



Child Protection and Safeguarding Policy

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Date of next review: September 2026

This policy will be reviewed annually and updated in response to changes in national or local guidance. DSLs and leaders should monitor for updates to KCSIE 2025 and revise policies accordingly

Key Contacts

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Other key staff <i>e.g. Trust Safeguarding Lead</i>		
<u>Local Safeguarding Partners</u>		
First Response & SPA	For urgent child protection concerns	01634 334466 (Monday to Friday from 9am to 5pm)
First Response/ Family Solutions	To request non-urgent support	Portal
Out of Hours – Emergency Duty Team	For urgent child protection concerns	03000 419 191
Kent Police	Emergency situations	999 for urgent matters
Local Authority Designated Officer	Allegations against adults in school	01634 331065 LADO referral
Education Safeguarding Service	Advice/Training/ Reviews	01634 331464 or 01634 331017 educsafeguarding@medway.gov.uk
Medway Safeguarding Children Partnership (MSCP)	Links to key Medway safeguarding documents, training and processes	01634 336 329 mscp@medway.gov.uk
Prevent Education Officer	Prevent advice & training	Sally.Green2@kent.gov.uk
<u>National Contacts</u>		
NSPCC Whistleblowing Helpline	Free advice and support to professionals about how CP issues are being handled in their own or other organisation.	0800 028 0285 help@nspcc.org.uk



<u>Training</u>	<u>DSL Date</u>	<u>Safer Recruitment Date</u>
<u>M.Ireland</u>	<u>01.07.2025</u>	<u>12.06.2024</u>
<u>J.Studniarz</u>	<u>Online Refresher</u> <u>03.09.2025 - Face to</u> <u>face upcoming</u>	<u>NA</u>
<u>C.Beer</u>	<u>08.09.2025</u>	<u>NA</u>
<u>E.Parsons</u>	<u>11.01.2024</u>	<u>12.06.2024</u>
<u>L.Branscombe-Ling</u>	<u>11.01.2024</u>	<u>NA</u>
<u>G.Evans</u>	<u>11.01.2024</u>	<u>NA</u>
<u>E.Barnwell</u>	<u>13.03.2025</u>	<u>NA</u>
<u>E.Roworth</u>	<u>13.03.2025</u>	<u>NA</u>
<u>R.Page</u>	<u>09.07.2024</u>	<u>NA</u>
<u>J.Penn</u>	<u>NA</u>	<u>29.11.2023</u>



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1. What to do if you have a concern about a child at Phoenix Primary School

Inform the Designated Safeguarding Lead – Claire Beer Cbeer@phoenixprimary.com or listed DDSLs above

Why are you concerned?

For example:

- Allegation/ child shares a concern or worry
- Behaviour change(s)
- Child's appearance; may include frequent or unexplained injuries/marks/bruises and or clothes
- Witnessed concerning, harmful or inappropriate behaviour

Record decision making and action taken in the pupil/student's Child Protection/safeguarding file

Monitor - Be clear about:

- What **ACTION** you have taken at the time of reporting the concerns, and why.
- What you are monitoring e.g. behaviour trends, appearance etc.
- How long you will monitor.
- Who is responsible?
- Where, how and to whom you will feedback and how you will record.

At all stages the child's situation will be kept under review *(if necessary)*

The DSL/Staff will request further support if required to ensure the child's safety is paramount

If you are unhappy with the response DSL/Staff:

- Follow [MSCP escalation procedures](#)
- Follow Whistleblowing procedures

[Whistleblowing Procedure](#)

Pupils/Students and Parents: Follow school [Complaints Procedure](#).



2. Introduction and Ethos

Procedures in this policy apply to all staff, including temporary or agency staff, students on placement, governors and volunteers and are consistent with Keeping Children Safe in Education 2024

- Phoenix Primary School recognise our statutory responsibility to safeguard and promote the welfare of all children. Safeguarding is everybody's responsibility and all those directly connected (staff, volunteers, governors, leaders, parents, families, and learners) 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.
- Phoenix Primary School recognises the importance of providing an ethos and environment within school that will help children to be safe and feel safe. In our school children are respected and encouraged to talk openly. 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, or sexual identity, have equal rights to protection.
- Our school acknowledges the need to treat everyone with equity, with fairness, dignity and respect. We recognise that unconscious bias may impact upon our perceptions and expectations of children, particularly those from minority groups and that this may influence the safeguarding actions we take. We seek to educate and challenge all members of the school community to address equality of access and opportunity for all children, by highlighting inequalities and increasing awareness.
- Staff challenge any form of derogatory and sexualised language or behaviour. They are vigilant to sexualised/aggressive touching/grabbing. We recognise that groups at particular risk include girls, pupils/students who are, or are perceived to be Lesbian, Gay, Bisexual, Trans or gender questioning, and pupils/students with SEND. We recognise that these children can be targeted by other children and acknowledge the importance of a safe space for them to speak out or share their concerns with members of staff. Pupils/students are protected from up-skirting, bullying (including cyberbullying), homophobic, bi-phobic and transphobic behaviour, racism, sexism, and all other forms of discrimination. Any discriminatory behaviours are challenged, and children are supported to understand how to treat others with respect. We also have a statutory duty to report and record any of the above incidents. Staff have familiarity with the Equality Act 2010 and the Public Sector Equality Duty (PSED), the Human Rights Act 1998 and recent reforms to the Act and how they apply to safeguarding.
- This policy applies where there are any child protection concerns regarding children who attend the school/college but may also apply to other children connected to the school/college, for example, siblings, younger members of staff (under 18) or children on student/work placements.
- Through their day-to-day contact with pupils/students and their direct work with families, all staff and volunteers in school have a crucial role to play in noticing indicators of possible abuse, neglect and/or exploitation at an early stage. Our school may be the only secure, stable, and predictable element in their lives.



- **Phoenix Primary School** recognises the need for a trauma-informed approach to safeguarding, considering the root causes and possible underlying trauma behind children's behaviour.
- Phoenix Primary School will endeavour to support the welfare and safety of all pupils through:
 - Ensuring that the child's welfare is of paramount importance.
 - Training all staff are to recognise the signs and symptoms of abuse and to know the school's procedures and lines of communication.
 - Ensuring that children's mental and physical health or development is not impaired.
 - Providing children, a balanced curriculum including PSHE (Personal, Social and Health Education); RSE (Relationships and Sex Education) to help pupils / students stay safe, recognise when they don't feel safe and identify who they might / can talk to.
 - Working with parents to ensure they understand the school's legal responsibility to ensure the welfare of all children including the need for referral to other agencies in some situations.
 - Keeping confidential records which are stored securely and shared appropriately with other professionals.
 - Ensuring the voice of the child is evident in case files and informs schools policy developments.
 - Ensuring that the school practices safer recruitment processes in checking the suitability of staff, supply staff, volunteers, visitors and contractors.
 - Informing parents about expected behaviour and our legal responsibility to safeguard and promote the welfare of all our children at our school.
- Phoenix Primary School expects that if any member of our community has a safeguarding concern about any child or adult, they will act immediately.
- This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, 'Keeping Children Safe in Education' 2025 (KCSIE) which requires individual schools and colleges to have an effective child protection policy.
- The procedures contained in this policy apply to all staff, including and governors, temporary or third-party agency staff and volunteers) and are consistent with those outlined within KCSIE 2025

3. Policy Context

- This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes:
 - DfE Keeping Children Safe in Education 2025(KCSIE)
 - Working Together to Safeguard Children 2023 (WTSC)
 - Ofsted: Education Inspection Framework 2019
 - Framework for the Assessment of Children in Need and their Families 2000)
 - Kent and Medway Safeguarding Children Procedures (Online)
 - Early Years and Foundation Stage Framework 2025 (EYFS)
 - The Education Act 2002



- [Sections 175 and 157 of the Education Act 2002](#) require school governing bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are pupils or students 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.

4. Definition of Safeguarding

- Safeguarding children is defined in Working Together to Safeguard Children 2023 and Keeping Children Safe in Education 2025 as:
 - **Providing help and support to meet the needs of children as soon as problems emerge**
 - **Protecting children from maltreatment, whether that is within or outside the home, including online**
 - **preventing impairment of children's mental and physical health or development**
 - **ensuring that children are growing up in circumstances consistent with the provision of safe and effective care**
 - **taking action to enable all children to have the best outcomes**

(Children includes everyone under the age of 18)

Child Protection – is a part of safeguarding and is defined as activity undertaken to protect specific children from significant harm. this includes harm inside or outside the home or online.

5. Key Responsibilities

5.1 Governance and Leadership

- The Governing Body and leadership team have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation.
- The Governing Body and leadership team ensure that policies and procedures are in place so that appropriate action is taken, in a timely manner, to safeguard and promote children's welfare.
- The Governing Body have regard to the guidance in KCSIE and will ensure our policies, procedures and training is effective and always complies with the law.
- The Governing Body / Proprietor will ensure that all governors/trustees receive appropriate safeguarding and child protection (including online safety) training at induction. This training will be regularly updated. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole school approach to safeguarding.



- Barbara Fincham is the nominated governor for safeguarding, who will take the lead role in ensuring that the school has an effective policy which interlinks with related policies; that locally agreed procedures are in place and being followed; and that the policies are reviewed at least annually and when required.
- The Governing Body will ensure they facilitate a whole school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies should operate with the best interests of the child at their heart.
- The Governing Body/Proprietor regularly review the effectiveness of school filtering and monitoring systems. They/I ensure that the leadership team and relevant staff are:
 - aware of and understand the systems in place
 - manage them effectively
 - know how to escalate concerns when identified.
- The Governing Body and Headteacher ensure that the DSL is suitably supported in their role; has the appropriate status, authority, funding, resources, and training. They assure themselves that the DSL understands they have the responsibility in leading safeguarding and child protection across the school

5.2 Designated Safeguarding Lead

- The school has appointed Melissa Ireland-Hubbert (DSL- Headteacher) and Claire Beer as the Designated Safeguarding Lead They are a members of the senior leadership team. The DSL has the overall responsibility for the day-to-day oversight of safeguarding and child protection systems in school.
- We have appointed eight Deputy DSLs (DDSLs), who have delegated responsibilities and act in the DSL's absence.
- Whilst the activities of the DSL may be delegated to the deputies, the ultimate **lead responsibility** for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.
- The DSL carries out their role as identified in Appendix C of Keeping Children Safe in Education, (P170) 2025, these duties are set out in their job description.
- The Designated Safeguarding Lead undergoes appropriate training to provide them with the knowledge and skills required to carry out their role. DDSLs are trained to the same standard as the DSL. Accredited DSL training, specific to the role, is renewed every two years. Knowledge and skills are updated at regular intervals, **at least annually**, according to the needs of the school
- The headteacher is kept informed of any significant issues by the DSL.
- Availability - during term time the DSL (or a DDSL) is always available (during school hours) for school staff to discuss any safeguarding concerns. Adequate and appropriate cover arrangements are made for school trips and any out of hours/out of term activities



During school holidays, the DSL will provide appropriate emergency contact details to the MASH Education Lead on the understanding that these will only be used if absolutely necessary and will not be shared elsewhere.

The Designated Safeguarding Lead (DSL) is responsible for fulfilling the duties outlined in Annex C of *Keeping Children Safe in Education* (KCSIE). These responsibilities include, but are not limited to:

- Act as main contact point for all school staff to discuss any safeguarding concerns.
- Manage and maintain the confidential paper/electronic case management systems to record concerns about pupils/students to ensure the quality of information is accurate, proportionate, and timely, also assessment/referrals are made appropriately.
- Coordinate safeguarding action for individual children. In the case of Children in Care, the DSL should have the details of the child's social worker and the name of the virtual school head in the authority who looks after the child (with the DSL liaising closely with the designated teacher.)
- Liaise with the headteacher or principal to inform them of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This includes being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - [PACE Code C 2019](#)
- To liaise with safeguarding partners, other agencies, and staff in line with KCSIE 2025 and WTSC 2023.
- Ensure that Medway referral procedures are followed as necessary (see referral process page 2).
- Support educational outcomes by effectively sharing information about welfare, safeguarding, and child protection concerns—including those affecting children with a social worker—with teachers and school or college leadership team
- As required, represent and liaise appropriately with other professionals and ensure the school is represented at multi-agency safeguarding meetings (including child protection conferences).
- Act as a source of support, advice and expertise for all staff during term time for staff in the school to be able to discuss any safeguarding concerns.
- Understand the importance of information sharing both within the school and with other schools and agencies.
- To encourage a culture of listening to children and taking account of their wishes and feelings, among all staff this will assist with any measures the school may put in place to protect them.
- Ensure all staff access appropriate safeguarding training and relevant updates in line with the recommendations within Keeping Children Safe in Education 2025

5.3 Members of Staff

**The welfare and safety of children is the responsibility of all staff in school.
ANY concern for a pupil's welfare MUST be reported to the Designated Safeguarding Lead.**

All members of staff have a responsibility to:

- Provide a safe environment in which children can learn and promote the child's welfare.
- Maintain an attitude of '**it could happen here**' where safeguarding is concerned and to always act in the best interests of the child.



- Be alert to any issues of concern in a child's life at home or elsewhere including the online world.
- Understand the early help process and their role in it.
- Be aware of the indicators of abuse, neglect and exploitation, so they can identify cases of children who may be in need of help or protection.
- Understand that children may not feel ready to or know how to tell someone they are being abused, exploited, or neglected and/or that they may not recognise their experiences as harmful. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. They may feel embarrassed, humiliated or be being threatened. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns any about a child.
- Consider wider environmental factors in a child's life that may be a threat to their safety and/or welfare.
- Be aware of the process of making referrals to children's social care and statutory assessment under the Children Act 1989.
- Build trusting relationships which facilitate communication with children and young people.
- Know what to do if a child tells them that he or she is being abused, neglected or exploited and understand the impact abuse and neglect can have upon a child.
- Know how to maintain an appropriate level of confidentiality.
- Understand and comply with this policy and understand other safeguarding policies and systems.
- ***Staff help improve and enhance the safeguarding policy through their contributions and development***
- To undertake and engage with regular and appropriate training, that is regularly updated.
- Be aware of, and take appropriate action to raise concerns, about poor or unsafe practice, or potential failures in the school safeguarding regime. (This may include accessing the school whistleblowing policy)
- act in line with our staff [code of conduct/behaviour policy](#)
- act in line with the [Teachers' Standards](#) which state that teachers (including headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

5.4 Children and Young People

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

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

5.5 Parents and Carers

Parents/carers have a responsibility to:

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



- Talk to their children about safeguarding issues and support the school in their safeguarding approaches.
- Identify behaviours which could indicate that their child is at risk of harm, including online
- Follow the procedure for lodging complaints to address issues and guarantee Phoenix Primary School's prompt response.
- Seek help and support from the school, or other appropriate agencies.
- We are committed to working with parents positively, openly, and honestly. We ensure that all parents are treated with respect, dignity, and courtesy. We respect parents' rights to privacy and confidentiality, and will not share sensitive information, unless we have permission, or it is necessary to do so to protect a child/children.

6. Child Protection and Safeguarding Procedures

6.1 Recognising Indicators of Abuse, Neglect and Exploitation

- As a school we are aware that abuse, neglect and safeguarding issues are rarely individual events that can be covered by one definition or label. In most cases multiple issues will overlap with one another, This is outlined locally within the [Medway Threshold Guidance](#).
- Knowing what to look for is vital to the early identification of abuse and neglect. If staff are unsure, they should always speak to the Designated Safeguarding Lead (or a deputy).
- All staff in school are aware of the definitions and indicators of abuse and neglect. There are four categories of abuse:

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

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.

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



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

7. Specific Safeguarding Issues

- Phoenix Primary is aware of environmental factors which may impact on a child's welfare and safety and understand safeguarding in the wider context.
- Phoenix Primary staff are mindful that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care (such as a Child in Need, or Child Protection, plan).
- All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, unexplainable absences from education, and sharing nudes or semi-nude images (also known as youth produced sexual imagery) put children in danger. The categories/issues that follow are by no means an exhaustive list but give an indication of the current themes in safeguarding and protecting children.

7.1 Child-on-Child Abuse

- Phoenix Primary recognises that children can abuse other children and that it can happen both inside and outside of school and online. This is referred to as child-on-child abuse and can take many forms. You may wish to refer/link your Child-on-Child abuse policy here.
- Phoenix Primary believes and understands the importance of challenging inappropriate behaviours between children that are abusive in nature. Staff understand that abuse is



abuse, and it will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”. All victims will be taken seriously and offered appropriate support, regardless of where the abuse takes place.

- Phoenix Primary recognises that child-on-child abuse can take many forms, including but not limited to:
 - bullying, including cyberbullying
 - physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
 - sexual violence and sexual harassment
 - ‘up-skirting’, which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or to cause the victim humiliation, distress or alarm
 - nude or semi-nude image sharing (also known as ‘sexting’ or youth produced/involved sexual imagery)
 - initiation/hazing type violence and rituals
- Staff and leadership recognise that that some child-on-child abuse issues may be affected by gender, age, ability and culture of those involved, (i.e. for gender-based abuse, girls are more likely to be victims and boys more likely to be perpetrators) however, all child-on-child abuse is unacceptable, and all reports will be taken seriously.
- In order to minimise the risk of child-on-child abuse, we will:
 - We will implement a robust anti-bullying policy, providing an age/ability appropriate PSHRE curriculum, providing a range of reporting mechanisms e.g. dedicated reporting emails monitored by DSLs, online report forms, worry boxes, visual and proactive pastoral team.
- Phoenix Primary will not tolerate, dismiss or minimise any harmful behaviours in school and will take swift action to intervene when this occurs. All allegations of child-on-child abuse will be recorded, investigated, and dealt with in line with associated school/college policies, including child protection, anti-bullying and behaviour.
- Alleged victims, perpetrators and any other child affected by child-on-child abuse may be supported by:
 - taking reports seriously, listening carefully, avoiding victim blaming, providing appropriate pastoral support, working with parents/carers, reviewing educational approaches, and in cases of sexual assault, informing the police and/or First Response.
- The school will take steps to ensure that appropriate curriculum time is dedicated to enabling children to develop an awareness and understanding of abusive behaviour and minimise the risk of all forms of child-on-child abuse. We will also ensure that children recognise warning signs and what support is available, both within the school and externally (such as Kent Police, ChildLine etc.).

7.2 Sexual Violence or Harassment

- Phoenix Primary will follow the guidance outlined in part five of KCSIE 2025. When responding to concerns relating to child-on-child sexual violence or harassment:
 - If DSLs are unsure how to proceed, advice will be sought from the Education Safeguarding Service.
 - [Peer on Peer Abuse Procedure](#)
 - Hackett’s Continuum will be used as a tool advised from Kent Safeguarding



- Phoenix Primary 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.
- Staff must be vigilant and recognise that information may come from overheard conversations or observed behaviour changes. Abuse that occurs online or outside of the school/College will not be dismissed or downplayed and will be treated as seriously and in line with relevant policies/procedures, for example anti bullying, behaviour, child protection, online safety.
- It is essential that all victims of sexual violence or sexual harassment are reassured that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment or be made to feel ashamed for making a report.
- Immediate consideration will be given as how to best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted).
- When there has been a report of sexual violence or harassment, the DSL will make an immediate risk and needs assessment. The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children, adult students and staff and any actions that are required to protect them.
- Where possible, KCSIE 2025 recommends that two members of staff manage reports of sexual violence and harassment.
- Reports will initially be managed internally by Phoenix Primary and where necessary will be referred to Children's Services and/or the Police.
- The decision making and required action taken will vary on a case by case basis, but will be informed by the wishes of the victim; the nature of the alleged incident (including whether a crime may have been committed); the ages and developmental stages of the children involved; any power imbalance between the children; if the alleged incident is a one-off, or a sustained pattern of abuse; if there are any ongoing risks to the victim, other children, adult students or Phoenix Primary staff; and, any other related issues or wider context.
- We will reassure and teach our pupils to understand that the law is in place to protect children and young people, rather than criminalise them.
- Phoenix Primary will regularly review decisions and actions to update and improve policies and practice.
- The school will consider the physical and mental health implications for both the victim and perpetrator. It is identified that both individuals will need additional support and provision of further information about harmful sexual behaviours and may need signposting to further sources of support.

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

- DSLs will respond to concerns as set out in the non-statutory UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) (Updated March 2024)
- The term 'sharing nudes and semi-nudes' is used to mean the sending or posting of nude or semi-nude images, videos or live streams of/by young people under the age of



18. Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents complex.

- When made aware of concerns involving nude or semi-nude image taking/sharing involving children, staff are advised to:
 - Report any concerns involving nude or semi-nude image sharing involving children to the DSL immediately.
 - Never view, copy, print, share, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already viewed the imagery by accident (e.g., if a child has shown it to them), this must be immediately reported to the DSL.
 - Not delete the imagery or ask the young person to delete it.
 - Not say or do anything to blame or shame any children involved.
 - Explain to child(ren) involved that they will report the issue to the DSL and reassure them that they will receive appropriate support and help.
 - Not ask the child or children involved in the incident to disclose information regarding the imagery and not share information about the incident with other members of staff, the child(ren) involved or their, or other, parents and/or carers. This is the responsibility of the DSL.
- Phoenix Primary recognises that nude and semi-nude image sharing (also known as youth produced/involved sexual imagery or “sexting”) is a safeguarding issue; this also includes AI produced sexual imagery. All concerns will be reported to and dealt with by the DSL (or deputy).
- the DSL will hold an initial review meeting with appropriate staff and will speak with the children involved if appropriate.
- parents and carers will be informed at an early stage and involved in the process of supporting their children, unless there is good reason to believe that involving them would put a child at risk of harm.
- a referral will be made to Children’s Services 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 or SEND).
 - the image/videos involve sexual acts and a child under the age of 13,
 - depict sexual acts which are unusual for the child’s developmental stage,
 - are violent, or
 - a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes.
- All decisions will be recorded in line with our child protection procedures and will be based on the consideration of the best interests of any child involved. The DSL may choose to involve other agencies at any time, if further information/concerns are disclosed.
- If DSLs are unsure how to proceed, advice will be sought from Children Services.

Hackett’s Continuum and Harmful Sexual Behaviour in Primary School Children

1. What is Hackett’s Continuum?

Hackett’s Continuum is a framework developed by Professor Simon Hackett (2010) to help professionals understand and categorise sexual behaviours in children and young people. It presents sexual behaviour on a spectrum from developmentally typical to highly concerning, allowing for a nuanced understanding of what is normal, problematic, or harmful.



The continuum includes five categories:

- - Normal: Developmentally expected, socially acceptable, mutual, and consensual.
- - Inappropriate: Single instances of behaviour that may be socially acceptable in one context but inappropriate in another.
- - Problematic: Developmentally unusual, socially unexpected, may lack mutuality or involve unclear consent.
- - Abusive: Involves coercion, misuse of power, lack of consent, and potential for emotional or physical harm.
- - Violent: Physically violent sexual abuse, often involving sadism or instrumental violence.

2. How is the Continuum Used?

The continuum is used to assess the nature and severity of a child's sexual behaviour, distinguish between developmentally typical behaviours and those that are cause for concern, guide proportionate and appropriate responses, and support early identification and prevention of escalation in harmful sexual behaviour (HSB).

Professionals are encouraged to consider:

- - The age and developmental stage of the child.
- - The context and frequency of the behaviour.
- - Whether the behaviour involves coercion, secrecy, or distress to others.
- - The power dynamics between children involved.

3. Application

Phoenix Primary School plays a critical role in identifying and responding to HSB. The Hackett Continuum supports schools to recognise early signs of problematic or harmful sexual behaviour, respond proportionately, safeguard all children involved, record concerns accurately, and refer to external agencies where necessary.

Schools are advised to:

- - Embed the continuum into staff training and safeguarding procedures.
- - Use it alongside tools like the NSPCC's traffic light system to support decision-making.
- - Ensure that responses are non-shaming, trauma-informed, and focused on understanding the underlying needs of the child.

[Responding to children who display sexualised behaviour](#)

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

- Phoenix Primary recognises 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 sexual or criminal activity.
- Phoenix Primary 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, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

- 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).
- Phoenix Primary 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.
- CSE can be difficult to spot and sometimes mistaken for "normal" teenage behaviour. Knowing the signs can help protect children and help them when they've no one else to turn to. To support in identifying the signs of child sexual exploitation please refer to the Kent and Medway [Exploitation Identification Tool](#) and the MSCP Risk [Assessment tool for sexually active young people](#).
- 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.

7.5 Serious Violence

- All staff should be aware of the indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include increased absence from school or college, a change in friendships or relationships with older individuals or groups, a significant decline in educational 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 criminal exploitation.
- Phoenix Primary School recognises that certain factors may increase a child's vulnerability to involvement in serious violence. These include being male, frequent absence or permanent exclusion from school, experiences of child maltreatment, and involvement in criminal activity such as theft or robbery. Additionally, the risk of serious violence may be heightened during times when pupils/students are travelling to and from school or college, particularly just before or after the school day.

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

- Phoenix Primary will make referrals to Children's Services and the police if we have reason to believe a student has become involved in these types of activity.
- In addition, where an exploitation concern has been identified, the form linked below will also be completed, to provide intelligence to the police on local exploitation concerns and issues. The portal allows for the reporting of suspected perpetrators of child exploitation and Places and Spaces where Child Exploitation is suspected of taking place and vehicles believed to be connected to be exploiting children. [Report an Exploitation Concern Online](#).



This is for Child Exploitation specifically. General vulnerability concerns still need to be reported directly to the police (101 or 999).

Please note, this portal is not suitable for reporting crime, as is not constantly monitored

7.6 Mental Health

- Phoenix Primary will ensure that all staff have an awareness of mental health problems and be aware that in some cases they can be an indicator that a child has suffered, or is at risk of suffering, abuse, neglect, or exploitation. Staff are aware of how children's experiences, can impact on their mental health, behaviour, and education.
- Where children have suffered abuse, neglect and exploitation, or other potentially traumatic adverse childhood experiences (ACES), this can have a lasting impact throughout childhood, adolescence and into adulthood. It is important that staff are aware of how these experiences can impact on children's mental health, behaviour, and education.
- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are '**well placed**' to identify behaviour indicating a mental health problem or being at risk of developing one.
- If staff have a concern about a child's mental health, that is also a safeguarding concern, immediate action will be taken, following the reporting procedures in this policy.
- Phoenix Primary School is consistently reviewing and acknowledging the ever changing needs of it's pupils with the Mental Health Action planning - [Senior Mental Health Final Action Plan.docx](#)

7.7 Domestic Abuse

- Domestic abuse is any type of controlling, bullying, threatening or violent behaviour between people in a relationship. Seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it in their own intimate relationships, can have a serious, long-lasting, impact upon children and is a form of child abuse.
- Phoenix Primary recognises that domestic abuse can encompass but is not limited to psychological; physical; sexual; financial; and emotional abuse.
- In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.
- Phoenix Primary an Operation Encompass School. This is a national police and education early intervention safeguarding partnership, to support children who witness and experience Domestic Abuse.
- Operation Encompass means that the police will share information with our school/college/nursery/setting about all police attended Domestic Abuse incidents involving any of our children, where possible, PRIOR to the start of the next school day.
- Operation Encompass does not replace statutory safeguarding procedures and where appropriate, a referral to the First Response will be made if there are any concerns about a child's welfare.
- Where the school is unsure of how to respond to a notification, advice may be sought from the First Response, or the Operation Encompass helpline which is available 8AM to 1PM, Monday to Friday on 0204 513 9990.



7.8 So-called 'Honour-Based' Abuse

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

7.9 Female Genital Mutilation (FGM)

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

7.10 Forced Marriage

- Phoenix Primary recognise that since February 2023 it has been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if **no** violence, threats or another form of coercion are used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages. (see page 155 of KCSIE 23) ([Legal age increases to 18](#))
- Multi-agency statutory guidance for dealing with forced marriage, which can found at [The right to choose: government guidance on forced marriage](#). Guidance for schools



can be found in Section 8. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fm@fcdo.gov.uk.

- Staff at Phoenix Primary will use the school's concern reporting system if they have any reason to believe that a child may be at risk of being taken out of the country for the purposes of a forced marriage.

7.11 Modern Slavery and the National Referral Mechanism (NRM)

- Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Statutory Guidance: [Modern slavery: how to identify and support victims](#).
- If there are concerns that any member of the community is a victim or involved with modern slavery, concerns should be shared with a DSL or deputy and will be responded to in line with this policy.

7.12 Preventing radicalisation

- The Counter Terrorism and Security Act 2015 placed a duty on specified authorities, which includes schools, to have due regard to the need to prevent people from being drawn into terrorism (the PREVENT duty). The school's work in promoting life in modern Britain and promoting Fundamental British Values (democracy; the rule of law; individual liberty; mutual respect for and tolerance of those with different faiths and beliefs and for those without faith) through the curriculum and pastoral programs underpins this strategy.
- Staff should be aware that there is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet).
- The department has published advice for schools on the [Prevent duty](#). The advice is intended to complement the Prevent guidance and signposts other sources of advice and support.
- Every member of staff at Phoenix Primary recognises that protecting children exposed to radicalisation and extremism is the same as safeguarding against any other vulnerability and should be approached in the same way.
- All staff and governors should complete the [Prevent online Awareness training](#) package developed by the Home Office which includes guidance on how to identify people who may be susceptible to being drawn into terrorism, and how to refer them into the Channel process.
- Staff will be supported to use their judgement in identifying children who might be at risk of radicalisation and will act proportionately; staff will report concerns to the DSL (or a deputy), who, where appropriate, will follow the [local procedures](#) in regard to making a Prevent referral.
- If there is an immediate threat to safety, the police will be contacted via 999.



- Where a child is receiving support regarding concerns relating to preventing radicalisation, for example, through the 'Channel' programme, the DSL will consider if it would be appropriate to share any information if/when a child leaves to attend any new schools/colleges, so support can be put in place in place for when the child arrives.
Statutory guidance on Channel is available at: [Channel guidance and Channel training from the Home Office](#).
[Prevent duty training - GOV.UK \(www.gov.uk\)](#)

8. Supporting Children Potentially at Greater Risk of Harm

8.1 Children who are absent from education.

- All staff should be aware that children who are **absent from education, particularly on repeat occasions and/or for prolonged periods and/or for unexplainable reasons**, can be a vital of a range of safeguarding issues, including neglect, child sexual exploitation and child criminal exploitation such as county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage.
- Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.
- **Phoenix Primary** recognises that, when a child is not in school, they may be susceptible to, or exposed to, other risks, so we work with parents and other partners to keep children in school whenever possible.
- Where there are concerns that a child has unexplainable and/or persistent absences from education, the school will respond in line with its statutory duties (DfE [Children Missing Education](#) and local support available from the Medway attendance and children missing education teams
Attendance Team: aassa@medway.gov.uk
Children Missing Education: cme@medway.gov.uk
- Staff are aware of the school's Unauthorised Absence and Children Missing from Education Procedures.
- Where possible, the school will hold more than one emergency contact number for each pupil, so we have additional options to contact a responsible adult if a child missing education is also identified as a welfare and/or safeguarding concern. There is an expectation that emergency contact information will be held for both parents, unless doing so would put a child at risk of harm

8.2 Children attending alternative provision



- When Phoenix Primary places a pupil with an alternative provision provider, it retains overall responsibility for the safeguarding and well-being of that child. This includes:
 - maintaining accurate records of the provider's address, any subcontracted provision, and satellite sites the child may attend.
 - The school/college will regularly review placements—at least half-termly—to ensure the child is attending, the provision remains safe, and it continues to meet their needs.
 - Prior to placement, appropriate checks will be carried out to confirm the provider can meet the pupil's needs, including written confirmation that all necessary safeguarding checks have been completed for staff working at the provision.
- If safeguarding concerns arise, the placement will be reviewed immediately and, if necessary, suspended or terminated until those concerns are resolved.

8.3 Elective Home Education

- **When a parent/carer intends to withdraw their child for Elective Home Education (EHE)**, we will respond in accordance with [national Elective Home Education guidance](#) and local Medway procedures.
- **We will work collaboratively with parents/carers and relevant professionals** to ensure decisions are made in the best interests of the child.
- [Attendance policy link](#)

8.4 Looked after children, previously looked after children and care leavers

- Phoenix Primary School acknowledges and understands the common reason for children becoming looked after is as a result of abuse and/or neglect and/or exploitation, and a previously looked after child potentially remains vulnerable.
- The school has appointed a '[designated teacher](#)' ([name, role](#)) who works with local authorities, including the [Virtual School Medway \(including the virtual school head\)](#), to promote the educational achievement of registered pupils who are looked after or who have been previously looked after, including those in [kinship care](#).
- The designated teacher 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.
- Phoenix Primary School understands their responsibility to inform the Local Authority via First Response, of Private fostering arrangements when they believe that a child is being cared for as part of a private fostering arrangement. (When a child under 16, or 18 if they are disabled, is cared for and lives with an adult who is not a close relative for 28 days or more.)

8.5 Children who are Lesbian, Gay, Bisexual, or Gender Questioning



Please note: the DfE expects to publish the revised guidance on gender questioning children this summer. The policy may need to be reviewed when this document is made available.

- A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, other children can sometimes target them. Phoenix Primary recognises children who are LGBTQ+ or are thought to be LGBTQ+ by other children, can be singled out by their peers or other individuals in the community.
- When supporting a gender questioning child, schools should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. **Schools should refer to the DofE guidance for Schools and Colleges in relation to Gender Questioning Children when deciding how to proceed.**
- Children may face greater risks where they do not have reliable adults around them that they feel they can trust and be open with.
- LGBT education is part of our curriculum for Relationships Education/Relationship and Sex Education and Health Education, and our staff will work to eliminate extra obstacles and create a safe environment that encourages children to voice their concerns.

8.6 Safeguarding Children with Special Educational Needs and Disabilities

- Phoenix Primary understands that children with special educational needs (SEN) and disabilities face additional safeguarding challenges. These children may have an impaired capacity to understand, resist, or avoid abuse. The DSL will work closely with the SENDco to plan learning opportunities and support, as required.
- All staff will ensure that children with SEN and disabilities are able to overcome the barriers that exist for this group of children and specifically ensure that those with communication difficulties are supported to be able to express their voice and that it is listened to and acted upon.
- It is important that all staff are aware that children with SEN and disabilities may not always outwardly display indicators of abuse and that some children can be disproportionately impacted by things like bullying and exploitation without explicitly showing signs.
- **Our school/college has clear policies on intimate and personal care that promote children's health, safety, independence, and dignity. Procedures are transparent and well-documented, with robust record-keeping in place. For more details, see our policy: [Early Years Intimate Care Policy](#)**

9. Online Safety

Schools will need to have a separate policy for Online Safety. This is only an overview of practice and further depth would be explored through a personalised school 'Online Safety Policy'.



It is recognised by Phoenix Primary that the use of technology presents challenges and risks to children and adults both inside and outside of school.

- The use of technology has become a significant component of many safeguarding issues. For example, technology often provides the platform that facilitates harm in cases of child exploitation; radicalisation; sexual predation and bullying.
- Phoenix Primary will empower, protect and educate the whole school community in the use of technology and establish mechanisms to identify, intervene in, and escalate any incident where appropriate.
- The DSL has overall responsibility for online safeguarding within the school but will liaise as necessary with other members of staff.
- The DSL and leadership team and Governing Body have read, understood and acted upon all guidance regarding Online Safety within 'Keeping Children Safe in Education' 2024
- Phoenix Primary identifies the breadth of issues within online safety can be considerable, but they can be broadly categorised into four areas of risk:
 - ❑ **Content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
 - ❑ **Contact:** being subjected to harmful online interaction with other users. For example, peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
 - ❑ **Conduct:** 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.
 - ❑ **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.
- Phoenix Primary recognises the specific risks posed by mobile phones, wearable technology and cameras, and, in accordance with KCSIE 2025, has appropriate policies in place that are shared and understood by all members of the school community. Further information reading the specific approaches relating to this can be found in the school's **Online Safety Policy**, **Acceptable Use Policy** and **Image Use Policy** which can be found **in the staff room/ office/ teams/ website**
- Phoenix Primary uses a wide range of technology. This includes computers, laptops, tablets and other digital devices, the internet, our learning platform, intranet and email systems.
 - All school owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.
- All members of staff have access to appropriate, regular and up-to-date online safety information as part of their safeguarding training.
- Phoenix Primary ensures that all staff receive training on the expectations, applicable roles and responsibilities, in relation to our filtering and monitoring systems and processes.
- Phoenix Primary ensures that appropriate filtering and monitoring systems are in place on school equipment and systems used by pupils/students and staff, including school devices used by pupils/students at home. **This link can assist you in understanding your broader responsibilities:** <https://www.gov.uk/guidance/meeting-digital-and->



[technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges.](#)

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

[Online Safety Policy & Procedures \(including Use of Images & Cyber-Bullying \(phoenixprimary.com\)](#)

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

- Phoenix Primary *will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements.*
- *All communication with learners and parents/carers will take place using Phoenix Primary provided or approved communication channels; for example, Phoenix Primary provided email accounts and phone numbers and/or agreed systems e.g., Dojo, Abor, Study Bugs, Parent Pay, Microsoft 365 or equivalent.*
 - *Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.*
- *Staff and learners will engage with remote teaching and learning in line with existing behaviour principles as set out in our behaviour and relationship policy/code of conduct and Acceptable Use Policies.*
- *Staff and learners will be encouraged to report issues experienced at home and concerns will be responded to in line with this and other relevant policies.*



- *When delivering remote learning, staff will follow our Remote Learning Acceptable Use Policy (AUP).*
- *Parents/carers will be made aware of what their children are being asked to do online, including the sites they will be asked to access. Phoenix Primary will be informed of who from the school their child is going to be interacting with online.*
- *Parents/carers will be encouraged to ensure children are appropriately supervised online and that appropriate parental controls are implemented at home.*

Additional guidance for DSLs and SLT regarding remote learning is available at DfE: [Safeguarding and Remote Education](#)

9.1 Generative Artificial Intelligence (AI)

Generative artificial intelligence (AI) offers exciting opportunities in education, supporting children's learning and helping staff reduce workload. However, its use also presents safeguarding risks to both children and staff, as well as potential threats to system security and data integrity.

Leaders should consider developing a standalone AI policy or referencing AI use within relevant curriculum or IT policies. This should cover both on-site and off-site use, ensuring compliance with school/college policies and national legislation, including data protection requirements.

Further guidance and policy templates can be found here:

- [Generative artificial intelligence \(AI\) in education - GOV.UK](#)
- [Using AI in education settings: support materials - GOV.UK](#)
- [Generative AI: product safety expectations - GOV.UK](#)
- [Generative AI in education: user research and technical report - GOV.UK](#)
- [Generative AI in education: educator and expert views - GOV.UK](#)
- [Data protection in schools - Artificial intelligence \(AI\) and data protection in schools - Guidance - GOV.UK \(www.gov.uk\)](#)
- [Artificial Intelligence and Online Safety | SWGfL](#)
- [Using artificial intelligence \(AI\) safely | Internet Matters](#)
- [Integrating AI in Schools: New Policy Template Available | SWGfL](#)
- [Ofsted's approach to artificial intelligence \(AI\) - GOV.UK](#)
- [National AI Strategy - GOV.UK](#)
- Phoenix Primary recognises the potential benefits of generative AI tools in supporting teaching, learning, and reducing staff workload—when used safely, responsibly, and with appropriate infrastructure. However, we also acknowledge the safeguarding, ethical, legal, and educational risks associated with AI, including exposure to harmful content, data breaches, academic dishonesty, and misinformation.
- To manage these risks, only AI tools approved by the senior leadership team—following appropriate risk and data protection assessments—may be used for educational or work purposes. A list of approved tools will be maintained and reviewed regularly.



- Staff and students will be informed of the benefits, risks, and expectations around AI use through training, policies (such as acceptable use and AI-specific policies), and curriculum content where appropriate.
 - Online safety through the curriculum, PSHE and Trust AI policy.
- Any misuse of AI will be addressed in line with existing policies, including behaviour, safeguarding, data protection, and complaints procedures. Serious concerns, such as AI-generated child sexual abuse material or deepfake abuse, will be handled in accordance with local safeguarding procedures and national guidance, including from the IWF, NCA-CEOP, and UKCIS.

9. Child Protection Procedures

- Phoenix Primary adheres to the MSCP Safeguarding Children Procedures. The full MSCP procedures and additional guidance relating to specific safeguarding issues can be found on the MSCP website <https://www.medwayscp.org.uk/mscb/>
- If staff have **any concerns** about a child's welfare, they should act on them immediately. See page **6/7** for the flow chart setting out the concern reporting process for staff.
- If a child is at risk of imminent danger or harm concerns will need to be referred by telephone to **First Response 01634 334466** and/or the police. **If it is an emergency the police need to be called on 999.**
- **If there are child protection concerns the role of the school is NOT to investigate but to recognise and refer.**
- **Less urgent concerns or requests for support will be referred to Children's Services and Family Solutions via the Medway online form ([the portal](#))**
- Once staff have reported their concerns, the DSL will make a decision about what action to take, these include:
 - continuing to closely monitor the situation
 - managing any support for the child internally, via the school's own pastoral support processes.
 - a referral to Family Solutions for an Early Help Assessment
 - a referral to Children's Services for statutory intervention.

All information and actions taken including the reasons for any decision/actions made, will be fully documented on a child's record. Actions will be assigned to a specific member of the safeguarding team and will have a review date

- All staff are aware of the process for making contact with Children's Services for statutory assessments under the Children Act 1989, along with the role they might be expected to play in such assessments.
- Wherever possible, the school will share safeguarding concerns, or the intention to refer a child to Children's Services, with parents or carers. **However, staff will not do so where it is felt that this could place the child at greater risk of harm or impede a criminal investigation.** On occasions it may be necessary to consult with First Response and/ or the police for advice on when to share information with parents/carers.
- If the DSL is not available to discuss an immediate and urgent concern, staff can seek advice from the Deputy DSL. They may also seek advice from Early Help co-ordinators **for level 2 ONLY advice Monday – Friday.** If anyone other than the DSL makes a referral to external services, then they will inform the DSL, and Headteacher, as soon as possible.
- Staff may pass information about a child to the DSL but remain anxious about action subsequently taken. Staff should feel able to check the progress of a case with the DSL,



so they can reassure themselves the child is safe, and their welfare is being considered. If, in following this process, the staff member remains concerned, it is their responsibility to follow the school's escalation or whistleblowing process.

- If a child's situation does not appear to be improving, then the DSL (or the person that made the request for support) will consider a re-referral.
 - If, after a request for support, or any other planned external intervention, a child's situation does not appear to be improving, the DSL will consider following [MSCP escalation procedures](#) to ensure their concerns have been addressed and, most importantly, that the child's situation improves. DSLs may request support with this via the Education Safeguarding Service.
 - All members of staff are made aware of the internal and local Early Help/Family Solutions support services. Where a child is being offered or receiving Family Solutions support, staff will be supported to understand their role in any Early Help assessment or intervention. This includes identifying emerging problems, liaising with other professionals, and in some cases acting as the lead practitioner.
 - The DSL will keep all Early Help cases under constant review and consideration will be given to a request for support to First Response if the situation does not appear to be improving or is getting worse (in liaison with the early help practitioner).
 - Phoenix Primary is an Operation Encompass School. This means we work in partnership with Kent Police to provide support to children experiencing domestic abuse. All staff know what Operation Encompass is, and there is a clear process for managing notifications in school. These are immediately logged on CPOMs, family contacted and referred / acknowledged with social care.
-
- **The child's wishes**
Systems are in place for children to express their views and give feedback. All systems and processes operate with the **best** interests of the child at their heart.
However, this should not prevent safeguarding action being taken, for the child or children involved.

11.Children Who May Benefit from Early Help

Any child may benefit from early help at some point, but all staff should be alert to the potential need for early help for those who:

- Have a disability, a specific additional need or particular health condition.
- Has an SEN, whether or not they have an EHCP.
- Has a mental health need.
- Is a young carer.
- Is showing signs of being drawn into anti-social or criminal behaviour.
- Is frequently missing from education, home, or care.
- Has experienced multiple suspensions, is at risk of being permanently excluded from education – including those who attend a Pupil Referral Unit or Alternative Provision.
- Is at risk of radicalisation.
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation.
- Has a parent or carer in custody or is affected by parental offending.
- Has challenging family circumstances, such as parental substance misuse, adult mental health issues and domestic abuse
- Is at risk of so-called 'honour-based abuse, such as FGM or Forced Marriage
- Is a privately fostered child.



Where it is identified that a child may need early help support, staff and the DSL will respond in line with Section 8 of this policy.

12. Record Keeping

- Well-kept records are essential to good child protection practice. Our school is clear about the need to record any concern about a child or children within our school and when these records should be shared with other agencies.
- Our child protection records will contain a clear and detailed summary of any concerns raised, including how they were followed up and resolved. Records will also note any actions taken (or not taken), the rationale behind decisions made, and the outcomes.
- Safeguarding records will usually record facts and not personal opinions. If a staff member records an opinion, such as this should be made explicit in the recording.
- A body map will be completed if injuries or marks are observed, with an accompanying detailed and objective written description.
- **Staff should NOT take photographs of injuries; staff should use body maps and written descriptions to detail concerns. Taking photos of injuries can be traumatic and distressing for children and staff. Staff should not examine a child and should only record what they can see.**
- **If, in exceptional circumstances, photos of injuries are required for evidence purposes, this should be carried out by specialist police officers. If for some reason, you are directed to take photos of an injury by a social worker or police officer, only do so on receipt of an email confirming the name of the person requesting, their role, the date, time, and the rationale behind this decision. Staff can challenge this request if they do not feel comfortable and wait for a social worker/ Police officer to attend.**
- Records will be completed as soon as possible after the incident/event, using the child's words, and will be signed and dated by the member of staff making the report. If members of staff are in any doubt about recording requirements, they will discuss their concerns with the DSL.
- Leaflets are provided for visitors outlining names, procedures and document location should they be required to report a concern. This will then be uploaded to CPOMs by the DSL and normal procedure will follow.
- Phoenix Primary uses CPOMs and training is completed annually, during inductions and as required for individuals. There are visitor forms in each classroom, all offices and staffroom for supply or visitors. On induction to the school, this is explained all visitors are provided with a safeguarding leaflet outlining procedures and names / photos of key staff.
- Safeguarding records are kept for individual children and are maintained separately from all other records relating to the child in the school. Safeguarding records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL. Safeguarding records are highly confidential and shared with staff on a 'need to know' basis only.
- All safeguarding records will be transferred in accordance with data protection legislation to the child's subsequent school/setting, under confidential and separate cover. These will be given to the new DSL, within 5 days of the child starting at their new school and a receipt of delivery will be obtained.

13. Transferring Child Protection Files



- Where children leave the school or college (including in year transfers) the designated safeguarding lead will ensure their child protection file is transferred to the new school or college within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be done separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.
- Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs, or the named person with oversight for SEN in colleges, are aware as required.
- In addition to the child protection file, the DSL should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and to have that support in place for when the child arrives.
- If a child is subject to a child protection plan or there are other ongoing concerns at the time of transfer, then it is strongly recommended that the transferring DSL arrange to meet with the receiving DSL in person, to ensure there is effective transition and handover of information.
- Child protection files should always be kept by the education setting where the child is on roll. Transferring settings do not need to keep copies of child protection files, but if there is reason to, they must be kept in accordance with data retention (see section 7). In cases where there may be ongoing involvement from transferring settings, for example if any siblings still attend your setting, DSLs may wish to take copies of chronologies etc.
- Records for children without an onward UK Placement are kept for six years within the basement record storage.

14. Multi-agency Working

- Phoenix Primary identifies that they have a pivotal role in multi-agency safeguarding arrangements. The Governing body/proprietor ensures that the school or college contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children 2023.
- Phoenix Primary recognises and is committed to its responsibility to work within the MSCP multi-agency safeguarding arrangements. The leadership team and DSL will work to establish strong and co-operative relationships with professionals in other agencies, in line with statutory guidance. Examples of multi-agency partnerships may include professionals such as social workers, early help practitioners, health professionals (including paediatricians, health visitors, mental health services, and speech and language therapists), specialist teachers, educational psychologists, staff from other schools or settings attended by the child, and the police.
- Phoenix Primary will endeavour to identify those children and families who may benefit from the intervention and support of external professionals and will seek to enable referrals (in discussion with parents/carers) as appropriate.
- Phoenix Primary recognises the importance of multi-agency working and will provide requested reports and support attendance at relevant safeguarding meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or early help multi-agency meetings.

15. Confidentiality and Information Sharing

- Phoenix Primary expect all staff to treat information they receive about children and young people in a highly discreet and confidential manner. Confidential information should **never** be discussed casually in conversation or shared with any person other than on a '**need-to-know basis**'



- All members of staff must be aware that whilst they have duties to keep information confidential, they also have a professional responsibility to be proactive and share information as early as possible, to help identify, assess and respond to risks or concerns about safety and welfare. This will only involve those who need to be involved, such as the DSL and Medway Children's Services.
- KCSIE, the [Information Commissioner's Office](#) (ICO), DfE [Data Protection in schools guidance](#) and DfE '[Information sharing advice for safeguarding practitioners](#)' guidance provides further details regarding information sharing principles and expectations.
- Phoenix Primary recognises our duty to share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE 2025.
- The Data Protection Act 2018 places a duty on organisations and individuals with regards to processing personal information fairly and lawfully. As a school we adhere to data protection, yet we do not allow this to stand in our way in the need to promote the welfare and protect the safety of our children in our care. DfE '[Information sharing advice for safeguarding practitioners](#)' (2018) provides further detail.
- Beyond Schools Trust has an appropriately trained Data Protection Officer (DPO) as required by the General Data Protection Regulations (GDPR) to ensure that our school/college is compliant with all matters relating to confidentiality and information sharing requirements.: dpo@beyschools.co.uk
- All staff are aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing. In accordance with statutory requirements, where there is a child protection concern, this must be reported to the Designated Safeguarding Lead and may require further referral and subsequent investigation by the appropriate authorities.

16. Complaints

- Phoenix Primary has a [complaints procedure](#) this can be found on our website and on request from the office. As a school we encourage children and families to raise complaints, concerns or comments with us. We have a robust internal investigation process.
- Safeguarding concerns should be raised with school immediately. If a child is at immediate risk, then the individual needs to contact First Response 01634 334466 or the police on 101.
- All reported concerns will be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation against a member of staff or volunteer will be dealt with in line with section 19 of this policy.

17. Staff Induction, Awareness and Training

- All members of staff have been provided with a copy of Part One of "*Keeping Children Safe in Education*" (2025) which covers Safeguarding information for all staff.
- School leaders and all members of staff who work directly with children will read Annex B within *Keeping Children Safe in Education* 2025.
- School leaders and governors including the DSL will have a thorough awareness of the entirety of KCSIE.



- All Members of staff sign to confirm that they have read and understood Part One and Annex B (or Annex A if deemed appropriate) of KCSIE. A register is taken on the INSET day 2.9.24. Staff are given time within the day to read all training and documentation. A signature is required by the end of the session for all staff.
- The DSL will ensure that all new staff and volunteers (including agency and third-party staff) receive child protection training and information to ensure they are aware of the Phoenix Primary internal safeguarding processes as part of their induction. Within induction all staff receive Driving Excellence, Key Policies, CCR, training links and a meeting held with DSL, FLO, DHT to ensure all areas are clear. This must be signed off within two weeks of induction start.
- All staff undergo safeguarding and child protection training (including online safety) at induction. The training is regularly updated. Induction and training is in line with advice from the Medway Safeguarding Children Partnership.
- In addition to safeguarding training, all members of staff receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings) as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- All staff members (including temporary/supply staff) will be made aware of the school's expectations regarding safe and professional practice via the staff behaviour policy (or code of conduct) and Acceptable Use Policy. Visitor leaflet / induction.
- The Governing Body recognise the expertise staff build through undertaking safeguarding training and managing safeguarding concerns on a daily basis. Opportunity should therefore be provided for staff to contribute to and shape safeguarding arrangements and child protection policy.
- The DSL and Head Teacher provide an annual report to the Governing Body detailing safeguarding training undertaken by all staff and will maintain an up-to-date register of who has been trained.
- Phoenix Primary has a nominated Safeguarding lead for the Governing Body, **Barbara Fincham** who ensures that all members of the Governing Body access appropriate safeguarding training covering their specific strategic responsibilities, at induction and on a regular basis. Training will provide them with the knowledge to ensure their school's safeguarding policies and procedures are effective. This includes governors' strategic responsibility for online safety.

18. Safe Working Practice

- All members of staff are required to work within clear guidelines on Safe Working Practice / the school's Code of Conduct. The DSL will ensure that all staff and volunteers have read this policy and staff behaviour policy/code of conduct and understand that their behaviour and practice must be in line with it.
- Staff are aware of the school's **Behaviour and Physical Intervention Policies**, and any physical interventions must be in line with agreed policy and procedures and national guidance.
- A list of staff who have accessed physical intervention training will be kept by the Headteacher/Designated Safeguarding Lead and updated in-line with [use of reasonable force](#) DfE guidance. All incidents will be recorded in line with guidance.
- There may be circumstances when it is appropriate for staff to use reasonable force in order to safeguard children from harm. Further information regarding our approach and expectations can be found in our Behaviour and Relationships Policy.
- If staff, visitors, volunteers or parent helpers are working with children alone they will, wherever possible, be visible to other members of staff. They will be expected to inform



another member of staff of their whereabouts in school, who they are with, for how long. Doors, ideally, should have a clear glass panel in them and be left open.

- Guidance about acceptable conduct and safe practice will be given to all staff and volunteers during induction. These are sensible steps that every adult should take in their daily professional conduct with children. This advice can be found in Guidance for safer working practice for those working with children and young people in education settings May 2019 (Safer Recruitment consortium). All staff and volunteers are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.
- Staff should be particularly aware of the professional risks associated with the use of electronic communication (e-mail; mobile phones; texting; social network sites) and should familiarise themselves with advice and professional expectations outlined in the school's Online Safety Policy and Acceptable Use Policy.

19. Staff Supervision and Support

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

20. Safer Recruitment

- Phoenix Primary values the importance of developing a safe culture and is committed to ensure that all steps are taken to recruit staff and volunteers who are safe to work with our pupils/students and staff.
- Phoenix Primary will use the recruitment and selection process to deter, identify and reject unsuitable candidates. We will ensure that detailed checks are carried out and evidence is provided e.g. criminal record checks (Disclosure and Barring Service (DBS) checks), barred list checks and prohibition checks, together with references and interview information this will aid the school in deciding about the suitability of the prospective employee.
- The school will carry out an online search on shortlisted candidates to help identify any issues that are publicly available online which may be relevant to their suitability to work with children and/or may have an impact on the school/academy's reputation.
- The Governing Body will ensure that at least one of the persons who conducts the interview has completed safer recruitment training. At all times, the Headteacher and Governing Body will ensure that safer recruitment practices are followed in accordance with the requirements of '*Keeping Children Safe in Education*,' DfE (2025).



- Safer recruitment procedures will include the requirement for appropriate checks in line with national guidance (see: [Safeguarding Children and Safer Recruitment](#)).
- The school maintains an accurate Single Central Record (SCR) in line with statutory guidance.
- Where appropriate we are committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools.
- We advise all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands and warnings.
- Where the school places a learner 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 pupil, including written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment.

21. Allegations Against Members of Staff, including Supply Staff, Contractors and Volunteers

- Phoenix Primary recognises that allegations sometimes arise from a differing understanding of the same event, but when they occur, they are distressing and difficult for all concerned. We also recognise that many allegations are genuine and there are some adults who deliberately seek to harm or abuse children.
- All staff, contractors and volunteers should feel able to raise concerns about poor or unsafe practice and such concerns will always be taken seriously by the senior leadership team.
- Phoenix Primary understands the duty to refer to the LADO where it is alleged that anyone working in the school has:
 - behaved in a way that has harmed a child or may have harmed a child.
 - possibly committed a criminal offence against or related to a child.
 - behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
 - behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- In depth information regarding staff allegations can be found within our Procedures for [Managing Allegations against Staff policy](#). This can be found in the staff room/website. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime. The leadership team at
- Phoenix Primary will take all concerns or allegations received seriously.
- If staff have safeguarding concerns, or an allegation is made about another member of staff (including volunteers/supply staff/visitors) posing a risk of harm to children, then:
 - Allegations should be referred immediately to the Head Teacher or deputy in their absence who will first contact the Local Authority Designated Officer (LADO) to agree further action to be taken in respect of the child and staff member. Please refer to the Medway [LADO Leaflet](#) if you need further information.
 - In the event of allegations of abuse being made against the Headteacher then staff are advised that allegations should be reported to the Chair of Governors who will contact the LADO in the first instance.



- Any member of staff or volunteer who does not feel confident to raise their concerns with the Headteacher or Chair of Governors should contact **the LADO directly on 01634 331065**.
 - The Headteacher or Chair of Governors will seek advice from the LADO within 24 hours of the alleged incident. No member of staff or the Governing Body will undertake further investigations before receiving advice from the LADO.
- Where headteachers are 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 has a legal duty to refer to the [Disclosure and Barring](#) Service anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person.
 - If these circumstances arise in relation to a member of staff at our 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 HR.

22. Concerns that do not meet the 'harms threshold'

- Phoenix Primary's Staff Code of Conduct explains what a low-level concern is and the importance of sharing concerns. We have clear reporting procedures for children, parents and other people to report concerns or complaints, including abusive or poor practice. We also acknowledge that low-level concerns can arise in several ways from various sources, e.g. suspicion, complaint or a disclosure. Procedures are in place for confidentially sharing, recording and handling of low-level concerns See Low level concern policy.
- A low-level concern is any concern (no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt') that a member of staff has acted in a way that:
 - is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.
 - does not meet the allegations threshold or is not considered serious enough to refer to the local authority designated officer (LADO).
- Low-level concerns can exist on a wide spectrum, from the inadvertent and thoughtless, through to behaviour which is intended to enable abuse.
- Where low-level concerns are reported, the headteacher/principal should liaise with the LADO Service on 01634 331 065
- The Medway LADO policy states that all allegations, including low level are considered with the LADO, please communicate and engage with the LADO in relation to all low-level concerns.

23. Whistleblowing Procedure

- All staff and volunteers should feel able to raise concerns about poor or unsafe practice and such concerns will always be taken seriously by the leadership team. All members of staff are made aware of the 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 also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.

24. Curriculum and Staying Safe

- Schools play a pivotal and crucial 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-esteem, self-awareness, social and emotional understanding, assertiveness and decision making; this ensures that our pupils/students have a range of strategies to ensure their protection and that they can also protect others.
- Online safety is integrated into the curriculum.
- We recognise the crucial role that school plays in preventative education. We have a whole school approach that creates a culture of zero tolerance for racism, ableism, sexism, misogyny, homophobia and sexual violence/harassment.
- The school ensures that those delivering the PSHE curriculum have been trained and equipped to deliver high quality PSHE education in a safe way. For further information and training on Medway PSHE programs please follow the link: [School PSHE programmes](#).
- Other systems and interventions that exist outside of day-to-day teaching opportunities, classroom interaction and support include: *worry books, boxes, termly safeguarding resets, children’s safeguarding policy in classes, regular pupil voice, prefects, play leaders, Phoenix Legacy, VBE, relationships, Dog Mentor etc*
- **Phoenix Primary** recognises the value of external organisations and/or speakers visiting to provide useful information or to help enrich children’s education. However, school will always assess the suitability of external organisations or speakers before granting them access to pupils; this may include an assessment of the educational value, the age/ability appropriateness of content and whether relevant safeguarding checks will be required.

25. Use of ‘reasonable force’

- Phoenix Primary acknowledges that in certain situations, staff may need to use reasonable force to safeguard children from harm. This refers to actions involving physical contact to control or restrain a child, ranging from guiding them to safety to intervening in more serious incidents such as fights or preventing injury. ‘Reasonable’ means using no more force than necessary.
- Further details on our approach can be found in our Relationships and Behaviour Policy and in line with the DfE guidance ‘*Use of Reasonable Force in Schools*.’ Additional advice is available in Part Two of *Keeping Children Safe in Education (KCSIE)*.

26. The Use of School Premises by Other Organisations



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

27. Security

- Phoenix Primary has a responsibility to provide a secure site that is controlled by clear management directives, but the site is only as secure as the people who use it. Therefore, all staff and people on the site have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light.
- Visitors and volunteers must only enter through the main entrance and after signing in at the office will be issued with a visitor's lanyard, yellow for DBS seen, red for DBS unseen. Red lanyard visitors sign to understand they must be accompanied at all times, peer buddy will also sign ensuring visitors are accompanied/supervised by a staff member.
- Phoenix Primary will not tolerate or accept the behaviour of any individual (including parents) that threatens school security or leads others (child or adult) to feel unsafe. This type of behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school site. [Parent Partnership](#)
- Any individual on site who is not known, or identifiable by a visitor's pass may be challenged by any staff member for clarification and reassurance.

28. Monitoring and Review

- All school staff (including temporary/supply staff and volunteers) will have access to a copy of this policy. The policy will also be available to parents/guardians on the school website or on request from the office, all classes hold a child-friendly version and complete a safeguarding reset at the beginning of each term.
- This policy has been written in **September 2025** to reflect the updated guidance and legislation issued in relation to safeguarding children and promoting their welfare.
- All staff will have access to this policy and sign to the effect that they have read and understood its contents. The DSL will review the policy following any serious child protection concerns (including following learning identified from serious case reviews) or substantiated allegations against staff, to ensure that it reflects appropriate, accurate and up-to-date safeguarding practice.
- This policy is available on our school website, waiting room and is available on request from the school office. We also inform parents and carers about this policy when their children join our school and through our school newsletter.
- The policy is included in our school development plan and will be evaluated each year by the **governing body**, who are responsible for overseeing safeguarding and child protection systems.



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

Definitions of Forms of Abuse

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

- **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.
- **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Please click on the hyperlink for further information, advice and guidance: [NSPCC Physical Abuse](#)

- **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only 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 from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.



Please click on the hyperlink for further information, advice and guidance: [NSPCC Emotional Abuse](#)

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

Please click on the hyperlink for further information, advice and guidance: [NSPCC Sexual Abuse](#)

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

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

Appendix 2: Support Links

Support for staff

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

Support for Pupils/Students

- NSPCC: www.nspcc.org.uk
- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- Young Minds: www.youngminds.org.uk
- The Mix: www.themix.org.uk
- Shout: www.giveusashout.org
- Fearless: www.fearless.org
- Kidscape: www.kidscape.org.uk
- Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children [5-11-year olds](#) and [12-17 year olds](#).



Support for adults

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

Specific Safeguarding Issues

Please see below links to information and guidance about specific safeguarding issues. You will find further information in Annex B: Keeping Children Safe in Education 2024

Mental Health

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

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

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

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

Support for Learning Disabilities

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

Domestic Abuse

- Refuge: www.refuge.org.uk



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

Honour based Violence (FGM and Breast Ironing)

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

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

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

Substance Misuse

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

Online Safety

- CEOP: www.ceop.police.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk
- Think U Know: www.thinkuknow.co.uk
- Childnet: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Report Harmful Content: <https://reportharmfulcontent.com>



- Parents Info: www.parentinfo.org
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Matters: www.internetmatters.org
- NSPCC/ Net Aware: www.nspcc.org.uk/online-safety and www.net-aware.org.uk
- Get safe Online: www.getsafeonline.org
- Stop it Now! www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- [Harmful online challenges and online hoaxes](#) - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support.
- LGFL 'Undressed' provided schools advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.

Radicalisation and hate

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

1. Appendix 3: Related Safeguarding Policies & Documentation

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

- Acceptable Use of Technology Policies (AUP)
- Anti-Bullying
- Attendance
- Behaviour and Relationships
- Complaints
- Confidentiality
- Data protection and Information sharing
- Emergency Procedures (Incl. evacuation & lock-down)
- First aid and accidents – including safer eating/allergies/infection/asthma
- Health and safety
- Managing allegations against staff
- Online Safety; Social media and Mobile technology
- Intimate care Policy
- Relationship Health and Sex Education (RHSE)
- Risk assessments (e.g. school trips, use of technology, school re-opening)
- Safer recruitment
- Peer on Peer
- Low Level Concern
- Hackett's Continuum
- Computing Curriculum
- Driving Excellence Procedures
- Whistleblowing





2. Appendix 4: Procedure for dealing with disclosures (the 6 R's – what to do if)

1. Receive:

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

2. Reassure:

- Reassure the child, but only so far as is honest and reliable. Do not make promises that you cannot be sure to keep, e.g. "everything will be all right now".
- Don't promise confidentiality – never agree to keep secrets. You have a duty to report your concerns.
- Tell the child that you will need to tell some people, but only those whose job it is to protect children.
- Acknowledge how difficult it must have been to talk and reassure them they have done the right thing.

3. React:

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

4. Record:

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

5. Remember:

- Contact the DSL
- The DSL may be required to make appropriate records available to other agencies

6. Relax

- Get some support for yourself



3. Appendix 5: Specific Safeguarding Issues

- Phoenix Primary acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):
 - Abuse and neglect
 - Bullying, including cyberbullying
 - Children with family members in prison
 - Children Missing Education (CME)
 - Child missing from home or care
 - Child Sexual Exploitation (CSE)
 - Child Criminal Exploitation (CCE)
 - Contextual safeguarding (risks outside the family home)
 - County lines and gangs
 - Domestic abuse
 - Drugs and alcohol misuse
 - Fabricated or induced illness
 - Faith abuse
 - Gender based abuse and violence against women and girls
 - Hate
 - Homelessness
 - Human trafficking and modern slavery
 - Mental health
 - Nude or semi-nude image sharing, aka youth produced sexual imagery or “Sexting”
 - Online safety
 - Child-on-child abuse
 - Preventing radicalisation and extremism
 - Private fostering
 - Relationship abuse
 - Serious Violence
 - Sexual Violence and Sexual Harassment
 - So-Called honour-based abuse including Female Genital Mutilation (FGM) and forced marriage
 - Up-skirting

(Also see Part One and Annex B within ‘Keeping children Safe in Education’ 2024)



1. Visitor Confidential safeguarding record form

To be handed to Claire Beer / Mel Ireland (DDL's available) immediately.

School: Phoenix Primary School

Record of concern:

Name of child:

Date of birth:

Name and position of person completing the form: (please print)

Date and time of incident	
Incident	
Names of witnesses and any other information	Action taken
Signature	Date (dd/mm/yy) and time form completed



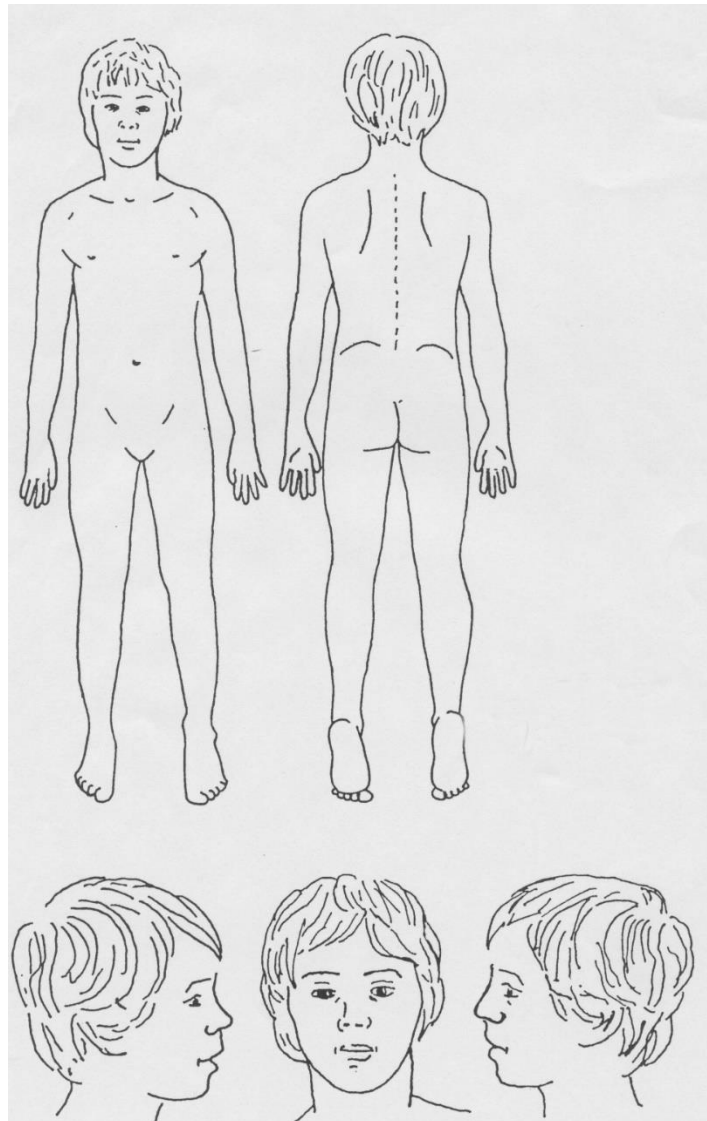
2. Confidential safeguarding record form

School: Phoenix Primary School

Body map: *(to be used in conjunction with a record of concern form).*

Name of child:

Date of birth:





Phoenix Primary School (Red Book with Jola Studniarz present)

Positive Handling Plan

Child's Name:	
Class:	
SEN, Disability, Vulnerability, Medical or Social Needs:	
What are the triggers? What has led to dangerous situations in the past?	
What hazards have been seen in the past? Please tick all that apply Spitting ☐ Kicking ☐ Punching ☐ Biting ☐ Slapping ☐ Hair Pulling ☐ Pushing ☐ Pulling Clothing ☐ Pinching ☐ Neck Grabs or Holds ☐ Arm Holds ☐ Leg Holds ☐ Body holds ☐ Use of Missiles ☐ Use of Weapons ☐ Other? Please state: Likelihood of it happening: Low ☐ Medium ☐ High ☐	
What can be done to prevent or reduce the risk these incidents happening?	
Are there any distractions or diversions that would help to stop a situation from escalation or help to de-escalate it? Interests, key words, objects etc.	
What de-escalation strategies have worked in the past? What should be avoided? Are there key people who the child may respond to?	
Has physical intervention worked in the past? If the answer is yes, what strategies were used? Should any be avoided?	
In the past, what calming strategies have been used after the incident? Is there anything that should be avoided?	
Who needs to be informed of these incidents? Parents/Carers ☐ Social Worker ☐ Educational Psychologist ☐ Doctor ☐ Hospital ☐ Other: (please state)	
People involved in formulating this plan: Date:	Review Date:



Child's Name: Name/s of staff involved: Class: SEN or Disability:			Name/s of witnesses, (staff or pupils):
Details of other pupils involved. Include any vulnerability due to SEN, disability or social reasons.			
Date:	Time:	Location of incident:	
Description of incident			
Action Taken: (Please include when and how parents were informed and their reaction)			



Signature of staff: Print name: Role:	Signature of any witnesses:
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Phoenix Primary School Record of Significant Incident/Use of Force
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Please use checklist on reverse before submitting this report

Checklist for writing a Significant Incident/use of force report

Have you included the following if necessary?

- ☐ • Any SEN, disability, vulnerability or medical need of the child?
- ☐ • Names and roles of any staff involved
- ☐ • Names and details of any witnesses
- ☐ • Any attempts made by staff to de-escalate the situation
- ☐ • Any warnings given that force may be used
- ☐ • The reasons for recording this incident
- ☐ • Any injury suffered by staff or pupils during the incident
- ☐ • Any first aid and/or medical treatment required as a result of the incident
- ☐ • The name/s of the person/people this form was shared with after the incident, including outside agencies
- ☐ • The action taken after the incident i.e. support and/or disciplinary action
- ☐ • When and how the parents/carers were informed and their reaction.
- ☐ • Name and role of person compiling the report
- ☐ • Name and role of person countersigning the report.



Prevent Referral form			
Referral details			
Name:			
Alternative names:			
Date of birth:		Gender:	
Address:			
Nationality:		Ethnicity:	
Language:		Religion:	
Family or carer details:			
Referring agency details			
Referral author and contact details			
Agency:			
Date of referral:			
Referral factors			
Faith / ideology issues	e.g. concerning comments relating to faith or ideology, association with extremists		
Social mobility issues	e.g. Poverty, lack of social activity, isolation, lack of education or employment, immigration issues		
Physical or mental issues	e.g. disability, learning difficulties, mental health concerns		



Risk or harm factors	e.g. threat posed by family member (i.e. DV issues), victim of hate crime or personal attack
Criminal activity or association	e.g. involved in criminal activity, associating with known criminals
Summary reason for referral	
Outline main reasons for referral	
Existing agency involvement	
Outline any agency involvement already in place (that you are aware of) e.g. Early Help/Preventative Services (CAF), MAPPA, Safeguarding	
Any other relevant information	

When completed please email to channel@kent.pnn.police.uk

