Solefield School *(DfE number 886/6038) is a member of the Sevenoaks Family of Schools and legally part of Sevenoaks School, a company limited by guarantee (4908949) and a registered charity (1101358) with a registered office at Sevenoaks School, High Street, Sevenoaks, Kent TN13 1HU. Any reference to governors, the governing body or the chair of governors refers to the governing body of Sevenoaks School. Any reference to local governors refers to the non-executive members of the Solefield School Local Advisory Board.*

Solefield School

Safeguarding & Child Protection Policy

(Including Mental Health Policy, Code of Conduct for Staff and Low Level Concerns Policy)

Key Personnel

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Area Safeguarding Team for North Kent including Sevenoaks Tel:
03301 651240 LADO Team 03000 410888
Urgent child protection issues (Kent) outside of office hours - 03000 411111 or the Police on 999

Governance

The Proprietor of Solefield School is the governing body of Sevenoaks School. The Chair of the governing body is Chris Gill who can be contacted at clerk@sevenoaksschool.org.

The Solefield local board governor responsible for safeguarding at Solefield School is Sue Webb who can be contacted at office@solefieldschool.org

The Lead Governor with responsibility for child protection across the Sevenoaks Family of Schools (including Solefield School) is Mrs Anita Yuravlivker, who can be contacted at a.yuravlivker@sevenoaksschool.org

Updated 1st September 2026

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SECTION ONE - INTRODUCTION, SCOPE, PERSONNEL

1.1 Introduction to Safeguarding at Solefield School

The Sevenoaks School Board of Governors has overall responsibility for compliance with child protection statutory requirements across the Sevenoaks Family of Schools, including Solefield School. The Board takes seriously its responsibility and duty of care in promoting the welfare of children and protecting them from harm. The reporting of Safeguarding practice both locally at Solefield School and at Board level enables the Governors to have oversight, ensuring compliance and ensuring safeguarding and child protection are the forefront and underpin all relevant aspects of processes and policy at Solefield School.

1.1.1. Definition:

Safeguarding and promoting the welfare of children are defined for statutory purposes as: providing help and support to meet the needs of children as soon as problems emerge: protecting children from maltreatment, whether that is within or outside the home, including online; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

The School recognises that safeguarding concerns can arise both online and offline and that technological developments, including artificial intelligence (AI), generative AI tools and AI-generated or manipulated content such as deepfake imagery, may present safeguarding risks to children. All staff should be alert to these risks and respond in accordance with this policy and the School's online safety procedures.

The core safeguarding principles of Solefield School, referred hereafter to as the 'School', are:

a. It is the responsibility of the School to safeguard and promote the welfare of children;

b. Children who are and feel safe make more successful learners;

The Safeguarding and Child Protection Policy will be reviewed annually by the Governing Body, unless an incident or new legislation or guidance suggests the need for an earlier date of review.

This policy has been authorised by the Board of Governors, is addressed to all members of staff and volunteers, is available to parents on request and is published on the School website. It applies wherever staff or volunteers are working with pupils even where this is away from the School, for example at an activity centre or on an educational visit.

This policy has been developed in accordance with the principles established by the *Children Acts 1989 and 2004*, and the *Education (Independent School Standards) (England) Regulations 2010* as amended in September 2019; and in line with government publications:

- Keeping Children Safe in Education (September 2026) (KCSIE)
- KCSIE incorporates the additional statutory guidance, Disqualification under the Childcare Act 2006
- What to do if you're worried a child is being abused (March 2015). What to do if you're worried a child is being sexually exploited (March 2015)
- Working Together to Safeguard Children (2023)
- Prevent Duty Guidance: England and Wales (2023)
- The use of social media for on-line radicalisation (July 2015)

This policy also has regard for Kent County Council Children's Services procedures

The School also has regard to the Department for Education guidance relating to children who are gender-questioning

and will ensure that decisions affecting individual children are made on a case-by-case basis, with safeguarding, wellbeing, parental involvement (except where this would not be in the child's best interests) and professional advice at the centre of decision-making.

Any deficiencies or weaknesses in the child protection arrangements will be remedied without delay.

In this policy, the Head refers to the Headmistress of Solefield School, 'DSL' refers to the 'Designated Safeguarding Lead' also known as the 'Safeguarding Lead'.

In this policy, any reference to the Local Authority Designated Officer (LADO) also includes the possibility of a team of officers being used by the Local Authority (LA).

In this policy, any reference governors, the governing body or the chair of governors refers to the governing body of Sevenoaks School unless there is specific reference to the "Solefield local board."

1.2 Policy Statement, Principles and Aims

1.2.1 Policy Statement

The protection and welfare of pupils at Solefield School is of paramount importance. Children and parents have a right to expect the school to provide a safe and secure environment and the school has a general duty for children's welfare as part of its role "in loco parentis". The School recognises its moral and statutory responsibility to safeguard and promote the welfare of all children. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. The School recognises emerging safeguarding risks including online abuse, exploitation facilitated through technology, AI-generated indecent imagery, serious violence, violence against women and girls (VAWG), misogynistic attitudes and behaviours, child-on-child abuse and harmful sexual behaviour.

1.2.2 Principles

The School is committed to safeguarding and promoting the welfare of children and young people and expects all staff to share this commitment so as to create an open environment where staff and pupils feel able to raise concerns, and where concerns will be listened to with a readiness to involve support services and other agencies as necessary:

- The School will ensure that the welfare of children is given paramount consideration when developing and delivering all school activities;
- All children, regardless of age, sex, ability, culture, race, language, religion or sexual identity, have equal rights to protection: to feel safe, secure, valued and respected, and feel confident, and know how to approach adults if they are in difficulties;
- The School is committed to maintaining an inclusive, respectful and anti-discriminatory culture. Promoting equality, diversity and inclusion is an important part of safeguarding and supports children to feel safe, valued and respected. The School will actively challenge discriminatory language, behaviour and attitudes and foster a culture in which all members of the school community are treated with dignity and respect;
- All staff, including the Head, are responsible for safeguarding the welfare of children as part of their professional duties;
- All staff have an equal responsibility to act, in accordance with this policy and procedures and KCSIE, on any suspicion, concern or disclosure that may suggest a child is in need of support services or is at risk of significant harm. All staff, regardless of role, are required to read and understand Part One of Keeping Children Safe in Education (KCSIE) 2026 and undertake safeguarding training appropriate to their role. The School maintains records confirming that staff have read and understood Part One and have received safeguarding and child protection updates at least annually. The full version of KCSIE is available to all staff via this link; staff confirm that they have read and understood this after DSL training and after each KCSIE

update

- The School recognises that incidents of violence against women and girls (VAWG), misogyny, sexual harassment, harmful sexual behaviour and gender-based abuse may be indicators of wider safeguarding concerns and will be addressed through both preventative education and safeguarding procedures.

A child's wishes or feelings will be taken into account when determining what action to take and what services to provide to protect them; children will be given the opportunity to express their views and give feedback wherever possible. The School recognises that mental health concerns may, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff should be alert to persistent changes in behaviour, emotional wellbeing and indicators of self-harm or suicidal ideation and should report concerns in accordance with safeguarding procedures.

The School is committed to operating safer recruitment procedures in compliance with relevant legislation and guidance and in accordance with the School's Safer Recruitment policy; where staff from another organisation are working with pupils on the school grounds or on another site, the School will have received written confirmation that appropriate child protection checks and procedures have been carried out on those staff. The School will ensure that arrangements for volunteers comply with current regulated activity requirements. Where volunteers undertake regulated activity with children, the appropriate enhanced DBS and children's barred list checks will be carried out in accordance with KCSIE 2026 and relevant legislation.

All pupils and staff involved in child protection issues will receive appropriate support from the senior management of the School who will follow this policy guidance and statutory guidance in all that they do.

The School will work with other agencies wherever such work is needed to ensure adequate arrangements to identify, assess and support those children who are suffering significant harm or who may suffer significant harm without appropriate intervention. The School will work with Kent Children's Services, the police, health and other services to promote the welfare of children and to protect them from harm. Where requested to do so, the School will allow access for children's social care from the Local Authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a Section 17 or a Section 47 assessment. In addition, the School recognises the importance of early identification of need and will work proactively with children, families and partner agencies to secure Family Help, targeted support or statutory intervention where appropriate. Staff should understand the role of Family Help within the wider safeguarding system and report concerns at the earliest opportunity. will comply with any request to supply information to the Local Safeguarding Partners that it requires in order for it to perform its functions.

1.2.3 Aims of this policy

- To provide all staff, including the DSLs, the Head, volunteers, the local board governors and Governors with the necessary information to enable them to meet their statutory responsibilities to promote and safeguard the wellbeing of children;
- To ensure consistent good practice across the School;
- To demonstrate the School's commitment with regard to safeguarding children.

1.3 Framework for the policy

This policy has been written in accordance with government statutory guidance and locally agreed safeguarding partner procedures (Kent County Council) and is available on the school website. It also applies to the EYFS

There are five main elements:

- Establishing a safe environment in which children can learn and develop.
- Raising awareness of child protection issues and equipping children with the skills needed to keep them safe.
- Ensuring safe recruitment in checking the suitability of staff and volunteers to work with children.
- Developing and then implementing procedures for identifying and reporting cases, or suspected or likely

cases, of abuse.

- In accordance with the agreed child protection plan, supporting pupils who have been abused.

Section 87(1) of the Children Act 1989, Section 157 of the Education Act 2002 and the Education (Independent Schools Standards) (England) Regulations 2010 (as amended) require the proprietors of the School (The Governing Body) to have arrangements to safeguard and promote the welfare of pupils at the School. The latest statutory guidance is contained in the documents Keeping Children Safe in Education (KCSIE) (September 2026), and Working Together to Safeguard Children (July 2023), see section 1.1 of this policy, or via the government Safeguarding link here:

Kent County Council also publishes guidance and information for schools in our area.

1.4 The Structure of Internal Reporting of Safeguarding

The DSL and DDSLs meet weekly to discuss safeguarding and child protection matters.

The DSL reports on safeguarding and child protection matters as follows:

- Twice weekly to the School Leadership Team
- Termly to the Education and Safeguarding Committee (EdSafe) Local Advisory Board (LAB)
- Termly to the Sevenoaks School Education Committee
- Termly to the Board of Governors Meeting

The School Leadership Team consists of the Head, Deputy Head, Deputy Head (Pre-Prep), Pastoral Lead and Registrar.

The EdSafe LAB includes the Head and DSL of Solefield School and the Solefield local board governor responsible for safeguarding.

The Sevenoaks School Education Committee includes the Head and DSL of Solefield School, the Lead Governor with responsibility for child protection across the Sevenoaks Family of Schools and the Solefield local board governor responsible for safeguarding (as an attendee).

The Board of Governors includes the Lead Governor with responsibility for child protection across the Sevenoaks Family of Schools.

SECTION TWO: ROLES AND RESPONSIBILITIES AT SOLEFIELD SCHOOL

2. Roles and responsibilities in Managing Safeguarding & Child Protection

2.1 All Staff

All staff, which includes the Head, all Governors, teaching and support staff, including temporary staff and all volunteers who do not fall under visitor procedures, (hereafter 'staff') have a statutory responsibility to:

- Have read and understood Part One of Keeping Children Safe in Education (KCSIE) 2026, together with Annex B where appropriate to their role, and have received safeguarding updates as required by statutory guidance.
- Provide a safe environment in which children can learn;
- Be aware of systems, policies and procedures within the School which support safeguarding;
- Be aware of the signs of abuse and neglect so that they are able to identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm and in such circumstances to take appropriate action, working with other services as needed;
- Recognise that prejudice-based harm, including racism, faith-targeted abuse, faith-based prejudice, antisemitism, Islamophobia and other forms of discrimination, can be harmful in their own right and may have a significant impact on a child's welfare, wellbeing and safety. All staff should be vigilant to such concerns and report them in accordance with safeguarding procedures.
- Be aware of the changing nature of abuse including, but not exclusively restricted to, Children Missing Education, Domestic Abuse, County Lines and gangs, Child-on-child Abuse, Child Sexual Exploitation, Honour-Based Violence and Female Genital Mutilation, Serious Violence, Upskirting, Radicalisation , technology-facilitated abuse, AI-generated harmful content, deepfake imagery, violence against women and girls (VAWG), misogynistic behaviour, harmful sexual behaviour and child-to-parent or caregiver abuse.
- Have taken part in the online training specified by the school for the Prevent Strategy (2023) combatting radicalisation;
- Work with the DSLs and, if required, to support social workers to take decisions about individual children;
- Attend appropriate safeguarding and child protection training on appointment and subsequent refresher training at a minimum of 3-yearly intervals in accordance with Local Safeguarding Partners guidance.
- Make a direct referral to Kent Children's Services immediately if, at any point, there is a risk of immediate serious harm.
- Identify possible mental health problems
- All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. All staff should be alert to indicators of emotional distress, self-harm, suicidal ideation or other significant mental health concerns and should report concerns promptly in accordance with safeguarding procedures. Staff should recognise that mental health concerns may coexist with safeguarding risks and should not be viewed solely through a pastoral lens.

2.2 Designated Safeguarding Lead & Deputies

The Designated Safeguarding Lead is Kate Easton (Deputy Head)

The Deputy Designated Safeguarding Leads are senior members of staff, Helen McClure (Headmistress), Dana Koheji (Pastoral Lead – Welfare & Head of Art), Robert Coston (Deputy Head), Gemma Goodwin (Head of Pre-Prep), Lisa Glennon-Cousins (SENDCo), Jacquelyn Hill (Head of EYFS) and Rachael Fenning.

The DSL and Deputies are responsible for safeguarding for the whole school including the EYFS and the school ensures there is sufficient cover. The DSL and Deputies meet weekly. The broad areas of responsibility for the DSL and DDSL are as follows and taken from Appendix B of KCSIE:

2.2.1 Managing referrals

The local Safeguarding Partners are accessed via KCC with advice from the LADO.

The DSL / DDSL will:

- Refer all cases of suspected abuse to the local authority Children's Social Care and:
  - The Local Authority Designated Officer (LADO) for child protection concerns (all cases which concern a staff member);
  - Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child) and/or
  - Police (cases where a crime may have been committed).
- Liaise with the Head, as appropriate, to inform her of safeguarding issues especially ongoing enquiries under Section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult.
- Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.
- Be responsible for pupils' online safety.

2.2.2. Training requirements: DSL and Deputy DSLs

The DSL and Deputy DSLs will receive appropriate training carried out at least every two years in order to:

- Understand the assessment process for providing Family Help and intervention, for example through locally agreed common and shared assessment processes such as Family Help assessment and multi-agency support arrangements.
- Have a working knowledge of locally agreed procedures for child protection and safeguarding partner working, in particular how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Understand the importance of the role the designated safeguarding lead has in providing information and support to children social care in order to safeguard and promote the welfare of children.
- Understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes.
- Understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners
- Ensure each member of staff has access to and understands the School's Safeguarding and Child Protection Policy and procedures and the staff Code of Conduct (including whistleblowing, acceptable use of IT, staff/pupil relationships and communication including use of social media, online safety and the 'Prevent' duty), including new and part time staff.
- Be alert to and support the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers.
- Ensure additional support for children in need who have welfare, safeguarding and child protection issues which might be impacting on attendance, engagement and achievement in school.
- Ensure support for those children who have or have had a social worker.
- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college
- Can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online

- Be able to keep detailed, accurate, secure written records of concerns and referrals.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them.

The DSL / DDSLs receive regular updates on safeguarding from the Local Authority.

2.2.3 Training of Staff

The DSL and DDSLs will ensure that:

- all staff have received the required training (through induction) and have signed to indicate that they have read and understood:
    - the Safeguarding Policy
    - the Code of Conduct (including whistleblowing, acceptable use of IT, staff/pupil relationships and communication including use of social media, online safety and the 'Prevent' duty) which includes detail of additional safeguarding arrangements where staff engage in one-to-one teaching and meetings with pupils
    - the Behaviour Policy
    - Part One of KCSIE 2026 and Annex B where appropriate to their role.
    - Safeguarding response to CME
    - Action needed in the case of Child-on-child violence or abuse
    - and that they know who the DSL and DDSLs are
    - identifying possible health problems
- all staff are re-trained as required and that an accurate record of staff attendance of induction and refresher training is maintained.
- all staff receive regular informal safeguarding updates, usually at the start of each term and at least once each year
- all staff are updated when any significant changes are made to KCSIE or other regulatory policies, or when there are any child specific updates to be communicated.
- all staff receive appropriate guidance regarding emerging online risks, including the safeguarding implications of artificial intelligence, generative AI tools, AI-generated content, deepfake imagery and technology-facilitated abuse.
- DSL and DDSLs will support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:
    - ensure that staff are supported during the referrals processes; and
    - support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support;
    - all staff are trained on the use of *My Concern*

2.2.4 Raising Awareness

The DSL will ensure the School's policies are known and used appropriately. The DSL will:

- Ensure the School's Safeguarding and Child Protection Policy and the staff Code of Conduct are reviewed annually, and that procedures and implementation are updated and reviewed regularly, in light of changes in local procedures and national statutory requirements and guidance, and work with the Governing Body regarding this.
- Ensure the Safeguarding and Child Protection Policy is available publicly (through the School website) and parents are aware of the fact that referrals about suspected abuse or neglect must be made and the role of the School in this.
- Link with the Kent Children's Services, to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

- Where children leave the School, ensure their child protection file is transferred to the new school as soon as possible, and within 5 days for an in-year transfer or within the first 5 days start of a new term. It must be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt and where appropriate, that the child's social worker is informed.

In addition to the above responsibilities as set out in KCSIE, the DSL will:

- Notify the local authorities if a child with a child protection plan is absent for more than two days without explanation.
- Consider how children may be taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum, for example through Information and Communications Technology (ICT), Relationships, Sex and Health Education (RSHE) and/or Form Time.
- Ensure appropriate safeguarding responses are in place and are implemented to deal with pupils who go missing from the School, in particular any pupils who go missing on repeat occasions. The School has a separate Missing Pupil Policy, see Appendix 4.
- Understand safer recruitment procedures and processes and be able to apply them as a member of an appointment panel.
- Liaise with other agencies that support the pupil such as Social Services, Child and Adolescent Mental Health Service, Education Welfare Service and Educational Psychology Service.
- Make requests to feeder schools for any child protection information which relates to children joining Solefield School (a letter is sent soon after pupils join the school to the DSL of feeder schools and nurseries). This includes children relocating from abroad.

2.2.5 Liaison between the DSL and the Solefield School Local Advisory Board

- When an issue arises which has potential child protection implications, the DSL will inform both the Solefield local board governor and the Sevenoaks governor with responsibility for safeguarding.
- At this stage, we cannot make a clear judgement as to the seriousness of the issue, but we can state whether external agencies (Social Services/Medical professionals/Police) have been contacted.
- The DSL can outline our next steps and the Solefield local board governor with responsibility for safeguarding will ensure that our policy is being followed and the law complied with.
- In the event that allegations are made against the Headmistress, the DSL must inform the Chair of Governors first of all.
- If the allegations are against one of the DDSLs, the DSL will be informed directly.
- The DSL would always keep information to the Local Advisory Board to a 'no names' basis.

2.2.6 On-Line Safety

The DSL is responsible for ensuring pupils are kept safe on-line. This is done through the Headmistress (DDSL) and Head of Computing and Data Officer of Solefield School, Robert Coston, and includes:

- Ensuring pupils are educated through RSHE and ICT lessons on how to stay safe on-line.
- Ensuring appropriate filters are in place and that filtering and monitoring systems are effective, proportionate and reviewed formally at least annually, with outcomes reported to senior leaders and governors.
- Scrutinising reports of browser histories for staff and pupils provided by the school's IT provider.
- Reporting to the school's Leadership Team and governors any concerns.
- Ensuring that online safety arrangements address emerging technologies, including artificial intelligence, generative AI tools, deepfake imagery, AI-generated indecent content and other technology-facilitated safeguarding risks.
- The use of Smoothwall

2.3 Deputy DSLs

The DDSLs have also undertaken child protection training and training in safeguarding partner working and will attend refresher training every two years. In the absence of the DSL, the functions of the DSL will be carried out by the DDSL. The School maintains clear and effective DSL cover arrangements to ensure that safeguarding expertise is always available during school hours, during educational visits and during extended school activities. Staff are informed regularly of the DSL and DDSL availability arrangements. Throughout this policy, reference to the DSL includes the DDSL where the DSL is unavailable.

2.4 Governing Body

It is the governing body's overall responsibility to ensure compliance with child protection statutory requirements. The Governing Body takes seriously its responsibility to uphold the aims of the charity and its duty of care in promoting the welfare of children, ensuring their security and protecting them from harm. The reporting of Safeguarding practice at the School enables the Governing Body to ensure compliance with current legislation and to identify areas for improvement. The Governing Body recognises that close liaison with the local authorities is also vital in order that appropriate support and training can be given.

2.4.1 The Governing Body will ensure that:

- Governors are aware of their duties under the Human Rights Act 1998, Equality Act 2010, and Data Protection Act 2018.
- There is an effective and statutorily compliant Safeguarding and Child Protection Policy and Procedures in place, together with a staff Code of Conduct and that these are provided to all staff (including temporary staff and volunteers) on induction;
- Safeguarding policies are inclusive and recognise that children who are questioning their gender may experience additional vulnerabilities. Decisions affecting individual children will be made on a case-by-case basis, taking account of safeguarding, wellbeing, parental involvement where appropriate and professional advice.
- DSLs are appointed and that they have the appropriate authority and the time, funding, training, resources and support to fulfil the role and responsibilities as outlined above;
- Governors support the DSL and have read the full job description (as outlined in Annex C of KCSIE)
- The School contributes to safeguarding partners in line with statutory guidance Working Together to Safeguard Children (2023) through effective implementation of the Safeguarding and Child Protection Policy and Procedures and good cooperation with local agencies;
- The School's safeguarding arrangements take into account the procedures and practice of the local authority as part of the safeguarding partners safeguarding procedures;
- The School has statutorily compliant procedures for dealing with allegations of abuse made against members of staff including allegations made against the Head (see part four of KCSIE 2026 and Appendix 3 of this document);
- The School operates safer recruitment policies and procedures that include the requirement for at least one member of a recruitment panel to have undertaken safer recruitment training and for appropriate checks to be made in line with national guidance (see part three of KCSIE 2026 and the School's Recruitment Policy);
- The School operates an effective training strategy that ensures all staff, including the Head receive child protection training, in accordance with Local Safeguarding Partners guidance;
- Appropriate filtering and monitoring systems are in place to safeguard children from harmful, inappropriate and illegal online content; the Governing Body will receive assurance that filtering and monitoring systems are effective and will review the effectiveness of those arrangements at least annually.
- The DSL and DDSL receive refresher training at two-yearly intervals as a minimum;
- An annual review of safeguarding is carried out by the Headmistress who in turn reports to the Governing Body;
- Where necessary, an appropriately trained and informed teacher is appointed to promote the educational

achievement of any child who is 'looked after';
- Appropriate safeguarding responses are in place to deal with pupils who go missing from the School (see Missing Pupil policy, Appendix 4);
- Ensure that any serious incident that has resulted or could result in a significant loss of funds or a significant risk to the School's property, work, beneficiaries or reputation is reported to the Charity Commission immediately, including any suspicions, allegations or incidents of abuse or mistreatment of vulnerable beneficiaries. In particular, if:
    - there has been an incident where the beneficiaries have been or are being abused or mistreated while under the care of the School or by someone connected with the School such as a Governor, member of staff or volunteer;
    - there has been an incident where someone has been abused or mistreated and this is connected with the activities of the School;
    - allegations have been made that such an incident may have happened, regardless of when the alleged abuse or mistreatment took place there are grounds to suspect that such an incident may have occurred.

See more at: https://www.gov.uk/complain-about-charity

2.4.2 Nominated Safeguarding Governor with responsibility for child protection (Sevenoaks Family of Schools)

A member of the Governing Body is nominated by the full Governing Body to:

- have oversight of child protection matters across the Sevenoaks Family of Schools;
- liaise with the local authority and/or partner agencies on issues of child protection;
- instigate the annual review of this policy;
- conduct the annual safeguarding audit

The Nominated Safeguarding Governor is supported by the Solefield local board governor with responsibility for safeguarding.

2.4.3 Annual Safeguarding Audit (Review)

The Nominated Safeguarding Governor carries out an annual audit as follows:

- Review of policies;
- Training records;
- Scrutiny of Single Central register;
- Check of minutes of safeguarding meetings (or similar);
- Check of minutes of pastoral staff meetings (or similar);
- Scrutiny of confidential paperwork involving pupils of concern, referrals etc.
- Check of behaviour log (or similar);
- Interview of staff to check understanding of their safeguarding role;
- Interview of pupils.

A report is submitted to the EdSafe LAB and Education Committee of Sevenoaks School.

2.5 The Head

The Head will:

- Ensure that the Safeguarding and Child Protection Policy and Procedures adopted by the Governing Body are implemented and followed by all staff;
- Allocate sufficient time and resources to enable the DSL and DDSLs to carry out their roles effectively, including the assessment of pupils and attendance at leadership discussions and other necessary meetings;

- Ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively. Reporting wrongdoing by staff in the workplace that does not involve the safeguarding and welfare of children is dealt with in accordance with the school's Whistle Blowing procedures;
- Provide immunity from retribution or disciplinary action against staff in the event of them 'whistleblowing' in good faith;
- Ensure that children's safety and welfare are addressed through the curriculum;
- Be able to understand safer recruitment procedures and processes and deal with allegations made against members of staff and volunteers.

2.6 Safeguarding Guidelines for all

To meet and maintain our responsibilities towards children, all members of the School community (staff, governors, pupils and parents) are expected to adhere to the following standards of good practice:

2.6.1 Individuals should be:

- Reading and understanding all of the School's safeguarding and guidance documents on wider safeguarding issues in addition to this policy, including: the Code of Conduct (including staff/pupil relationships and communication including use of social media and the 'Prevent' duty), Anti-Bullying, E-Safety Policy, First Aid, Missing Pupil Policy, Data Protection Policy, SEN Policy, Whistleblowing Policy, ICT Acceptable Use Policy and Mental Health Policy; See the School policies section in the staff handbook on OneDrive;
- Treating all children with respect;
- Setting a good example by conducting ourselves appropriately;
- Involving children in decision-making which affects them;
- Encouraging positive and safe behaviour among children;
- Being a good listener;
- Being alert to changes in children's behaviour;
- Maintain an attitude of 'it could happen here' where safeguarding is concerned;
- Recognising that challenging behaviour may be an indicator of abuse;
- Asking the child's permission before doing anything for them which is of a physical nature (except where there is an urgent need to take action to protect them or to prevent them from harming others), such as assisting with dressing, physical support during PE or administering first aid;
- Maintaining appropriate standards of conversation and interaction with and between children and avoiding and discouraging the use of inappropriate sexualised or derogatory language; Recognising and challenging misogynistic attitudes, sexist language, sexual harassment, harmful sexual behaviour and other behaviours associated with violence against women and girls (VAWG).
- Being aware that the personal and family circumstances and lifestyles of some children lead to an increased risk of neglect, abuse and/or exploitation.
- Being aware of the impact of domestic abuse including the potential short term and long term detrimental impact on children's health, wellbeing and ability to learn.
- Promoting the school ethos which promotes a positive, supportive and secure environment and gives pupils a sense of being valued;
- Making clear to all pupils that if they have any problems or worries these can be taken to a form tutor, a subject teacher or any member of academic staff, a prefect or any member of the support or admin' staff.
- Building trusted relationships with children which facilitate good communication.

SECTION THREE AREAS OF SCHOOL LIFE UNDERPINNED BY SAFEGUARDING

3.1 Safer Recruitment

The School is committed to Safer Recruitment and the School's HR department (Headmistress, Registrar) are responsible for implementing these practices. 4 members of the School's interviewing team are trained in Safer Recruitment.

The School carries out the required checks on staff as outlined in Part 3 of KCSIE (September 2026). The flowchart on p.30 of KCSIE provides a helpful summary of what sort of checks are required for different roles and activities undertaken by staff. A curriculum vitae will only be accepted alongside a full application form.

More detailed information about our Recruitment policy and practice can be found in our Recruitment policy on the school website: The School must be assured that any staff employed by another organisation and working with Solefield School pupils outside of school premises (for example, in another institution) have undergone relevant safeguarding checks. The School will ensure that volunteers are assessed against current regulated activity requirements. Where a volunteer is undertaking regulated activity with children, an enhanced DBS certificate including children's barred list information will be obtained and recorded in accordance with KCSIE 2026 and relevant legislation.

3.2 Abuse of Trust and Inappropriate Relationships

All school staff are aware that inappropriate behaviour towards children is unacceptable and that their conduct towards all children must be beyond reproach.

The School's Code of Conduct, in the Employment Manual, separately sets out expectations of staff.

All staff are aware of the potential for a pupil's relationship with another pupil to be or become abusive and are alert to this possibility and the requirement for concerns of this nature to be referred under the procedures detailed in this policy.

Staff should recognise that child-on-child abuse can include sexual violence, sexual harassment, misogynistic behaviour, image-based abuse, technology-facilitated abuse and harmful sexual behaviour. Such behaviour will never be dismissed as banter, part of growing up, or "just having a laugh".

3.3 Children who may be particularly vulnerable

Some children may be at increased risk of significant harm as a result of neglect and/or physical, sexual or emotional abuse. See Appendix 1 and Appendix 2 for details about the types and signs of abuse.

Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse happens, or who have a high level of tolerance in respect of neglect.

To ensure that all of our children receive full and adequate protection, we will give special consideration and attention to children who are:

- disabled or have special educational needs;
- living in an identified domestic abuse situation;
- affected by known parental substance misuse;
- asylum seekers;
- living away from home;
- vulnerable to being bullied, or engaging in bullying;
- living in temporary accommodation;
- living transient lifestyles;
- living in chaotic, neglectful and unsupportive home situations;

- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality;
- gender-questioning children. The school will take a cautious, child-centred approach and involve parents unless doing so would pose a risk of harm. Staff will consider clinical advice and broader vulnerabilities, including mental health and SEND.
- vulnerable to online exploitation, technology-facilitated abuse, coercion through social media or exposure to AI-generated harmful content, including manipulated or deepfake imagery;
- involved directly or indirectly in prostitution or child trafficking;
- do not have English as a first language;
- 'Looked After' Children (LACs) or children in care. This includes those who are subject to a care order or temporarily classed as looked after on a planned basis for short breaks or respite care.

Special consideration and attention includes monitoring through the pastoral systems of the school:

- The behaviour tracker underpins this care, is completed and accessed by all staff;
- The form teacher liaises with the Headmistress and Head of Pre-Prep (depending on the age of the pupil) and monitors the welfare of children who may be particularly vulnerable. There is regular liaison with the DSL & DDSLs, and the pupil's individual file is updated as new information arises;
- The School uses the services of a Counsellor who may be involved to support the child where this is deemed to be appropriate;
- The DSL liaises with the local authority regarding involvement of outside support agencies.

3.4 Complaints about staff

3.4.1 Complaints Procedure

The School's Complaints Procedure will be followed where a parent raises a concern about poor practice or wrongdoing by staff in the workplace that does not involve the safeguarding and welfare of children. The complaints policy and procedure is available to all parents and staff via the School Policies page of the school's website.

3.4.2 Whistleblowing Policy and Low Level Concerns

Complaints from staff involving wrongdoing in the workplace that does not involve the safeguarding and welfare of children are dealt with under the School's Whistle Blowing Policy and Disciplinary and Grievance policy, both of which are available on OneDrive. Low level concerns are to be reported to the Head either by a low level concern form or by using the Low Level Concern reporting tool on MyConcern. Staff are encouraged to self-refer if they feel it necessary.

3.4.3 Allegation against a member of staff

The procedure in Appendix 3 entitled Arrangements for Dealing with Allegations against Staff will apply if there is an allegation that a teacher or other member of staff or volunteer has:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm if they work regularly or closely with children.

If the allegation is made against a supply teacher, volunteer, contractor or other person not directly employed by the School, the organisation or agency of employment will be informed in addition to following the procedures in this policy.

Allegations against former members of staff or volunteers who are no longer working at the School, or concerns or suspicions about applicants for positions at the School should be referred to the Head who will refer them to the LADO, or in an emergency or in cases of serious harm, directly to the police.

3.5 Training

It is important that all staff have training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern.

New staff will receive training on appointment as part of their induction, overseen by the DSL, which includes:

- this policy;
- the staff Code of Conduct (including whistleblowing, low level concerns, acceptable use of IT, staff/pupil relationships and communication including use of social media, online safety and the 'Prevent' duty 2023);
- Children Missing Education;
- Online Safety, including Artificial intelligence (AI), generative AI tools, deepfake imagery, technology-facilitated abuse and other emerging online safeguarding risks.
- managing a report of child-on-child sexual violence;
- the identity of the DSL and Deputies;
- Part One of KCSIE 2026 and Annex B where appropriate to the member of staff's role.
- Mental Health
- The use of *My Concern*

All staff will be required to sign to confirm they have read, understood and agreed to comply with the requirements outlined in these documents. A log of the induction training and most recent child protection training is kept on the central register.

All staff will receive child protection training that is updated regularly and at least every three years in accordance with Kent Children's Services. Such training, when arranged, takes priority over all other commitments.

All staff have been trained to manage a report of child-on-child sexual violence and sexual harassment.

All staff have been trained to identify possible mental health problems and refer these to the DSL and DDSLs.

A full log of all induction training to be kept by the office administrator. The office administrator will identify those whose training needs to be updated and inform the DSL, agreeing with the DSL and arranging suitable times to hold the necessary training.

The DSL and DDSLs will receive training updated at least every two years, including training in safeguarding partners working, participation in child protection case conferences, supporting children in need, record keeping and promoting a culture of listening to children, and safer recruitment. Such training, when arranged, takes priority over all other commitments.

The DSL gives whole staff training / updates at the beginning of each term with regular updates in weekly staff meetings.

3.6 Health & Safety, Extended School Activities and Educational Visits

The School's Health & Safety and Educational Visits policies are set out in separate documents, and reflect the consideration given to the protection of our children both physically within the School environment and away from the School when undertaking School trips and visits.

Where extended school activities are provided by and managed by the School, our own Safeguarding and Child Protection Policy and procedures apply. Where other organisations provide services or activities on our site the member of the School's staff responsible for arranging the services or activities will check that the service or activity providers have appropriate procedures in place, including relevant risk assessments and safer recruitment procedures.

When our children attend off-site activities, including those abroad on School trips, we will check that effective child protection arrangements are in place. All staff are bound by the School's Educational Visits Policy when arranging and organising off-site trips.

3.7 The use of mobile phones, photography, images and videos

Staff shall set an example and shall never use their own mobile telephones or other electronic devices whilst they are on duty (whether in a classroom, EYFS, Pre-Prep or Prep) and any such mobile devices should be switched off except in the case of an emergency and be kept out of sight of parents or pupils. The use of photographic images of pupils in publications and on the School website is covered under the Data Protection Policy.

The School will not publish photographs of individual pupils with their names without the express agreement of the pupil's parent or guardian. Permission is sought and gained from parents when the pupil enters the school. This is collated and recorded by the Admissions Office, and lists pupils from families not wishing to be in photographs etc. are sent to staff at the start of each academic year. The marketing department will, as a matter of course, always check this list before using film footage or photographs of children.

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place. The School recognises that technological developments now allow photographs and videos to be manipulated through artificial intelligence. Staff must remain alert to the risks associated with AI-generated, altered or deepfake images and videos and should report concerns immediately to the DSL. To protect children we will:

- seek parental consent;
- ensure that children are appropriately dressed;
- encourage children to tell us if they are worried about any photographs that are taken of them.

The use of personal cameras or the camera facility on mobile devices within an educational context (including the EYFS) is permitted, providing it is appropriate and on school business, for example a school trip, and it is in accordance with the school's social media policy (within the school's employment manual) and anti-bullying policy. Any images taken on personal devices should be transferred as soon as reasonably practicable onto the school network and deleted from the relevant device. The use of the facility to take pictures of pupils in a social context is generally not permitted anywhere in the school (including within the EYFS). This policy applies to all images (including within the EYFS) created, received or maintained by staff of the school in the course of carrying out their duties.

Further guidance for staff on the taking and storing of photographs and images of pupils is contained in the Code of Conduct. From time to time professional photographers are invited into the School to take group photographs or pictures of significant events; any professional photographers hired by the School are subject to appropriate vetting checks.

CCTV is located around the School but is not installed in classrooms, changing rooms or toilet areas.

Photographs, digital images or videos of pupils may be taken by parents and family members, either on the School site or when pupils are involved in organized activities off site. Parents and family members are welcome to take photographs or videos of school events which may include images of other pupils. To respect the privacy of others and in some cases for protection purposes, parents are requested that these images should not be made publicly available on social networking sites or on other public areas of the internet.

If the behaviour of an adult capturing images seems unusual or the pupil appears to be worried by someone taking photographs of them, staff will act to challenge the adult (where they feel safe and confident to do so) and report the matter to the DSL as soon as possible, and in as much detail as possible, to allow the concern to be followed up. The police will be informed in cases of serious concern.

3.8 Pastoral and Safeguarding Education

The School promotes the welfare of children through assemblies, the RSHE curriculum, the ICT curriculum and form time. Pupils are given the information to avoid situations and persons, including over the internet and mobile technology, which/who could lead them into harm.

The evidence based RSHE curriculum has been written specifically with the needs of Solefield children in mind, including those with individual vulnerabilities and those on the SEND register. It is key in preventative education and all Solefield staff understand that the delivery of RSHE reinforces our school culture of zero tolerance to any form of prejudice or discrimination, including sexism and misogyny/misandry. Preventative education also supports pupils to recognise harmful stereotypes, abusive behaviours, violence against women and girls (VAWG), online coercion, exploitation and healthy relationships.

3.9 Bullying

Bullying is a subset of abuse that can take different forms, including: physical, emotional, verbal, ostracism, homophobic and gender-related bullying and/or cyber bullying (which includes abusive messages posted online or sent by SMS or email or via other means using technology). The School is determined that no kind of bullying will be tolerated by pupils, parents or staff at the School.

Verbal, written and cyber-bullying, including the sharing of nude or semi-nude images, image-based abuse, AI-generated images and other forms of technology-facilitated harm, will not be dismissed as banter.

The School's Anti-bullying policy can be found on OneDrive and website. All School staff, pupils and parents must be aware that engaging in bullying behaviour or condoning or failing to challenge or report bullying would lead to the application of child protection procedures and in the case of a member of staff being complicit, or otherwise involved, in bullying behaviour, to the application of the procedure in Appendix 3 (Allegations of abuse) of this policy.

If there is a concern that a child is at risk of serious harm from bullying behaviour, the School's Child Protection Procedures will be followed; the police will be informed in cases of serious harm.

The School's Anti-bullying policy applies to bullying behaviour outside of the School of which the School becomes aware.

3.10 E-Safety

The school's online safety strategy addresses the four areas of risk:

- **Content**: exposure to harmful material
- **Contact**: harmful interactions with others
- **Conduct**: online behaviours that cause harm
- **Commerce**: financial scams and inappropriate advertising

The School also recognises risks arising from artificial intelligence (AI), generative AI platforms, deepfake content, manipulated images, technology-facilitated abuse and online scams targeted at children.

Most of our children will use mobile devices and computers at some time. They are important tools for communication and education as well as for recreation and socialising. However, we know that some men, women and young people will use these technologies to harm children. The harm might range from sending hurtful or abusive texts and emails (cyber-bullying), to enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings. We also teach our pupils the dangers of online hoaxes and challenges.

The School's Code of Conduct and ICT Acceptable Use Policy explain the responsibilities of staff in relation to keeping children safe in school.

Pupils receive guidance on safe use of the web (including anti-bullying) through the ICT and RSHE curricula and in year group assemblies. This is part of a balanced curriculum and takes into account guidance published by the government, Teaching Online Safety in Schools (Jan 2023). The school ensures that although appropriate filters and monitoring are in place, it does not "over-block" leading to unnecessary restrictions as to what children can be taught with regard to online teaching and safeguarding. The effectiveness of filtering and monitoring arrangements will be formally reviewed at least annually and whenever there is a significant change in the School's technological environment or safeguarding risk profile.

The DSL, Headmistress and SLT scrutinise all internet use each week through a report produced by Smoothwall. The Safeguarding Team receives alerts should any school filter be tested by pupils or staff and these are followed up accordingly.

Cyber-bullying by children, via texts, direct messages, social media or email, will be treated as seriously as any other type of bullying and will be managed through our Anti-bullying policy and procedures.

3.11 Secure premises

School premises: The School will take all practicable steps to ensure that School premises are as secure as circumstances permit.

Visitors' book: the School keeps a visitors' book at Reception. All visitors must sign in on arrival and sign out on departure and are escorted whilst on School premises by a member of staff. All visitors will be given a 'Visitor's Badge' which must be clearly displayed and worn at all times whilst on the School premises. Visitors are also given a Child Protection booklet at reception when receiving their badge.

Identification badges: All Governors, the Local Board, peripatetic music teachers, games coaches and relevant volunteers receive a Visitor's Lanyard which must clearly displayed and be worn at all times whilst on the School premises.

3.12 Disqualification Under the Childcare Act 2006

3.12.1 Background

Keeping Children Safe in Education (KCSIE) incorporates statutory guidance, Disqualification under the Childcare Act 2006 . It concerns how people can be disqualified under the Childcare Act 2006 and explains the changes made by The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge)(Extended Entitlement)(Amendment) Regulations 2018

The school also has regard for:

The Childcare (Disqualification) Regulations 2009

3.12.2 Scope

The advice applies to relevant staff or volunteers providing 'childcare' (where childcare means any form of care for a child, which includes education for a child and any other supervised activity for a child) who work in Early Years provision and to those who work in later years provision for children who have not attained the age of 8. It also applies to staff or volunteers who are directly concerned in the management of such provision even though they may not work in the early years or relevant later years provision themselves.

The advice reminds schools that they may not allow relevant staff or volunteers to work in these settings or to be directly concerned in their management, if they or others in their households are disqualified under the Childcare (Disqualification) Regulations 2009, unless granted a waiver by Ofsted. The ISI January 2015 Regulatory Handbook clarified that this requirement applies to independent schools. This was updated in January 2017 and again in 2018.

From September 2018 schools are no longer required to establish whether a member of staff is disqualified "by association".

The grounds for disqualification include, in summary:
• being on the DBS Children's Barred List;

• being cautioned for, convicted of or charged with certain violent and sexual criminal offences against children and adults, at home or abroad;

Any offence involving the death of or injury to a child (even if not specifically listed in the guidance);

• being the subject of certain other orders relating to the care of children;

• refusal or cancellation of registration relating to childcare or children's homes or being prohibited from private fostering;

• living in the same household where another person who is disqualified lives or works.

Disqualification occurs as soon as the above criteria are met, for example, as soon as a caution or conviction occurs, even before the person is formally included on the children's barred list.

Relevant staff and volunteers are required to complete a self-declaration form before they join the school. An annual reminder is issued to staff regarding their duty to disclose any of the above situations.

3.12.3 Immediate action taken

Existing Staff:

All teachers and teaching assistants have completed a self-declaration form. All other relevant staff have been issued and have completed a self-declaration form. This includes school office personnel, relevant visiting music teachers, school assistants, caretaker etc.

The self-declaration form has been provided by Veale Wasborough Vizards.

The Headmistress will consider the correct action to be taken should anyone appear to be caught by the 'by association' rule. This is likely to include immediate suspension.

3.12.4 Moving forward

New staff:

- On appointment staff and volunteers who meet the criteria will be issued with a self-declaration form as part of their pre-employment documentation.
- This will be reviewed by the Headmistress. Where the person falls within the 'by association' rule the new member of staff can apply for a waiver from OFSTED. Failure to obtain the waiver would result in the offer of employment being withdrawn.
- HR documentation issued to staff includes a reminder to staff that they need to inform the Headmistress should their circumstances change.

SECTION FOUR: REVIEW OF POLICY AND PRACTICE

4.1 Monitoring and review

This policy is reviewed as part of the annual policy checks by the Headmistress, to whom the Governors delegate responsibility for making necessary immediate changes. The Headmistress reports to the EdSafe LAB and the Sevenoaks School Education Committee to confirm efficient enforcement of this policy, and any deficiencies in these arrangements are to be addressed at once. It is the responsibility of both bodies to confirm the effective implementation of this policy. Reviews and updates may take place more frequently where necessary, and changes will be highlighted to staff, parents and pupils as appropriate. The annual review will include consideration of emerging safeguarding risks, including online safety, artificial intelligence (AI), technology-facilitated abuse, violence against women and girls (VAWG), child-on-child abuse, harmful sexual behaviour, mental health concerns and local safeguarding priorities.

The effectiveness of the School's filtering and monitoring arrangements will be formally reviewed at least annually, with findings reported to the Governing Body through the appropriate governance structures. Any identified weaknesses will be addressed promptly and proportionately.

Any child protection incidents at the school will be followed by a review of the safeguarding procedures within the School and a prompt report to theEdSafe LAB and (where necessary) the Sevenoaks School Education Committee . Where an incident involves a member of staff, the LADO will assist in this review to determine whether any improvements can be made to the School's procedures.

The School will also review the effectiveness of safeguarding training, induction processes and staff understanding of safeguarding responsibilities, including the requirement for all staff to read and understand Part One of KCSIE 2026.

Reviews will include consideration of safeguarding record keeping, information sharing practices, transfer of child protection records and engagement with external agencies, including Family Help and statutory safeguarding services where appropriate.

Any deficiencies or weaknesses in regard to child protection arrangements at any time will be remedied without delay and a report made to the Governing Body through the EdSafe LAB.

SECTION FIVE: SPECIFIC CHILD PROTECTION PROCEDURES

It is important that a child at risk or in need receives the right help at the right time to address risks and prevent issues escalating. It is therefore important that all staff understand their responsibility to: identify, act on and refer the early signs of abuse and neglect; keep clear written records; listen to the views of the child; reassess concerns when situations do not improve; share information quickly and challenge inaction.

5.1 Recognising abuse

To ensure that children are protected from harm, we need to understand what types of behaviour constitute abuse, exploitation and neglect.

The government document 'What to do if you're worried a child is being abused' can be found here:

Abuse, exploitation and neglect are forms of maltreatment. Somebody (adult or child) may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a young or immature child home alone. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children. Abuse, exploitation and neglect may also occur through the use of technology, including social media, gaming platforms, messaging applications, artificial intelligence tools and AI-generated content.

There are four categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect, as defined in part one of KCSIE 2026 and reproduced in Appendix 1.

5.2 Specific safeguarding issues

When a concern is raised, the DSL will consider whether there has been or is a likelihood of significant harm and whether there is a need for additional support from one or more agencies; the former will be reported to the Children's Social Care immediately, the latter would lead to assessment by safeguarding partners using the local processes.

The following link is to Kent Children's Services' threshold document: Threshold Document

Expert and professional organisations provide up-to-date guidance and practical support on specific safeguarding issues. For example NSPCC offers information for schools on the TES website and also at http://www.nspcc.org.uk.

Staff can also access broad government guidance on the issues listed below via the GOV.UK website:

Children and the court system

Children missing from education

Children with family members in prison

Child sexual exploitation

Child criminal exploitation: county lines

County Lines

Domestic abuse

Gangs

Homelessness

So-called 'honour-based' violence including Female Genital Mutilation

Forced Marriage

Preventing radicalisation

Child-on-child abuse

Sexual violence and sexual harassment between children in schools and colleges

Sexual violence

Sexual harassment

Upskirting:

> Upskirting typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence and may constitute sexual harassment.

5.3 What to do if you suspect a child is at risk of significant harm

If a member of staff is concerned that a pupil may be suffering significant harm or is at risk of significant harm, the matter should be referred to the DSL, or DDSLs in the DSL's absence, as soon as possible. If there is a risk of immediate serious harm to a child a referral should be made to Children's Social Care immediately, or in an emergency, dial 999 and request the appropriate emergency service. Anyone can make such a referral. You do not need parental consent to make a referral.

There will be occasions when you suspect that a child may be at serious risk, but you have no 'real' evidence. The child's behaviour may have changed, their art or written work could be concerning or you may have noticed other physical but inconclusive signs. In these circumstances, you should try to give the child the opportunity to talk. The signs you have noticed may be due to a variety of factors and it is fine to ask the child if they are alright or if you can help in any way.

It is important to know that children are not always ready or able to talk about their experiences of abuse, exploitation or neglect. In fact, they may not recognise that they are being abused. Staff should also remain alert to indicators of self-harm, suicidal ideation, persistent emotional distress and other significant mental health concerns, recognising that these may indicate a child is suffering, or at risk of suffering, abuse, neglect or exploitation.

Record these early concerns and pass it to the DSL immediately. If the child does begin to reveal that they are being harmed or is at risk of significant harm you should follow the advice in section 5.4 below: 'If a child discloses information to you'.

5.4 If a child discloses information to you

It takes a lot of courage for a child to disclose that they are being neglected and / or abused. They may feel ashamed, particularly if the abuse is sexual, their abuser may have threatened what will happen if they tell, they may have lost all trust in adults, or they may believe, or have been told, that the abuse is their own fault.

If a child talks to you about any risks to their safety or wellbeing you will need to let them know that you must pass the information on – you are not allowed to keep secrets or promise confidentiality. The point at which you do this is a matter for professional judgement. If you jump in immediately the child may think that you do not want to listen; if you leave it till the very end of the conversation, the child may feel that you have misled them into revealing more than they would have otherwise. Disclosures relating to online abuse, image-based abuse, AI-generated images, manipulated content or technology-facilitated harm should be treated with the same level of seriousness as disclosures relating to offline abuse.

During your conversation with the child:

- Allow them to speak freely;
- Remain calm and do not over-react – the child may stop talking if they feel they are upsetting you;
- Give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me';
- Do not be afraid of silences – remember how hard this must be for the child;
- Under no circumstances ask investigative or leading questions – such as how many times this has happened, whether it happens to siblings too, or what does the child's mother thinks about all this;
- At an appropriate time tell the child that in order to help them you must pass the information on;
- Do not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused;
- Avoid admonishing the child for not disclosing earlier. Saying 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' may be your way of being supportive but the child may interpret it that they have done something wrong;
- Tell the child what will happen next. The child may agree to go with you to see the DSL. Otherwise let them know that someone will come to see them before the end of the day;
- Follow the procedure outlined below: Taking action: advice for staff;
- Write up your conversation as soon as possible on the record of concern form and hand it to the DSL;
- Seek support if you feel distressed;

Note: best practice dictates that you should not write any notes whilst the pupil is speaking. Write up your notes immediately after the meeting, and give the DSL these notes, however rough. If an aide-memoire is required, only very brief phrases or notes should be jotted down - the priority is to listen, not to write down everything that is said, and the writing of any notes may lead a pupil to clam up.

Report concerns to a member of the Safeguarding Team or upload them to *My Concern* which will generate an automatic alert to all members of the team.

5.5 Taking action: advice for staff

Key points to remember for taking action are: - in an emergency take the action necessary to help the child, for example, call 999; - report your concern to the DSL as soon as possible, unless it involves an allegation against a member of staff or volunteer in which case the procedures in Appendix 3 should be followed; - if the DSL is not available, ensure the information is shared with one of the DDSLs (or in their absence, with the most senior person in the school) that day. If there is a risk of immediate serious harm to a child and it is not possible to report the matter in accordance with this procedure, a referral should be made to children's social care immediately. See section 6 below:

- never start your own investigation;
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family;
- seek support for yourself if you are distressed.

5.6 Reporting directly to child protection agencies

Staff should follow the reporting procedures outlined above. However, they may also share information directly with the Kent Children's Service, the police or the NSPCC if:

- the situation is an emergency and the DSL, their DDSLs, the Headmistress and/or the chair of the LAB are all unavailable
- or if they are convinced that a direct report is the only way to ensure the child's safety.

If, at any point, there is a risk of immediate serious harm to a child, and you are unable to share the information with the DSL or the DDSLs or the most senior person in the School you can find to help you, a referral should be made to the local authority immediately. Anybody can make a referral.

Under these circumstances, you (or, if necessary, the most senior person in the school that you can find to help you) should contact the team at Kent Children's Services, using the local authority contact information in Section 7 of this policy.

They will require basic information from you such as:

- Your name
- Address
- Details of the child that you have concerns about.

This information is taken to help the specialist safeguarding team make enquiries and contact you again if necessary. Information you supply is held in the strictest of confidence and not disclosed to any party; including those connected to the child you have concerns about.

Other ways to report your concerns: Call the local Police. Contact the NSPCC – for help if you are unsure whether to report your concerns. Call 0808 800 5000 to speak in confidence, or text anonymously to 88858.

5.7 Notifying parents

The School will normally seek to discuss any concerns about a child with their parents. This must be handled sensitively and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure.

However, if the School believes that notifying parents could increase the risk to the child or exacerbate the problem, then advice will first be sought from the local authority. This is also subject to advice from the LADO if the allegation involves a member of staff.

For the avoidance of doubt, referrals do not require parental consent. Staff must act in in the best interests of the child, even if this means making a referral against the parents' wishes.

5.8 Action by the DSL - referral

The DSL (or in their absence, the DDSL) will make a referral to Kent Children's Services immediately if it is believed that a child has suffered or is at risk of suffering significant harm.

Where a child requires targeted support but is not suffering, or at risk of suffering, significant harm, the DSL will work with the child, family and partner agencies to secure Family Help or other appropriate early intervention services.

If there is room for doubt as to whether a referral should be made, the DSL will consult with the local authority on a no names basis without identifying the family. However, as soon as sufficient concern exists that a child may be at risk of significant harm, a referral will be made without delay.

If the initial referral is made by telephone, the DSL will confirm the referral in writing within 24 hours. If no response or acknowledgment is received within three working days, the DSL will contact the local authority again.

Referrals following an allegation against a member of staff or volunteer will be dealt with in accordance with the procedures set out in Appendix 3.

5.9 Harmful behaviour by other children (Child-on-child Abuse)

Children can abuse other children. This is generally referred to as child-on-child abuse and it can happen both inside and outside of school and online. It can take many forms. This can include (but is not limited to) bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse in intimate personal relationships between peers; sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse); sharing nudes and semi-nude images and/or videos and initiating/hazing type violence and rituals. Child-on-child abuse may also include image-based abuse, the creation or sharing of AI-generated sexualised images,

technology-facilitated coercion, misogynistic behaviour, sexualised bullying and other harmful behaviours linked to violence against women and girls (VAWG). The greatest number of incidents of child-on- child abuse are male on female but all child-on-child abuse is unacceptable and will be taken seriously.

The DfE Sexual Violence and Sexual Harassment guidance is statutory and can be found in Part 5 of KCSIE 2026. Staff will respond to all signs, reports and concerns of child-on-child sexual violence and sexual harassment, including those that have happened outside of Solefield premises, and/or online.

Solefield has a zero-tolerance approach to child-on-child abuse. It should never be passed off as "banter", "just having a laugh", "part of growing up" or "children being children" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

Staff will be aware of the harm caused by bullying and will use the School's anti-bullying procedures where necessary.

It is recognised that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported. Pupils are encouraged through RHSE, assemblies and form time to report abuse to their form tutors, teachers or the school counsellor. There is also a worry box for pupils in the library.

The School takes steps to minimise the risks of child-on-child abuse by training staff to be vigilant and by promoting pupil's self-esteem and empathy through its core values.

However, there will be occasions when a child's (or children's) behaviour warrants a response under child protection rather than anti-bullying procedures. All such instances must be reported to the DSL and will be dealt with in accordance with the school's recording reporting and referring procedures. Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, the DSL will refer the abuse to external agencies, including, as necessary, the police, and local services in accordance with the procedures in this policy.

A pupil (or pupils) against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from the local authority on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse.

If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of the local authority, the pupil's parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult.

The management of children and young people with harmful behaviour (including sexually harmful behaviour) can be complex and the School will work with other relevant agencies to maintain the safety of the whole school community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator – i.e. all children involved will be treated as being "at risk".

Pupils who have experienced child-on-child abuse will be supported by:

- Offering them an immediate opportunity to discuss the experience with a member of staff of their choice;
- Informing and supporting parents/carers
- Being advised to keep a record of concerns as evidence and discussions regarding how to respond to concerns and build resilience, if appropriate;
- Providing reassurance and continuous support;
- Working with the wider community and local/national organisations to provide further or specialist advice and guidance.

Pupils who are alleged to have abused other pupils will be helped by:

- Discussing what happened, establishing the specific concern and the need for behaviour to change;

- Informing parents/carers to help change the attitude and behaviour of the child
- Providing appropriate education and support;
- Sanctioning them in line with the Behaviour policy. This may include official warnings, detentions, removal of privileges (including denial of online access), fixed term and permanent exclusions;
- Speaking with police or other local services (such as Family Help or children's specialist services) as appropriate.

5.10 Children missing or absent from education

A child going missing from education particularly on repeat occasions, or frequently absent, is a potential indicator of abuse or neglect, including sexual exploitation. Solefield acknowledges its legal duty to report any pupil who fails to attend school regularly, or who has been absent without the school's permission for a continuous period of 10 school days or more. The school also reports pupils leaving at non-standard points in time.

5.11 Children who run away or go missing

A child going missing from school or home is a potential indicator of abuse or neglect. All staff are informed of the separate procedure to be used for searching for, and if necessary, reporting any pupil missing from school. The procedure includes the requirement to record any incident, the action taken and the reasons given by the pupil for being missing.

Please see the School's separate Missing Pupil policy (Appendix 4) for further details.

5.12 Confidentiality and sharing information

All staff will understand that child protection issues warrant a high level of confidentiality, not only out of respect for the child and staff involved but also to ensure that being released into the public domain does not compromise evidence.

Staff must not promise confidentiality to a pupil and will always act in the best interests of the pupil.

Staff should only discuss concerns with the DSL, a Deputy DSL, the Headmistress or Chair of Governors (depending on the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

The School will co-operate with police and Kent Children's Services to ensure that all relevant information is shared for the purposes of child protection investigations under Section 47 of the Children Act 1989 in accordance with the requirements of Working Together to Safeguard Children (current statutory guidance)

Where allegations have been made against staff, the School will consult with the LADO and, where appropriate, the police and Kent Children's Services to agree the information that should be disclosed and to whom. The reporting restrictions applicable to such matters will be observed.

All written information will be stored in a locked facility and any electronic information will be password protected.

KCSIE is very clear that data protection compliance cannot be allowed to stand in the way of safeguarding children.

SECTION SIX: LINKS TO POLICIES TO BE USED FOR FURTHER GUIDANCE

6.1 Linked Policies

The following documents are available via the Staff Policies and Handbooks page held on OneDrive. Some are also available to parents on the policies page of website, or from the School Office on request:

Safeguarding & Child Protection policy

Anti-bullying Policy

Rewards and Sanctions Policy

Staff Code of Conduct

Complaints Policy and procedure

Data Protection Policy

E-Safety Policy

First Aid Policy

Recruitment Policy

ICT Acceptable Use Policy for Staff

Missing Pupil Policy

Whistleblowing Policy

Mental Health Policy

6.2 Linked documents/pages

Gov.uk website includes all government documentation on Safeguarding Children. Links from this website are provided at the relevant points during this policy. The main documents used are:

Keeping Children Safe in Education, September 2026

Working Together to Safeguard children, 2023

SECTION SEVEN: LOCAL AUTHORITY CONTACT INFORMATION

The school will operate safeguarding procedures in line with locally agreed multi-agency procedures.

No matter where they reside, the first port of call is the Kent County Council, as stipulated in Section 47 of the Children's Act. The Kent Children's Services website is here:

From June 2019, Kent County Council replaced the local safeguarding children board (LSCB) with SAFEGUARDING PARTNERS, made up of

- Kent County Council
- Kent Clinical Commissioning Groups (CCGs)
- Kent Police

They will also refer to the relevant agencies:

- Education
- Health providers
- District Councils
- Social care providers
- National Probation Service
- Family Help, Kent
- Fire and Rescue Service and others

The LADO (Local Authority Designated Officer Team) can be contacted on 03000 410 888

Please remember that the LADO Team are there to assist you with allegations against members of staff including volunteers.

If you have a concern for a child that does not involve a member of staff please call the Central Referral unit on 03000 411 111.

It should be noted that "...the local authority's Every Child Matters responsibilities extend to all children receiving services in their area, irrespective of the type of school in which they are being educated, and of the local authority area (or in the case of overseas pupils, the country) they come from." (Keeping Our Schools Safe, Sir Roger Singleton, pg 47)

SECTION EIGHT: APPENDICES

Appendix 1 Categories of Abuse

The following (taken from KCSIE, September 2020) are different types of abuse for which to be vigilant:

REMEMBER

Abuse can take place wholly online or technology may be used to promote offline abuse

Abuse can be child-on-child as well as adult on child

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

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.

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

Sexual abuse: Sexual abuse: involves forcing, causing or inciting a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children (see 5.9 Child-on-child Abuse). Children who are sexually abused are more likely to know their abuser than not. A child under the age of 13 can never legally consent to any sexual activity.

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

Appendix 2 Recognising Signs of Abuse

As part of training, staff are also provided with the following guidance for recognising the signs of abuse:

Physical abuse

Physical indicators:

- Unexplained bruises and welts on the face, throat, upper arms, buttocks, thighs or lower back in unusual patterns or shapes which suggests the use of an instrument on an infant in various stages of healing that are seen after absences, weekends, or vacations
- Unexplained burns, cigarette burns, especially burns found on palms, soles of feet, abdomen, buttocks; immersion burns producing "stocking" or "glove" marks on hands and feet; "doughnut shaped" on buttocks or genital area
- Rope burns
- Infected burns indicating delay in treatment; burns in the shape of common household utensils or appliances.

Behavioural Indicators:

- Behavioural extremes (withdrawal, aggression, regression, depression)
- Inappropriate or excessive fear of parent or caretaker
- Antisocial behaviour such as substance abuse, truancy, running away, fear of going home
- Unbelievable or inconsistent explanation for injuries
- Lies unusually still while surveying surroundings (for infants)
- Unusual shyness, wariness of physical contact

Emotional Abuse

Physical Indicators:

- Eating disorders, including obesity or anorexia
- Speech disorders (stuttering, stammering)
- Developmental delays in the acquisition of speech or motor skills
- Weight or height level substantially below norm
- Flat or bald spots on head (infants)
- Nervous disorders (rashes, hives, facial tics, stomach aches)

Behavioural Indicators:

- Habit disorders (biting, rocking, head-banging)
- Cruel behaviour, seeming to get pleasure from hurting children, adults or animals; seeming to get pleasure from being mistreated
- Age-inappropriate behaviours (bedwetting, wetting, soiling)
- Behavioural extremes, such as overly compliant-demanding; withdrawn-aggressive; listless-excitable

Sexual Abuse

Physical Indicators:

- Torn, stained or bloody underclothes
- Frequent, unexplained sore throats, yeast or urinary infections
- Somatic complaints, including pain and irritation of the genitals
- Sexually transmitted diseases
- Bruises or bleeding from external genitalia, vagina or anal region
- Pregnancy

Behavioural Indicators:

- The victim's disclosure of sexual abuse
- Regressive behaviours (thumb-sucking, bedwetting, fear of the dark)
- Promiscuity or seductive behaviours
- Disturbed sleep patterns (recurrent nightmares)
- Unusual and age-inappropriate interest in sexual matters
- Avoidance of undressing or wearing extra layers of clothes
- Sudden decline in school performance, truancy
- Difficulty in walking or sitting

Neglect

Physical Indicators:

- Poor hygiene, including lice, scabies, severe or untreated diaper rash, bedsores, body odour
- Squinting
- Unsuitable clothing; missing key articles of clothing (underwear, socks, shoes); overdressed or underdressed for climate conditions
- Untreated injury or illness
- Lack of immunisations
- Indicators of prolonged exposure to elements (excessive sunburn, insect bites, colds)
- Height and weight significantly below age level

Behavioural Indicators:

- Unusual school attendance
- Chronic absenteeism
- Chronic hunger, tiredness, or lethargy
- Begging for or collecting leftovers
- Assuming adult responsibilities
- Reporting no caretaker at home

Child Sexual Exploitation

Physical indicators:

- Tiredness, mood swings
- Bruising
- Sexually transmitted diseases
- Pregnancy

Behavioural indicators

- Sudden decline in school performance, punctuality, attendance
- In possession of expensive goods
- Going to places you know they cannot afford
- Age-inappropriate clothing
- Inappropriate sexualised behaviour
- Secretive
- Mixing with older people

Female Genital Mutilation

Physical indicators

- Difficulty walking, sitting, standing
- Spend longer than normal in the bathroom
- Bladder or menstrual problems

Behavioural indicators

- May talk about a 'special procedure' or 'special occasion to become a woman'
- Abroad for a prolonged period
- Unusual absence
- Reluctant to undergo normal medical examinations

Serious Violence

Physical indicators

- Signs of self-harm or change in wellbeing
- Unexplained injuries
- Unexplained gifts or new possessions

Behavioural indicators

- Increased absence from school
- Change of friendship groups
- Significant decline in behaviour

Risk factors that might increase the likelihood of involvement in serious violence include:
• being male • having been frequently absent or permanently excluded from school • having experienced child maltreatment • having been involved in offending, such as theft or robbery.

Radicalisation

There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Children at risk of radicalisation may display different signs or seek to hide their views. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately.

We might consider the following when looking for indicators, although no single checklist can be created in the case of radicalisation:

- Disclosure: e.g. writing, drawings, poems, accessing extremist material
- Expressions of support for terrorism: 'us' and 'them' language, justifying use of violence
- Personal crisis: family tension, sense of isolation, changes in friendship group, low self-esteem, questioning identity, family, faith, belonging
- Personal circumstance: migration, local community tension, a sense of grievance triggered by a personal experience e.g. of racism, discrimination

No list of abuse or neglect indicators can include all signs, and staff are advised to use their best judgement.

Appendix 3 Procedure to be followed in the event of an Allegation of Abuse against a member of staff or volunteer

It is expected that all staff and Governors involved in the management of allegations of abuse made against a member of staff or volunteer or former member of staff or volunteer will comply at all times with DfE statutory guidance contained within the document: Keeping Children Safe in Education (September 2026). The following guidance is drawn directly from the appropriate section in KCSIE.

School staff, because of their daily contact with children in a variety of situations including the wider caring role, are particularly vulnerable to accusations of abuse. Their relationships with pupils may lead to allegations being made against them by pupils or adults with parental responsibilities. In any such case, these procedures need to be applied with common sense and judgement; a quick response and resolution is a priority.

A3.1 The School's procedures

The School's procedures for dealing with allegations made against staff or volunteers or former staff or volunteers will be used where the member of staff or volunteer is alleged to have:

Behaved in a way that has harmed a child, or may have harmed a child

Possibly committed a criminal offence against or related to a child; or

Behaved towards a child or children in a way that indicates he or she would pose a risk of harm if they work regularly or closely with children

This procedure relates to members of staff who are currently working in the School regardless of whether the School is where the abuse is alleged to have taken place. Allegations against former members of staff or volunteers who are no longer working at the School will be referred to the LADO, or, in an emergency to the police.

If an allegation is made against a member of staff or volunteer, the School's priority will be to achieve a quick resolution of that allegation in a fair and consistent way that provides effective protection for any child involved and at the same time supports the person who is the subject of the allegation. All such allegations must be dealt with as a priority without delay.

All staff are informed as part of their training that any member of staff can make a referral, as specified in KCSIE (September 2020) and have been given guidance how to. In practice, given the experience and working relationship established between the DSL and the local authorities, it is almost always likely to be preferable for the DSL to make the referral.

The following definitions are to be used when determining the outcome of allegation investigations:

a. **Substantiated**: there is sufficient evidence to prove the allegation

b. **False**: there is sufficient evidence to disprove the allegation

c. **Malicious**: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive

d. **Unsubstantiated**: this is not the same as a false allegation. It means that there is insufficient evidence to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.

The procedures to be followed in all such cases are outlined in Part 4 of KCSIE p40-50 here: A summary of practical steps to be followed, including when the alleged abuser is a volunteer or pupil follow in Section 2.

A3.2 Reporting an allegation against staff or volunteers

All allegations, complaints, concerns or suspicions against staff or volunteers, should be reported to the Headmistress, but may be reported directly to the DSL / DDSLs who will keep the Head informed; in the absence of

the Headmistress they may be reported to the Chair of the LAB, unless that person is the subject of the concern.

All allegations about the Headmistress or a member of the Governing Body should be reported to the Chairman of Governors without the Headmistress being informed.

All allegations, complaints, concerns or suspicions about the Chairman of Governors should be reported to the LADO without the Chairman of Governors being informed. The LADO may choose to appoint a 'case manager'.

The Headmistress or Chairman of Governors will decide whether or not to inform the LADO based on the established statutory criteria for such a referral. The case manager will also inform the DSL, or, if the DSL is the subject of the allegation, the DDSL. The LADO will be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria and the LADO may consult the Police and Children's Services as appropriate.

In borderline cases, or where there is room for doubt as to whether to make a referral, the case manager will still consult the LADO informally for advice before any investigation takes place and within one working day. The LADO may ask the case manager to provide or obtain relevant additional information, such as previous history, whether the child or their family have made similar allegations previously and the individual's current contact with children. There may be situations when the case manager will want to involve the police immediately, for example if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.

The LADO's contact details can be found in Section seven, local contact information.

No investigation will be undertaken into allegations without prior consultation with the LADO so as not to jeopardise statutory investigations. Borderline cases will be discussed informally with the LADO without naming the school or individual until the LADO has advised whether a referral is required. Any allegations not meeting the criteria will be dealt with in accordance with Kent Safeguarding Children Board's procedures. All such cases will be handled within the School without delay.

All discussions with the LADO will be recorded in writing.

In a strategy discussion or the initial evaluation of the case, the case manager should share all relevant information they have about the person who is the subject of the allegation, and about the alleged victim(s).

The initial sharing of information and evaluation by the appropriate agencies may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern; in which case this decision and a justification for it should be recorded by both the case manager and the LADO, and agreement reached on what information should be put in writing to the individual concerned and by whom. The case manager should then consider with the LADO what action should follow both in respect of the individual and those who made the initial allegation.

A3.3 Disclosure of information

The case manager will inform the accused person as soon as possible after consulting the LADO and will provide as much information as possible at that time.

The Parents or carers of the child[ren] involved will be informed of the allegation as soon as possible if they do not already know of it. They will also be kept informed of the progress of the case and the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed, but the parents or carers of the child should be told the outcome in confidence.

Where the LADO advises that a strategy discussion is needed, or police or Local authority services need to be involved, the case manager will not speak to the accused person or the parents or carers until those agencies have consulted and have agreed what information can be disclosed.

The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation in certain circumstances will be observed and, where necessary, parents and carers will be made aware of the prohibition on reporting or publishing allegations about teachers. If parents or carers express a wish to apply to the court to have reporting restrictions removed, they will be told to seek legal advice.

The case manager should take advice from the LADO, police and children's social care services to agree the following:

- who needs to know and, importantly, exactly what information can be shared;
- how to manage speculation, leaks and gossip;
- what, if any information can be reasonably given to the wider community to reduce speculation; and
- how to manage press interest if and when it should arise.

Where the police are involved, wherever possible the case manager will ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the employer disciplinary process. This should be done as their investigation proceeds and will enable the police to share relevant information without delay at the conclusion of their investigation or any court case.

A3.4 Action to be taken against the accused

The School has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. Individuals will be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless external agencies object to this. The individual concerned will be advised to contact their trade union representative, if they have one, or a colleague for support. He/she will also be given access to welfare counselling and medical advice.

The case manager will appoint a named representative to keep the member of staff informed of the progress of the case and to consider what other support might be appropriate. If the member of staff is suspended he/she will also be kept up to date with current work-related issues.

Where an investigation by the police or local authority is unnecessary, the LADO will discuss the steps to be taken with the case manager. The appropriate action will depend on the nature and circumstances of the allegation and will range from taking no further action to dismissal or a decision not to use the person's services in the future.

It may be necessary to undertake a further enquiries to determine the appropriate action. If so, the LADO will discuss with the case manager how and by whom the investigation will be undertaken.

A3.5 Suspension

Suspension will not be an automatic response to an allegation and will only be considered in a case where:

- there is cause to suspect a child or other children at the School is or are at risk of significant harm; or
- the allegation is so serious that it might be grounds for dismissal.

All options to suspension will be considered before taking that step. Consideration will be given to whether the result that would be achieved by suspension could be obtained by alternative arrangements, for example, redeployment either within or outside of the School or providing an assistant when the individual has contact with children. The School will give due weight to the views of the LADO when making a decision about suspension.

A member of staff will only be suspended if there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification will be recorded and the member of staff notified of those reasons in writing within one working day. Appropriate support will be provided for the suspended individual and contact details provided. Social contact with colleagues and friends should not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

A3.6 Criminal proceedings

The School will consult with the LADO following the conclusion of a criminal investigation or prosecution as to whether any further action, including disciplinary action, is appropriate and if so, how to proceed. The options will depend on the circumstances of the case, including the result of the police investigation or trial and the standards of proof applicable.

A3.7 Return to work

If it is decided that the person who has been suspended should return to work, the School will consider how best to facilitate this, for example, arranging a phased return and / or the provision of a mentor to provide assistance and support in the short term. The School will also consider how to manage the contact with the child[ren] who made the allegation.

A3.8 DBS and TRA Referrals and Ceasing to use staff

NB There is a legal requirement on the school as an employer to make a referral to the DBS where they think that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child.

If the School ceases to use the services of a member of staff or volunteer because they are unsuitable to work with children, a settlement/compromise agreement will not be used and a referral to the Disclosure and Barring Service will be made as soon as possible if the criteria are met – see above – as per the guidance published by the DBS.

If the accused person resigns or ceases to provide his / her services, this will not prevent child protection allegations being followed up in accordance with this policy and the statutory guidance. A referral to the Disclosure and Barring Service (DBS) will be made as soon as possible, if the criteria are met – see above – as per the guidance published by the DBS.

Staff should be aware that the DBS has statutory authority to bar a person from working in regulated activity with children and/or vulnerable adults in the UK.

Where a teacher is dismissed (or would have been dismissed had he/she not resigned) for misconduct, separate consideration will be given as to whether a referral to the Teaching Regulation Agency (TRA) should be made, as per the flow chart that appears in the guidance published by the TRA. For information, the reasons for the TRA to consider whether a prohibition order might be appropriate are: 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'. The College will follow the advice set out in the National College for Teaching and Leadership's guidance, "Teacher misconduct - the prohibition of teachers" (as updated or amended from time to time) to make a judgment about whether a prohibition order may be appropriate and whether an early referral is advisable in order to consider an interim prohibition order. If in doubt, a referral will be made.

Guidance for making referrals can be found on the DBS website http://www.homeoffice.gov.uk/agencies-public-bodies/dbs/. Failure to report to the DBS constitutes an offence and the School may be removed from the DFE register of independent schools.

Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the Governors without delay.

A3.9 Charity Commission report

Safeguarding issues may also be reportable to the Charity Commission under their serious incident reporting guidance, that is, if any one or more of the following things occur:

- there has been an incident where the beneficiaries of the School have been or are being abused or mistreated while under the care of someone connected with the School such as a trustee, member of staff or volunteer;

- there has been an incident where someone has been abused or mistreated and this is connected with the activities of the School;
- allegations have been made that such an incident may have happened, regardless of when the alleged abuse or mistreatment took place;
- the School has grounds to suspect that such an incident may have occurred;
- It is the responsibility of the Governing Body to make this report and notify the School's insurers as appropriate.

A3.10 Timescales

All allegations must be dealt with as a priority so as to avoid any delay. Where it is clear immediately that the allegation is unsubstantiated or malicious, the case should be resolved within one week. It is expected that most cases of allegations of abuse against staff will be resolved within one month with exceptional cases being completed within 12 months. If the nature of the allegation does not require formal disciplinary action, the Headmistress should institute appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, as far as possible it should be held within 15 working days.

A3.11 Unsubstantiated, false or malicious allegations

Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Headmistress will consider whether to take disciplinary action in accordance with the School's rewards and sanctions policy.

The School may apply appropriate sanctions to pupils who are found to have made malicious allegations. This could include temporary or permanent exclusions or referral to the police if a criminal offence may have been committed.

Where a parent has made a deliberately invented or malicious allegation the Headmistress will consider whether to require that parent to withdraw their child or children from the school on the basis that they have treated the School or a member of staff unreasonably.

Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the School reserves the right to contact the police to determine whether any action might be appropriate.

A3.12 Record keeping and references

Details of all allegations found to be malicious will be removed from personnel records.

A clear and comprehensive summary of any allegations made against a member of staff, and all details leading to and including a resolution, and a note of any actions taken and decisions reached will be kept on the confidential personnel file and will be retained until the accused has reached normal retirement age or for a period of 10 years if that is longer. However, where an issue or concern relating to a member of staff and the safeguarding of children has been identified, records of any concerns, suspicions or investigations will be kept for 75 years. Such records will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time. The School will provide information regarding a substantiated allegation for the purposes of future references and DBS disclosures in accordance with the School's safer recruitment procedures. In cases where allegations are found to be malicious or unsubstantiated, reference will not be made in employer references.

A3.13 Review and Learning Lessons

At the conclusion of a case in which an allegation is substantiated, the LADO should review the circumstances of the case with the case manager to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future. This should include issues arising from the decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified.

Lessons should also be learnt from all allegations against staff, not just from those that are concluded and

substantiated. The LADO and case manager should consider how future investigations of a similar nature could be carried out without suspending the individual.

Appendix 4: Missing Pupils Policy & Procedure

Solefield School Missing Pupils Policy and Procedure is applicable to all pupils in the school including those within EYFS (Both Reception classes and Little Acorns)

Introduction:

The welfare of our pupils is our paramount responsibility. Every adult who works at the school has been trained to appreciate that he or she has a primary responsibility for keeping all of the children safe at all times. Our staffing ratios are generous and are deliberately designed to ensure effective supervision. All new staff receive an induction into the effective supervision. All new staff receive an induction into safeguarding procedures and the effective supervision of pupils.

The School recognises that a child who goes missing from education, from the School site, or during a School activity may be at risk of harm. Missing incidents may indicate underlying safeguarding concerns, including abuse, neglect, mental health difficulties, exploitation, child-on-child abuse, criminal exploitation, child sexual exploitation, or other vulnerabilities. Any incident involving a missing pupil will therefore be treated as a potential safeguarding concern and responded to immediately.

The Designated Safeguarding Lead (DSL) will consider whether any missing pupil incident requires additional safeguarding action, referral, assessment or support.

Information for Parents:

The hours/days each pupil attends school must be agreed, although these can sometimes be flexible where work patterns or needs are diverse. The contact details for the parents/guardians, an emergency contact and any other person designated to collect the child must be held within the school and kept up to date.

Further arrangements can be found within the Parents' Handbook on the website, including:

- The arrangements for handing over children to the care of their parents at the end of the day;
- The qualifications of our staff and the arrangements for supervising the children whilst they are in school;
- The arrangements for registering the children in both morning and afternoon.

Action to be taken by Staff if a pupil goes missing from School:

The following step-by-step guidance should be followed in the event that a pupil is considered to be missing from a school session:

1. Take a register in order to ensure that all other children are present;
2. Inform the Headmistress as well as the DSL or Deputy DSL immediately;
3. Ask all of the adults and children calmly if they can tell us when and where they last remember seeing the child;
4. Establish the pupil's last known location and approximate time of last sighting;
5. Occupy all of the other children safely in their classroom, e.g. by reading to them, setting a task;
6. At the same time, arrange for one or more adults to search everywhere, both inside and out, carefully checking all spaces, cupboards and washrooms where a small child might be;
7. Check the doors, gates, exits and perimeter boundaries for signs of entry/exit;
8. Review CCTV systems, visitor records and access systems where available;
9. Begin and maintain a written chronology of actions and timings;
10. Undertake an immediate risk assessment of the pupil's vulnerability.

If the child is still missing, the following steps should be taken:

1. Inform the Headmistress and the DSL immediately;
2. Ask the Office to ring the child's parents and explain what has happened and what steps have been
3. taken/are in place. Reassure them as much as possible, but ask them to come to the school at once;
4. The Headmistress or the DSL will contact the Police immediately;
5. The Headmistress will co-ordinate other staff searching the rest of the school premises and grounds and record all decisions;
6. Do not undertake lone off-site searches unless risk assessed;
7. If the child's home is within walking distance, members of staff may set out on foot to attempt to catch up
8. with them;
9. The DSL may inform the Local Safeguarding Partners and Kent Children Services as appropriate;
10. The school will cooperate fully with any Police investigation and any Safeguarding investigation by Social Care. In the case of an investigation, the Chair of Governors and Insurers would be informed. If the pupil is injured, a report would be made under RIDDOR to the HSE, where appropriate

Action to be taken by staff if a pupil is missing on a School trip/Outing:

1. Take an immediate head count to ensure that all other pupils are present. All adults and pupils should be asked to calmly explain when they last remember seeing the missing pupil;
2. An adult would search the immediate vicinity and if at a venue, the venue manager should be informed to arrange a search and potentially securing the venue;
3. The Head and DSL should be informed immediately if the pupil is still missing;
4. A strategy would be agreed with the Head, which may involve returning the rest of the group to school, or moving to a different location (if outside, for example) where the rest of the group can be safely supervised and, ideally, occupied;
5. The Office will phone the pupil's parents to explain what has happened and what steps have been taken. Depending on where the trip is, it may be appropriate for them to go to the venue, or to come to school;
6. Depending on the precise circumstances, either the Head or the staff with the group would call the Police to notify them of a missing pupil. Precise information, timings and descriptions should be readily available before making this call;
7. The DSL may inform the Local Safeguarding Partners and Kent Children Services as appropriate;
8. The school will cooperate fully with any Police investigation and any Safeguarding investigation by Social Care. In the case of an investigation, the Headmistress, Chair of Governors and Insurers would be informed. If the pupil is injured, a report, where appropriate, would be made under RIDDOR to the HSE;
9. A full record of all activities taken up to the stage at which the pupil was found would be made for the incident report.

Action to be taken by staff once the pupil is found:

1. Talk to and take care of the pupil, as necessary;
2. Speak to the other pupils to ensure that they understand what has happened and what will now happen;
3. The Headmistress will speak to the pupil's parents to explain what happened and what action was taken;
4. It may be necessary for an investigation or review to take place. This should always involve taking written statements from those involved. Specific details should be given: date, time, place, numbers of staff and pupils, the purpose of the visit, length of time the pupil was missing, any lessons for the future;
5. All media queries should be referred to the Headmistress.

Action to be taken by staff when a child is not collected on time:

1. If a child is not collected within half an hour of the agreed collection time, the contact numbers for the parent or carers should be called;
2. If there is no answer, a member of staff will begin to call the emergency numbers for the child. During this time, the child will be safely looked after at school;

3. The child will go to After School Care where he/she will be looked after until 6pm. Further phone calls will be made;
4. If there is no response from the parents/carers or emergency contacts by 6.15pm, the Headmistress will be informed;
5. If there is still no response at 6.30pm, the Head will contact the Social Care duty officer on 0300411111. Social Care will make emergency arrangements for the child and will arrange a visit to be made to the child's house and will check with the Police. The Head will continue to liaise with them until the situation is resolved;
6. A full written report is to be made;
7. The School will ensure the child is looked after throughout the time he/she remains in the School's care.
8. Review repeated late collection incidents through the DSL safeguarding process

Action to be taken by staff when a child is not at school when their parent or carer arrives to collect them:

1. If a parent or carer reports that their child cannot be located, the member of staff must immediately inform the Headmistress and DSL (or Deputy DSL).
2. Arrange an immediate search of the school site whilst the School Office checks CCTV footage, attendance records, signing in/out records and any after-school activity registers. The search should include school buildings, grounds, exits, gates and perimeter boundaries.
3. Establish the pupil's last known location and the time they were last seen.
4. Begin and maintain a written chronology of all actions taken and timings.
5. Undertake an immediate risk assessment and consider any safeguarding concerns.
6. If there is any indication that the pupil may have left the school site, or the pupil cannot be located promptly, the Headmistress will contact the Police without delay.
7. Keep the parent or carer informed of actions taken and developments throughout the incident.
8. The DSL will consider whether referrals to Children's Social Care or other agencies are required.
9. Once the pupil is found, ensure their welfare needs are met and establish the circumstances of the incident.
10. Complete a full written record of the incident and review any lessons learned or procedural improvements required.

Appendix 5: Children Missing and Absent from Education Policy

Guiding Principles

The safety and welfare of all of our pupils at Solefield School is our highest priority. The school will follow the procedures laid down by our own Local Authority (LA): Kent County Council (KCC) together with the guidance contained in the DfE's guidance 'Keeping Children Safe in Education' (KCSIE 2026) and 'Children Missing Education' September 2025.

This Children Missing and Absent from Education Policy applies to all pupils including those pupils in the Early Years Foundation Stage (EYFS).

Introduction

A child missing from education or frequently absent, particularly on repeat occasions, is a potential indicator of abuse or neglect, including sexual exploitation and so called 'honour based' violence. Every adult who works at the school has been trained to appreciate that he or she has a key responsibility for helping to keep all of the pupils safe at all times. This includes the importance of effective information sharing to ensure our children are safe and receiving suitable education. Where staff have concerns that a child is missing from education, this policy should be followed. Every member of our staff who works with children has read and understood Part One of Keeping Children Safe in Education (KCSIE) 2026 and receives regular safeguarding updates.

Providing Information to the Local Authority for standard transitions

The school recognises its duty to provide information to the relevant LA for standard transitions as requested. The school recognises that there is an overlap with KCSIE 2026 which recognises children missing education as a safeguarding issue particularly when a child leaves with no known destination. The LA can also request information at other non-standard points, to which the school would respond on request.

Pupils arriving or leaving the school at a non-standard points (Compulsory School Age) - (Non-standard points are those mid-year or at any stage other than at the end of Year 6 or Year 8)

Joiners

In the interests of safeguarding children and in order to assist KCC with their duty under section 436A of the Education Act 1996 in identifying children of compulsory school age missing education (CME), the school notifies KCC if a pupil joins our school at a non-standard point (during the school year or into a year group other than Reception).

Leavers

All leavers at non-standard points (for Solefield School this would be during a school year or other than at the end of Year 6 or Year 8) will be reported via the KCC KELSI online system, by email to: kentinyearadmissions@kent.gov.uk or through the Digital Front Door.

When a pupil leaves the school the following information about that pupil is logged in our ISAMs database:

- future address (if changing and if known)
- Name of the school the pupil is moving to
- date of leaving

Using the KELSI online system, we notify KCC of the following for each pupil leaving at a non-standard point:

- Full name of child
- Gender
- Full name and address of every parent and an indication of which parent the pupil normally resides with and where a parent notifies a school that the pupil will live at another address in addition to or instead then the new address, the full name of the parent with whom the pupil will normally live in future and the date if known
- Telephone number of parent (at least one)
- Future address with date of commencement (if applicable)
- Future school setting and date of commencement
- reason for leaving/deletion from the admission register (the reason for leaving is selected from a drop down list, that is one of the 15 separate grounds for removing a pupil as set out in Appendix A of the Department of Education advice September 2024 Children Missing Education
- Date of leaving Solefield School
- (NB. As an independent school the pupils do not have UPN (Unique Pupil Numbers) so if requested these are marked as 00000)

In relation to deletions from the register, the school recognises that the duty arises as soon as the grounds for deletion are met and in any event before deleting the pupil's name. This information is shared with KCC when this information is logged at the end of term but otherwise within 5 days of the deletion.

Pupils failing to attend on the first day of school

All new pupils are placed on the School's admission register at the beginning of the first day on which the School has agreed that the pupil will attend the School. If a child fails to attend on the agreed date and no other reason has been given, staff must inform the Head without delay. The Head will notify the local authority, having investigated the absence.

Where there are changes affecting the child (including a change of address or school), these will be reflected in the admission register on the PASS database. This will assist the School and external agencies when making enquiries to locate any missing children.

Significant Absence from School - duty to report

As part of the school's duty to safeguard children, any unexplained absence will be investigated immediately. The school recognises that persistent or unexplained absence may be an indicator of safeguarding concerns, including neglect, abuse, or exploitation.

In accordance with the Working Together to Improve School Attendance statutory guidance (DfE, 2024), the school will inform Kent County Council (KCC) of any pupil who fails to attend school regularly, or who has been absent without permission for a continuous period of 10 school days or more.

The Head is responsible for monitoring prolonged absences, supported by the school's attendance and administrative staff. Where a pupil has been continuously absent with authorisation for 20 school days or more, and there are no reasonable grounds to believe the pupil is unwell or unable to attend due to unavoidable circumstances, and reasonable enquiries (as defined under the Children Act 2004) have failed to establish the pupil's whereabouts, the school may delete the pupil's name from the admissions register. The school will notify the local authority at the time of deletion, in line with the Education (Pupil Registration) (England) Regulations 2024.

If, during the course of these enquiries, there is reason to believe that a child may be at risk of significant harm, the school will make an immediate referral to children's social care.
The school maintains accurate admission and attendance registers and follows a proactive approach to attendance monitoring, in line with its safeguarding responsibilities and the expectations set out in Keeping Children Safe in Education (KCSIE) 2026.

Persistent Absence from School

If a child is absent without there being a reason, the parents will be contacted promptly. Persistent absence amounts to 10% of possible school sessions. If a child has reached this threshold, the school will contact the parents. While there are often valid reasons for absence, such as illness, the school will explore whether any additional support can be offered to the family to help improve attendance and ensure the child's wellbeing.

The school also recognises its wider reporting duties following deletions from the admission register, in accordance with the Education (Pupil Registration) (England) Regulations 2006 (as amended), to help identify children who are missing education and/or otherwise at risk of harm.

Changes to the Admissions Register

In order to maintain the admissions register up to date and accurate the school request that parents should check the current details held for them once a year and remind parents to notify the relevant school office of any changes to their details.

If pupil's parents change address then the school will record, as required:

- The full name of the parent with whom the pupil will live
- The new address
- The date from when it is expected the pupil will live at this address

The school ensures it has at least two sets of contact details for every pupil in the school.

Pupil Supervision

Our pupil supervision procedures for each school describes:

- The arrangements for children arriving at school and leaving the premises at the end of the day
- The qualifications of our staff and the arrangements for supervising the children whilst they are in school
- The arrangements for registering the children in both morning and afternoon. We take a register of pupils during the morning and afternoon sessions. Parents are responsible for notifying the school if their child is absent for any reason via phone or email to the school. The school will always contact the parent if the child fails to arrive at school without an explanation.
- The physical security measures which prevent unsupervised access to or exit from the building
- The supervision of the playground and the physical barriers that separate it from the rest of the school
- The enhanced supervisory arrangements for trips involving our children are very clear and we have strict ratios to enable safe offsite experiences to occur:
- Reception: One adult for every 5 pupils
- Years 1 to 3: One adult for every 6 pupils
- Years 4 to 6: One adult for every 10 pupils (this could be extended to 15 pupils if it is a door-to-door trip e.g. a theatre visit.)
- Years 7 and 8: One adult for every 15 pupils.

These ratios are only adjusted at the discretion and risk analysis of the Head.

We review these procedures regularly (at least once a year) in order to satisfy ourselves that they are robust and effective. All new staff receive a thorough induction into the importance of effective supervision of pupils and are required to read and understand Part One of Keeping Children Safe in Education (KCSIE) 2026.

Related Policies:

- Safeguarding and Child Protection Policy
- Staff Code of Conduct (within the Employment Manual)
- Educational Visits and Visiting Speaker Policy
- Trips Booklet (within the Staff Handbook)
- Equality, Diversity and Inclusion Policy

Appendix 6: Solefield School Mental Health Policy

Dana Koheji, Pastoral Lead, September 2026

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POLICY STATEMENT

At Solefield School, we are committed to supporting the mental health and wellbeing of our students and staff. Our culture is supportive, caring, and respectful. We encourage students to be open and we want each student to have their voice heard. At our school, we know that everyone experiences different life challenges, and that each of us may need help to cope with them sometimes. We understand that anyone and everyone may need additional emotional support. At our school, positive mental health is everybody's responsibility. We all have a role to play.

POLICY SCOPE

This policy is a guide to all staff, including teachers, governors, and non-teaching staff. It outlines our approach to promoting student mental health and wellbeing. It should be read and understood alongside our other relevant school policies.

POLICY AIMS

The aim of our policy is to demonstrate our commitment to the mental health of our staff and students. At our school, we will always:

• Help children to understand their emotions and experiences better.

• Ensure our students feel comfortable sharing any concerns and worries.

• Help children to form and maintain relationships.
• Encourage children to be confident and help to promote their self-esteem.

• Help children to develop resilience and ways of coping with setbacks.

We will always promote a healthy environment by:

• Promoting positive mental health and emotional wellbeing in all students and staff.

• Celebrating both academic and non-academic achievements.

• Promoting our school values and encouraging a sense of belonging and community.

• Providing opportunities to develop a sense of worth and to reflect.

• Promoting our students' voices and giving them the opportunity to participate in decision making.

• Celebrating each student for who they are and making every student feel valued and respected.

• Adopting a whole school approach to mental health and providing support to any student that needs it.

• Raising awareness amongst staff and students about mental health issues and their signs and symptoms.

• Enabling staff to respond to early warning signs of mental-ill health in students.

• Supporting staff who are struggling with their mental health.

KEY STAFF MEMBERS

All staff members have a responsibility to promote the mental health of students and each other. However, certain staff members have a specific role in the process.

These are:

• Our Designated Safeguarding Officers: Kate Easton, Dana Koheji, Helen McClure, Rachael Adams, Gemma Goodwin, Lisa Glennon-Cousins

• Pastoral Leads: Dana Koheji, Carlos Henry, Linda Payne, James Cramp, Gemma Goodwin

• Director of Learning Development: Lisa Glennon-Cousins

• Deputy Head (H&S), GDPR Officer, Director of Technology, Head of Computing: Robert Coston

If a member of staff is concerned about the mental health and wellbeing of a student, then in the first instance they should speak to the child's form tutor and the pastoral lead for that child's year group. If a child presents a medical emergency then relevant procedures will be followed, including involving the emergency services. If a member of staff had a Safeguarding concern then they should alert a member of the Safeguarding team.

TEACHING ABOUT MENTAL HEALTH

Our RHSE curriculum is developed to give students the skills, knowledge, and understanding they need to keep themselves mentally healthy. This includes resilience techniques and training. We will regularly review our RHSE curriculum and lesson content to ensure that they're meeting the aims outlined in this policy. We'll also implement this into our curriculum at all stages to provide students with strategies to help keep them mentally well. In form

times, assemblies and RHSE students are taught about wellbeing. We also teach mindfulness on mindful Mondays once a month.

SUPPORT AT SCHOOL AND IN THE LOCAL COMMUNITY

We have a range of support available in school for any students struggling, as listed below:

Worry box - pupils have access to a worry box in the library to post their worries to a teacher, who can then offer support.

Circle time in RSHE.

Mindful Mondays – these take place once a month and pupils are taught about mediation techniques and how to be mindful.

Wellbeing Hubs – we have three wellbeing hubs in the school. Two for students and one for staff.

Wellbeing Dogs (please see separate policy)

Wellbeing Lessons

Talk time – in school counselling with teachers who have completed a foundation course in counselling children. These consist of one to one sessions weekly over a period of at least 3 weeks, but often a term.

Counselling – in school counselling by a professional counsellor from Kent Counselling for Schools. Children are referred by their teachers or parents. Weekly counselling sessions take place over a period of 6 – 12 weeks or longer.

CAMHS - Students are referred to the NHS Child and Adolescent Mental Health Services when they and their families require a higher level of support than we are able to provide at school.

SIGNPOSTING

We will ensure that all staff, students, and parents are aware of the support that's available in our school for mental health. This includes how to access further support, both inside and outside of school hours.

IDENTIFYING NEEDS AND WARNING SIGNS

All of our staff will be trained in how to recognise warning signs of common mental health problems. This means that they will be able to offer help and support to students who need it, when they need it. These warning signs will always be taken seriously and staff who notice any of these signs will communicate their concerns with the Designated Safeguarding Officer as appropriate. Staff will be able to identify a range of behaviour and physical changes, including:

- Physical signs of harm.
- Changes in eating and sleeping habits.
- Increased isolation from friends and family and becoming socially withdrawn.
- Changes in mood.
- Talking and/or joking about self-harm and/or suicide.
- Drug and alcohol abuse.
- Feelings of failure, uselessness, and loss of hope.

• Secretive behaviour.

• Clothing unsuitable for the time of year, e.g. a large winter coat in summer.

• Negative behaviour patterns, e.g. disruption.

Staff will also be able to identify a range of issues, including:

• Attendance and absenteeism.

• Punctuality and lateness.

• Changes in educational attainment and attitude towards education.

• Family and relationship problems.

Finally, staff will be well placed to identify any additional needs arising from difficulties that may impact a child's mental health and wellbeing, such as bereavement and health difficulties.

MANAGING DISCLOSURES

If a student discloses concerns about themselves or a friend, to any member of staff, then all staff will respond in a calm, supportive, and non-judgemental manner. All disclosures will be recorded confidentially and only shared with the appropriate authorities if it's necessary to keep the child safe, in line with our Safeguarding Policy.

The disclosure record will contain:

• The date of the disclosure.

• The name of the staff member to whom the disclosure was made.

• The nature of the disclosure and the main points from the conversation.

• Agreed next steps.

CONFIDENTIALITY

If a member of staff thinks it's necessary to pass on concerns about a student, either to somebody inside the school or somebody outside it, then this will first be discussed with the student. They will be told:

• Who the staff member is going to tell.

• What the staff member is going to disclose.

• Why it's necessary for somebody else to be told.

• When the contact will be.

However, it may not be possible to gain the student's consent first, such as in the case of students who are at immediate risk. Protecting a student's safety is our main priority so we would share disclosures if we judged a child to be at risk.

WHOLE SCHOOL APPROACH

We take a whole school approach towards the mental health of our students. This means working with parents and carers and with other agencies and partners, where necessary.

WORKING WITH PARENTS AND CARERS

We aim to support parents as much as possible. This means keeping them informed about their child and offering our support at all times.

To support parents we will:

• Highlight sources of information and support about mental health and emotional wellbeing that we have in our school.

• Share and allow parents to access further support.

• Ensure that parents are aware of who to talk to if they have any concerns about their child.

• Give parents guidance about how they can support their child's/children's positive mental health.

• Ensure this policy is easily accessible to parents.

• Keep parents informed about the mental health training our school staff receive and how mental health is covered in our school curriculum.

•Arrange workshops and talks for parents with mental health specialists and the school counsellor

•Share our Zones of Regulation with parents to facilitate a common language around mental wellbeing at home and at school

WORKING WITH OTHER AGENCIES AND PARTNERS

As part of our whole school approach, we will also work with other agencies to support our students' emotional health and wellbeing.

This might include liaising with:

• Paediatricians.

• CAMHS.

• Counselling services.

• Therapists.

• Family support workers.

• Behavioural support workers.

SUPPORTING PEERS

We understand that, when a student is suffering from mental health issues, it can be a difficult time for their peers. In response to this, we will consider, on a case by case basis, any peers that may need additional support. We will provide support in a one-on-one or group setting. These sessions will be guided by the student, but they will discuss how peers can help, how peers can access support themselves, and healthy ways of coping with any emotions they might be feeling.

TRAINING

All staff will receive regular training in child mental health so that they can recognise and respond to mental health issues. This will form part of their regular safeguarding training and is a requirement to keep children safe. Training records will be held in staff files. We will consider additional training opportunities for staff and we will support

additional CPD throughout the year where it becomes appropriate due to developing situations with pupils.

POLICY REVIEW

This policy will be reviewed every year. This is so that it remains up to date, useful, and relevant. We will also regularly review it in accordance with local and national policy changes.

Appendix 7: Summary Code of Conduct for Staff

Review: September 2026

Full Code of Conduct can be found on pages 12-29 of the Employment Manual

Staff behaviour should be beyond reproach at all times. Solefield is committed to safeguarding. The following is expected of Solefield Staff at all times:

- Listen to, respect and support pupils, staff, parents and governors
- Only share private and sensitive information about a pupil when it is in their best interests to do so and then only to the appropriate staff eg, if there is a safeguarding concern or a disclosure
- Not promise to keep secrets and not ask anyone to do so
- Be aware of their position of trust
- Maintain appropriate professional boundaries and not display behaviour that may be misinterpreted by others
- Adhere to the organisation's policy on the use of communication technologies, including the use of mobile phones, cameras or webcams, the internet, social networking, etc.
- Not make personal use of social media, 'phone calls, e-mails or message contact with pupils. Carefully consider any use of these with current parents
- Not engage in any physical or sexual contact with pupils either inside or outside of the organisation
- Not use sarcasm, insensitive or belittling comments or behaviour, or physical punishment of any description
- Adhere to the Solefield's policy and procedures on transporting children and young people
- Report any disclosures or allegations against any member of staff or volunteer without delay, using Low Level Concern form if necessary
- Behave in a civil and respectful manner with all other members of staff at the school
- Arrive for the start of the school day and lessons punctually
- Never leave classes unsupervised
- Mark and return books within 7 days
- Respond to parents within 24 hours, even if only with a holding email.
- Set an example and never use your own mobile telephones or other electronic devices whilst on duty (whether in a classroom, EYFS, Pre-Prep or Prep) and any such mobile devices should be switched off except in the case of an emergency and be kept out of sight of parents or pupils.
- Notify the Head, office and cover administrator of any absences as soon as possible

Low Level Concerns

Please share any concern with the Headmistress (in person, using the reporting tool on MyConcern or using the form available for this in the Resources Room), no matter how small or seemingly insignificant, even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that is inconsistent with the Schools' Code of Conduct [including inappropriate conduct outside of work] and/or in a way that on first glance does not appear to meet the allegation, 'harm' threshold.

Whistleblowing

We have a whistleblowing policy to enable people to report suspected wrongdoing. This is called 'making a disclosure in the public interest'. In the first instance, concerns should be addressed to the DSL or one of the deputies. If this is impossible, please contact the Chair of Governors, Peter Collini .

The NSPCC operates a whistle blowing helpline to provide free advice and support on telephone number 08000 280285.

HM September 2026

Appendix 8 Low Level Concerns Policy

Responsible Staff Member: Helen McClure

Responsible Solefield local board governor: Sue Webb September 2026

Review: September 2026

This policy is applicable to all staff in the school, including EYFS:

1. Introduction and purpose

1.1 Solefield School ("the School") understands the importance of a positive culture where concerns can be identified and spoken about openly and acknowledges that this is a key element of a strong safeguarding system. This Low-Level Concerns Policy seeks to ensure that all staff who work with children behave appropriately and to enable the early identification and prompt and appropriate management of concerns.

1.2 As part of its whole school approach to safeguarding, the School will ensure that it promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the School (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

1.3 Creating a culture in which all concerns about adults (including allegations that do not meet the harm threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should encourage an open and transparent culture; enable the School to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the School are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the School.

1.4 This Low-Level Concerns Policy operates in conjunction (as appropriate) with the following

- Staff Code of Conduct
- Disciplinary Procedure
- Grievance Procedure
- Whistleblowing Policy
- Data Protection Policy
- Safeguarding Policy

2. Introduction to the concept and importance of sharing low-level concerns

2.1 Behaviour which is not consistent with the standards and values of an organisation, and which does not meet the organisational expectations encapsulated in the School's Staff Code of Conduct, needs to be addressed. Such behaviour can exist on a wide spectrum – from the inadvertent or thoughtless, through to that which is ultimately intended to enable abuse.

2.2 All staff need to be informed about and be able to identify concerning, problematic or inappropriate behaviour and understand the importance of sharing concerns when they observe behaviour which violates the School's Staff Code of Conduct.

3. What is the Low-Level Concerns Policy?

3.1 The Low-Level Concerns Policy enables all staff to share any concerns – no matter how small – about their own or another member of staff's behaviour with the Headmistress

3.2 Safeguarding and promoting the welfare of children is everyone's responsibility.

4. What is the purpose of the Low-Level Concerns Policy?

4.1 The purpose of the Low-Level Concerns Policy is to create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour which are set out in the School's Staff Code of Conduct are constantly lived, monitored and reinforced by all staff.

5. What are the aims of the Low-Level Concerns Policy?

5.1 The aims of the Low-Level Concerns Policy are to:

- ensure that staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour – in themselves and others, and the delineation of professional boundaries and reporting lines;
- empower staff to share any low-level concerns with the Headmistress and to help all staff to interpret the sharing of such concerns as a neutral act;
- address unprofessional behaviour and support the individual to correct it at an early stage;
- identify concerning, problematic or inappropriate behaviour – including any patterns – that may need to be consulted upon with (on a no-names basis if appropriate), or referred to, the Local Authority Designated Officer ("LADO");
- provide for responsive, sensitive and proportionate handling of such concerns when they are raised; and
- help identify any weaknesses in the School's safeguarding system.

6. Definitions

6.1 Who does the policy apply to?

6.1.1 The policy applies to all staff whether working in or on behalf of the School, engaged as a paid employee (including supply teacher), worker or contractor, or unpaid member of staff or volunteer. It also includes anyone who is part of the Governing Body.

6.1.2 **Designated Safeguarding Lead (DSL**) means the DSL at the School.

6.1.3 **Governing Body** means those individuals who are responsible for the School's governance -i.e. Governors.

6.1.4 **Headmistress** means the Headmistress of the School.

Details of the individuals currently in these roles can be found at Annex 1 of this policy.

6.2 **Allegation that may meet the harm threshold.** The term 'allegation' means it is alleged that an adult who works with children has:

6.2.1 behaved in a way that has harmed a child, or may have harmed a child; and/or

6.2.2 possibly committed a criminal offence against or related to a child; and/or

6.2.3 behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or

6.2.4 behaved or may have behaved in a way that indicates they may not be suitable to work with children.

In terms of managing cases of allegations that may meet the harm threshold, these might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school.

6.3 **Concern (including an allegation) that does not meet the harm threshold – i.e. a low-level concern.** The term 'low-level concern' does not mean that it is insignificant, it means that an adult's behaviour towards a child does not meet the harm threshold set out above (at paragraph 6.2). A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that:

6.3.1 is inconsistent with the School's Staff Code of Conduct, including inappropriate conduct outside of work; and

6.3.2 does not meet the allegation threshold or is otherwise not serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary.

> Although it is important that staff feel comfortable with, and are clear about, the concept of low-level concerns, and know what to do if they have such a concern, they do not need to be able to determine in each case whether their concern is a low-level concern, or if it is not serious enough to consider a referral to the LADO, or whether it meets the threshold of an allegation. Once staff share what they believe to be a low-level concern, that determination should be made by the Headmistress

6.3.3 The diagram at Annex 2 of this policy further illustrates the distinction between an allegation that may meet the harm threshold, and a concern (including an allegation) that does not meet the harm threshold – i.e. a low-level concern.

6.3.4 Examples of behaviour that could be classed (but not limited to) a low level concern include:

Being over friendly with children, having favourites or engaging with a child on a one-to-one basis in a secluded area or behind a closed door.

6.3.5 Such behaviour could be inadvertent or thoughtless or behaviour that may look to be inappropriate, but might not be in specific circumstances.

6.4 Low-Level Concerns Form means the form at Annex 3 of this policy or the reporting tool on MyConcern.

7. School Culture

7.1 The School promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the School are dealt with promptly and appropriately.

8. Privacy of Staff and Confidentiality

8.1 The School will always respect the personal data of staff (and others, where they may be identifiable) in implementing the Low-Level Concerns Policy and in keeping records of low-level concerns secure.

8.2 The Data Protection Act 2018 includes a specific provision which permits organisations to process even the most sensitive personal data where necessary for the purposes of protecting children from harm. Although sharing of low-level concerns will not always involve legally sensitive categories of data, the safeguarding purpose is the same as that under the School's Safeguarding Policy.

8.3 A proportionate approach must be taken by all to considering what personal data is in fact necessary to share and record by way of low-level concern(s) in each case in order to support the safeguarding purpose and to ensure the information is accurate, fair and as far as possible recorded in neutral terms.

8.4 If a member of staff who raises a low-level concern does not wish to be named, then the School will respect

their wishes as far as possible. However, staff should be aware that in certain circumstances this anonymity may need to be waived (as explained further in paragraph 10 below).

8.5 All staff are entitled, under data protection law, to ask to see the content of any low-level concern(s) retained by the School under the Low-Level Concerns Policy as it relates to them personally and to make any reasonable objection as to the fairness or accuracy of that content. The School will process such requests within the period prescribed by law, subject always to any necessary protection of the rights of third parties and unless any other relevant exemptions apply (including if complying with the request would be likely to prejudice the safeguarding purpose of the Low-Level Concerns Policy). If the content of a low-level concern is disputed, it may not be appropriate for the School to delete or alter the original record, but a note may be recorded alongside reflecting the staff member's alternative account or objection(s).

8.6 All personal data processed in connection with the Low-Level Concerns Policy will be processed in accordance with the staff privacy notice and the school Data Protection Policy.

9. Who should staff share low-level concerns with?

9.1 It is important that low-level concerns are shared with the Headmistress as soon as reasonably possible and, in any event, within 24 hours of becoming aware of it (where the concern relates to a particular incident) – although it is never too late to share a low-level concern.

9.2 If the Headmistress is absent for any reason, low-level concerns should be shared with the Deputy Headmistress who will ensure they inform the Headmistress immediately on their return.

9.3 If any low-level concern relates to the behaviour of the Headmistress, it should be referred to the Chair of the Local Advisory Board. .

9.4 If there is a conflict of interest in sharing a low-level concern with the Headmistress, the low-level concern should be shared with the Chair of the Local Advisory Board, unless there is conflict of interest in doing so, in which case it should be reported directly to the LADO.

10. Should staff who share low-level concerns be able to remain anonymous?

10.1 Staff are encouraged to consent to be named when sharing low-level concerns, as this will help to create a culture of openness and transparency. If the staff member who raises a low-level concern does not wish to be named, the School will respect that person's wishes as far as possible. However, there may be circumstances where the staff member will need to be named (for example, where disclosure is required by a court or local authority, or under a fair disciplinary process) and, for this reason, the School will not promise anonymity to members of staff who share low-level concerns.

11. Should staff share concerns about themselves (i.e. self-report)?

11.1 Occasionally a member of staff may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, a member of staff may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the School's Staff Code of Conduct. Self-reporting in these circumstances can be positive for a number of reasons, and staff are encouraged to self-report on the basis that:

11.1.1 it is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity;

11.1.2 it demonstrates awareness of the expected behavioural standards and self-awareness as to the member of staff's own actions or how they could be perceived; and

11.1.3 crucially, it is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

11.2 The School's aim is to create an environment where staff are encouraged and feel confident to self-refer.

12. How should low-level concerns be shared and recorded?

12.1 The concern can be shared verbally with the Headmistress in the first instance or a written summary of it can be provided to them and with the option of submitting a Low-Level Concerns Form (at Annex 3).

12.2 Where the low-level concern is provided verbally, the Headmistress will make an appropriate record of the conversation, either contemporaneously or immediately following the discussion and will exercise sound professional judgment in determining what information is necessary to record for safeguarding purposes.

12.3 Where a low-level concern relates to a person employed by a supply agency or a contractor, the School will notify that person's employer so that any potential patterns of inappropriate behaviour can be identified.

13. How should a low-level concern be responded to?

13.1 Staff are asked to share what they believe to be low level concerns, but it is for the Headmistress to determine if further investigation and follow up action is needed.

13.2 Once the Headmistress has received the low-level concern, they will – not necessarily in the below order but in an appropriate sequence according to the nature and detail of the particular concern shared with them:

13.2.1 Speak to the person who raised the low-level concern (unless it has been raised anonymously).

13.2.2 Speak to any potential witnesses (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted).

13.2.3 Speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted).

13.2.4 If they are in any doubt, seek advice from the LADO – on a no-names basis if necessary.

13.2.5 Review the information and determine whether the behaviour in question:

a) is entirely consistent with the School's Staff Code of Conduct and the law;
b) constitutes a low-level concern;
c) is not serious enough to consider a referral to the LADO but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary;
d) when considered with any other low-level concerns previously raised about the same person, could now meet the threshold of an allegation, and should be referred to the LADO/other relevant external agencies, and in accordance with the School's Safeguarding Policy, Part 4 of KCSIE 2026, and the relevant procedures and practice guidance stipulated by the School's Local Safeguarding Partnership; or
e) in and of itself meets the threshold of an allegation and should be referred to the LADO/other relevant external agencies, and in accordance with the School's Safeguarding Policy, Part 4 of KCSIE 2026, and the relevant procedures and practice guidance stipulated by the School's Local Safeguarding Partnership.

13.2.6 Ensure that appropriate and detailed records are kept of all internal and external conversations regarding the concern, their determination, the rationale for their decision and any actions taken, and retain records in accordance with the Low-Level Concerns Policy.

13.2.7 Consider whether the concern also potentially raises misconduct or capability issues.

13.3 Staff may also find it helpful to refer to the diagram at Annex 4 of this policy.

14. What action will be taken if it is determined that the behaviour is entirely consistent with the School's Staff Code of Conduct and the law?

14.1 The Headmistress will update the individual in question and inform them of any action taken (as above).

14.2 The Headmistress will speak to the person who shared the low-level concern – to provide them with feedback about how and why the behaviour is consistent with the School's Staff Code of Conduct and the law.

15. What action will be taken if it is determined that the behaviour constitutes a low-level concern?

15.1 The Headmistress will respond in a sensitive and proportionate way – on the one hand maintaining confidence that such concerns when raised will be handled promptly and effectively, whilst on the other hand protecting staff from any potential false allegations or misunderstandings. Any investigation of low-level concerns will be done discreetly and on a need-to-know basis.

15.2 Most low-level concerns by their very nature are likely to be minor. Some will not give rise to any ongoing concern and, accordingly, will not require any further action. Others may be most appropriately dealt with by means of management guidance and/or training. In many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised.

15.3 Any such conversation with individuals in these circumstances will include being clear with them as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment which is agreed with the individual, and regularly reviewed with them, may also be appropriate.

15.4 Some low-level concerns may also raise issues of misconduct or poor performance. The Headmistress will also consider whether this is the case – by referring to the School's disciplinary and/or capability procedure and/or taking specialist advice as necessary on a named or no-names basis where necessary.

15.5 If the Headmistress considers that the School's disciplinary or capability procedure may be triggered, they will refer the matter to the Chair of the LAB. If the School's disciplinary or capability procedure is triggered, the individual will have a full opportunity to respond to any factual allegations which form the basis of capability concerns or a disciplinary case against them.

15.6 Staff should be aware that when they share what they believe to be a low-level concern, the Headmistress will speak to the adult who is the subject of that concern (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted) – no matter how 'low' level the concern may be
perceived to be, to gain the subject's account – and to make appropriate records (as above), which may be referenced in any subsequent disciplinary proceedings.

15.7 How the School responds to a low-level concern may be different depending on the employment status of the individual who is the subject of the concern - i.e. whether they are an employee or worker to whom the School's disciplinary and/or capability procedure would apply; or a contractor, Governor or volunteer. The School's response will be tailored accordingly.

16. What action will be taken if it is determined that the behaviour:

16.1 Whilst not sufficiently serious to consider a referral to the LADO nonetheless merits consulting with and seeking advice from the LADO, and on a no-names basis if necessary? Then action (if/as necessary) will be

taken in accordance with the LADO's advice; or

16.2 When considered with any other low-level concerns that have previously been shared about the same individual, could now meet the threshold of an allegation, or in and of itself meets the threshold of an allegation? Then it will be referred to the LADO/other relevant external agencies, and in accordance with the School's Safeguarding Policy, Part 4 of KCSIE 2026 and the relevant procedures and practice guidance stipulated by the School's Local Safeguarding Partnership.

17. How should low-level concerns be held?

17.1 The School will retain all records of low-level concerns (including those which are subsequently deemed by the Headmistress to relate to behaviour which is entirely consistent with the School's Staff Code of Conduct) in a central low-level concerns file.

17.2 Where multiple low-level concerns have been shared regarding the same individual these will be kept in chronological order as a running record, and with a timeline alongside. These records will be kept confidential and held securely with access afforded only to a limited number of individuals such as the Headmistress and Chair of the LAB.

18. How often should the central low-level concerns file be reviewed?

18.1 The Headmistress will review the central low-level concerns file periodically to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. A record of these reviews will be made.

18.2 Where a pattern of behaviour is identified in respect of a specific individual, the Headmistress will also consider whether any wider cultural issues are at play that may have enabled the behaviour and/or whether the School should arrange for additional training or a review of any of its policies to reduce the risk of it happening again.

19. How long should records of a low-level concern be kept?

19.1 Low-level concerns will be retained securely by the School for as long as deemed relevant and necessary for a safeguarding purpose unless the School is required to disclose by law (for example, where the threshold of an allegation is met in respect of the individual in question). In most cases, once a staff member leaves the School, any low-level concerns which are held relating to them:

19.1.1 will be retained for the same duration as that individual's personnel file and

19.1.2 will not be included in any onward reference, except as set out at paragraph 20.

19.2 Low-level concerns will be retained on the School's central low-level concerns file (securely and applying appropriate access restrictions) unless and until further guidance provides otherwise.

20. References

20.1 Where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and is found to be substantiated, it will be referred to in a reference.

20.2 Low-level concerns (or a group of concerns) which have not met the threshold for referral to the LADO which relate only to safeguarding will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance.

21. What is the role of the Governing Body?

21.1 The Headmistress will regularly inform the Governing Body through the EdSafe LAB about the implementation of the Low-Level Concerns Policy and any evidence of its effectiveness.

21.2 The Solefield local board governor with responsibility for safeguarding will support the Nominated Safeguarding Governor by reviewing an anonymised sample of low-level concerns at regular intervals, in order to ensure that these concerns have been responded to promptly and appropriately.

22. Monitoring and Review

22.1 The Low-Level Concerns Policy will be monitored to ensure that it is being effectively implemented in practice and will be reviewed annually by the Headmistress and in response to any relevant legislative, statutory or regulatory changes and/or changes in relevant guidance and/or safeguarding best practice.

Annex 1

Details of individuals currently in the roles defined within the Low-Level Concerns Policy

Job Title	Name	Contact Details
Headmistress	Helen McClure	h.mcclure@solefieldschool.org
Deputy Headteacher	Kate Easton	k.easton@solefieldschool.org
Designated Safeguarding Lead (DSL)	Kate Easton	k.easton@solefieldschool.org
The local board governor with responsibility for safeguarding	Sue Webb	sa.sunderland@gmail.com
The Lead Governor with responsibility for child protection across the Sevenoaks Family of Schools (including Solefield School)	Mrs Anita Yuravlivker	a.yuravlivker@sevenoaksschool.org
Chair Governors	Chris Gill	clerk@sevenoaksschool.org
Local Authority Designated Officer (LADO)	Sue Unwin	01622 696366

Annex 2 Spectrum of behaviour

Allegation	Behaviour which indicates that an adult who works with children has (or is alleged to 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; and/or • behaved towards a child or children in a way that indicates they may pose a risk of harm to children; and/or • behaved or may have behaved in a way that indicates they may not be suitable to work with children.
Low-Level Concern	Does not mean that it is insignificant, it means that the adult's behaviour towards a child does not meet the threshold set out above. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that: • is inconsistent with the School's Staff Code of Conduct, including inappropriate conduct outside of work; and • does not meet the allegation threshold or is otherwise not serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary.
Appropriate Conduct	Behaviour which is entirely consistent with the School's Staff Code of Conduct, and the law.
NB: Allegations and low level concerns can relate to an adult's behaviour outside of their working environment	

Annex 3 - Low-Level Concerns Form

Low-Level Concerns Form

Please use this form to share any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that:

- is inconsistent with the School's Staff Code of Conduct, including inappropriate conduct outside of work, and
- does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO.

You should provide a concise record – including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible – of any such concern and relevant incident(s) (and please use a separate sheet if necessary).

The record should be signed, timed and dated.

Name of Staff Member: Department and Role:

Details of Concern:

Received by: At: (Time) On: (Date)

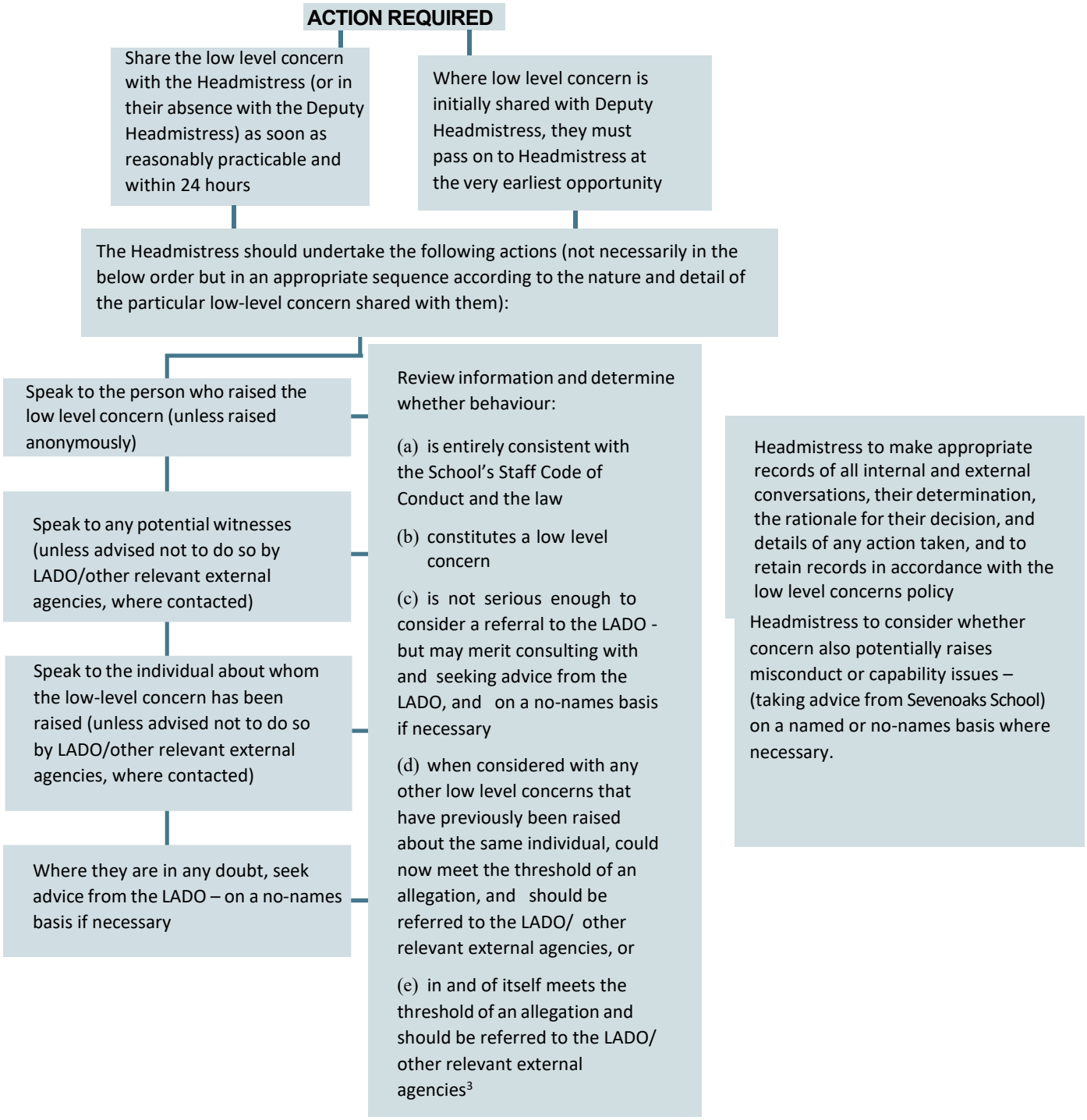
Action Taken: (Specify)

This record will be held securely in accordance with the School's Low-Level Concerns Policy. Please note that low-level concerns will be treated in confidence as far as possible, but the School may in certain circumstances be subject to legal reporting requirements or other legal obligations to share information with appropriate persons, including legal claims and formal investigations.

Annex 4 Sharing Low Level Concerns – Action Required By Staff, Headmistress, Deputy Headmistress

If a member of staff has an allegation that may meet the harm threshold – they should follow the procedure in the School's Child Protection and Safeguarding Policy.

If a member of staff has what they **believe** to be a concern that does not meet the harm threshold – i.e. LLC – they should take the below action.



September 2026

Review September 2027