



SAFEGUARDING POLICY

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Board of Trustees



SAFEGUARDING POLICY

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

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We are committed to reviewing our policy and good practice annually.



Introduction and Ethos

- Dover Smart Project recognise our responsibility to safeguard and promote the welfare of all children and vulnerable adults. Safeguarding is everybody's responsibility and all those directly connected (staff, volunteers, Trustees, senior management, parents, families) are an important part of the wider safeguarding system for children / vulnerable adults, and have an essential role to play in making our Smart community safe and secure.
- Our approach at Dover Smart Project is driven by a number of principles which are informed by relevant legislation, guidance and national best practice.
- Staff working with children / vulnerable adults at Dover Smart Project are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.
- We believe that the best interests of children / vulnerable adults always come first. All children (defined as those up to the age of 18) and vulnerable adults have a right to be heard and to have their wishes and feelings taken into account and all children / vulnerable adults regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- Dover Smart Project recognises the importance of providing an ethos and environment that will help children / vulnerable adults to be safe and feel safe. Our ethos in Dover Smart Project is that children / vulnerable adults are respected and encouraged to talk openly, and that all our staff understand safe professional practice and adhere to our safeguarding policies.
- Our core safeguarding principles are:
 - Prevention
Positive, supportive, safe culture and safer recruitment procedures.
 - Protection
Following the agreed procedures, ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns.
 - Support
For all children / vulnerable adults, parents and staff
 - Working with parents and other agencies
To ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.



- Dover Smart Project expect that if any member of our community has a safeguarding concern about any child or adult, they should act, and act immediately.
- The procedures contained in this policy apply to all staff, including senior managers, e Trustees, temporary or third-party agency staff and volunteers.

Policy Context

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and has due regard to the related guidance. This includes:

- DfE Keeping Children Safe in Education 2021 (KCSIE)
- Working Together to Safeguard Children 2018 (WTSC)
- Ofsted: Education Inspection Framework'
- Framework for the Assessment of Children in Need and their Families 2000
- Kent and Medway Safeguarding Children Procedures (Online)
- Early Years and Foundation Stage Framework 2021 (EYFS)

Definition of Safeguarding

- Working Together to Safeguard Children (2018) states that safeguarding and promoting the welfare of children is defined as:
 - protecting children from maltreatment.
 - preventing impairment of children's mental and physical health or development.
 - ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
 - taking action to enable all children to have the best outcomes.
- It also reminds us that safeguarding *"is everyone's responsibility"* and everyone who comes into contact with children and families has a role to play. Everyone should consider wider environmental factors in a child's life that may be a threat to their safety and/or welfare.
- Dover Smart Project acknowledge that safeguarding includes a wide range of specific issues including (but not limited to):
 - Abuse and neglect
 - Bullying, including cyberbullying
 - Children with family members in prison
 - Children Missing Education (CME)



- Child missing from home or care
 - Child Sexual Exploitation (CSE)
 - Child Criminal Exploitation (CCE)
 - Contextual safeguarding (risks outside the family home)
 - County lines and gangs
 - Domestic abuse
 - Drugs and alcohol misuse
 - Fabricated or induced illness
 - Faith abuse
 - Gender based abuse and violence against women and girls
 - Hate
 - Homelessness
 - Human trafficking and modern slavery
 - Mental health
 - Nude or semi-nude image sharing, aka youth produced/involved sexual imagery or "Sexting"
 - Online safety
 - Peer on peer abuse
 - Preventing radicalisation and extremism
 - Private fostering
 - Relationship abuse
 - Serious violence
 - Sexual violence and sexual harassment
 - So-called 'honour-based' abuse, including Female Genital Mutilation (FGM) and forced marriage
 - Upskirting
- Annex B of ['Keeping Children Safe in Education'](#) (KCSIE) contains important additional information about specific forms of abuse and safeguarding issues. Staff at the setting who work directly with children will read this annex.
 - If staff have any concerns about a child's welfare, they should act on them immediately. They should follow this policy and speak to the Designated Safeguarding Lead (or deputy).



Policy Compliance, Monitoring and Review

- Dover Smart Project will review this policy at least annually. The policy will be revised following any national or local policy updates, any local child / adult protection concerns and/or any changes to our procedures.
- All staff (including temporary staff and volunteers) will be provided with a copy of this policy.
- Parents/carers can obtain a copy this Policy and other related policies on request. Additionally, our policies can be viewed via the website www.doversmartproject.co.uk and
- The policy forms part of our business continuity plan and will be reviewed annually by the Trustee Board which has responsibility for oversight of safeguarding and child protection systems.
- The Designated Safeguarding Lead will ensure regular reporting on safeguarding activity and systems to the Trustee Board. The Trustee Board will not receive details of individual's situations or identifying features of families as part of their oversight responsibility.

Key Responsibilities

- The Trustee Board have read and will follow this policy.
- Dover Smart Project has a nominated trustee for safeguarding. They will support the DSL and have oversight in ensuring that Dover Smart Project has an effective policy which interlinks with other related policies; that agreed procedures are in place and being followed; and that the policies are reviewed at least annually and when required.
- The Trustee Board and Leadership Team will ensure that the Designated Safeguarding Lead is supported in their role.

Designated Safeguarding Lead (DSL)

- Dover Smart Project has appointed a member of the Leadership Team as the Designated Safeguarding Lead (DSL). Additionally, Dover Smart Project has appointed a Deputy DSL who will have delegated responsibilities and act in the DSL's absence. Names of these safeguarding officers are shown at the beginning of this policy.
- The DSL has overall responsibility for the day-to-day oversight of safeguarding and child protection systems in the organisation. Whilst the activities of the DSL may be delegated to the deputy, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.
- The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. Deputy DSL's are trained to the same standard as the DSL. The DSL and any deputy DSL's training will be updated formally every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.



- The Trustee Board will be kept informed of any significant issues by the DSL.
- The DSL (and deputy) will be provided with sufficient time so they can provide appropriate support to staff and children / vulnerable adults regarding any new safeguarding and welfare concerns. This may include handling of referrals to integrated social care and working with other agencies where appropriate.
- It is the role of the DSL to:
 - Act as the central contact point for all staff to discuss any safeguarding concerns.
 - Maintain a confidential recording system for safeguarding and child protection concerns.
 - Coordinate safeguarding action for individual children / vulnerable adults
 - When supporting children / vulnerable adult with a social worker the DSL should have the details of the child's / vulnerable adult's social worker.
 - Liaise with other agencies and professionals.
 - Represent, or ensure Dover Smart Project is appropriately represented, at multi-agency safeguarding meetings (including Child Protection conferences).
 - Manage and monitor Dover Smart Project's role in any multi-agency plan for a child / vulnerable adult.
 - Be available for staff to discuss any safeguarding concerns.
 - Help promote outcomes by sharing the information about the welfare, safeguarding and child protection issues that children / vulnerable adults, including children / vulnerable adults with a social worker, are experiencing, or have experienced, with the Trustee Board and leadership staff.
 - Ensure adequate and appropriate DSL cover arrangements in response to any closures and out of hours.
 - Ensure all staff access appropriate safeguarding training as relevant.

Members of Staff

All members of staff have a responsibility to:

- Provide a safe environment for children and vulnerable adults.
- Be prepared to identify children / vulnerable adults help.
- Understand what help is available.
- Understand Dover Smart Project's safeguarding policies and systems.
- Undertake regular and appropriate training which is regularly updated.
- Be aware of the process of making referrals to children's / adult social care and statutory assessment under the Children Act 1989.



- Know what to do if a child / vulnerable adult tells them that he or she is being abused or neglected and understand the impact abuse and neglect can have upon a child / vulnerable adult.
- Be able to identify and act upon indicators that children / vulnerable adults are, or at risk of developing mental health issues.
- Know how to maintain an appropriate level of confidentiality.
- Be aware of the indicators of abuse and neglect so that they can identify cases of children / vulnerable adults who may need help or protection.

Children, Young People and Vulnerable Adults

Children, young people and vulnerable adults have a right to:

- Feel safe, be listened to, and have their wishes and feelings taken into account.
- Contribute to the development of Dover Smart Project 's safeguarding policies.
- Receive help from a trusted adult.
- Learn how to keep themselves safe, including online.

Parents and Carers

Parents/carers have a responsibility to:

- Understand and adhere to the relevant Dover Smart Project policies and procedures.
- Talk to their children / vulnerable adult about safeguarding issues and support Dover Smart Project in their safeguarding approaches.
- Identify behaviours which could indicate that their child / vulnerable adult is at risk of harm including online and seek help and support from Dover Smart Project or other agencies.

What is child abuse?

Child abuse happens when a person harms a child. It can be physical, sexual or emotional, but can also involve neglect.

Children may be abused by:

- family members
- friends
- people working or volunteering in organisational or community settings
- people they know
- strangers.



Identifying and preventing abuse

There are four main areas of abuse of which our staff and volunteers working with young people and vulnerable adults are made aware:

1. **Emotional Abuse:** Generally, this occurs when adults persistently fail to show young people and/or vulnerable adults due care, love or affection, where a young person may be consistently shouted at, threatened or taunted, or be subjected to sarcasm and unrealistic pressures. There may also be over-protection, preventing young people and/or vulnerable adults from socialising, or bullying to perform to high expectations. The young person or vulnerable adult may lose self-confidence and may become withdrawn and nervous. We will ensure that every young person and vulnerable adult individuality is respected at all times.
2. **Neglect:** Generally, this occurs when a person's essential needs for food, warmth and care are not met. Failing, or refusing, to provide love and affection could also be deemed as neglect. We will remain mindful of the impact of neglect for the young person and adults that we work with.
3. **Physical Abuse:** Generally, this occurs when adults, or even children, deliberately inflict injuries on a young person or vulnerable adult, or knowingly do not prevent such injuries. This includes for example injuries caused by hitting, shaking, squeezing, biting or using excessive force. It also occurs when an adult gives underage young people or vulnerable adult's alcohol, or inappropriate drugs, or fails to supervise their access to these substances.

Sexual Abuse: Generally, this occurs when boys and/or girls and/or vulnerable adults are abused by adults, both male and female, who use children or vulnerable people to meet their own sexual needs. This includes for example forcing a child or vulnerable adult to take part in sexual activity such as sexual intercourse, oral intercourse, masturbation, oral sex, showing children pornographic material.



Specific Safeguarding Issues (New section)

- Dover Smart Project is aware of a range of specific safeguarding issues and situations that can put children at greater risk of harm. Whilst some of these issues may be more likely to involve older children, early years children may still be at risk at harm, for example where there are concerns involving family members.
- Where staff are unsure how to respond to specific safeguarding issues, they should follow the processes as identified in this policy and speak with the DSL or a deputy.

1. Peer on Peer Abuse

- All members of staff at Dover Smart Project recognise that children are capable of abusing their peers, and that it can happen both inside and outside of the setting and online.
- Dover Smart Project recognises that peer on peer abuse can take many forms, including but not limited to:
 - Bullying, including cyberbullying, prejudice-based and discriminatory bullying
 - abuse in intimate personal relationships between peers
 - physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
 - sexual violence and sexual harassment
 - consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
 - causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
 - upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
 - initiation/hazing type violence and rituals
- Dover Smart Project believes that abuse is abuse and it will never be tolerated or dismissed as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.
- Dover Smart project recognises that even if there are no reported cases of peer on peer abuse, such abuse is still likely to be taking place.



- All staff have a role to play in challenging inappropriate behaviours between peers. Staff recognise that that some peer on peer abuse issues may be affected by gender, age, ability and culture of those involved, i.e. for gender based abuse, girls are more likely to be victims and boys more likely to be perpetrators.
- In order to minimise the risk of peer-on-peer abuse, Dover Smart Project will:
 - Implement a robust Anti-Bullying Policy
 - Provide age appropriate groups and activities.
- Dover Smart Project want children to feel able to confidently report abuse and know their concerns will be treated seriously. All allegations of peer on peer abuse will be reported to the DSL and will be recorded, investigated, and dealt with in line with associated policies, including child protection, anti-bullying and behaviour. Children who experience abuse will be offered appropriate support, regardless of where the abuse takes place.
- Alleged victims, perpetrators and any other child affected by peer on peer abuse will be supported by:
 - Taking reports seriously,
 - Listening carefully
 - Avoiding victim blaming
 - Providing appropriate pastoral support
 - Working with parents/carers
 - Reviewing educational approaches, following procedures as identified in other policies e.g. the anti-bullying, behaviour and child protection policy, and where necessary and appropriate, informing the police and/or ICS.

2. Child on Child Sexual Violence or Harassment

- When responding to concerns relating to child on child sexual violence or harassment, Dover Smart project will follow the guidance outlined in Part Five of KCSIE 2021 and the DfE 'Sexual Violence and Sexual Harassment Between Children in Schools and Colleges' guidance.
- Dover Smart Project recognises sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children and can occur online and face to face (both physically and verbally). Sexual violence and sexual harassment is never acceptable.



- All victims of sexual violence or sexual harassment will be reassured that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment or be made to feel ashamed for making a report.
- When there has been a report of sexual violence or harassment, the DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted).
 - The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children, and adult participants and staff and any actions that are required to protect them.
- Reports will initially be managed internally by the setting and where necessary will be referred to Integrated Children's Services and/or the Police.
 - The decision making and required action taken will vary on a case by case basis, but will be informed by the wishes of the victim, the nature of the alleged incident (including whether a crime may have been committed), the ages and developmental stages of the children involved, any power imbalance, if the alleged incident is a one-off or a sustained pattern of abuse, if there are any ongoing risks to the victim, other children, adult students or setting staff, and, any other related issues or wider context.
- If at any stage the DSL is unsure how to proceed, advice will be sought from the local Safeguarding Service.

3. Nude and/or Semi-Nude Image Sharing by Children

The term 'sharing nudes and semi-nudes' is used to mean the sending or posting of nude or semi-nude images, videos or live streams of/by young people under the age of 18. Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents complex.

The [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) guidance outlines how all educational settings should respond to incidents and should be read and understood by DSLs working with all age groups, not just older learners.



- Dover Smart Project recognises that consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as youth produced/involved sexual imagery or “sexting”) can be a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).
- When made aware of concerns involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos by children, staff are advised to:
 - Report any concerns to the DSL immediately.
 - Never view, copy, print, share, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already viewed the imagery by accident, this will be immediately reported to the DSL.
 - Not delete the imagery or ask the child to delete it.
 - Not say or do anything to blame or shame any children involved.
 - Explain to child(ren) involved that they will report the issue to the DSL and reassure them that they will receive appropriate support and help.
 - Not ask the child or children involved in the incident to disclose information regarding the imagery and not share information about the incident with other members of staff, the child(ren) involved or their, or other, parents and/or carers. This is the responsibility of the DSL.
- DSLs will respond to concerns as set out in the non-statutory UKCIS guidance: Sharing nudes and semi-nudes: advice for education settings working with children and young people’ and the local KSCMP guidance. When made aware of a concern involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos:
 - the DSL will hold an initial review meeting to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child involved. This may mean speaking with relevant staff and the children involved as appropriate.
 - parents and carers will be informed at an early stage and be involved in the process to best support children, unless there is good reason to believe that involving them would put a child at risk of harm.
 - All decisions and action taken will be recorded in line with our child protection procedures.



- a referral will be made to ICS and/or the police immediately if:
 - the incident involves an adult (over 18).
 - there is reason to believe that a child has been coerced, blackmailed, or groomed, or there are concerns about their capacity to consent, for example, age of the child or they have special educational needs.
 - the image/videos involve sexual acts and a child under the age of 13, depict sexual acts which are unusual for the child's developmental stage, or are violent.
 - a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes.
- The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date.
- If DSLs are unsure how to proceed, advice will be sought from the Education Safeguarding Service.

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

- Dover Smart Project recognises that CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.
- If staff are concerned that a child may be at risk of CSE or CCE, immediate action should be taken by speaking to the DSL or a deputy.

5. Serious Violence

- All staff are made aware of the indicators which may signal children are at risk from or are involved with serious violent crime. These may include unexplained gifts or new possessions, increased absence, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.
- Any concerns regarding serious violence will be reported and responded to in line with other child protection concerns.
 - The initial response to child victims is important and staff will take any allegations seriously and work in ways that support children and keep them safe.



6. So-Called Honour Based Abuse

- So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.
- All forms of HBA are abuse (regardless of the motivation) and concerns should be responded to in line with section 3 of this policy. Staff will report any concerns about HBA to the DSL (or a deputy).

7. Preventing Radicalisation

- Dover Smart Project is aware of our duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), to have "due regard to the need to prevent people from being drawn into terrorism", also known as the Prevent duty and the specific obligations placed upon us as an education provider regarding risk assessments, working in partnership, staff training, and IT policies.
- Dover Smart Project recognises that children are vulnerable to extremist ideology and radicalisation and staff will be alert to changes in children's behaviour which could indicate that they may be in need of help or protection.
- Staff will report any concerns to the DSL (or a deputy), who is aware of the local procedures to follow.

If abuse is suspected:

Our Staff and Volunteers may be aware of abuse in a number of ways:

- A young person or vulnerable adult may tell them
- A person may have reported an incident, or may have a strong suspicion
- They may have the suspicion themselves

In many situations however, the signs will not be obvious and decisions about what actions to take can be difficult. The following signs and indicators are not exhaustive, and we understand that the presence of one or more indicators is not proof that abuse is actually taking place, but we should be mindful of these indicators and seek advice.



Signs and indicators:

- An injury for which the explanation seems inconsistent
- Someone else (young person or adult) expresses concern about the welfare of the young person
- Unexplained changes in behaviour, e.g. becoming very quiet, withdrawn or displaying sudden uncharacteristic outbursts of temper
- Inappropriate sexual awareness, including explicit language
- Sexually explicit behaviour
- The person is distrustful of adults, particularly those with whom a close relationship will normally be expected
- The person has difficulty making friends
- A young person is prevented from socialising with other children
- Variations in eating patterns including overeating, loss of appetite etc
- Weight loss for no apparent reason
- Young people with access to unexplained items, gifts and money which might indicate concerns regarding exploitation.

It is NOT the responsibility of our Staff or Volunteers to decide that abuse is occurring, but it IS their responsibility to act on any concern, or to seek advice.

If abuse is reported/alleged/suspected:

- Observations, conversations or concerns will be recorded, signed and dated.
- It will be made clear to any young person or adult making a disclosure, allegation, or expressing a concern, that it may be necessary to pass the information to another party. This discussion will be recorded in writing and the following information will be recorded by the member of staff:

- a) The date and time
- b) Location of discussion
- c) People present
- d) The facts of the conversation

- The matter must not be investigated or discussed with anyone other than the DSL.
- The DSL will assess the information and contact the appropriate local statutory services, e.g. schools/social services/police.
- The person will be listened to and encouraged to speak without interruption, comment or judgment.



- It will be explained that in terms of Dover Smart Project's Confidentiality Policy, information may need to be shared with appropriate professionals in certain circumstances.
- If the matter is regarded as critical it should be referred immediately and directly to the DSL of Dover Smart Project.

Record Keeping

- All safeguarding concerns, discussions and decisions, and reasons for those decisions, will be recorded in writing on Dover Smart Project's safeguarding incident/concern form. Information must be passed, without delay to the DSL. A body map will be completed if injuries have been observed.
 - If members of staff are in any doubt about recording requirements, they should discuss their concerns with the DSL.
- Incident/Welfare concern forms are kept in the Safeguarding Folder. Regardless of the means of communication, staff must ensure their reporting is not viewed by anyone else.
- Records will be completed as soon as possible after the incident/event, using the child's / vulnerable adults words and will be signed and dated by the member of staff. If there is an immediate concern the member of staff should consult with a DSL before completing the form as reporting urgent concerns takes priority.
- Safeguarding records are kept for individual children / vulnerable adults and are maintained separately from all other records relating to the child / vulnerable adult. Safeguarding records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL. Safeguarding records are shared with staff on a 'need to know' basis only.

Multi-Agency Working

- Dover Smart Project recognises and is committed to its responsibility to work within the KSCMP multi-agency safeguarding arrangements. The management team and DSL will work to establish strong and co-operative local relationships with professionals in other agencies in line with statutory guidance.
- Dover Smart Project recognises the importance of multi-agency working and is committed to working alongside partner agencies to provide a coordinated response to promote children's welfare and protect them from harm. This includes contributing to KSCMP processes as required, such as, participation in relevant safeguarding multi-agency plans and meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.



Confidentiality and Information Sharing

- Dover Smart Project recognise our duty to share relevant information with appropriate agencies in matters relating to child and adult protection at the earliest opportunity.
- All staff must be aware that they cannot promise confidentiality.
- The DSL will disclose information about a child / vulnerable adult on a 'need to know' basis.
- All members of staff must be aware that whilst they have duties to keep any information confidential, they also have a professional responsibility to share information with other agencies to safeguard children / vulnerable adults.
- Dover Smart Project has an appropriately trained Data Protection Officer (DPO) as required by the General Data Protection Regulations (GDPR) to ensure that our organisation is compliant with all matters relating to confidentiality and information sharing requirements. Trained DSL officers are listed at the start of this policy.

- The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children / vulnerable adults safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children / vulnerable adults.

Complaints

- Dover Smart Project has a Complaints Procedure available to parents, children, vulnerable adults and members of staff and visitors who wish to report concerns. This can be found on the website.
- All reported concerns will be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation against a member of staff or volunteer will be dealt with under the Whistleblowing Policy. This can be found in the safeguarding file or on the website.

Staff Induction, Awareness and Training

- The DSL will ensure that all new staff and volunteers (including agency and third-party staff) receive Safeguarding Children and Vulnerable Adults training to ensure they are aware of Dover Smart Project's internal safeguarding processes as part of their induction.
- All staff members (including agency and third-party staff) will receive appropriate child safeguarding training to ensure they are aware of a range of safeguarding issues. This training will include online safety and will take place at least annually.



- In addition to specific safeguarding training, all staff will receive regular safeguarding and child protection updates through whole staff meetings, team meetings, or as individuals, as appropriate at least annually, to provide them with relevant skills and knowledge to safeguard children / vulnerable adults effectively.
- All staff members (including agency and third-party staff) will be made aware of Dover Smart Project's expectations regarding safe and professional practice via the staff code of conduct.
- Staff will be encouraged to contribute to and shape Dover Smart Project's safeguarding arrangements and child protection policies through review and feedback as well as inviting input at staff meetings.

Safer Working Practice

- All members of staff are required to work within our clear guidelines on safer working practice as outlined in the code of conduct.
- All staff will be made aware of the professional risks associated with the use of social media and electronic communication (such as email, mobile phones, texting, social networking). Staff will adhere to relevant Dover Smart Project policies including staff code of conduct.

Staff Supervision and Support

- Any member of staff affected by issues arising from concerns for children's / vulnerable adult's welfare or safety can seek support from the DSL, who can refer on to an outside agency as appropriate for further support.
- The induction process will include familiarisation with safeguarding responsibilities and procedures to be followed if members of staff have any concerns about a child's / vulnerable adult's safety or welfare.
- Dover Smart Project will provide appropriate supervision and support for all members of staff to ensure that:
 - o All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children / vulnerable adults
 - o All staff are supported by the DSL in their safeguarding role.
 - o All members of staff have regular reviews of their own practice to ensure they improve over time.

Safer Recruitment

- Dover Smart Project is committed to ensure that we develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our children / vulnerable adults and staff.
- We follow relevant guidance from The Disclosure and Barring Service (DBS):



- The Board of Trustees and Leadership Team are responsible for ensuring that the Dover Smart Project follow safe recruitment processes outlined within guidance.
- The Board of Trustees will ensure that there is at least one of the persons who conducts an interview has completed safer recruitment training.
- We advise all staff to disclose any reason that may affect their suitability to work with children / vulnerable adult's including convictions, cautions, court orders, cautions, reprimands and warnings.
- We will ensure that all staff and volunteers have read the staff code of conduct and understand that their behaviour and practice must be in line with it.

Allegations Against Members of Staff and Volunteers

- Dover Smart Project recognises that it is possible for any member of staff, including volunteers, Trustees, contractors, agency and third party staff and visitors to behave in a way that:
 - o Indicates they have harmed a child / vulnerable adult, or may have harmed a child / vulnerable adult;
 - o Means they have committed a criminal offence against or related to a child / vulnerable adult;
 - o behaved towards a child or children / vulnerable adult in a way that indicates he or she may pose a risk of harm to children / vulnerable adults; or
 - o behaved or may have behaved in a way that indicates they may not be suitable to work with children / vulnerable adults.
- All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in Dover Smart Project's safeguarding regime. The Leadership Team at Dover Smart Project will take all concerns or allegations received seriously.
- Allegations should be referred immediately to the DSL who will inform the Board of Trustees to agree further action to be taken in respect of the child / vulnerable adult and staff member.
- In the event of allegations of abuse being made against the DSL, staff are advised that allegations should be reported to the Leadership Team. In the event of allegations of abuse being made against the Leadership Team, staff are advised that allegations should be reported to the chair of Trustees who will contact the LADO (Local Authority Designated Officer).
- All staff and volunteers should feel able to raise concerns about poor or unsafe practice and such concerns will always be taken seriously by the Leadership Team.



- All members of staff are made aware of the Whistleblowing procedure. It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child / vulnerable adult at risk.
- Staff can access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally.
 - o Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.
- Dover Smart Project legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child / vulnerable adult, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person.
 - o If these circumstances arise in relation to a member of staff at our organisation, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO

NSPCC guidance on different types of abuse –

[Download Definitions and signs of child abuse \(PDF\)](#)

- Dover Smart Project use a wide range of technology. This includes computers, laptops, tablets and other digital devices, the internet and email systems.
 - o All Dover Smart Project owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.
- Dover Smart Project recognises the specific risks that can be posed by mobile technology, including mobile phones and cameras.
 - o Further information reading the specific approaches relating to this can be found in our acceptable use and image use policies which can be found in the safeguarding file.
- We will do all we reasonably can to limit children's exposure to online risks. If learners or staff discover unsuitable sites or material, they are required to turn off monitor/screen or cover the screen and report the concern immediately to the DSL
 - o All users will be informed that use of our systems can be monitored, and that monitoring will be in line with data protection, human rights and privacy legislation.



o Any access to material believed to be illegal will be reported immediately to the appropriate agencies, such as the Internet Watch Foundation and the police.

- Dover Smart Project will build a partnership approach to online safety and will support parents/carers to become aware and alert by providing information on our website and through existing communication channels such as newsletters or offering specific online safety events for parents/carers.
- Dover Smart Project will ensure that online safety training for all staff is integrated, aligned and considered as part of our overarching safeguarding approach.
 - o Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.

Security

- No visitors will be invited to Dover Smart Project whilst groups are running, unless this has been pre-arranged and approved by the Leadership Team.
- Dover Smart Project will not accept the behaviour of any individual (parent or other) that threatens security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the group setting.



Local Support

- All members of staff in Dover Smart Project are made aware of local support available.

Contact details for Kent LADO Service

Telephone: 03000 41 08 88

Email: kentchildrenslado@kent.gov.uk

Contact details for Area Safeguarding Advisor (Education Safeguarding Service)

Dover schools: 03000 415648

If a child may be at risk of imminent harm you should call the Police on 999. Also check www.kelsi.org.uk/support-for-children-and-young-people/child-protectionand-safeguarding/safeguarding-contacts for any updates.

Contact details for Online Safety in the Education Safeguarding Service

Telephone: 03000 415797 21

Email: esafetyofficer@theeducationpeople.org (non-urgent issues only)

Integrated Children's Services

Front door: 03000 411111

Out of Hours Number: 03000 419191

Kent Police

101 or 999 if there is an immediate risk of harm

Kent Safeguarding Children Multi-Agency Partnership (KSCMP)

Email: kscmp@kent.gov.uk

Telephone: 03000 421126

Adult Safeguarding

Adult Social Care via 03000 41 61 61 (text relay 18001 03000 41 61 61) or

Email: social.services@kent.gov.uk