive nature. Care will be taken to keep all information secure and accessible only to relevant staff. Highly sensitive information, e.g., information relating to a safeguarding issue, or a Student Support Plan will be accessible only by relevant staff, as determined by the Designated Safeguarding Lead or SLT. Information will be updated as and when it becomes available. All students defined as at risk will be monitored closely and the school will ensure interventions are timely and effective.

6. **How risk/vulnerability is determined**

   See Annex 1.

7. **Guidelines and procedures for working with students who are, or are at risk of, being sexually active**

   - If a student is highlighted by a member of staff as being at risk of sexual activity or sexualised behaviour, the Designated Safeguarding Lead will be notified, and a risk assessment will be completed by the Housemaster/mistress and DSL. If the student is identified as having harmful sexual activity or seriously harmful sexual activity, a consultation with Kent Safeguarding will take place on the same day as the completion of the risk assessment. The risk assessment will be added to the student's safeguarding record.

   - If the sexual activity or sexualised behaviour is mentioned as part of a medical consultation, either with the Doctor or the Nursing staff, this will be deemed a confidential matter. The Nursing team will complete an assessment to establish whether the student is at risk of harm. If a student is identified as having harmful sexual activity, this information <u>must</u> be passed that same day to the Designated Safeguarding Lead who will consult with the Kent Safeguarding team.

8. **Guidelines and procedures for working with students who are at risk of Child Sexual Exploitation**

   If a student is highlighted by a member of staff as being sexually active and/or at risk of CSE the Designated Safeguarding Lead will be notified to determine next steps.

9. **FGM**

   Whilst all staff will speak to the DSL (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the Police. The DSL will support the teacher through this procedure.

10. **Radicalisation**

    If staff have suspicions that a student may be at risk of radicalisation, they must consult immediately with a member of the safeguarding team so that appropriate and swift action can be taken. Any staff requiring further information regarding this subject should consult with a member of the safeguarding team.

11. **Links to other policies**

    Anti-Radicalisation Policy
    Safeguarding and Child Protection Policy
    Medical Care Policy
    Sex and Relationships Policy
    Personal, Social, Health and Economic Wellbeing Education Policy

12. **Review**

    The Vulnerable Students Policy will be reviewed annually by the Designated Safeguarding Lead (DSL.

Anti-Radicalisation Policy

1.   Introduction

The Duke of York's Royal Military School is fully committed to safeguarding and promoting the welfare of all its students. As a School we recognise that safeguarding against radicalisation is no different from safeguarding against any other vulnerability. All staff are expected to uphold and promote the fundamental principles of British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs.

In formulating this policy, the trustees have taken account of the guidance from the Department for Education (DfE) who has called for all public bodies to make explicit their preventative measures to minimise the threat of extremism in their setting.

2.   Definitions and Indicators

Radicalisation is defined as the act or process of making a person more radical or the favouring of extreme or fundamental changes in political, economic, or social conditions, institutions, or habits of the mind.

Extremism is defined as the holding of extreme political or religious views.

The governing body has a zero-tolerance approach to extremist behaviour for all community members. We rely on our strong values to steer our work and ensure the pastoral care of our students protects them from exposure to negative influences.

3.   Aims and Principles

The main aims of this policy are to ensure that staff are fully engaged in being vigilant about radicalisation; that they overcome professional disbelief that such issues will not happen here and ensure that we work alongside other professional bodies and agencies to ensure that our students are safe from harm.

The principle objectives are that:

- Students are encouraged to adopt and live out our core values. These complement the key "British Values" of tolerance, respect, understanding compassion and harmonious living.

- Students are helped to understand the importance of democracy and freedom of speech, through the PSHEE curriculum, assemblies, and the elected School Council members.

- Students are taught how to keep themselves safe, both in School and when using the internet.

- Students participate in local community events so that they appreciate and value their neighbours and friends who may not share their faith background.

- Student wellbeing, confidence and resilience is promoted through our planned curriculum and out of hours learning opportunities.

- Students are supported in making good choices, so they understand the impact and consequences of their actions on others.

- Trustees, teachers, teaching assistants and non-teaching staff demonstrate an understanding of what radicalisation and extremism are and why we need to be vigilant in School.

4.   **Procedures for Referrals**

It is important for us to be constantly vigilant and remain fully informed about the issues which affect the region in which we teach. Staff are reminded to suspend any professional disbelief that instances of radicalisation 'could not happen here' and to refer any concerns through the appropriate channels (currently via the Safeguarding team).

This policy is strictly adhered to should issues arise.

5.   **The Role of the Curriculum**

Our curriculum promotes respect, tolerance, and diversity. Students are encouraged to express themselves through discussions, debates, and consultations. Students are taught about how to stay safe when using the Internet.

6.   **Staff Awareness**

As part of wider safeguarding responsibilities staff will be alert to:

- Disclosures by students of their exposure to the extremist actions, views, or materials of others outside of School such as in their homes or community groups, especially where students have not actively sought these out.

- Graffiti symbols, writing or artwork promoting extremist messages or images.

- Students accessing extremist material online, including through social networking sites.

- Distributing extremist literature and documentation.

- Parental reports of changes in behaviour, friendship or actions and requests for assistance.

- Partner schools, local authority services and Police reports of issues affecting students in other schools or settings.

- Students voicing opinions drawn from extremist ideologies and narratives.

- Use of extremist or 'hate' terms to exclude others or incite violence.

- Intolerance of difference, whether secular or religious or, in line within our equalities policy, views based on, but not exclusive to, gender, disability, sexual orientation, race, colour or culture.

- Attempts to impose extremist views or practices on others.

- Anti-Western or Anti-British views.

7. **Training**

Whole School in-service training on safeguarding will be organised for staff and trustees on an annual basis and will comply with the prevailing arrangements agreed by the Local Authority. The annual training will provide specific guidance on extremism and radicalisation and its safeguarding implications.

The Designated Safeguarding Lead will attend training courses as necessary, and the appropriate inter-agency training organised by the Local Authority at least every two years. Again, this will include training on extremism and radicalisation and its safeguarding implications.

Information is provided to staff as part of our safeguarding training programme (PREVENT) to allow staff to identify possible changes in student behaviour that may suggest the student has become influenced by extremist ideology. This may include changing their style of dress, particularly in the Sixth Form, loss of contact with traditional groups of friends, using insulting or derogatory language to describe groups opposed by extremists or evidence the student may have recently joined a gang in the local community or at home. The School's PREVENT officer is **Mr Ed Pallant.**

Staff training will also provide staff with information on factors that may make young people want to be radicalised, i.e., status, identity, sense of belonging, neglect in the family, a need to re-dress some form of injustice, excitement, adventure, political motivation, moral motivation, family / other friends involved in extremist activities. Training will also focus significantly on the possible impact of extremist views on the young person once they have been radicalised, i.e. – over-identification so that extremist views become the norm, development of an 'us and them' thinking and dehumanising the perceived enemy.

Annual safeguarding training reinforces the message that staff should never attempt to impose their political or religious views and beliefs on students under any circumstances. The School will use appropriate systems to deal with any member of staff trying to use their position of trust to influence the views of young people at the School.

8.   Resources

This policy also draws on the following DfE Guidance:

- Keeping Children Safe in Education 2023
- The Prevent Duty Guidance
- Promoting Fundamental British Values as Part of SMSC in Schools

and HM Government guidance:

- CONTEST - The United Kingdom's Strategy for Countering Terrorism