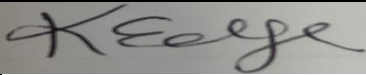


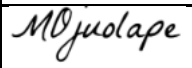




Rivermead Inclusive Trust Safeguarding Policy

Signatories		
Deputy CEO	Mrs K. Edge	
Chair of Trustees	Mr J. Stuart	
Trust Safeguarding Trustee	Mr J. Nunn	
Trust Safeguarding Lead	Mrs M. Ojuolape	

Review	
Dated	September 2025
Next review	September 2026

The Rivermead Inclusive Trust provides governance and oversight to those academies which are part of the Trust namely: Walderslade Primary School, Luton Primary School, Academy of Woodlands, Hoo St Werburgh, The Marlborough, Rivermead School, Rivermead Routes for Reintegration and Rivermead Post 16

This Policy, Managing Allegations Against Staff Procedure and the Whistleblowing policy applies to each of the Academies listed above.

This document references the relevant local Safeguarding Partnership arrangements for Medway. Each Academy is required to act in line with the guidelines/procedures contained within the model policy for Medway.

This policy is available on the MAT website and also on the individual websites of the academies listed above.

All staff and volunteers are required to read it and confirm that they have done so before commencing work within the Trust.

This policy should be read in conjunction with the Rivermead Inclusive Trust Health and Safety and Premises Policy.

Contact details

Trust Key Contacts	
CEO	Tina Lovey
Deputy CEO	Kerri Edge
Director of School Improvement	Paul Dadson
Chair of Trustees	Justin Stuart
Trustee with Safeguarding Responsibilities	James Nunn
Trust Safeguarding Lead	Mikala Ojuolape
Trust Human Resources Manager	Karen Watkin
Trust IT Lead	Bhavesh Jetha
Walderslade Primary School Key Contacts	
Executive Head	Emma Poad
Head of School/DSL	Amy Rowley Jones
DDSL/Family Liaison Officer	Sara Bridger
SENCO	Louise Glover
Governor for Safeguarding	Gemma Pressman
Luton Primary School Key Contacts	
Executive Head	Emma Poad
Head of School	Liz Gamet
Deputy Head	Chloe Riley
DSL	Lisa Darran
SENCO/DLACT	Liz Davies
Assistant Head of Inclusion	Mikala Ojuolape
Governor for Safeguarding	Stephen Perez
Academy of Woodlands Key Contacts	
Executive Head	Emma Poad
Head of School	Chloe Brown
DSL	Sarah Palmer
SENCO/DLACT	Sam Meconi
Governor for Safeguarding	Lee Costidell
Hoo St Werburgh	
Executive Head	Emma Poad
Head of School	Lorraine Boffa

Deputy Head	Lois Banks
DSL	Michelle Pace
SENCO/DLACT	Jo Gallacher
Governor for Safeguarding	Anne Costidell
The Marlborough	
Executive Head	Mark Burgiss
Head of School	Louise Kennett
Deputy Head	Laura Currie
DSL	Donna Mack (Interim)
SENCO/DLACT	Rhea Lovelock
Governor for Safeguarding	Anne Costidell
Rivermead School, Rivermead Routes for Reintegration and Rivermead Post 16 Key Contacts	
Executive Head	Mark Burgiss
Head of School	Shelley Campbell
Deputy Head	Mark Nolan
DSL	Carly Ewer
SENCO/DLACT	Beth Hayhow Meads
Governor for Safeguarding	David Hopkins
Local Authority Key Contact Details	
Kate Barry – Education Safeguarding Officer	educsafeguarding@medway.gov.uk 01634 331464 or 01634 331017
Fiona Veitch – Education Safeguarding Officer	educsafeguarding@medway.gov.uk 01634 331464 or 01634 331017
Helen Brown – Multi Agency Safeguarding Hub	masheducation@medway.gov.uk
Harriet Obrien – Multi Agency Safeguarding Hub	masheducation@medway.gov.uk
Maisie Adkins – LADO	01634 331065
Sallyanne French - LADO	01634 331065
Lucy Greig - LADO	01634 331065
Medway Children's Services First Response and Single Point of Access <i>For urgent child protection concerns</i>	01634 334466 (Monday to Friday from 9am to 5pm)
Medway Children's Services Out of Hours <i>For urgent child protection concerns</i>	03000 419 191
Kent Police	999 for urgent matters
Prevent Education Officer	Sally.Green2@kent.gov.uk
NSPCC Whistleblowing Helpline	08000280286 help@nspcc.org.uk

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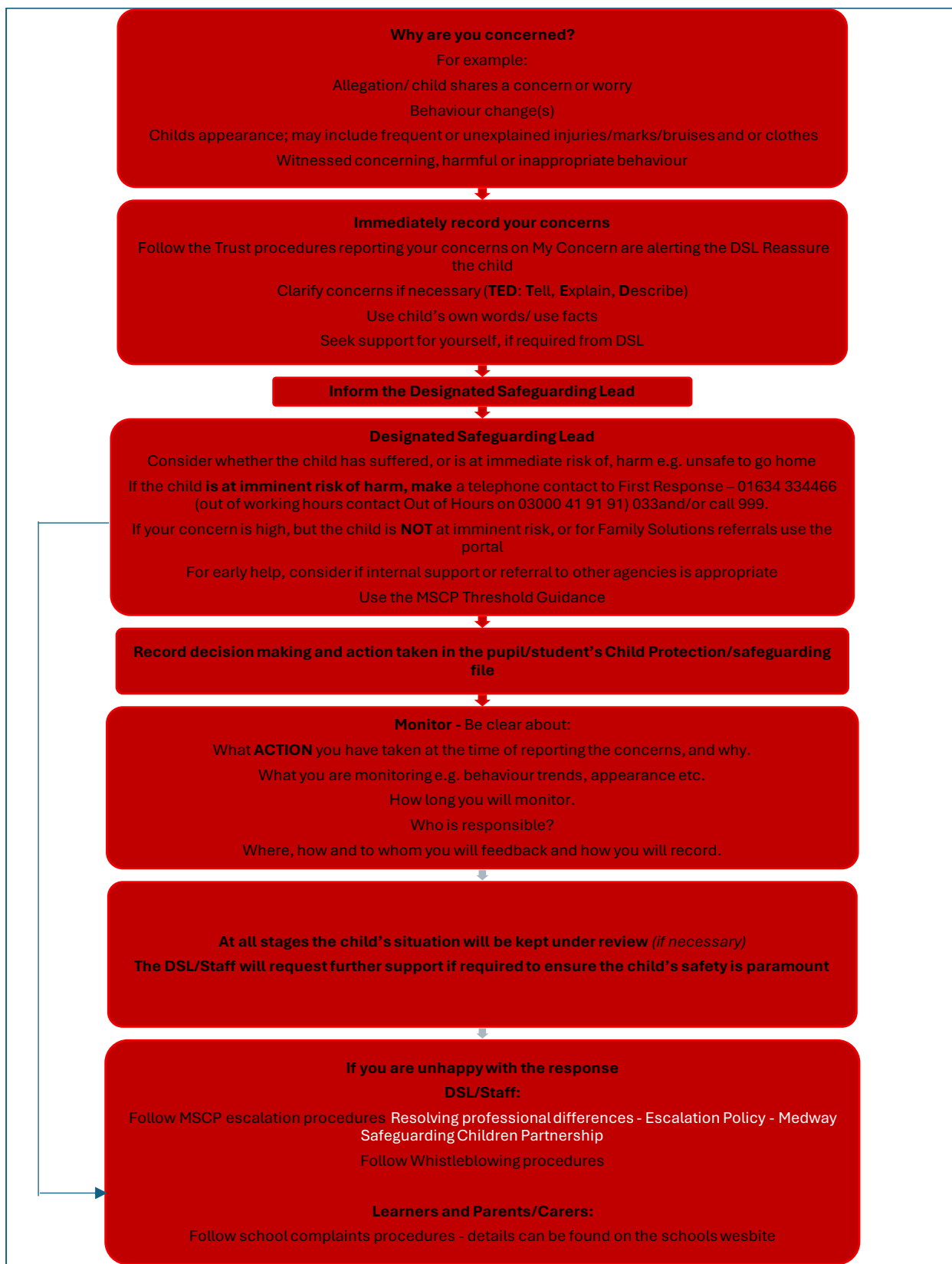
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**What to do if you have concerns about a child within the Rivermead
Inclusive Trust**



Introduction

The policy emphasises that it applies to everyone involved with The Rivermead inclusive Trust, including trustees, governors, staff, and volunteers. This collective approach fosters collaboration among all stakeholders to ensure a safe and supportive environment for pupils. By adhering to the guidelines set out in the policy and the Keeping Children Safe in Education 2025, the Trust demonstrates an aspiration to uphold the highest standards of safeguarding and welfare for all pupils. This commitment encourages all members of the Trust to aim for excellence in their roles.

The policy is designed to protect and promote the welfare of children, reflecting a nurturing approach that prioritises the safety and well-being of pupils. By making the policy accessible to families and visitors, the Trust fosters a nurturing environment where everyone feels supported.

Making the policy available on school websites ensures that all members of the community, including children and their families, feel they belong to a transparent and inclusive environment. This accessibility reinforces the Trust's commitment to creating a sense of belonging for everyone involved.

The policy aims to meet the requirements outlined in official guidance, signifying a commitment to excellence in safeguarding practises. By striving to comply with these standards, the Trust encourages all members to excel in their duties and responsibilities towards the safety and welfare of pupils.

Statement of Intent

At Rivermead Inclusive Trust, we are committed to promoting and protecting the well-being of every child in our care so that each one flourishes, and **CAN BE** their best. Our safeguarding vision is underpinned by our core values:

- **Collaborate** – working together to build a culture of safety and trust
- **Aspire** – encouraging ambition in a secure and supportive environment
- **Nurture** – caring for the emotional, physical, and mental well-being of all
- **Belong** – fostering inclusive communities where every child feels valued
- **Excel** – enabling all children to thrive and reach their full potential

We align our safeguarding approach with the Marmot Principles, recognising that reducing inequalities in health and well-being is essential to ensuring that all children are safe, supported, and empowered. These principles guide us to:

- Give every child the **best start in life**
- Enable all children to **maximise their capabilities**
- Create safe, inclusive environments that **reduce inequalities**
- Strengthen the role of education in promoting **well-being and resilience**

Our safeguarding strategy is fully aligned with the Department for Education's *Keeping Children Safe in Education (KCSIE)* September 2025 guidance, ensuring that safeguarding is a **golden thread** running through all aspects of school life.

Safeguarding is a shared responsibility across all levels of the Trust:

- Each Academy's Executive Headteacher, Head of School, and Designated Safeguarding Lead (DSL)—a member of the Senior Leadership Team—holds lead responsibility for safeguarding.
- The Trust's Safeguarding Lead coordinates safeguarding strategy across all schools and reports to the Deputy CEO, who in turn reports to the CEO and Trust Board, including the Safeguarding Trustee.
- Each Local Advisory Board has a named Safeguarding Governor to ensure local oversight and accountability.

Key Drivers of Our Safeguarding Agenda

- Education and training for staff and pupils
- Physical and mental health and emotional well-being
- Protection from harm, abuse, and neglect
- Contribution pupils make to society
- Social and economic well-being

These drivers reflect both Keeping Children Safe in Education 2025 priorities and the **CAN BE** values, ensuring that safeguarding is proactive, inclusive, and responsive to both national priorities and the local context of our Academies.

Our safeguarding policies are:

- Consistently applied across all academies
- Aligned with statutory guidance and multi-agency arrangements
- Regularly reviewed and clearly communicated to all stakeholders

This ensures that timely, informed, and effective action can be taken to safeguard and promote the welfare of all children.

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 (WTSC) 2023
- Ofsted: Education Inspection Framework 2019
- Framework for the Assessment of Children in Need and their Families 2000)
- Kent and Medway Safeguarding Children Procedures
- Early Years and Foundation Stage Framework 2025 (EYFS) Remove if not applicable
- The Education Act 2002
- The Education (Independent School Standards) Regulations 2014 Remove if not applicable
- The Non-Maintained Special Schools (England) Regulations 2015 Remove if not applicable

Sections 175 and 157 of the Education Act 2002 require school governing bodies, proprietors, 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.

Key Terms

Safeguarding and promoting the welfare of children is defined in Working Together to Safeguard Children 2023 as:

- Providing help and support to meet the needs of children as soon as problems emerge

- Protecting children from maltreatment, whether this is within or outside of the home, including online
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of children
- Taking action to enable all children to have the best outcomes.

Child Protection is a part of safeguarding and promoting welfare. It refers to the specific activity that is undertaken to protect specific children who are suspected to be suffering, or are likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm.

Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused or harmed in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse or harm can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused or harmed by an adult or adults, or another child or children. There are a number of types of abuse and safeguarding issues that could increase the risk that a child could be abused. These are further defined and explained in Part 1, Part 5 and Annex B of Keeping Children Safe in Education 2025.

Staff refers to all those working for or on behalf of our Trust, full or part time, temporary or permanent in either a paid or voluntary capacity. The exceptions to this term are trustees and local governors.

Trustees refer to those who are part of the Trust Board.

Local Governors refers to those who are part of the individual school's Local Governing Body.

Child includes everyone under the age of 18.

Parent refers to birth parents and others who have parental responsibility (as defined by the Children's Act 1989) or has care of a child. (S576 Education Act 1996)

Roles and Responsibilities

Trust Board: The Trust Board has a strategic leadership responsibility for ensuring our Trust takes a whole trust approach to safeguarding arrangements as outlined in this policy and that we comply with duties under the related legislation and guidance listed later in this policy. Keeping Children Safe in Education Part 2 outlines the key responsibilities. The Trust Board has delegated some responsibilities, although retains accountability, as follows.

The Chief Executive Officer (CEO): The CEO ensures:

- Each Trust school has a Designated Safeguarding Lead (DSL) who has the appropriate status and authority to carry out the duties of the post and is provided with the time, funding, resources, and support needed to carry out their role effectively.
- Each Trust school adheres to this policy and has procedures in place (as outlined in Part 2 Keeping Children Safe in Education) that are implemented effectively and comply with the Trust's duties under the related legislation and guidance listed later in this policy.
- Our Trust has adequate executive leadership by appointing:
 - Trust Safeguarding Lead: Mikala Ojuolape
- All staff are knowledgeable and confident in carrying out their safeguarding duties in line with training and the related legislation and guidance listed later in this policy.

The Safeguarding Link Trustee: The Trust Board has appointed a Safeguarding Link Trustee who is responsible for meeting with the Trust Safeguarding Lead and reporting back to the Trust Board.

Safeguarding Link Trustee: James Nunn

Local Advisory Board (LAB): Under the Scheme of Delegation, the Trust Board has delegated monitoring of the effectiveness and implementation of safeguarding arrangements at school level to LABs. Each individual LAB will appoint a Safeguarding Link Local Governor. Each Safeguarding Link Local Governor is responsible for leading on the governance oversight of safeguarding arrangements. They meet with the DSL on a termly basis and report back to the LAB normally by a written report.

The Safeguarding Link Local Governors for the Trust's schools are as follows:

- Luton Primary School – Stephen Perez
- Academy of Woodlands – Lee Costidell
- The Marlborough – Anne Costidell
- Hoo St Werburgh School – Anne Costidell
- Walderslade Primary School – Gemma Parsons
- Rivermead School, Rivermead Routes for Reintegration and Post 16 – David Hopkins

Head of Schools: Head of Schools are responsible (with the support of the DSL for each school) for ensuring safeguarding arrangements are implemented effectively in their school. Responsibilities include:

- Having the overarching responsibility of ensuring the effectiveness of the school's safeguarding arrangements as outlined in this policy.
- Being accountable and reporting to the LAB (with the support of the DSL) on the effectiveness of school safeguarding arrangements.
- Supporting and promoting a whole school safeguarding culture and ethos as outlined in the Safeguarding Statement. This includes ensuring that the Senior Leadership Team (SLT) work effectively together and with the DSL, to ensure a whole school approach to safeguarding.
- Taking the lead role in ensuring the school implements safe practice including ensuring staff are knowledgeable and confident in their safeguarding practice and that practice is in line with national and local requirements. The Head of School is also the lead person responsible for receiving, managing, and referring to/liasing with the Local Authority Designated Officer (LADO) with the support of the DSL or any other authorities regarding allegations of abuse made against staff or other organisations/individual who use school premises.
- Enabling the DSL and any deputy(ies) to carry out their roles effectively. This means ensuring they are given sufficient time, training, support, resources, including cover arrangements where necessary.
- Ensuring that all school policies including safeguarding policies and procedures and those required to be in place, are implemented and followed by all staff.

The Designated Safeguarding Leads (DSL): The DSL for each school takes the lead responsibility for safeguarding and child protection in their school. Annex C in Keeping Children Safe in Education 2025 outlines their key responsibilities. The named DSL for each academy can be found on the Key Contacts page in this document.

All Rivermead Inclusive Trust Designated Safeguarding Lead's completes 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 (Medway Education Safeguarding led) and annually on National College to Level 3 standard.

The DSL's knowledge and skills are updated at regular intervals, at least annually, according to the needs of the school - The Head of School is kept informed of any significant issues by the DSL, 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

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 DSL acts as main contact point for all school staff to discuss any safeguarding concerns. Whilst managing and maintaining the confidential paper/electronic case management systems to record concerns about pupils to ensure the quality of information is accurate, proportionate, and timely, also assessment/referrals are made appropriately.

Deputy Designated Safeguarding Lead(s) (DDSL): support the DSL in the discharge of their responsibilities. Responsibilities include:

- Ensuring that the school has a Safeguarding and Child Protection Policy in place as required by Keeping Children Safe in Education, that is implemented and followed by all staff.
- Being available to deal with safeguarding and child protection during school hours. Each DSL will put in place cover arrangements for outside the school's day and term times. Details can be obtained by contacting the DSL.
- Acting as the point of contact with whom to raise safeguarding concerns within (including those raised by the school filtering and monitoring system) and to their school.
- Supporting the Headteacher to implement safe practice in their school.
- Managing safeguarding referrals to the relevant Local Authority; Police and any other statutory authorities or multi-agency risk management arrangements (see DSL Response).
- Working closely with our Trust, Headteacher and relevant SLT members to ensure a whole school safeguarding culture and ethos as outlined in our Trust's Safeguarding Statement and the implementation of effective safeguarding arrangements.
- Acting as the point of contact to and proactively engaging with the Medway Safeguarding Children's Partnership, and other Safeguarding Partnerships depending on the child's home local authority, as outlined in Working in Partnership section of this policy.
- Ensuring children and parents are aware of how and encouraged to raise safeguarding concerns and how they will be responded to as outlined in Working in Partnership section of this policy.

- Acting as a source of support, advice, and expertise to all staff; including ensuring that there is ongoing promotion and awareness of safeguarding and children protection in their school.
- Ensuring the effective management and oversight of safeguarding information as outlined in the Record Keeping and Information Security section of this policy.
- Maintaining records for staff and volunteers training.

All Staff (including students on placement and volunteers): All Staff are expected to work in line with our Trust's Safeguarding Statement and adhere to the policies, processes and systems of our Trust and each school that support safeguarding.

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.

This specifically includes:

- 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.

- 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.

Children and Young People: have a right to:

- Contribute to the development of school safeguarding policies. (Please take into consideration whether the school will/is able to do this)
- 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.

Parents and Carers: have a responsibility to:

- Work in partnership with the school to safeguard and promote the welfare of child/ren and understand [Name of 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 the schools or if necessary, trust'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.

Professional Development and Support

Within our Trust, to ensure all staff are knowledgeable and confident in keeping children safe in our schools, staff will complete the professional development activities as outlined below:

- Read the Child Protection and Whistleblowing Policy annually
- Read Keeping Children Safe in Education (KCSiE), Annex B and then complete a KCSiE quiz annually
- Child Protection and Safeguarding course on National College annually
- Attend Face to Face Safeguarding training led by the schools DSL annually
- Complete Female Genital Mutilation training every 2 years
- Complete Prevent training on National College every 2 years
- Cyber Security training annually
- Online Safety training annually
- GDPR training annually
- Sign a declaration to state they have had face to face training, completed online training and read and understood KCSiE and Annex B

This is the minimum requirement for our Trust's staff and schools will assess and monitor individual staff's training needs. Schools will maintain professional development records.

The DSL and DDSL(s) provide all staff with ongoing safeguarding support, advice, and expertise. Staff safeguarding knowledge and competence is overseen as part of the staff induction, appraisal, and performance processes in school. The DSL and DDSLs receive regular support and supervision.

The minimum training requirements for staff, volunteers, DSLs, DDSLs, trustees and local governors and frequency are outlined in Appendix A

Ensuring Safeguarding Practice Across our Trust

Safer Recruitment

Our Trust adopts robust recruitment procedures that deter and prevent people who are unsuitable to work with children from applying for or securing employment or volunteering opportunities in any of our Trust's settings. All staff involved in recruitment complete additional safer recruitment training as outlined in the Professional Development and Support section of this policy. Recruitment procedures are outlined in our Trust's Safer Recruitment Policy and are in alignment with Keeping Children Safe in Education 2025: Part 3.

As part of our Trust's recruitment and selection processes; we ensure that the commitment to safeguarding and promoting the welfare of children is evident to candidates throughout each stage of the process; with any candidate who is not suitable to work with children being deterred and identified at the earliest point. This policy is included in the application information for candidates. Our Trust also ensures that all applicants complete a robust application form, which is checked by the interview panel looking for any missing information, relevant qualifications and scrutiny of the personal statement. Suitable references are sought, and online social media checks are carried out prior to interview; as well as ensuring that there is a focus on the candidate's knowledge and competency in safeguarding practice as part of the interview processes.

In accordance with Keeping Children Safe in Education 2025: Part 3; our Trust maintains a record of information received to confirm the necessary pre-appointment safer recruitment checks are completed on staff (including volunteers, supply staff and students on placement), trustees, local governors, contractors, and visitors who attend the Trust in a professional capacity. We complete the checks on staff, volunteers, trustees, and local governors who are recruited by our Trust. For those who are recruited by others; we ensure receipt of written confirmation that the relevant checks have been completed, and their identification checked before they are allowed to work unsupervised or engage in regulated activity with children.

Where all the necessary information has not been obtained or there are gaps in the information, our Trust has robust risk assessment processes in place to ensure that anyone who does not meet the required standards of pre-appointment checks or suitability does not work unsupervised or engage in regulated activity with children. We reserve the right to refuse access to any Trust site for any person who our Trust is not assured is safe to work or engage in regulated activity with children.

On appointment, staff (including volunteers) receive a robust induction programme which provides them with the relevant safeguarding knowledge but also clarity on the expected standards of behaviour within and outside of our Trust's settings.

If any safeguarding concerns or allegations arise relating to a member of staff, trustee, local governor or other person working on our Trust's school premises, staff are expected to act in line with the sections Ensuring Safe Staff and Staff Safeguarding Concerns: Recognise, Respond, Report within this policy.

Contractors

Our Trust has several contracts with external providers to work in our schools including with children. Each school writes to these contractors on an annual basis seeking written confirmation that all the necessary safeguarding checks have been carried out on all contractors coming into school. This information is then logged on each school's Single Central Record of which our Trust Human Resources Manager has oversight of centrally for an additional layer of security. A robust process is in place in each school when contractors arrive on site to ensure that the necessary checks have taken place before they are allowed entry into school.

Visitors

Our Trust has procedures for recording the details and confirming the identity of visitors, including prospective candidates for employment and volunteering through the use of a visitors log which is linked to the school's Single Central Record. We ensure that schools have control over who comes into the schools' premises so that no unauthorised person has unsupervised access to children.

All visitors to Trust academies are required to sign in using the InVentry system. During the sign-in process, they must read and agree to the school's Visitor Protocol. For pre-arranged visits, including guest speakers, the Visitor Protocol will be shared in advance alongside the invitation. This document outlines expectations regarding conduct on site, including the use of mobile phones (which must be switched off and kept out of sight), and provides information about the Designated Safeguarding Lead (DSL) team.

Visitors engaging in regulated activity with pupils must present valid photographic identification and an enhanced DBS certificate. These visitors will be issued with an orange lanyard, indicating they are authorised to work with pupils on a one-to-one basis.

Visitors without a DBS check must be accompanied at all times and will be issued with a yellow lanyard. Where appropriate supervision cannot be guaranteed, access to the main school buildings will not be permitted.

Work experience (Secondary Schools/Colleges only)

Our schools have processes in place to ensure that individuals or companies who provide work experience placements for our children have appropriate safeguarding policies and procedures in place. They ensure that any adults who are supervising children on work experience have the appropriate checks carried out as required by "Keeping Children Safe in Education 2025: Part 4: Adults who supervise children on work experience". If a child's work experience placement is

in a “specified place” where regulated activity is carried out (such as an education or childcare setting); we will work with the provider to ensure that the appropriate checks and/or risk assessments are carried out.

Use of School Premises for Non-School Activities

When extra-curricular activities out of school hours are arranged in any of our Trust’s schools, which are directly supervised/managed by school staff, this Safeguarding and Child Protection Policy is to be followed and any concerns should be managed in accordance with Staff Safeguarding Concerns: Recognise, Respond, Report and DSL Response sections of this policy.

Our Trust will follow the Ensuring Safe Staff procedures as outlined below if it becomes aware of any allegations relating to an organisation or individual using school premises.

Where our schools have sessions or activities which are provided by another person or organisation that is using any school site and not during school time or under direct supervision, each school will seek assurances that the person or organisation has the required child safeguarding arrangements in place as an individual/organisation as outlined in the DfE’s Keeping children safe during community activities. This is regardless of whether children who are on roll at a Trust school access the activity or not.

The requirements for safeguarding arrangements will be set out within any transfer of control agreement, (i.e. lease or hire agreement); and failure to comply with these arrangements will lead to termination of the agreement.

Alternative Provision

Where a child is placed with an alternative provision provider, our Trust will continue to be responsible for their safety and welfare and should be satisfied that the provider can meet the needs of the pupil.

We do this by: Designating a key school contact, either Assistant Head of Inclusion or SENDCO, depending on the needs of the pupil. An initial site visit will be carried out to see the alternative provision to ensure it is being run in line with its own policies and procedures as well as the school’s safeguarding expectations. A Local Authority approved checklist is completed. Compliance checks are recorded on the SCR. Attendance and pupils’ progress is monitored by one of the Senior Leadership team with regular communication with a key contact at the alternative provision. Half termly reviews take place to ensure alternative provision is still appropriate for the pupil.

Our schools obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been conducted on individuals working at the establishment, i.e., those checks that our Trust would otherwise perform in respect of its own staff. See Appendix B: Alternative Provision Quality Assurance Checklist and Alternative Provision statutory guidance. Our schools will conduct an initial site visit to ensure they conduct a health and safety site check as well as checking all relevant certification of staff. In addition to this, all children attending alternative provision will have a 6-weekly review of the provision to ensure suitability. Each school will also monitor attendance and apply appropriate attendance codes in line with Working together to improve school attendance,

Ensuring Safe Staff

Managing allegations (including low level concerns)

In all Trust settings, an open and transparent culture is promoted in which all concerns about the behaviour or conduct of any adults working in, at or on behalf of our Trust are dealt with appropriately. Confide is the Trusts electronic reporting system for any concerns related to staff's professional conduct. All staff have a Confide account and will be asked to record any concerns they have about a member of staff on the platform to ensure all concerns can be investigated thoroughly with a clear and succinct chronology.

There are two levels of allegations/concerns:

1. Allegations that may meet the harm threshold.

Circumstances where someone working within our Trust has or may have:

- Behaved in a way that has harmed a child, or may have harmed a child and/or
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates that they would pose a risk of harm to children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes any behaviour that may have occurred outside of a Trust setting that could pose a transferable risk.

Allegations that someone is working in, at or on behalf our Trust has met the harm threshold should be immediately referred to the school's Head of School or Trust Safeguarding Leads/RIT Core Team verbally and followed up on Confide.

If the allegation relates to the Head of School; this should be immediately reported to the Executive Head verbally and recorded on Confide.

If there is any conflict of interest or immediate risk of harm to a child, then the person with the concern must ensure immediate safety and contact the Local Authority Designated Officer (LADO).

In most cases; the Head of School will lead on managing allegations; with the support of the Trust's HR and the DSL. They will ensure that Part 4 Keeping Children Safe in Education 2025 and Medway's LADO policy are applied. Any allegations that meet the above criteria will be referred to the LADO within 1 working day and the Trust will follow their advice and guidance.

It is essential that any allegations of abuse against a member of staff are dealt with quickly, in a fair and consistent way, to effectively safeguard all those involved.

Our Trust also has a duty of care towards staff, and we will provide a named contact for the staff member.

If necessary, our Trust will adhere to the legal reporting duties (such as referring to the Disclosure and Barring Service or Teaching Regulation Agency) as employers as outlined in Keeping Children Safe in Education Part 3 if the criterion for such reporting is met.

2. Allegations / concerns that do not meet the harm threshold (low level concerns). The term low level does not mean that these concerns are insignificant. A low-level concern is when staff or volunteer may have acted in a way that:

- Is inconsistent with our Trust's Code of Conduct for Staff, including inappropriate conduct outside of work. The Code of Conduct outlines examples of what could be considered a low-level concern.
- Does not meet the harm threshold at point 1 above.

Low level concerns should be reported in person to the DSL and/or Headteacher; to embed the culture of openness and transparency and to ensure that our Trust's values and expected behaviours are lived, monitored, and reinforced by all staff. Patterns of low-level concerns are monitored and escalated where necessary.

On receipt of a report of a low-level concern, the Head of School /DSL will gather as much information as possible.

The Head of School will decide the outcome of all low-level concerns (in consultation with the DSL and/or TSL if necessary). Consideration will be given to whether there is a pattern of behaviour by the individual; or if there is a wider school culture issue and if policies need to be revised, or if all staff guidance or additional staff training is required.

Whistleblowing

Whistleblowing is the mechanism by which staff can raise concerns about poor or unsafe practice, wrongdoing and/or potential failures in the school's arrangements in good faith without fear of repercussions. All staff have a duty to raise concerns about malpractice or wrongdoing where this is impacting on the safety and welfare of children.

If staff have such concerns; these should be raised with the DSL, Headteacher or TSL.

Please also refer to our Trust's Whistleblowing Policy available on our website. If staff feel unable to raise concerns with our Trust directly; they can contact

<https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/>

Record Keeping and Information Security

Our Trust has a legal duty to act in line with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR). There are data protection processes in place to ensure that we keep and process (manage) personal information about children, their families, staff and others safely and lawfully. This includes:

- Securely manage electronically held information in line with Meeting digital and technology standards in schools and colleges and Early Years practitioners: using cyber security to protect your settings - NCSC.GOV.UK (see also the Online Safety section of this policy)
- Manage requests for access to personal information held by the Trust (known as subject access requests).

Details of processes and how to request access to personal information held are outlined in The Data Protection Policy and Subject Access Request Procedure

<https://www.gov.uk/guidance/data-protection-in-schools> and/or

<https://www.ncsc.gov.uk/guidance/early-years-practitioners-using-cyber-security-to-protect-your-settings>

Storage and Management of Safeguarding Information (Child Protection files)

Safeguarding concerns and responses for individual children are kept electronically and securely in each of our Trust's schools on My Concern. Each school has a robust system in place whereby only DSLs are able to view safeguarding files for individual children.

If any of our Trust's schools are provided with Child Protection files when children are transferred into the school, they are stored securely and individually for each child and are separate to a child's main pupil file. Paper copies are uploaded to My Concern to ensure we hold an electronic copy. The DSL is responsible for ensuring the quality, maintenance, and management of Child Protection files; as well as using the system to monitor themes and patterns of concern to inform and continue to improve our whole Trust approach to safeguarding.

Sharing Safeguarding Information

Our Trust is proactive in sharing information internally and with others who are working with our children and their families as early as possible; so that children can receive the help and support they need; respond to any safeguarding concerns and where possible prevent abuse, neglect or exploitation.

Staff are expected to share information with one another as part of their work in school about the needs and risks of children on a need-to know basis in line with our Trust's Safeguarding Statement so that children are kept safe and their welfare promoted. Staff are not permitted to share information with friends, family, or anyone in the local community outside of their work.

Sharing Information with Other Organisations

Staff should be familiar with and use the DfE's [Information sharing advice for safeguarding practitioners - GOV.UK](#).

- As part of our work in partnership with parents and children; consent to share their information with others outside of school should always be sought from a child and their parent(s) unless it is not safe to do so. This includes where seeking consent would: Place the child at increased risk of significant harm.
- Place any other at risk of injury.
- Obstruct or interfere with any potential Police investigation.
- Lead to unjustified delay in making enquiries about significant harm.

If a parent or child does not consent to information being shared, the law does not prevent the sharing of information if sharing is necessary for the purpose of keeping a child safe and promoting their welfare. Therefore, staff must make parents and children aware that information may still be shared with other organisations if necessary to help keep their child safe or promote their welfare or if there is another legal basis to do so.

Decisions to share safeguarding information with other organisations will be overseen by the DSL (refer to DSL Response section of this policy). The Designated Safeguarding Lead will keep detailed, accurate, secure written records of all concerns, discussions and decisions made including rationale for those decisions. This should include instances where referrals have or have not been made to another agency.

Transfer of Child Protection Files and Other Safeguarding Information

When a child leaves for a new education setting; the DSL will arrange for the Child Protection file (and any additional information to assist the new setting to help safeguard and promote the child's welfare) to be transferred to the new setting no later than within 5 working days of an interim transfer or within 5 days from the start of the new term. Where the move is planned, the DSL will consider sharing information in advance of the child leaving to help with the child's transition and to enable any help and support they may need. This is shared separately to any child's main file and confirmation of receipt of the files should be gained (refer to Appendix C: File Transfer Record and Receipt).

If a child is absent from education or Electively Home Educated; our schools share relevant information with the Local Authority as required by law (refer to Children Potentially at Greater Risk of Harm section of this policy). If a child leaves one of our Trust's schools without transitioning to another educational setting, their Child Protection file—along with any relevant supplementary information—will be retained by the school until the child reaches the age of 25. If the child re-enters education before turning 18 and the school is formally notified of their enrolment, the Designated Safeguarding Lead will ensure the transfer of records in accordance with established procedures within five working days of receiving the notification.

Working in Partnership

In order to ensure all children in our Trust schools are effectively safeguarded, and their welfare is promoted, we will work in partnership with children, their parents/carers and other agencies/partnerships as follows:

Children

Our children are taught how to keep safe; including how and when to share or report any worries or concerns they may have about their safety and wellbeing or that of others. Depending on the setting, the Trust encourages children to share, and report worries and concerns by:

- Reporting the concern directly to a member of staff. Head of School, Safeguarding team or trusted adult. There are also nurture teams available during breaks and lunchtimes, for drop-ins if pupils find them more approachable.
- Worry monsters and/or post boxes in schools which learners can use. These are checked daily by a member of staff and have been placed in an area of school where pupils feel confident using them. Form times are used to highlight issues such as bullying.
- Open door policy for pupils who wish to speak to safeguarding team members

Staff are expected to build trusted relationships with and work in the best interests of children in line with our Trust's Safeguarding Statement, and recognise, respond and report concerns as outlined in the Staff Safeguarding Concerns: Recognise, Respond, Report section of his policy.

We actively seek children's views of safety in our schools through a range of activities appropriate to the setting including periodic pupil surveys and meetings with trustees and/or local governors. These are reviewed at Trust level to ensure we can support schools with helping our children to feel safe within all of our settings.

Parents/Carers

Our Trust recognises the importance of working together with and supporting parents/carers to safeguard and promote the welfare of their children. This includes:

- Communicating to parents/carers how we keep children safe in our schools (including online). This policy is made available to all parents/carers through each of our schools' websites and in paper copy on request. Each school ensures the existence of this policy is promoted at all appropriate conversations and/or events. If parents want to raise concerns or complaints about how our Trust keeps their children safe; they can do this using the Complaints Policy which is available on our Trust's and schools' website.
- Actively seeking parent/carer views of safety in school through periodic parent surveys, events involving parents and meetings with trustees and/or local governors.
- Encouraging parents/carers to share and report worries and concerns about the safety and welfare of their child(ren) or any other children. We do this by encouraging open and honest communication with our parents/carers, using school platforms and face to face conversations to highlight concerns. Staff are expected to respond to any parents/carers who raises worries or concerns to them either about their child(ren) or others in line with Staff Safeguarding Concerns: Recognise, Respond, Report section of this policy.

- Ensuring, through the DSLs, that schools work with parents/carers to offer and enable support for children and their families; taking action to safeguard and promote their welfare (see DSL Response) in line with the local arrangements in the Local Authority where they live. Ensuring that parents/carers are made aware of how to raise safeguarding concerns or criminal behaviour themselves to the Local Authority where they live and/or Enforcement Agencies. Information for the Children's Social Services and LADO agency are available on school websites including a link to the Medway Local Authority safeguarding arrangements page.
- Providing parents/carers with regular information, guidance and external support available to them through newsletters; specific pages on your website; running sessions for parents/carers; signposting)

Other Agencies/Partnerships

As our Trust operates in Medway, it engages and co-operates with the local safeguarding arrangements. The local safeguarding partnership is the Medway Safeguarding Children's Partnership (MSCP). Our Trust engages and co-operates by:

- Ensuring our Trust effectively safeguards and promotes the welfare of children living in Medway in line with the DfE's Working together to safeguard children and the Medway Safeguarding Children's Partnership local criteria for action and assessment; as outlined in the MSCP Threshold Document. Where children do not live in Medway but attends a Trust's school; we will work in line with the relevant local arrangements in their home area.
- Ensuring our Trust works with other agencies and comply with other pieces of relevant statutory guidance in safeguarding children potentially at greater risk of harm.
- Supplying information and co-operating in multi-agency forum/meetings, audit or learning reviews as requested by the safeguarding partners
- Participating in the local Operation Encompass Protocol; an arrangement where police notify schools when a child who attends their school may have been subject or witness to police-attended incidents of domestic abuse. This enables us to provide appropriate emotional or practical support to a child/ren who may have been witness to and victim of domestic abuse. All new parents/carers are sent a letter informing them of our participation in Operation Encompass.

Teaching Children How to Keep Safe

Our Trust recognises that educating children in how to keep themselves and others safe both online and in face-to-face situation plays a crucial role in safeguarding them. There is a clear set of values and standards that provide opportunities for children to learn how to keep themselves and others safe; that are demonstrated and reinforced throughout school life and underpinned through –

- Our Trust Safeguarding Statement
- Relationships and Behaviour Policy
- Anti-Bullying Procedure
- Preventing Radicalisation
- Our approach to Online Safety
- Personal Social Health and Education and Computing curriculum and policies including the Relationships Sex Health and Education (RSHE) Policy.
- Our Schools' RSHE programmes are developed to be fully inclusive of all ages and stages of development and consideration of children's needs including children potentially at greater risk of harm; and addresses issues as outlined Keeping Children Safe in Education 2025; Part 2: Opportunities to teach safeguarding.

The DSL, RHE/RSHE lead and other key members of the SLT (such as computing, Mental Health and SENDCo) will work collaboratively to ensure that this is implemented; and being responsive to any safeguarding themes or patterns of concern that arise in our schools.

Online Safety

The use of information and communication technology (ICT); is a vital part of the everyday functioning of life in our schools. We also recognise the important role ICT plays in the lives of children and their families.

Whilst there are many benefits and strengths in using ICT; there are also a number of risks to children's welfare and safety in school when using internet enabled technology; which are summarised in the following categories:

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.

Our Trust adopts a whole trust approach to online safety which aims to safeguard and educate children and their families, staff, visitors, trustees, and local governors in the use and management of ICT (including the use of camera enabled; mobile and personal devices and the ICT systems in place). Our Online Safety policies outline our approach.

In addition to close supervision by staff, all academies are supported by the Trust with a monitoring system which provides real-time alerts as to any inappropriate activity or searches on devices within our school. These alerts are monitored by the DSL who takes the appropriate safeguarding actions following any alert. We use SENSO and Classroom to monitor iPads where all apps are approved and regularly monitored. Short cuts are used for most often visited sites, which are also monitored regularly.

The Rivermead Inclusive Trust staff regularly talk to learners about keeping themselves safe on-line and have brought external visitors in (such as the police) to talk about this and how to report concerns. Staff are aware of their responsibility to report any potentially harmful websites to the DSL.

Where there are online safety concerns involving identified children (including child-on-child abuse); staff will follow Staff Safeguarding Concerns: Recognise, Respond, Report and DSL Safeguarding Response sections of this policy.

Any school cyber security incidents will be reported to Action Fraud (National Fraud and Cyber Crime Reporting Centre) and, if there is a data breach this will be reported in line with our Data Protection Processes to the Information Commissioners Office. Please also see Record Keeping and Information Security.

Where children are being asked to learn online at home, we follow advice from the Department of Education, Safeguarding and remote education. The Trust's approach to remote learning is outlined in the Remote Learning Policy.

We review the online safety arrangements annually to ensure the Keeping Children Safe in Education 2025 online safety standards (including the digital standards for filtering and

monitoring [Meeting digital and technology standards in schools and colleges - Filtering and monitoring standards for schools and colleges - Guidance - GOV.UK](#) and cyber security [Meeting digital and technology standards in schools and colleges - Cyber security standards for schools and colleges - Guidance - GOV.UK](#) are met. Any risks arising from the reviews are clearly recorded as part of each school's evaluation and improvement action planning processes. These are reported to and overseen by the school's LAB.

All staff; senior leaders, trustees and local governors are appropriately trained to enable them to ensure effective online safety arrangements. We will respond to online safety incidents which indicate safeguarding concerns in line with the Staff Safeguarding Concerns: Recognise, Respond, Report and DSL Response sections of this policy.

Filtering, Monitoring and AI Safety

In accordance with the Department for Education's 2025 guidance, Rivermead Inclusive Trust ensures that all academies implement robust digital filtering and monitoring systems that meet the latest statutory and technological standards. These systems are reviewed annually and overseen by the Designated Safeguarding Lead (DSL) in collaboration with the Trust IT Lead. DSL teams meet termly with the Trust DSL, with Online Safety as a standing agenda item to ensure consistency and responsiveness across all settings.

The Trust uses a combination of SENSO, MGFL WebScreen, and Apple Classroom to monitor online activity and manage device usage in real time. These tools support compliance with statutory safeguarding requirements and enable proactive intervention. All staff are trained to identify and report concerns arising from digital activity.

Key Features of SENSO.cloud

SENSO.cloud is a cloud-based safeguarding and classroom management platform designed to support student safety and digital oversight across school-owned devices:

- **AI-Powered Threat Detection:** Monitors keystrokes and screen activity for signs of self-harm, bullying, radicalisation, and inappropriate content.
- **Real-Time Alerts:** Notifies safeguarding staff immediately when critical risks are detected.
- **Keyword Libraries:** Integrated with the Internet Watch Foundation and Counter-Terrorism Internet Referral Unit for up-to-date risk detection.
- **Visual Threat Analysis:** Captures screenshots linked to flagged activity for contextual review.

- **Classroom Management Tools:** Enables teachers to view screens, lock devices, launch apps, and manage student groups.
- **Cloud-Based & Scalable:** Accessible from any device, with centralised control across multi-academy trusts.
- **Audit Trails:** Maintains logs for safeguarding reviews and inspections.
- **KCSIE Compliance:** Meets all monitoring requirements outlined in Keeping Children Safe in Education.

Key Features of MGFL WebScreen

MGFL WebScreen is a flexible, school-friendly web filtering system developed for UK education settings:

- **Granular Filtering Control:** Allows schools and MATs to customise filtering policies by IP address, user, or group.
- **Category-Based Filtering:** Automatically categorises websites and applies allow/deny rules based on school-defined policies.
- **Local Lists & Bundles:** Schools can override default settings using custom URL and keyword lists.
- **HTTPS Filtering:** Supports encrypted traffic filtering for platforms like YouTube and Google.
- **User-Based Filtering:** Integrates with Active Directory or USO for personalised filtering per user.
- **System-Level Safeguards:** Prioritises system-level blocks to prevent circumvention of critical safety rules.
- **Reporting & Oversight:** Provides detailed logs and reports for safeguarding audits and compliance.

Key Features of Apple Classroom

Apple Classroom is used to manage iPad usage in real time and supports safeguarding through the following features:

- **Live Screen Monitoring:** Enables teachers to view all student screens simultaneously and zoom in for closer observation. Students are notified when their screens are being viewed.
- **Remote Control of Devices:** Allows staff to launch apps, websites, or textbooks across all student devices, lock students into specific apps, or mute devices to minimise distractions.
- **AirPlay Integration:** Facilitates sharing of student work on classroom displays via Apple TV, supporting collaborative learning and celebration of achievement.
- **Group Management:** Enables creation of custom student groups for differentiated instruction and targeted support.
- **Shared iPad Support:** Automatically assigns students to their previously used iPad and allows teachers to log them out at the end of a session, syncing work to iCloud.
- **Class Summary Reports:** Provides teachers with a breakdown of student activity, including app usage and engagement time, to inform future planning.
- **Password Reset:** Allows teachers to reset Managed Apple ID passwords directly within the app, reducing downtime and reliance on IT support.

<https://support.apple.com/guide/classroom/what-is-classroom-cla6d39b9338/web>

<https://education.apple.com/resource/250012220>

<https://apps.apple.com/us/app/classroom/id1085319084>

Generative Artificial Intelligence (AI) – Opportunities and Safeguarding

The Trust also recognises the emerging risks associated with 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. The DSL is responsible for overseeing all aspects of digital filtering and monitoring within each school environment.

Safe and Responsible Use

Rivermead Inclusive Trust recognises the potential benefits of generative AI tools in supporting teaching, learning, and reducing staff workload—when used safely, responsibly, and with appropriate infrastructure.

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 Trust IT lead – Bhavesh Jetha 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.

Safe and Responsible Use

Staff and students will be informed of the benefits, risks, and expectations around AI use through:

- Staff training and CPD sessions.
- Acceptable Use Policies (AUP) and AI-specific policies.
- Curriculum content (e.g. digital literacy, computing, PSHE).
- Regular updates and briefings from the Trust IT and safeguarding teams.

Responding to Misuse

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 managed in accordance with local safeguarding procedures and national guidance, including from the Internet Watch Foundation (IWF), NCA-CEOP, and UKCIS.

Curriculum

Creating a Safe School Culture

Rivermead Inclusive Trust recognises that schools play a pivotal role in helping children understand and identify what constitutes appropriate child and adult behaviour, what is ‘safe’, and how to recognise when they or others may not be safe. We are committed to ensuring that all pupils know how to seek advice and support when they have concerns.

Curriculum and Preventative Education

Our curriculum provides opportunities to develop self-esteem, self-awareness, social and emotional understanding, assertiveness, and decision-making skills. This ensures that pupils have a range of strategies to protect themselves and others.

Online safety is fully integrated into the curriculum across all key stages.

We adopt a whole-school approach to preventative education, fostering a culture of zero tolerance for racism, ableism, sexism, misogyny, homophobia, and sexual violence or harassment.

All staff delivering the PSHE curriculum are trained and equipped to provide high-quality, safe, and inclusive PSHE education. Using accredited platforms such as the PSHE Association and Jigsaw, Rivermead Inclusive Trust academies are able to deliver structured, age-appropriate lessons that support pupils' personal development, emotional wellbeing, and understanding of safeguarding themes. These platforms enable staff to confidently address sensitive topics such as healthy relationships, consent, online safety, and mental health, while ensuring alignment with statutory guidance and the Trust's safeguarding ethos.

Systems and Interventions Beyond the Classroom

In addition to classroom teaching, we have a range of systems and interventions to help children feel safe and supported in school, including:

- An anti-bullying policy and pupil anti-bullying ambassadors.
- Anonymous reporting systems such as worry boxes or online forms.
- Regular pupil voice questionnaires and surveys.
- Access to pastoral and nurture teams.
- Open-door policies for pupils to speak with trusted adults or the safeguarding team.
- Assemblies and workshops on safeguarding themes.
- Peer mentoring and buddy systems.
- Commando Joes
- Therapeutic Interventions

External Visitors and Enrichment

Rivermead Inclusive Trust values the contribution of external organisations and guest speakers in enriching children's education and providing useful information. However, all external visitors are subject to a suitability assessment before being granted access to pupils. This includes:

- Evaluation of the educational value and age-appropriateness of content.
- Verification of relevant safeguarding checks (e.g. DBS).
- Ensuring that all external input aligns with the Trust's safeguarding ethos and statutory requirements.

Preventing Radicalisation

The Prevent Duty for England and Wales (2015) under section 26 of the Counterterrorism and Security Act 2015; places a duty on schools and registered childcare providers to have “due regard to the need to prevent people from being drawn into terrorism”.

Our Trust academies have a Prevent Policy and risk assessment in place which outlines how our schools fulfil this duty. This is available on request from each Trust school and can be found on the academies website.

We regularly review the adherence to the Prevent Duty and ensuring that schools review the practice through a prevent risk assessment annually. Any actions arising from the assessment are included in our school evaluation and improvement action planning processes. These are reported to and overseen by the school's LAB.

All staff, senior leaders, trustees and local governors are appropriately trained (see Appendix A Professional Development and Support Minimum Training Requirements) to enable them to ensure that all children, particularly those who may be susceptible to extremist ideology and radicalisation are effectively safeguarded. Our Trust responds to children who are identified as being susceptible to an extremist ideology in line with the Staff Safeguarding Concerns: Recognise, Respond, Report and DSL Response sections of this policy.

We will ensure that all of our teaching approaches help our learners build resilience to extremism and give learners a positive sense of identity through the development of critical thinking skills. Our goal is to build mutual respect and understanding and to promote the use of dialogue not violence as a form of conflict resolution. We will achieve this by using a curriculum that includes:

- Open discussion and debate
- Work on anti-violence and a restorative approach addressed throughout curriculum
- Focused educational programmes Our staff are aware that children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is a part of our school's safeguarding approach.

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the Government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to Children's Services or Channel, the Government's programme for identifying and supporting individuals at risk of being drawn into terrorism.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which all staff and governors can call to raise concerns about extremism for a pupil. In non-emergency situations DSLs can also email counter.extremism@education.gov.uk. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321.

Staff are 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 within the Rivermead Inclusive Trust, 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.

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](#).**

Our Trust schools work closely with Sally Green – Medway and Kent Prevent Office ensuring they have a good understanding of the local and national context and use approved resources for example, Educate against Hate and Going too Far (Igfl).

Children Potentially at Greater Risk of Harm

Our Trust recognises that whilst all children should be protected, some groups of children are potentially at risk of greater harm than others (both online and offline). The list below is not exhaustive but highlights some of those groups. Where a child falls into multiple groups above; this potentially further increases their vulnerability.

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

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse and/or neglect and/or complex family circumstances. A child's experiences of adversity and/or trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.

Staff are aware the most common reason for children becoming looked after is because of abuse and/or neglect. Appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. Appropriate staff members also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated safeguarding lead has details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

Looked After Children and Previously Looked After Children

The most common reason for children becoming looked after is as a result of abuse and/or neglect; as well as/or other significant complexities or adversity in theirs and their family's life. All schools within our Trust ensure that appropriate staff members have access to the information they need in relation to a child's looked after legal status, contact and care arrangements. All Trust schools have an appointed designated teacher who works with the local authority to promote the educational achievement of registered pupils who are looked after in line with. The name of the allocated Designated Looked After Child Teacher can be found in this document under Key Contacts. This professional within the school is aimed at supporting

the educational achievement and well-being of children who are in the care of the local authority (commonly referred to as "looked after children" or "Child in Care", which is a more modern and child-friendly term.

Please also refer to the DfE [Designated teacher for looked-after and previously looked-after children - GOV.UK](#)

Children who attend Alternative Provision

Pupils in Alternative Provision often have complex needs, and we are aware of the additional risk of harm that children accessing alternative provision may be vulnerable to. Where our schools place a child with an alternative provision provider, we continue to be responsible for their safety and welfare and should be satisfied that the provider can meet the needs of the child. Details of how schools do this can be found in the section Ensuring Safeguarding Practice across our Trust.

Children who are absent from or are not in receipt of full-time education

Children aged 5-16 are legally entitled to a full-time education, suitable to any special educational need. Education is essential for children's progress, wellbeing and wider development and being in school is a protective factor against wider harms including exploitation.

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect (including Educational Neglect) or child exploitation, as well as other needs. Our Trust's response to persistently absent pupils and children who are absent from education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future.

Please refer to each school's Attendance policy and Children with health needs who cannot attend school policy for further information about our Trust's process and procedures relating to absence.

Our Trust refers to and uses Statutory Guidance on [Children missing education - GOV.UK](#) to ensure we comply with our duties regarding children missing education. This includes notifying the Local Authority in line with the [Children missing education | School attendance | Medway Council](#) Children missing education process when removing a child from the school roll at standard and non-standard transition points.

Children Who are Electively Home Educated

Many home educated children have an overwhelmingly positive learning experience. The Trust would expect the parents/carers' decision to home educate to be made with their child's best education at the heart of the decision. However, this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs. When a parent notifies us that they wish to deregister their child to electively home educate them, we will immediately notify the local authority.

Where a parent/carer has expressed their intention to remove a child from the Trusts academies with the view to educating at home, this will normally only come at the end of lengthy planning meetings and interventions. Depending on the needs of the child this may involve: Head of School, Assistant Head of Inclusion, Family Liaison Officers, DSL, Attendance Officer or SENDCO. They must also put in writing their intention to Home Educate making it clear their responsibility to provide an education for their child. This must be addressed to the Headteacher who will make contact to confirm intentions.

The Attendance Officer will notify the Local Authority of the family's intentions. in line with DfE Elective home education guidance and Medway Council's Elective home education processes and protocols.

Children who have experienced multiple suspensions and are at risk or have been permanently excluded

It is important that children in our Trust schools know and understand how we expect them to behave, and we ensure that our school is a safe place where all children feel safe and are able to learn. Serious, harmful and/or repeated behaviour by children will always be responded to. Such behaviour can be a sign or indicator that a child has an unmet need or could indicate that they are at risk of or are experiencing/have experienced abuse, neglect, exploitation or some other form of adverse experience in their life.

Our Trust Relationship and Behaviour Policy outlines the expected standards of behaviour for our children, as well as how the school will support and respond to children with additional needs (including Special Educational Needs and Disabilities), or whose needs or circumstances might affect their behaviour. Where a child's behaviour also indicates a safeguarding concern; staff will adhere to Staff Safeguarding Concerns: Recognise, Respond, Report.

Children Requiring Mental Health Support

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Children who have mental health needs will often need early help or support to avoid their safety and welfare being compromised.

Each Trust school has a senior mental health lead who is a member of/ supported by the senior leadership team. The Trust also have a Mental Health and Wellbeing working party who meet termly to discuss prevalent topics, updates and mental health awareness events in schools.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the child protection policy, and speaking to the DSL or a DDSL. [Promoting and supporting mental health and wellbeing in schools and colleges - GOV.UK](#) sets out how schools and colleges can help prevent mental health problems by promoting resilience as part of an integrated, whole school approach to social and emotional wellbeing, which is tailored to the needs of their pupils.

Children with Special Education Needs Disabilities or other Health Issues.

Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. Our Trust recognises that additional barriers can exist when recognising abuse and neglect in this group of children (e.g. assumptions that indicators of possible abuse such as behaviour, mood and injury, relate to the child's impairment without further exploration).

Any concerns of abuse involving children with SEND will therefore require close liaison with the DSL (or DDSL) and the SENDCo. The school will consider extra pastoral support attention for children with SEND. This will be provided through close liaison between our SENDCo, pastoral and student support team. The SENDCo will be involved in pastoral planning meetings, professionals' meetings and child protection case conferences as appropriate.

Children Who are Lesbian, Gay, Bisexual or Gender Questioning

The fact that a child or a young person may be lesbian, gay bisexual or gender questioning is not in itself an inherent risk factor for harm. However, children who are in these groups can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, bisexual or gender questioning can be just as vulnerable as children who already identifies within these groups.

Each school has DEI representatives and a Trust DEI lead – Jerome Xavier, who champions equality and the importance of embracing all genders and sexuality. The Inclusion teams carefully monitor and log any instances of abuse or bullying in relation to gender identity and work closely with pupils questioning their identity encouraging them to be active participants in school life and working closely with families. The whole school calendar and charities events celebrate Diversity and highlight the importance of Pride month.

The Trust adopts a cautious, evidence-informed approach to supporting gender-questioning children, working closely with families and clinical professionals where appropriate.

Child-on-Child Abuse

As set out in our Trust's Safeguarding Statement; we will not tolerate the abuse of children. This includes where children abuse other children (child-on-child abuse) or use words or actions which downplay or could (if not responded to) lead to abuse. Our Trust works to ensure that no child-on-child abuse takes place in its schools. However, we understand that children telling staff that they are experiencing abuse from other children cannot be relied on. Staff should understand that even if there are no reports in their school, this does not mean child-on-child abuse is not happening. Staff will be made aware of the signs and indicators of child-on-child abuse as part of their Professional Development and Supervision, which do not just rely upon children telling someone. Staff across our Trust are expected to follow our Appendix D: Child-on-Child Abuse Procedures.

Each of our Trust's schools monitor patterns of child-on-child incidents including those involving abuse, to ensure that schools are aware of and able to minimise and respond to any emerging themes or patterns of behaviours. This helps us to continue to prevent, identify and respond to child-on-child abuse as outlined at the beginning of this section. This monitoring and our responses to it are reported to and overseen by each school's LA and Trust Designated Safeguarding Lead.

Sexual Violence and Sexual Harassment

Rivermead Inclusive Trust academies adhere to the statutory guidance outlined in Part Five of Keeping Children Safe in Education (KCSIE) 2025 when responding to concerns related to sexual violence and sexual harassment between children.

We recognise that sexual violence and sexual harassment can occur between children of any age and gender. These behaviours may involve individuals or groups and can take place both

online and offline, including verbal, physical, and image-based abuse. Such behaviour is never acceptable and will not be tolerated.

Staff Responsibilities and Response:

- All staff must remain vigilant and recognise that concerns may arise from overheard conversations, observed changes in behaviour, or disclosures. Abuse occurring outside of school or online will be treated with the same seriousness as incidents within school.
- Staff must respond in line with relevant policies, including those for child protection, behaviour, anti-bullying, and online safety.
- Victims must be reassured that they are being taken seriously, supported, and kept safe. Under no circumstances should they be made to feel ashamed or that they are causing a problem by reporting abuse.
- Immediate consideration will be given to how best to support and safeguard the victim, the alleged perpetrator, and any other children affected.
- Upon receiving a report, the Designated Safeguarding Lead (DSL) will conduct a risk and needs assessment, which will be recorded and regularly reviewed. This assessment will consider:
 - The victim's protection and support needs.
 - The alleged perpetrator's circumstances.
 - The impact on other children and staff.
- Where possible, reports should be managed by two members of staff, as recommended by KCSIE 2025.
- Initial management of the report will be undertaken by the DSL. Where appropriate, referrals will be made to Children's Services and/or the Police.
- Decision-making will be informed by:
 - The wishes of the victim.
 - The nature and severity of the incident.
 - The ages and developmental stages of those involved.
 - Any power imbalance.
 - Whether the incident is isolated or part of a pattern.
 - Any ongoing risks to individuals or the wider school community.
- Pupils will be taught that the law exists to protect them, not to criminalise them.
- All decisions and actions will be regularly reviewed to ensure continuous improvement in safeguarding practice.
- The physical and mental health needs of both the victim and the alleged perpetrator will be considered. Both may require additional support and signposting to specialist services.

Nude and/or Semi-Nude Image Sharing by Children

Rivermead Inclusive Trust academies follow the non-statutory guidance from the UK Council for Internet Safety (UKCIS): *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**’ refers to the sending or posting of nude or semi-nude images, videos, or live streams by children under the age of 18. This includes content created and shared with consent. Creating, possessing, or distributing such imagery is illegal, which makes responding to incidents particularly sensitive and complex.

Staff Responsibilities

When concerns arise regarding nude or semi-nude image sharing, all staff must:

- **Report the concern immediately** to the Designated Safeguarding Lead (DSL) or Deputy DSL.
- **Never view, copy, print, share, store, or save** the imagery. If the image has already been seen accidentally (e.g. shown by a pupil), this must be reported to the DSL without delay.
- **Not delete** the imagery or instruct the child to do so.
- **Avoid blaming or shaming** any child involved.
- **Reassure the child** that they have done the right thing by speaking up and explain that the concern will be passed to the DSL.
- **Not investigate** or ask the child to disclose further details. Staff must not share information with other staff, pupils, or parents—this is the responsibility of the DSL.

DSL Response

The DSL (or deputy) will:

- Hold an **initial review meeting** with relevant staff and speak with the child(ren) involved where appropriate.
- **Inform parents/carers** at an early stage, unless doing so would place a child at risk of harm.
- Make a **referral to Children’s Services and/or the Police** immediately if:
 - The incident involves an adult (18+).
 - There is evidence of coercion, blackmail, grooming, or concerns about capacity to consent (e.g. due to age or SEND).

- The imagery involves sexual acts and a child under 13.
- The content is violent or developmentally inappropriate.
- A child is at immediate risk of harm.

All decisions and actions will be:

- **Recorded** in line with the Trust's child protection procedures.
- Based on the **best interests of the child(ren)** involved.
- Reviewed regularly, with further referrals made if additional concerns arise.

If the DSL is unsure how to proceed, advice will be sought from **Children's Services** or the **Education Safeguarding Service**.

Rivermead Inclusive Trust recognises that this issue also includes **AI-generated sexual imagery**, which will be treated with the same level of seriousness and safeguarding response.

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

Rivermead Inclusive Trust academies recognise that both Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are forms of abuse. These occur when an individual or group takes advantage of an imbalance of power to coerce, manipulate, or deceive a child into sexual or criminal activity.

We acknowledge that children can become trapped in criminal exploitation, with perpetrators using threats of violence, coercion, or debt to control victims and their families. Children involved in criminal exploitation may be forced to commit crimes themselves, and their vulnerability as victims is not always recognised by adults or professionals—particularly in older children. It is important to note that a child may still be criminally exploited even if the activity appears to be something they have agreed or consented to.

The experiences of girls who are criminally exploited can differ significantly from those of boys, and both may be at increased risk of sexual exploitation. CSE can occur over time or as a one-off incident and may happen without the child's immediate knowledge—for example, through others sharing images or videos of them on social media. CSE can affect any child who has been coerced into sexual activity, including 16- and 17-year-olds who can legally consent to sex. Some children may not realise they are being exploited, believing they are in a genuine relationship.

CSE and CCE can be difficult to identify and are sometimes mistaken for “normal” teenage behaviour. Recognising the signs is crucial to protecting children who may not have anyone else to turn to. Staff are encouraged to refer to the Kent and Medway Exploitation Identification Tool and the MSCP Risk Assessment Tool for sexually active young people to support identification.

If any member of staff is concerned that a child may be at risk of CSE or CCE, they must take immediate action by speaking to the Designated Safeguarding Lead (DSL) or a deputy.

Serious Violence

Rivermead Inclusive Trust academies recognise that children may be at risk of, or involved in, serious violent crime. All staff must be aware of the indicators that may signal such involvement, including:

- Increased absence from school or college.
- Changes in friendships or associations with older individuals or groups.
- A significant decline in academic performance.
- Signs of self-harm or a marked change in emotional wellbeing.
- Unexplained injuries or signs of assault.
- Possession of unexplained gifts, money, or new items, which may suggest involvement with criminal networks or gangs.

We acknowledge that certain factors may increase a child’s vulnerability to serious violence, including:

- Being male.
- Frequent absence or permanent exclusion from school.
- A history of child maltreatment.
- Prior involvement in criminal activity, such as theft or robbery.

The risk may be heightened during transitional periods, particularly when pupils are travelling to and from school, especially before or after the school day.

Rivermead Inclusive Trust refers to the following guidance to support staff in identifying and responding to concerns:

- **Home Office: Preventing Youth Violence and Gang Involvement**
- **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 the National Police Chiefs' Council)

Where there is reason to believe that a pupil is involved in serious violence or criminal exploitation, the academy will make a referral to **Children's Services** and/or the **Police** without delay.

Note: Referrals to Children's Services are appropriate for concerns relating to **child exploitation**. For general vulnerability concerns, staff must contact the police directly via **101** (non-emergency) or **999** (emergency).

The online portal is not suitable for reporting crime, as it is not monitored in real time.

Female Genital Mutilation (FGM)

Rivermead Inclusive Trust staff are committed to safeguarding and promoting the welfare of all children, young people, and vulnerable adults. We recognise FGM as a form of child abuse and gender-based violence that has severe physical and psychological consequences. FGM is illegal in the UK and constitutes a serious violation of human rights.

This policy is underpinned by the following legislation and guidance:

- The Female Genital Mutilation Act 2003 (as amended by the Serious Crime Act 2015)
- Working Together to Safeguard Children (HM Government)
- Keeping Children Safe in Education (DfE)
- Multi-Agency Statutory Guidance on FGM

We will:

- **Identify and respond** to signs and indicators of FGM.
- **Report known cases** of FGM in under-18s to the police, as required by the mandatory reporting duty.
- **Refer concerns** to children's social care in line with local safeguarding procedures.
- **Support affected individuals** with access to appropriate medical, psychological, and safeguarding services.

- **Raise awareness** among staff, volunteers, and the community through training and education.

All staff will receive regular safeguarding training, including specific guidance on identifying and responding to FGM. Designated Safeguarding Leads will ensure that staff understand their legal duties and the referral process.

We will handle all concerns sensitively and in accordance with our confidentiality and data protection policies. Information will be shared with relevant agencies where necessary to protect individuals at risk.

We are committed to providing a safe and supportive environment for individuals affected by FGM. We will work with specialist services to ensure appropriate care and support is available.

Any staff member who suspects or becomes aware of a case of FGM must report it immediately to the Designated Safeguarding Lead. In cases involving children under 18, the police must be informed under the mandatory reporting duty.

Staff Safeguarding Concerns: Recognise, Respond, Report

Recognise

Be alert and curious!

Pay attention to possible signs or indicators of abuse from the child or others either from your own observation or what the child/others tell you:

Appearance

Behaviour

Communication.

Do not just rely on a child telling you (there are lots of reasons why they won't

Use TED – Tell me, Explain to me, Describe to me

Any child in any family could become a victim of abuse, neglect or exploitation. Abuse and safeguarding issues are complex; and can often involve a child experiencing multiple issues or types of abuse. Staff should always maintain the attitude that abuse “could happen here”. Staff should be particularly alert to children potentially at greater risk of harm and vigilant in

identifying the signs and indicators which could indicate a concern that a child is being or could be at risk of abuse.

As well as maintaining their Professional development and accessing support; staff can remind themselves of the signs and indicators of abuse and safeguarding issues by referring to: Keeping Children Safe in Education 2025: Part 1 and Annex B.

Signs and indicators of concern may be evident in spaces and places where children spend time (including when online). They may be present in the child or others around them (including adults or children); in their: • Appearance • Behaviour • Communication

Signs and indicators can be recognised by staff through:

- Concerns shared directly by a child: Staff must not rely on children telling them they are experiencing abuse, neglect or exploitation. Children may not recognise; feel ready; know how to or be able to communicate concerns or worries. Staff must therefore act in accordance with our Trust's Safeguarding Statement; and use professional curiosity and skills in developing trusted and supportive relationships in their everyday work with children.
- Observations: In person or online (including online behaviour in school) of a child or someone else (for example a parent, someone working or visiting the school).
- Concerns shared by others: either verbally or in written communications. This could be parents; other children; other staff members or other adults who may be working in or with the school or individual children.
- Other systems in place: For example, online filtering and monitoring or information from other agencies through working in partnership etc.

There will be occasions where there are signs and indicators of concern but not enough evidence to indicate that the child is at risk of or experiencing abuse. Signs and indicators could be present for a variety of reasons as well as abuse (for example other family circumstances; health or learning needs); and may act as an early sign for the need for early help and support. In such circumstances, staff are still expected to respond in line with this policy.

Respond

Ensure the immediate safety of the child potentially at risk.

If there is immediate danger, take action as necessary to protect the child, others and yourself (including contacting emergency services on 999 and refer to child protection concerns)

Apply other relevant policies/procedure (e.g. behaviour, first aid, attendance, staff code of conduct and/or Appendix D: Child-on-Child Abuse Procedures as applicable).

Seek views/gather relevant information (if safe to do so).

Remember: Listen (don't investigate), reassure (don't promise) and explain you will be reporting the concerns.

Immediate safety

If a child is in immediate danger; staff must take individual action as necessary to keep the child, others, and themselves safe. They must:

- Contact emergency services if someone is in immediate danger (999).
- Call the Front Door for Children's Social Services to raise an immediate concern for a child at risk of harm
- Work in line with our Relationships and Behaviour Policy and [Use of reasonable force in schools - GOV.UK](#) in schools' guidance.
- Report any allegations of harm by adults in a position of trust or unsafe practices in school in line with the Ensuring safe staff.

Other relevant policies/processes

Staff may need to follow other school safeguarding policies/processes as applicable along with responding in line with this policy. All staff will immediately consider how best to support and protect the child and any other children who may be at risk or involved; ensuring they act in their best interests. Where there are concerns of child-on-child abuse; Appendix D: Child-on-Child Abuse Procedures should be referred to.

Injuries

Each of our Trust's schools request parents notify the school of any accidents or injuries to their child before attending school. The school will make a written record of the notification along with any injuries the child may have. Should a child receive any injuries during school time; staff will follow the accident reporting and first aid procedures.

Seek views and gather information from the child and others.

Where safeguarding concerns are identified; staff should (where it is safe to do so) always seek the views of and directly from:

- Children (where appropriate and depending on the circumstances and their role with children)
- any other people involved in school (only on a need-to-inform/know basis for the purposes of gathering information for the purposes of safeguarding: see Record Keeping and Information Security section of this policy)
- Their parents (if necessary and depending on the circumstances and their role).

Any uncertainty about seeking views should be discussed with the DSL.

Seeking views from the child/parents means asking them what they think using open questions (What? How? etc) and if they want any help or support. Staff should listen, reassure, and explain that concerns will be reported. Staff should avoid making assumptions, judgments or investigating. Please also refer to When Concerns are Directly Shared by a Child section below

Views should always be sought unless it is not safe to do so. This includes where seeking views would:

- Place the child at increased risk of significant harm.
- Place any other at risk of injury.
- Obstruct or interfere with any potential Police investigation.
- Lead to unjustified delay in making enquiries about significant harm.

If needs for help and support are identified; parents and children should always be asked for their consent to share information with other organisations individuals so that help and support can be provided to them. If consent is not given; staff should follow guidance in the Recording Keeping and Information Security: Sharing Safeguarding Information with Organisations section in this policy.

Any uncertainty about seeking views should be discussed with the DSL. Decisions to share safeguarding concerns with other organisations without consent will be reported to and overseen by the DSL.

If a child is non-verbal or not able to explain their views themselves due to their age, level of development or needs; then staff should pay attention to how the child may be expressing their views and feelings through their behaviour and use communication tools to help the child share their views.

Within our academies, to further assist pupils with their ability to communicate, our staff are trauma-informed trained and equipped to provide sensitive, responsive support that fosters a


safe and inclusive learning environment. Some members of staff are familiar with basic sign language, allowing for more accessible interaction with pupils who may benefit from visual or gestural communication. Additionally, specialist software and Picture Exchange Communication System (PECS) resources are available on school IT devices to support non-verbal learners and enhance communication opportunities across diverse learning needs.


When Concerns are Directly Shared by a Child


Children are far more likely to disclose abuse, neglect, or exploitation to someone they know and trust. Disclosures may unfold gradually, often as fragmented pieces shared with different staff members over time. They may not be verbal or direct - children often communicate distress through appearance, behaviour, or other forms of non-verbal expression (see *Recognise* section). Sharing such experiences demands immense courage, and many children face barriers including fear, shame, denial, discrimination, or a lack of understanding about what they are experiencing.


Staff should be prepared to respond with compassion, sensitivity, and professionalism when a child chooses to share concerns. It is essential to:


Listen to the child: Create a safe environment that shows the child they are being heard. Staff should refer to the NSPCC poster *Let Children Know You're Listening* for practical strategies.

 **Remain calm:** A composed response helps the child feel secure. Visible distress or shock from staff can discourage further disclosure. [let-children-know-listening-poster-english.pdf](#).

 **Explain it cannot be kept a secret:** Children should be gently informed that the information will need to be passed on to relevant adults in order to safeguard them. Staff should time this explanation with care, ensuring the child's trust is maintained.

 **Reassure appropriately:** Recognise the child's emotions and bravery. Avoid minimising their account or showing disappointment if they choose not to share further or delayed their disclosure. Physical comfort (e.g., touch) should not be offered automatically.

 **Seek the child's views:** Use developmentally appropriate questions and communication tools to gather the child's perspective. Staff should collect information without investigating or making assumptions.

 **Explain What Will Happen Next:** Clearly and calmly explain to the child what the next steps will be. If full details are not yet known, reassure the child that they will be kept informed throughout the process to help maintain trust and emotional safety.

Report and Record Immediately: The conversation must be documented without delay, following procedures outlined in the *Reporting Concerns* section. Timely and accurate recording ensures accountability and supports appropriate intervention.

Seek Support if Distressed: Staff members who feel distressed following a safeguarding conversation should speak with their line manager or a member of the Safeguarding Team for guidance and emotional support. Additional wellbeing support can be accessed through the Trust's HR team or via *Care First*, the staff support service.

Report

Report in Person: All safeguarding concerns must be shared with the Designated Safeguarding Lead (DSL) **in person as soon as possible**, following any initial response to the child or others involved.

Record Promptly and Accurately: Staff must document concerns, decisions, actions taken, and any resulting outcomes using the **safeguarding recording system (MyConcern)**. This ensures continuity, oversight, and transparency in safeguarding processes.

Concerns Involving Staff or School Visitors: If the concern relates to a **member of staff or another individual within the school**, it must be reported **in line with the 'Ensuring Safe Staff' procedures**. **You will report your concerns about Staff on Confide on My Concern.** This may include reporting to the Head of School, the Trust's HR team, or the Trust Designated Safeguarding Lead, depending on the nature of the concern.

Report to Designated Safeguarding Lead

All safeguarding concerns must be reported to the Designated Safeguarding Lead (DSL) immediately upon recognition, following any initial response to the child or those involved. Staff are expected to **verbally communicate** their concern directly to the DSL as a first step.

Record concerns

In our academy schools, all safeguarding concerns must be recorded in writing via **MyConcern**, our designated digital platform. Each staff member has personal login credentials and must:

- Identify the child by name
- Provide an outline of the concern

- Tag the entry for the **DSL team collectively** rather than a specific individual, allowing for effective triage and oversight, especially in cases of staff absence

If the concern includes **physical injuries**, staff must record relevant observations using the **Body Map** tool within MyConcern.

Each safeguarding entry should include:

- A clear and comprehensive summary of the concern
- Documentation of follow-up actions and resolution
- Details of decisions made, actions taken, and resulting outcomes

If uncertain about the required detail, staff must seek guidance from a DSL.

Each safeguarding concern record should include:

- A clear and comprehensive summary of the concern.
- Details of how the concern was followed up and resolved.
- Any action taken, decisions reached and the outcome. If staff are unsure of the recording requirements staff should seek advice from the DSL.

DSL Response

Safeguarding Concerns May Be Raised By:

- Staff (verbally and via MyConcern)
- Children, parents/carers, or visitors
- External agencies (*see Working in Partnership*)
- ICT filtering and monitoring systems
- Phone calls to the school
- Student communications via Microsoft Teams
- Emails received via the school's Office email address (available on the website)

DSL Response: Consideration and Assessment

Upon receipt of a concern, the DSL will:

- Review the reported information

- Gather additional details if required
- Conduct a risk and needs assessment where appropriate

In making informed decisions, the DSL will refer to:

- *Working Together to Safeguard Children 2023* (Chapters 1 & 3)
- *Keeping Children Safe in Education 2025*
- MSCP Threshold Document
- Local safeguarding tools and pathways
- Appendix D: Child-on-Child Abuse Procedures (if applicable)
- *When to Call the Police – Guidance for Schools*
- The Trust's Online Safety Policy
- The school's Prevent guidance and policies

The DSL will Decide on What Action to Take

Once a concern has been considered and assessed, the Designated Safeguarding Lead (DSL) will determine the appropriate actions to take. Where necessary, they may delegate tasks to other members of staff, ensuring that all decisions are made in the best interests of the child.

The DSL will also support the Head of School in decision-making processes related to staff matters. In reaching these decisions, the DSL will work collaboratively with the Head of School, relevant members of staff and the senior leadership team, in accordance with their roles and responsibilities. Partnership working may also include engagement with external organisations, as outlined in the sections on *Working in Partnership* and *Record Keeping and Information Security*.

Depending on the nature and severity of the concern identified, the Designated Safeguarding Lead (DSL) may take one or more of the following actions:

- **Manage Internally:** In accordance with school policies and procedures, the DSL may initiate support for the child and their family through the school's pastoral offer (Universal/School Early Help), tailored to address the identified needs and risks. This may include steps to make physical and digital environments safer, curriculum adaptations to promote pupil awareness of safety, and collaborative work under the *Working in Partnership* approach.

- **Offer Early Help / Targeted Early Help:** Where additional support is needed, the school may offer or refer the child and/or their family to enhanced or specialist services, in line with the Medway Safeguarding Children Partnership (MSCP) Thresholds document and locally available provisions. All referrals will require parental consent and will be guided by the child's wishes and feelings.
- **Raise Concerns to Children's Social Care:** When the threshold for statutory intervention is met, concerns will be escalated to Children's Social Care, in accordance with the MSCP Thresholds document and relevant tools and pathways.
- **Report to the Police:** If there are indications that a crime may have been committed—whether offline or online—the DSL will ensure that appropriate concerns are reported to the police to safeguard the child and support any necessary investigation.

Where there is potential criminal behaviour involving a child—including incidents of child-on-child abuse—the school will refer to [when-to-call-the-police--guidance-for-schools-and-colleges.pdf](#) to determine appropriate action.

In addition, relevant local referral processes will be followed where applicable. This may include engagement with multi-agency forums and pathways, such as:

- **Prevent** referrals to safeguard against radicalisation.
- **Online Safety** procedures to address digital risks and exploitation.
- **Domestic Abuse** responses through the Multi-Agency Risk Assessment Conference (MARAC), where high-risk cases are assessed and supported collaboratively.

These measures form part of the school's commitment to safeguarding children through a coordinated and informed approach involving all appropriate partners.

Record Actions, Decisions, and Outcomes.

All safeguarding concerns, assessments, and subsequent actions must be recorded in the child protection file, in accordance with the school's *Record Keeping and Information Security* procedures. Documentation should include:

- Notes and minutes from discussions and meetings with staff, external professionals, and other stakeholders, as outlined in *Working in Partnership*
- Clear, detailed, and accurate written records maintained by the Designated Safeguarding Lead(s)

- A full account of all concerns raised, actions taken, decisions made, and the rationale for each decision.
- A body map will be completed if injuries or marks are observed, with an accompanying detailed and objective written description.
- Evidence of whether a referral was made to another agency or not, including the reasoning behind that decision

These records must be kept securely and updated regularly to ensure accountability, continuity of care, and compliance with statutory safeguarding requirements.

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.

Manage and Oversee any Ongoing Response.

Once the initial safeguarding actions have been taken, the Designated Safeguarding Lead (DSL) will determine whether there is an ongoing need to actively monitor or manage the child's safeguarding needs. Where such a need is identified, the DSL will ensure that the school works collaboratively with the child, parents or carers, and any involved external agencies. This may involve taking further steps, as outlined previously, should concerns escalate.

In cases where professional disagreement arises while working with external agencies, the school will refer to the "[Resolving professional differences - Escalation Policy - Medway Safeguarding Children Partnership](#)". This framework will be used to challenge, resolve, and, if necessary, escalate concerns to ensure the child's safety remains paramount.

Linked Policies

- Relationships and Behaviour Policy
- Anti-Bullying Policy
- Staff Code of Conduct

- Whistleblowing
- Health & Safety
- Allegations against staff
- Attendance
- Curriculum
- RSHE
- Complaints
- SEND
- Remote Learning
- Administration of first aid/medicines
- Physical intervention
- Online Safety, including staff use of mobile phones/ devices with imagery and sharing capacity. Risk Assessments
- Safer Recruitment
- Disciplinary and grievance
- Intimate Care
- Prevent Policy and Risk Assessment
- Data Protection/GDPR Guidance Policy

Supervision

The Trust recognises that the roles of the Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads (DDSLs) carry significant responsibility and emotional impact. To ensure effective safeguarding practice and staff wellbeing, the Trust is committed to providing structured and reflective supervision for these roles.

1. Purpose of Supervision

Supervision for DSLs and DDSLs is a formal process of professional support, reflection, and accountability. It aims to:

- Ensure safeguarding decisions are robust and in line with statutory guidance.
- Provide emotional support and prevent burnout.
- Promote continuous professional development.
- Identify and address any gaps in safeguarding knowledge or practice.
- Supports DSLs and DDSLs in managing complex safeguarding cases.

- Ensures reflective practice and continuous professional development.
- Maintains a clear focus on the welfare of children.

2. Frequency and Format

- Group supervision will be held at least termly, with additional sessions available upon request or following significant safeguarding incidents.
- While DSLs will have access to individual supervision sessions with a trained supervisor, the group collectively expressed a preference for group supervision over 1:1 sessions.
- Supervision will be recorded confidentially, with notes stored securely in line with data protection policies.

3. Supervisor Qualifications

- Supervision will be conducted by a suitably experienced senior leader, such as the Trust Safeguarding Lead or a member of the Core Team
- Supervisors must have up-to-date safeguarding training and experience in managing complex safeguarding cases.

4. Content of Supervision

Supervision sessions will typically include:

- Review of recent safeguarding cases and decision-making.
- Discussion of any challenges or concerns.
- Reflection on emotional impact and wellbeing.
- Identification of training or support needs.

5. Escalation and Support

- Any safeguarding concerns raised during supervision that require further action will be escalated in line with the Trust's safeguarding procedures.
- DSLs and DDSLs will have access to peer support networks and external safeguarding advice where appropriate.

Use of Reasonable Force

Rivermead Inclusive Trust recognises that there may be circumstances where staff need to use reasonable force to protect children from harm. This may involve physical contact to guide, control, or restrain a child—ranging from leading them to safety to intervening in serious

incidents such as fights or preventing injury. 'Reasonable' refers to using no more force than is necessary in the circumstances.

Further information on our approach can be found in our individual schools Relationships and Behaviour Policies Behaviour Policy on the schools' websites, which aligns with the Department for Education's guidance on the 'Use of Reasonable Force in Schools'. Additional guidance is also available in Part Two of Keeping Children Safe in Education (KCSIE).

Monitoring and Review

The Trust's Designated Safeguarding Lead, Deputy CEO, and Trustee with linked safeguarding responsibility will collectively monitor the outcomes and assess the impact of this policy on an annual basis, ensuring continuous improvement and alignment with best practice across our academies.

Appendix A Professional Development and Support Minimum Training Requirements All School Staff (including Volunteers)

Activity	Who Should Complete	Frequency
Receive information on school safeguarding arrangements and procedures as outlined in KCSiE 2025 (Part 1 and Part 5)	All Staff and Volunteers	Induction or when arrangements/procedures are updated.
Read Keeping Children Safe in Education (KCSiE): All Staff: Part 1; Part 5 and Annex B. Senior Leadership Team and Safeguarding Teams: Must read the entire document. Governors: Must read Part 1; Part 2 and Annex B	All Staff and Volunteers	Induction then annually (in Autumn Term) or when updated.
Complete Safeguarding Awareness Training to enable staff to recognise, respond to and report safeguarding (including online safety and child-on-child abuse) concerns	All Staff and Volunteers	Induction and then annually
Complete FGM training appropriate to role	All staff	Every 2 years
Complete Prevent Awareness Training appropriate to role	All staff	Every 2 years
Complete Online Safety training appropriate to role	All staff	Induction and then annually
Complete GDPR training appropriate to role	All staff	Induction and then annually
Complete Cyber Security Training (training packages are available at:	All staff	Induction and then annually

Cyber security training for school staff - NCSC.GOV.UK)		
Receive regular national and local safeguarding updates (including those relating to online safety).	All staff	Termly updates will be provided by the DSL and Trust DSL. This will be done via email and/or in person training. The training schedule is set out by the Trust DSL and the DSLs at the beginning of the year with additional sessions planned to address any patterns and themes.

Appendix B Alternative Provision Quality Assurance Checklist

Alternative Provision Quality Assurance Checklist			
Name of alternative provision:			
Name of person completing checklist (from host school):			
All agencies and settings who place pupils at alternative provision MUST quality assure the placement. This quality assurance document must be completed prior to working with a new alternative provision and annually thereafter.			
		On file/ evidence of check	Date & Initial
1.	If this quality assurance check is a review, please confirm the date of previous assurance check.		
2.	<p>Is the alternative provision registered as an independent school with the DfE? Y/N</p> <p>The criteria to be registered as an independent school is that; - full-time¹ education is provided for five or more pupils of compulsory school age</p> <p>Or</p> <p>-full-time education is provided for one or more pupils with an EHC plan or who is “looked after” by a local authority</p> <p><small>1 - There is no legal definition of what constitutes 'full-time' education. However, DfE would consider an institution to be providing full-time education if it is intended to provide, or does provide, all, or substantially all, of a child's education.</small></p>		
3.	What is the provider's DfE number? (If applicable)		
4.	Copy of signed Service Level Agreement (SLA) /contract (attached)		
5.	Is there a clear governance structure within the Alternative provision? Y/N		
6.	Does the referral process include the requirement for a detailed pupil profile from the host school prior to agreement of placement? Y/N		
7.	Pupil's attendance should be monitored daily. Is this included in the SLA? Y/N Copy of providers Attendance policy attached.		
8.	Is there a procedure for when pupils fail to attend or the placement breaks down? Y/N		

9.	Is there adequate access to resources for all pupils who access the provision? Y/N		
10	Is there inclusive practice with regards to positive behaviour management, attendance and punctuality? Y/N <ul style="list-style-type: none"> • Pro-actively promote and support the regular attendance of pupils • Effective reward/incentive strategies to promote participation 		
11.	Is there regular assessment and review of pupil progress? Y/N Provision agrees to share weekly progress reports		
12	Are risk assessments completed for activities that pupils may undertake? Y/N (copy attached		
13	Is there a full and clear pupil induction procedure regarding health and safety and fire evacuation? Y/N		
14	Are there robust procedures in place (including information sharing that are referenced in the SLA) to safeguard children in line with KEEPING CHILDREN SAFE IN EDUCATION? Y/N Copy of providers Safeguarding/Child protection policy attached.		
15	Has evidence of staff receiving accredited child protection training been seen? Y/N Has evidence of DSL receiving training for their role been seen? Y/N Have contact details for DSL been provided? Y/N (attached).		
16	Copy of public liability insurance document attached.		
17	Is there a policy for when members of staff are working alone with pupils? Y/N (copy attached)		
18	Does the provider have an online safety policy in line with KEEPING CHILDREN SAFE IN EDUCATION? Y/N (copy attached)		
19	Copy of health and safety policy attached.		
20	Has written confirmation from the provider that staff vetting checks have been undertaken been received? Y/N Checks include. <ul style="list-style-type: none"> • An identity check. • A barred list check. • An enhanced dbs check/certificate. • A prohibition from teaching check. • Further checks on people who have lived or worked outside the uk 		

	<ul style="list-style-type: none"> • A check of professional qualifications, where required; and • A check to establish the person's right to work in the united kingdom. <p>Has confirmation of these checks been added to the Single Central Record?</p>		
21	<p>Is there a Designated First Aid Officer and suitable equipment available? Y/N</p> <ul style="list-style-type: none"> • Qualified First Aiders identified • Recording system for accidents including informing host school and home • Historical or current RIDDOR investigations • Evidence of full first aid kit 		
22	<p>Has confirmation been received from the provider that a representative will attend or contribute to multi-agency meetings when necessary? Y/N</p>		
<p>Action Plan If 'no' is answered to any of the questions in Part 2 an action plan must be formulated to obtain information</p>			
Action reference number.	Area for improvement	Intended action	
Signed by host school:		Date:	
Signed by Alternative Provision:		Date:	

Appendix C: File Transfer Documentation

PART 1: To be completed by sending / transferring setting, school or college.

NAME OF CHILD:	
DOB:	
NAME OF SCHOOL/SETTING SENDING CP FILE:	
ADDRESS OF SCHOOL / SETTING SENDING CP FILE:	
METHOD OF DELIVERY:	BY HAND SECURE POST ELECTRONICALLY
DATE FILE SENT:	
NAME OF DSL TRANSFERRING FILE:	
NAME OF PERSON TRANFERRING TO:	
SIGNATURE:	

PART 2: To be completed by receiving setting, school or college.

NAME OF SCHOOL / SETTING RECEIVING FILE:	
ADDRESS OF SCHOOL / SETTING RECEIVING FILE:	
DATE RECEIVED:	
NAME OF PERSON RECEIVING FILE:	
DATE CONFIRMATION OF RECEIPT SENT:	
SIGNATURE:	

Receiving School: Please complete Part 2 and return this form to the Designated Safeguarding Lead listed in Part 1 above. You are advised to keep a copy for your own reference.

Appendix D: Child-on-child Abuse Procedures

Our Trust aims to prevent, identify, and respond to child-on-child abuse at the earliest opportunity by:

- Expecting all staff, trustees and local governors in our Trust's school to ensure they are adhering to and promoting the commitments made in the **Safeguarding Statement**.
- Ensuring staff are aware of and respond to signs and indicators of child-on-child abuse. This includes ensuring that DSLs and other relevant staff have completed training in how to assess and respond to child-on-child abuse. For further detail; please refer to **Professional Development and Support**.
- Being clear how children are expected to behave towards one another. Our Trust's Relationships and Behaviour Policy outlines these expectations; how our schools will support children to understand and fulfil them; and how they will prevent and respond to behaviour which falls below expected standards. Where behaviour also indicates child-on-child abuse; staff will adhere to the processes outlined in this section.
- Ensuring Teaching children how to keep safe is implemented.
- Making sure that children who experience or are at risk of experiencing abuse from other children are identified, feel supported and safeguarded from further harm.
- Making sure that children who have caused or are identified as being at risk of being abusive in their behaviour towards other children are identified, supported and safeguarded from engaging in further harmful behaviour.
- Making sure that we are taking positive action to ensure that Children who are more vulnerable to child-on-child abuse are not disproportionately impacted by child-on-child abuse in our schools.

What is child-on-child abuse?

Child-on-child abuse: Is when a child or group of children inflicts harm or fails to act to prevent harm to another child.

- Actions that cause harm can be a single serious incident or a pattern of incidents.
- Harm caused to a child can be physical, emotional and/or psychological; and can include witnessing the ill treatment of others.
- Can happen both inside and outside of school; at home or someone else's home; in public spaces and online. In the school context; child-on-child abuse can take place in spaces and at times of the school day where children are less likely to be

supervised. Where child-on-child abuse is taking place outside of school (including online) this abuse can also continue and have an impact on a child when they are at school.

- Can be defined in different ways (examples are outlined in Keeping Children Safe in Education 2025: Part 1; Child-on-child abuse and Part 5).
- A child may experience one or multiple types of child-on-child abuse at the same time.

Children Who Are More Vulnerable to Child-On-Child Abuse

Please read this alongside Children Potentially at Greater Risk of Harm section of this policy.

Children who are perceived to be different to others can be particularly vulnerable to child-on-child abuse. When children are abused by other children; there is more often than not a misuse of power or privilege by the child(ren) causing harm. This can have a significant impact on the emotional development and mental wellbeing of the child who is being harmed; and lead them to feel isolated, unsafe, and traumatised.

Children Who Harm Others May Have Additional or Complex Needs.

Harmful behaviour by children can also be a sign or indicator that a child has an unmet need or could indicate that they themselves are at risk of or are experiencing/have experienced abuse or neglect or some other form of adverse experience² in their life. Children who harm other children may have power or privilege over a child(ren) they are causing harm to but can also be powerless or vulnerable in other part of their lives.

Child-on-child abuse is harmful to all children involved.

Evidence indicates that children from particular groups are more vulnerable to child-on-child abuse. This includes children who:

- Have special education needs and/or disabilities and/or health issues.
- Have already been and/or are experiencing abuse or some other kind of adversity or trauma. This includes children who are looked after or who have a social worker due to safeguarding concerns.
- Are eligible for free school meals. Socio economic inequality can increase incidents of bullying.
- Are from Black, Asian and/or other minoritized ethnic communities (including travelling communities and children for whom English is an additional Language). These children are more likely to be the target of hate-related behaviour/crime. They are less likely to be identified as children who are being harmed and more likely to be over identified as children who are a risk of causing harm. This is known as adultification bias³.

- Are Lesbian Gay, Bi-Sexual; Gender Questioning. These children are more likely to be the target of bullying and/or hate-related behaviour/crime and harmful sexual behaviour and abuse. • Are female. Girls are more vulnerable to harmful sexual behaviour and abuse in intimate personal relationships.
- Are male. Boys are more vulnerable to experiencing bullying; particularly that which is physical in nature (including being forced to carry out initiation or other acts which humiliate or degrade: known as hazing).

Where a child has several differences and would fall into multiple groups above; this further increases their vulnerability.

² See [Understanding trauma and adversity | Resources | YoungMinds](#) for further information.

³ [Adultification bias within child protection and safeguarding – HM Inspectorate of Probation](#)

When Is Child-on-Child Behaviour Considered Abusive?

Our Trust recognises the importance of distinguishing between behaviour that is developmentally appropriate, concerning, or harmful. Harmful behaviour is considered abusive and may, though not always, involve physical abuse.

When assessing whether behaviour is abusive, staff should consider the following:

Impact on the Child(ren) Affected

Any behaviour that negatively affects a child's physical or emotional health and development should be treated as potentially harmful. The greater the impact, the more serious the level of harm.

Staff must always take into account the individual needs and circumstances of the child who may have been harmed. This includes actively seeking and considering the child's wishes and feelings. If a child is unable or unwilling to express their views, staff should remain alert to other signs or indicators of abuse (refer to the *Staff Safeguarding Concerns: Recognise, Respond, Report* section of this policy).

All concerns raised by children—whether about themselves or others—must be taken seriously. Children should never be made to feel that they are causing a problem by speaking up.

Behaviour of the Child(ren) Causing Harm

It is essential to view the behaviour of the child causing harm along a continuum, considering their age, developmental stage, and any other relevant needs or circumstances. Harmful behaviour may indicate unmet needs, experiences of abuse, or other adverse experiences affecting the child.

Features of Abusive Behaviour May Include:

- A **pattern** of similar behaviours, including lower-level concerns that escalate over time.
- **Misuse of power** over the child being harmed (see also the section on vulnerable children).
- **Victimisation**, including situations where the child causing harm is supported or encouraged by others.
- **Intrusive actions** that disregard the ability of the other child to freely consent.
- Elements of **control, coercion, or force**.
- **Physical or sexual violence**, which, if present, significantly increases concern.
- Evidence that the child causing harm is **planning, seeking out, or deriving pleasure** from the behaviour.

The Trust's Response to Child-On-Child Abuse

In most instances, our schools will use our Relationships and Behaviour Policy to manage the conduct of children towards each other. However, where behaviour is considered abusive or indicates safeguarding concerns; then staff will also need to raise such concerns to the DSL in line with the Staff Safeguarding Concerns: Recognise, Respond, Report section of this policy.

In responding to any concern of child-on-child abuse; schools will take account of:

- Part 5 Keeping Children Safe in Education 2025.
- [Use of reasonable force in schools - GOV.UK](#)
- [Searching, screening and confiscation in schools - GOV.UK](#)
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK](#)
- [when-to-call-the-police--guidance-for-schools-and-colleges.pdf](#)

Risk And Needs Assessment.

All staff will act promptly to safeguard and support every child involved in incidents of child-on-child abuse, ensuring that decisions are made in the best interests of all children concerned.

Where appropriate, the school will carry out a formally recorded **Risk and Needs Assessment** for each child involved. This decision will be made by the Designated Safeguarding Lead (DSL), and a formal assessment will always be undertaken where there is evidence of violent or abusive behaviour.

The purpose of this assessment is to safeguard all children involved—including those not on roll at the school, such as siblings—and to identify and implement strategies that reduce risk and address individual needs.

The assessment will be informed by input from:

- Key staff working with the children,
- Relevant external professionals,
- Parents and carers,
- And, where safe and appropriate, the children themselves.

Completed assessments will be shared with all relevant staff and professionals involved in the children's care, as well as with parents and carers. The assessment will be regularly reviewed and updated in response to any changes in behaviour or circumstances, and to evaluate the effectiveness of the support in place.

In cases where children display concerning sexualised behaviour towards others, the DSL—trained in the use of the **Brook Traffic Light Tool**—will apply this framework to inform the risk and needs assessment process.

Response

Parents and carers of all children involved in incidents of child-on-child abuse will be informed and engaged in the school's response. The school will only share information about other children with parents/carers where consent has been obtained, or where it is necessary to do so in order to safeguard their child. (See also the *Record Keeping and Information Security* section of this policy.)

The outcome of the **Risk and Needs Assessment** will guide the school's response. Multiple actions may be taken simultaneously, depending on the circumstances and the needs identified. Possible responses include:

- **Internal Management**
Addressing the incident through the school's Behaviour Policy and pastoral support framework. This includes proportionate sanctions for the child who caused harm, balanced with any other interventions (e.g. police involvement), and consideration of the ongoing impact on the child harmed and others. Measures may also include changes to the physical or online environment, curriculum adaptations, and partnership-based interventions.
- **Early Help or Targeted Support**
Offering or referring children to enhanced or specialist services in line with the SSCP

Thresholds document and local provision. Parental consent will be required for referrals, and children's views and feelings will be taken into account.

- **Referral to Children's Social Care**

Where concerns meet the threshold, the school will escalate to Children's Social Care in accordance with the Medway Safeguarding Children Partnership (MSCP) guidance.

- **Police Involvement**

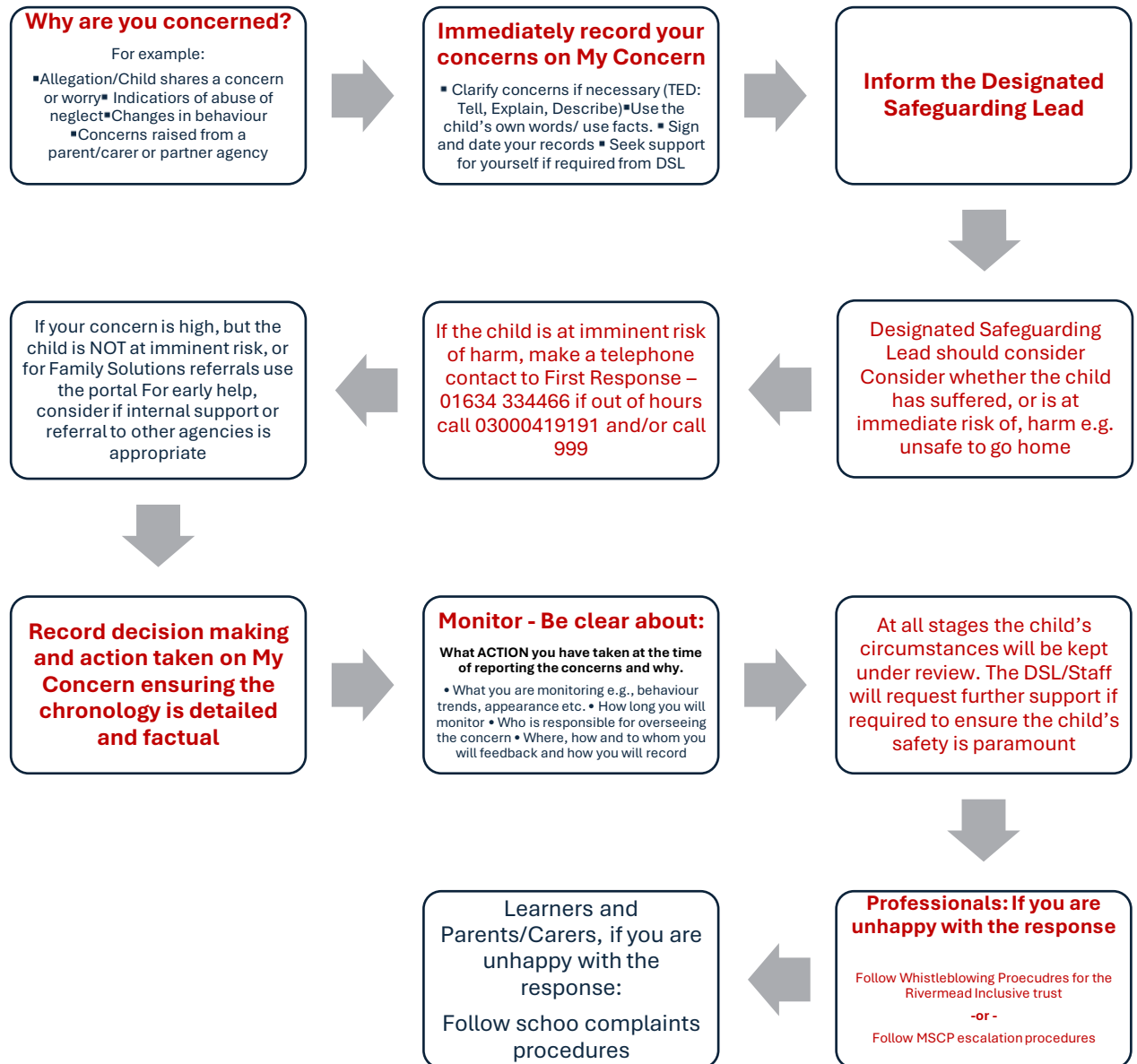
Where appropriate, the school will report incidents to the police, following the *When to Call the Police: Guidance for Schools and Colleges*.

Recording And Monitoring

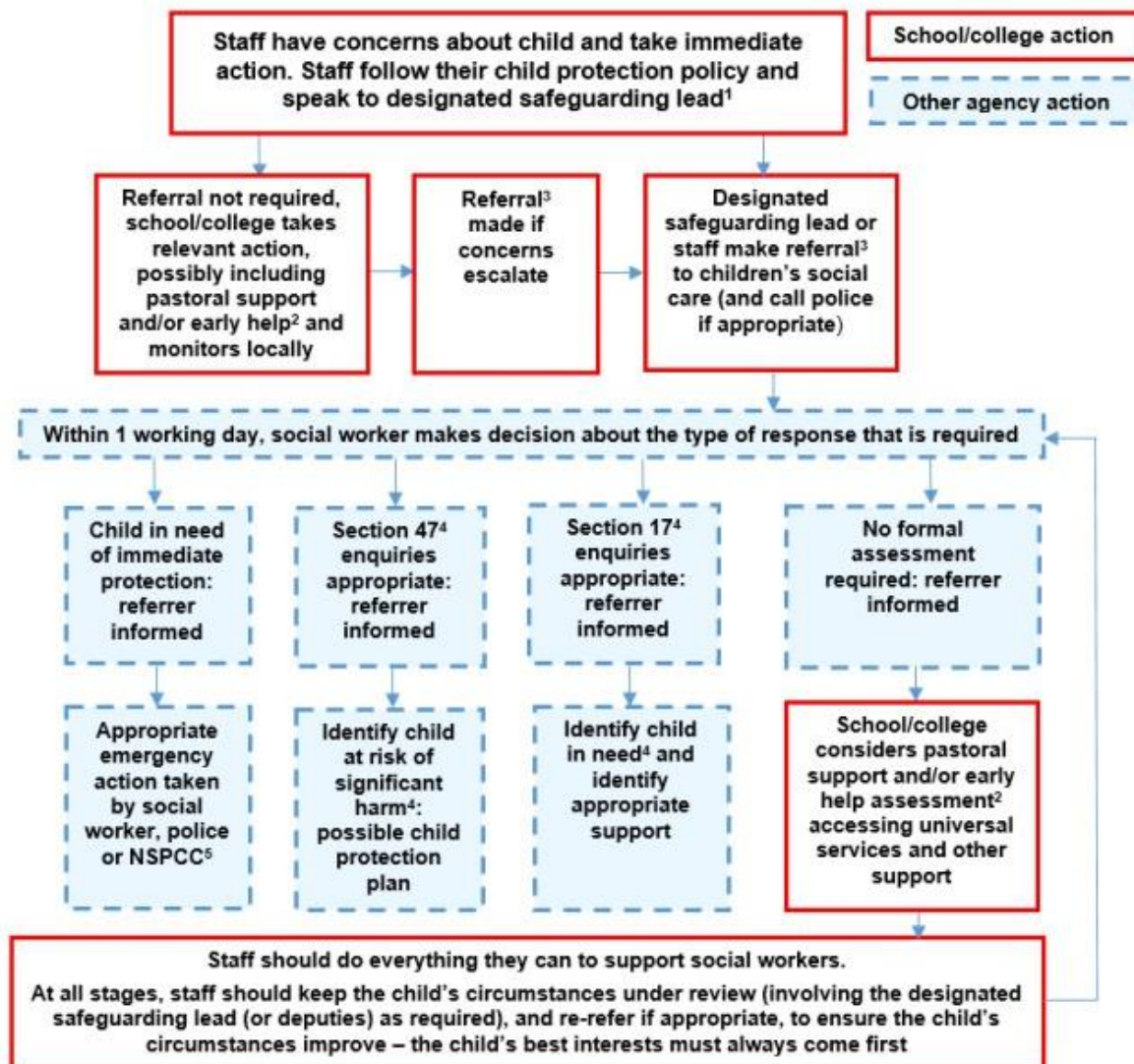
All concerns and actions related to child-on-child abuse will be documented and securely stored within the child protection records of each child involved, using the **My Concern** system. (Refer to the *Record Keeping and Information Security* section of this policy for further details.)

Incidents involving peer interactions that do not meet the threshold for abuse or safeguarding concerns will be recorded in accordance with the school's **Relationships and Behaviour Policy**, using the **Arbor** system.

Appendix E: What to do if you have a concern about a child



Actions Where There Are Concerns About a Child.



Appendix F: Support Links

Support for staff

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

Support for Pupils

- 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
- Kooth:
- 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 appropriate age 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

Appendix G: 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 2025

Mental Health

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.

- Mind: www.mind.org.uk
- Moodspark: <https://moodspark.org.uk>
- Young Minds: www.youngminds.org.uk
- Every mind matters <https://www.nhs.uk/oneyou/>

- 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

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.mensadviceline.org.uk
- Mankind: www.mankindcounselling.org.uk
- National Domestic Abuse Helpline: www.nationaldahelpline.org.uk
- Respect Phonenumber: <https://respectphonenumber.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
- Upskirting – know your rights: <https://www.gov.uk/government/news/upskirting-know-your-rights>
- www.gov.uk/government/news/upskirting-know-your-rights
- <https://www.csacentre.org.uk/research-resources/practice-resources/film-series/>
- <https://shorespace.org.uk>

Substance Misuse

- Drugs advice for Schools: <https://www.gov.uk/government/publications/drugs-advice-for-schools>
- Talk to Frank <https://www.talktofrank.com/>

Online Safety

- CEOP: www.ceop.police.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk
- Think U Know: www.thinkuknow.co.uk
- Childnet: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Report Harmful Content: <https://reportharmfulcontent.com>
- Parents Info: www.parentinfo.org
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Matters: www.internetmatters.org
- NSPCC/ Net Aware: www.nspcc.org.uk/onlinesafety and www.net-aware.org.uk
- Get safe Online: www.getsafeonline.org
- Stop it Now! www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- 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

The Rivermead Inclusive Trust 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

APPENDIX H: 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](#)