

Safeguarding and Protecting Children Policy and Procedures



Date of issue: September 2022, updated March 2023 and August 2023

Date of next review: July 2024 (or sooner in response to regulatory changes)

Responsible person: Director of Safeguarding (Designated Safeguarding Lead)

References: [Surrey Safeguarding Children Partnership protocols, guidance and procedures Working Together to Safeguard Children 2018](#)
[Keeping Children Safe in Education \(KCSIE\) 2023](#)
[Disqualification under the Childcare Act 2006 \(updated 2019\)](#)
[FGM Act 2003 Mandatory Reporting Guidance 2020](#)
[Prevent Duty 2021](#)
['What to do if you are worried a child is being abused' 2015](#)
[Teacher Standards 2011](#)
[Information Sharing Advice for Practitioners' guidance 2018](#)
[SCC Children Missing Education](#)
[SCC Touch and the use of physical intervention when working with children and young people](#)
[The Equality Act 2010](#)
SCC Safeguarding Children Missing Education (CME) and Educated Other Than at School (EOTaS)
[The Relationships Education, Relationships and Sex Education, and Health Education \(England\) Regulations 2019 and DfE Statutory Guidance](#)
[National minimum standards for boarding schools, September 2022](#)

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The Governing Council's legal responsibility for safeguarding the welfare of children goes beyond child protection. The duty is to ensure that safeguarding permeates all activity and functions. The School's Safeguarding and Protecting Children Policy and Procedures therefore underpin, complement, and support a range of other School policies, such as:

- Anti-Bullying Policy and Procedure
- Behaviour, Rewards and Sanctions
- Restrictive Physical Intervention
- Educational Visits Policy
- Visiting Speaker Policy
- Medical and First Aid Policy
- Health and Safety Policy
- Low-Level Concerns Policy
- Online Safety Policy
- Mental Health Handbook
- Recruitment, Selection and Disclosure Policy and Procedure
- Relationships and Sex Education Policy
- Staff Code of Conduct
- Whistleblowing Policy and Procedure

The above list is not exhaustive but when undertaking development or planning of any kind the School will consider the implications for safeguarding.

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Safeguarding Statement

“It could happen here”

St John's School is fully committed to safeguarding children and recognises its moral and statutory responsibility to safeguard and promote the welfare of all children. The School believes the safety and wellbeing of children and young people is of fundamental importance and that they have an equal right to be protected from harm regardless of age, disability, gender, race, religion or belief, sex, or sexual orientation. This includes responding immediately and appropriately where there is a suspicion that any young person who is a pupil at the School, including those 18 years old and under, may be a victim of bullying, harassment, abuse (including physical, sexual, emotional) or neglect.

The School makes every effort to promote and provide an environment in which children and adults feel safe, secure, valued and respected, and feel confident to talk if they are worried, believing they will be effectively listened to.

All School staff will be fully trained, encouraged to share concerns, supported in their safeguarding responsibilities and encouraged to adopt an 'it could happen here' approach. The School promotes a safeguarding culture amongst all members of its community and always acts within the best interests of the child. The purpose of this policy is to provide staff, volunteers and governors with the framework they need to keep children safe and secure in our School. The policy also informs parents and carers how we will safeguard their children whilst they are in our care.

Key Personnel

Leah Hilt , Designated Safeguarding Lead (DSL) Mobile: 07458 034083 Office: 01372 384 405 lhilt@stjohns.surrey.sch.uk	Alex Tate , The Head and Deputy DSL Mobile: 07458 086473 Office: 01372 231575 head@stjohns.surrey.sch.uk
Alex Mogford , Deputy DSL Mobile: 07720 270174 Office: 01372 385 462 amogford@stjohns.surrey.sch.uk	Richard Harvey , Deputy DSL Mobile: 07720 742294 Office: 01372 231 568 rharvey@stjohns.surrey.sch.uk
Andy Bass , Deputy DSL Mobile: 07730 206 6710 Office: 01372 385 465 abass@stjohns.surrey.sch.uk	Ben Peart , Safeguarding Adviser for Boarding, Deputy DSL Office: 01372 385493 Mobile: 07391 682165 bpeart@stjohns.surrey.sch.uk
Gareth James , Deputy DSL Office: 01372 373 000 Mobile: 07720742281 gjames@stjohns.surrey.sch.uk	Oliver White , Deputy DSL Office: 01372 373 000 Mobile: owhite@stjohns.surrey.sch.uk
The Nominated Safeguarding Governors: Angela Wright safeguardinggovernor@stjohns.surrey.sch.uk Sandra Phillips sphillips@stjohns.surrey.sch.uk	
The Acting Chair of the Governing Council: Tim Beckh TBeckh@stjohns.surrey.sch.uk or contact via: Siân Graham, Secretary to the Governing Council sgraham@stjohns.surrey.sch.uk	

The **DSL** should be contacted if there are any concerns about a child. In their absence, one of the **Deputy DSLs** should be contacted. The DSL will decide whether to make a referral (using contacts below).

If there is a situation where a child is in immediate danger call 999 and request the appropriate emergency service. If there is a risk of serious harm to a child contact the Children's Single Point of Access C-SPA (Surrey Children's Single Point of Access) immediately. Telephone: 0300 470 9100 Mon – Fri from 9.00am until 5.00pm. Outside of these hours telephone 01483 517 898. Anyone can make a referral. Where referrals are not made by the DSL, they should be informed, as soon as possible, that a referral has been made.

Arrangements for effective DSL cover

The optimal scenario for any school providing care for children is to have a trained DSL or deputy DSL available on site at all times.

During the day, the DSL or one of the deputies will always be on site, unless the school is required to close as part of Covid-19 (or other) control measures.

Overnight, the Head (Deputy DSL), Deputy Head Co-curricular & Logistics and Safeguarding Adviser for Boarding (Deputy DSL) are all resident on site and on call for emergencies. These personnel remain on site even in the event of school closure.

The safeguarding team (DSL, Deputy DSLs, Safeguarding Adviser for Boarding and The Head) can be contacted by phone or Microsoft Teams at all times, if necessary. Any member of this team may take responsibility for coordinating safeguarding on site. This might include updating and managing access to child protection files, liaising with the offsite DSL (or deputy) and, as required, liaising with children's social workers where they require access to children in need and/or to carry out statutory assessments at the School.

Terminology

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.
- taking action to enable all children to have the best outcomes.

Child Protection is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

Early Help means providing support as soon as any needs emerge or are identified at any point in a child's life.

Staff refers to all those working for or on behalf of the School, full or part time, temporary or permanent, in either a paid or voluntary capacity.

Child(ren) includes everyone under the age of 18 years old. It also includes those pupils who turn 18 years old whilst at the School. On the whole, this will apply to pupils of our School; however, the policy will extend to visiting children and students from other establishments.

Parents refers to birth parents and other adults who are in a parenting role, for example stepparents, foster carers and adoptive parents.

Social Care refers to Children's Services in the area in which the child is resident, unless a child is a Child Looked After then this will be the Children's Services in their home authority.

SSCP refers to the Surrey Safeguarding Children Partnership.

C-SPA refers to the Children's Single Point of Access.

1. Introduction

This policy sets out the arrangements made by the School as required by The Education (Independent School Standards) Regulations 2014 and has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002, and in line with statutory guidance: 'Working Together to Safeguard Children' 2018, revised Safeguarding Statutory Guidance 'Framework for the Assessment of Children in Need and their Families' 2000, 'What to do if You are Worried a Child is Being Abused' 2015 to safeguard and promote the welfare of pupils at the School.

The policy also reflects, both statutory guidance 'Keeping Children Safe in Education' 2023 (KCSIE), and [Surrey Safeguarding Children Partnership](#) (SSCP) Procedures.

The Governing Council takes seriously its responsibility to comply with its duties under section 175/157 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure there are robust arrangements within our School to identify, assess, and support those children who are suffering harm or at risk of suffering harm.

The Safeguarding and Protecting Children Policy and Procedures will be reviewed annually by the Designated Safeguarding Lead (DSL) and the Governing Council, unless an incident or new legislation or guidance suggests the need for an earlier date of review. This policy has been authorised by the Governing Council, it applies to all members of staff (including teaching and nonteaching staff, temporary part-time workers, support staff, contractors and members of the Governing Council (hereafter staff) and volunteers, is available to parents on request and published on the School's website. It applies wherever staff or volunteers are working with pupils even when this is away from the School, for example at an activity centre or on an educational visit.

2. Policy Principles and Values

- The welfare of the child is paramount.
- Maintain an attitude of "it could happen here".
- Children have a right to feel safe and secure, they cannot learn effectively unless they do so.
- All children have a right to be protected from harm and abuse.
- All staff have a role in the prevention of harm and abuse and an equal responsibility to act immediately on any suspicion or disclosure that may indicate a child is at risk of harm, or suffering harm, either in the School or in the community, taking into account contextual safeguarding, in accordance with statutory guidance.
- We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working to protect and safeguard children.
- Whilst the School will work openly with parents as far as possible, it reserves the right to contact Social Care or the Police, without notifying parents if this is believed to be in the child's best interests.

3. Policy Aims

- To demonstrate how the School will foster an active and positive safeguarding culture in all aspects of school life and throughout the entire school community.
- To demonstrate the School's commitment with regard to safeguarding and child protection to children, parents and other partners.
- To raise the awareness of all staff of their responsibilities to safeguard children through identifying and reporting possible cases of abuse.
- To raise awareness of and provide guidance for the different types of abuse that occur including specific safeguarding issues such as FGM, radicalisation, forced marriage and sexting.
- To ensure all staff are aware of who and how to contact key individuals/agencies who will provide advice and guidance to enable the School to effectively contribute to Early Help, assessments of need and support for those children.
- To provide robust School systems and procedures that are followed by all members of the School community in cases of suspected abuse.
- To reinforce the importance of good communication, thorough record keeping and careful evidence taking to enable all professional agencies to act and respond in the best interests of the child.

- To set out the manner in which staff will be inducted and trained to enable them to carry out their safeguarding responsibilities.
- To develop and promote effective working relationships with other agencies, in particular Early Help providers, the Police, Health and Social Care.
- To ensure that all staff working within our School who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory DBS check (according to KCSIE 2023 guidance), and a single central record is kept for audit.
- To ensure that we comply with the [Disqualification under the Childcare Act 2006 \(updated 2018\)](#)

4. Supporting Children

The School will support all children:

We recognise that School may provide a safe place and stability in the lives of children who have been abused or who are at risk of harm.

We recognise that a child who is abused or witnesses abuse and/or violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth.

We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

We will promote a caring, safe and positive environment within the School. Amongst other initiatives the School organises therapeutic, wellbeing sessions for staff and pupils with registered, temperament-tested dogs (certified with *Pets as Therapy*). See the *Animals on Site Policy* (I18).

We will encourage self-esteem and self-assertiveness, through the curriculum and through positive relationships within the School community.

We will ensure children are taught to understand and manage risk through personal, social, health and economic (PSHE) education and Relationship and Sex Education (RSE) and through all aspects of School life, including staying safe online.

We will respond sympathetically to any requests for time out to deal with distress and/or anxiety.

We will offer details of helplines, counselling or other avenues of external support.

We will liaise and work in partnership with other support services and agencies involved in Early Help and the safeguarding of children.

We will notify Social Care without delay if there is an immediate risk of significant harm.

We will provide continuing support to children about whom there have been concerns who leave the School by ensuring that information is shared confidentially with the child's new setting. We will ensure the School records are forwarded as a matter of priority and within statutory timescales.

5. Prevention / Protection

We recognise that the School plays a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection.

The School will:

Establish and maintain an ethos where children feel safe and secure, are encouraged to talk and are always listened to.

Include regular consultations with children e.g. through questionnaires, participation in anti-bullying activity, asking children to report whether they feel safe in the setting.

Ensure that all children know they can access a trained adult in the School whom they can approach if they are worried or in difficulty. Make sure children know they can use the *Let's Talk* anonymous reporting system.

Include safeguarding across the curriculum, including PSHE, opportunities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help. In particular this will include anti-bullying work, online-safety, accessing emergency services, road safety, pedestrian and cycle training.

Ensure all staff are aware of School guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.

Ensure appropriate levels of filtering and monitoring are in place to block harmful online content while ensuring pupil learning is not unduly impacted.

6. Safe School, Safe Staff

We will ensure that:

The School operates safer recruitment procedures in line with KCSIE 2023 and that includes statutory checks on the suitability of staff to work with children, including social media checks.

All staff receive information about the School's safeguarding arrangements, Staff Code of Conduct, Safeguarding and Protecting Children Policy and Procedures, the role and names of the Designated Safeguarding Lead and the deputy DSLs, and the relevant parts of Keeping Children Safe in Education, part 1 or Annex A as a minimum.

All staff receive safeguarding and child protection training at induction in line with advice from Surrey Safeguarding Children's Partnership (SSCP) which is regularly updated and that they receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually.

All members of staff are trained in and receive regular updates in online safety, Prevent and reporting concerns.

All members of staff maintain a zero-tolerance approach to sexual violence and sexual harassment and understand the importance of challenging abusive behaviours.

All staff and governors have regular child protection awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse.

The Safeguarding and Protecting Children Policy and Procedures is made available via the School website and that parents/carers are made aware of this policy.

All staff are aware of the filtering and monitoring systems and processes in place on school devices and networks and know how to escalate and respond to any concerns.

All parents/carers are made aware of the responsibilities of staff members with regard to child protection procedures through the publication of the Safeguarding and Protecting Children Policy and Procedures and reference to it in the Parent Handbook.

We provide a coordinated offer of Early Help when additional needs of children are identified and contribute to early help arrangements and inter-agency working and plans.

Our *Lettings Policy* will seek to ensure the suitability of adults working with children on School sites at any time and ensure that any groups who use the School premises have child protection policies and procedures in place. Lettings Agreements with the School will draw attention to the code of practice, [keeping children safe in out-of-school settings](#).

Community users organising activities for children are aware of the School's Safeguarding and Protecting Children Policy and Procedures, guidelines and procedures.

The name of the designated members of staff for child protection, the Designated Safeguarding Lead and deputy DSLs, are clearly advertised in the School with a statement explaining the School's role in referring and monitoring cases of suspected harm and abuse.

All staff will be given a copy of the parts/annexes of Keeping Children Safe in Education 2023 that are relevant to their role (and Part 1 or Annex A as a minimum) and will confirm that they have read and understood it. This also applies to the Governing Council in relation to part 2 of the same guidance.

6.1 Secure Premises

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

All visitors will be required to verify their identity to the satisfaction of staff. If a visitor is unknown to the School, their credentials and reasons for visiting will be checked and verified before they will be allowed on site. Visitors should therefore be prepared to produce identification. The School has an electronic sign in system at reception and visitors are expected to sign in on arrival and out on departure. Visitors will be given a badge to wear by reception, and this must be clearly displayed and worn at all times whilst on the premises. All visitors will be accompanied at all times. Contractors are required to report to the Estates Office before they commence work where they will be issued with a numbered contractor badge.

All visitors to the boarding houses must report to the duty member of staff immediately on arrival and must observe the necessity to be kept under sufficient staff supervision during their visit.

Please also refer to the *Visiting Speakers Policy* (141).

7. Roles and Responsibilities

7.1 All School Staff:

All staff have a key role to play in identifying concerns early and in providing help for children. To achieve this they will:

- Have read and understood the parts of KCSIE (2023) that are assigned to them.
- Have read and be familiar with this policy, *Staff Code of Conduct*, the pupil behaviour policy (*Behaviour, Rewards, and Sanctions*) and Anti-Bullying Policy and Procedures.
- Know who the DSL and Deputy DSLs are and know how to contact them; have an awareness of the role of the DSL, understand the *Staff Code of Conduct* and procedures relating to the safeguarding response for children who go missing from education.
- Establish and maintain an environment where children feel secure, are encouraged to talk, are listened to and actively provide a safe environment in which children can learn. All staff ensure children know that there are adults in the School who they can approach if they are worried or have concerns.
- Be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.
- Ensure all staff are 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. Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Only appropriately trained professionals are able to make a diagnosis of a mental health problem, and staff should not attempt to do so. Take immediate action if they have a mental health concern about a child that is also a safeguarding concern, following our child protection policy and procedures and speaking to the DSL or a deputy.

- Plan opportunities within the curriculum for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe.
- Attend training in order to be aware of and alert to the signs of abuse and neglect.
- Maintain an attitude of “it could happen here” with regards to safeguarding and understand that safeguarding is “everyone’s responsibility.”
- Know how to respond to a child who discloses harm or abuse following training of ‘Working together to Safeguard Children’, and ‘What to do if you are worried a child is being Abused’ (2015).
- Record their concerns onto CPOMS if they are worried that a child is being abused and report these to the DSL immediately that day. If the DSL is not contactable immediately a Deputy DSL should be informed.
- Be prepared to refer directly to the Children’s Single Point of Access (C-SPA), and the Police if appropriate, if there is a risk of significant harm and the DSL or their Deputy is not available.
- Be aware of the filtering and monitoring systems in place and understand the reporting mechanisms for safeguarding and technical concerns.
- Follow the allegations procedures if the disclosure is an allegation against a member of staff.
- Report low-level concerns (as defined in KCSIE 2023) about any member of staff/supply staff or contractor to the DSL or the Head and where a low-level concern is raised about the Head it will be shared with the Chair of Governing Council.
- Follow procedures set out by SSCP and take account of guidance issued by the Department for Education to safeguard children.
- Provide support for children subject to Early Help, Child in Need or Child Protection that is in keeping with their plan.
- Treat information with confidentiality but never promise to “keep a secret”.
- Notify the DSL or their Deputy of any child on a child protection plan or child in need plan who has unexplained absence.
- Understand Early Help and be prepared to identify and support children who may benefit from Early Help.
- Will identify children who may benefit from Early Help, liaising with the DSL in the first instance. (Options may include managing support for the child internally via the School’s pastoral support process or an Early Help Assessment). In some circumstances it may be appropriate for a member of School staff to act as the lead professional in Early Help cases.
- Liaise with other agencies that support pupils and provide early help.
- Teaching staff will adhere to the Teacher Standards which states that teachers should safeguard children’s wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- Assist the Governing Council and the Head in fulfilling their safeguarding responsibilities set out in legislation and statutory guidance.

7.2 The Head:

In addition to the role and responsibilities of all staff the Head will ensure that:

- The School fully contributes to inter-agency working in line with Working Together to Safeguard Children 2018 guidance.
- The Safeguarding and Protecting Children Policy and Procedures are implemented and followed by all staff.
- That the School has appropriate policies in place that make it clear that sexual harassment, online sexual abuse and sexual violence (including sexualised language) is unacceptable, with appropriate sanctions and support in place.
- That the School’s staff have appropriate knowledge of part 5 of KCSIE (Child-on-child sexual violence and sexual harassment).
- That all children are supported to report concerns about harmful sexual behaviour freely. That concerns are taken seriously and dealt with swiftly and appropriately, and children are confident that this is case. And that comprehensive records of all allegations are kept.
- All staff are aware of the role of the designated safeguarding lead (DSL), including the identity of the DSL and any deputies.
- Sufficient time, training, support, funding, resources, including cover arrangements where necessary, is allocated to the DSL to carry out their role effectively, including the provision of advice and support to School staff on child welfare and child protection matters, to take part in strategy discussions/meetings and other inter-agency meetings and/or support other staff to do so; and to contribute to the assessment of children.

- Opportunities are provided for a co-ordinated offer of early help when additional needs of children are identified.
- Ensure Deputy DSLs are trained to the same standard as the DSL and the role is explicit in their job description.
- Adequate and appropriate DSL cover arrangements are in place for any out of hours/out of term activities.
- Where there is a safeguarding concern that the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Child-centred systems and processes are in place for children to express their views and give feedback.
- All staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle-blowing procedures.
- Children are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.
- That allegations or concerns against staff and other adults are dealt with in accordance with guidance from Department for Education (DfE), Surrey Safeguarding Children's Partnership ("SSCP") and Surrey County Council (SCC).
- "Low-level concerns" about a member of staff/supply staff/contractor or a volunteer are recorded and reviewed. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that will be respected as far as reasonably possible. Refer to the *Low-Level Concerns Policy*.
- That statutory requirements are met to make a referral to the Disclosure and Barring Service and additionally in the case of teaching staff the Teacher Regulation Agency where they think an individual has engaged in conduct that harmed (or is likely to harm) a child; or if the person otherwise poses a risk of harm to a child.

7.3 The Designated Safeguarding Lead:

The role of the Designated safeguarding Lead sits with the Director of Safeguarding, who is a member of the Senior Leadership team. In addition to the role and responsibilities of all staff the DSL will:

- Hold the lead responsibility for safeguarding and child protection (including online safety) in the School, this responsibility is not able to be delegated.
- Have an "it could happen here" approach to safeguarding and encourage all staff to 'Think it, Report it.'
- Liaise with the local authority and work in partnership with other agencies in line with Working Together to Safeguard Children.
- Manage and submit a Request for Support Form for a child if there are concerns about suspected harm or abuse, to the Children's Single Point of Access (C-SPA), and act as a point of contact and support for school staff. Requests for support should be made securely by email to cspa@surreycc.gov.uk using the [Request for Support Form](#) urgent referrals should be made by telephone 0300 470 9100 (and ask for the priority line).
- Report concerns that a child may be at risk of radicalisation or involvement in terrorism, following the [Prevent referral process](#) and use the Prevent referral form to refer cases by e-mail to preventreferrals@surrey.pnn.police.uk. If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101 or 01483 632982 and ask to speak to the Prevent Supervisor for Surrey. The Department of Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).
- Refer cases where a crime may have been committed to the Police as required. NB: NPCC- [When to call the police](#) should help DSLs understand when they should consider calling the Police and what to expect when they do.
- Liaise with the "case manager" and Local Authority "Designated Officer" (LADO) for child protection concerns in cases which concern a member of staff/supply staff/contractor or a volunteer; and refer cases where a person is dismissed or left service due to risk/harm to a child to the Disclosure and Barring Service and Teaching Regulation Agency, as required.
- Follow DfE and KCSIE guidance 'Child-on-child Abuse' when a concern is raised that there is an allegation of a child abusing another child within the School ([see section 15](#))

- Follow guidance in part 5 of KCSIE for signs, reports and concerns of child-on-child sexual violence and sexual harassment. Be confident as to what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support when required.
- When there has been a report of sexual violence, make an immediate risk and needs assessment. Additionally, where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis and will be put in place as required.
- Take lead responsibility in understanding the filtering and monitoring systems and processes working with the IT Director and the Assistant Head (Digital Learning & EDI) to ensure effective systems are in place and system alerts for safeguarding matters are appropriately responded too, including regular testing of the filters (at least termly) and an annual review.
- Ensure all staff are aware of the filtering and monitoring on all School devices and networks and ensure training is effective in supporting staff to understand responsibilities and respond to safeguarding concerns.
- Work with SLT and other key staff to ensure that the government standards for filtering and monitoring in schools is met.
- Be available during term time (during School hours) for staff in School to discuss any safeguarding concerns. Appropriate and adequate cover arrangements will be arranged by the DSL and the School leadership for any out of hours/term activities.
- Act as a source of support and expertise in carrying out safeguarding duties for the whole School community.
- Encourage and promote a culture of listening to children and taking account of their wishes and feelings, amongst all staff.
- Access training and support to ensure they have the knowledge and skills required to carry out the role. DSL training should be updated at least every two years, include inter-agency working and Prevent, and their knowledge and skills refreshed at regular intervals but at least annually.
- Have a secure working knowledge of SSCP procedures and understand the assessment process for providing early help and statutory intervention, including the local authority levels of need criteria and referral arrangements.
- Have a clear understanding of access and referral to the local early help offer and will support and advise members of staff where early help intervention is appropriate.
- Understand and support the School delivery with regards to the requirements of the Prevent duty and provide advice and guidance to staff on protecting children from radicalisation.
- Liaise with School staff (especially pastoral support, behaviour leads, School health colleagues and the SENDCO) on matters of safety and safeguarding and consult the SSCP Levels of Need document to inform decision making and liaison with relevant agencies.
- Be alert to the specific needs of children in need, those with Special Educational Needs and Disability (SEND) and young carers.
- Understand the risks associated with online activity and be confident that they have the up to date knowledge and capability to keep children safe whilst they are online at School; in particular understand the additional risks that children with SEND face online and the associated and appropriate support they require.
- Keep detailed, accurate records (either written or using appropriate secure online software), that include all concerns about a child even if there is no need to make an immediate referral and the rationale for decisions made and action taken.
- Ensure that an indication of the existence of the additional child protection file is marked on the child's School file record.
- Ensure that when a child transfers school (including in year), their child protection file is passed to the new school as soon as possible, and within statutory timescales, ensuring secure transit and that confirmation of receipt is received.
- Ensure that where a pupil transfers school and is on a child protection plan or is a child looked after, their information is passed to the new school immediately and that the child's social worker is informed. In addition consideration should be given to a multi-agency schools transition meeting if the case is complex or on-going.
- If the transit method requires that a copy of the Child Protection file is retained until such a time that the new school acknowledges receipt of the original file, the copy should then be securely destroyed on confirmation of receipt.
- Ensure that all appropriate staff members have a working knowledge and understanding of their role in case conferences, core groups and other multi-agency planning meetings, to ensure that they

attend and are able to effectively contribute when required to do so; where a report is required, this should be shared with the parents prior to the meeting.

- Report to the Head any significant issues for example, use of the [SSCP multi-agency escalation procedures, enquiries](#) under section 47 of the Children Act 1989 and Police investigations.
- Ensure that the case holding Social Worker is informed of any child currently with a child protection plan who is absent without explanation.
- Ensure that all staff sign to say they have read, understood and agree to work within the School's Safeguarding and Protecting Children Policy and Procedures, School Rules and Staff Code of Conduct) and Keeping Children Safe in Education (KCSIE 2023) Part 1 and Annex B and ensure that the policies are used effectively.
- Organise child protection and safeguarding induction, regularly updated training and a minimum of annual updates (including online safety) for all School staff, keep a record of attendance and address any absences.
- Ensure that in collaboration with the school leadership and governors, the Safeguarding and Protecting Children Policy and Procedures are reviewed at least annually, and the procedures and implementation are updated and reviewed regularly.
- Ensure that the Safeguarding and Protecting Children Policy and Procedures is available publicly and that parents are aware that referrals about suspected harm and abuse will be made and the role of the School in this.
- Establish and maintain links with the Local Authority safeguarding partners to make sure staff are aware of training opportunities and the latest policies on local safeguarding arrangements.
- Contribute to and provide, with the Head and Chair of Governors, the "Audit of Statutory Duties and Associated Responsibilities" to be submitted biannually and data submitted annually to the Surrey County Council, Education Safeguarding Team.
- Ensure that the names of the Designated Safeguarding Lead and Deputies, are clearly advertised with a statement explaining the School's role in referring and monitoring cases of suspected abuse.
- Meet all other responsibilities as set out for DSLs in KCSIE 2023.

7.4 The Deputy Designated Safeguarding Leads:

There are seven Deputy DSLs (DDSLs). In addition to the responsibilities for all staff (at 7.1 above) the Deputy DSLs will:

- Be trained to the same standard as the Designated Safeguarding Lead and their safeguarding role will be explicit in their job description.
- Provide support and capacity to the DSL in carrying out delegated activities of the DSL; however, the lead responsibility of the DSL cannot be delegated.
- In the absence of the DSL, the Deputy Head (Pastoral) will carry out the activities necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the DSL the Deputy Head (Pastoral) will assume all of the functions above.

7.5 The Safeguarding Adviser for Boarding:

The Assistant Head (Pastoral) & DDSL will be the Safeguarding Adviser for Boarding and will provide the first point of contact for boarding staff with any safeguarding concerns during boarding hours. In addition to the responsibilities for all staff (at 7.1 above) the Safeguarding Adviser for boarding will:

- Be trained to the same standard as the Designated Safeguarding Lead and the safeguarding adviser for boarding role will be explicit in their job description.
- Provide support and capacity to the DSL in carrying out delegated activities of the DSL; however, the lead responsibility of the DSL cannot be delegated.
- During boarding hours, in conjunction with the other Deputy DSLs, carries out the activities necessary to ensure the ongoing safety and protection of boarders.

7.6 The Governing Council:

Governing Council has a strategic leadership responsibility for safeguarding arrangements at St John's and must ensure that they comply with their duties under relevant legislation. Governing Council must have regard to KCSIE, ensuring policies, procedures and training is effective and complies with the law at

all times. In particular, Governing Council should be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 and Surrey's local multi-agency safeguarding arrangements.

In addition to the role and responsibilities of all staff, all members of the Governing Council understand and fulfil their responsibilities to ensure that:

- There is a whole school approach to safeguarding and the promotion of the ethos 'it could happen here.'
- The School has effective safeguarding policies and procedures including a Safeguarding and Protecting Children Policy and Procedures, a Staff Code of Conduct, a Behaviour Policy¹ and a response to children who go missing from education.
- Policies are consistent with Surrey Safeguarding Children Partnership ("SSCP") and statutory requirements, are reviewed annually and that the Safeguarding and Protecting Children Policy and Procedures is available on the school website.
- The SSCP is informed in line with local requirements about the discharge of duties via the annual safeguarding audit.
- Ensure that the School operates thorough safer recruitment procedures and processes, and that the Single Central register (SCR) is kept up to date and reviewed regularly.
- All governors receive appropriate safeguarding and child protection (including online) training at induction to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place at St John's School are effective, and to support the delivery of a robust whole school approach to safeguarding. Governors' training should be regularly updated.
- At least one member of the Governing Council has completed safer recruitment training.
- Staff have been trained appropriately and this is updated in line with guidance and all staff have read Keeping Children Safe in Education (2023) Part 1 or Annex A as a minimum and that mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance.
- That all staff including temporary staff/supply staff, volunteers and contractors are provided with the School's Safeguarding and Protecting Children Policy and Procedures and if applicable the Staff Code of Conduct. The School takes a risk-based approach to the level of information provided to temporary staff and volunteers.
- That the School has procedures for dealing with allegations of abuse against staff (including the Head), volunteers and against other children and that a referral is made to the DBS and/or the Teaching Regulation Agency (as applicable) if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have had they not resigned.
- Policies and processes are in place to deal with concerns (including allegations) which do not meet the harm threshold or "low level concerns" as defined in KCSIE 2023.
- A nominated governor for safeguarding is identified.
- A member of the senior leadership team has been appointed by the Governing Council as the Designated Safeguarding Lead (DSL) who will take lead responsibility for safeguarding and child protection and that the role is explicit in the role holder's job description.
- That on appointment, the DSL and deputy(s) undertake interagency training (SSCP Foundation Modules 1&2) and also initially undertake DSL 'New to Role' with 'Refresher' training every two years as well as attending DSL network events to refresh knowledge and skills.
- Children are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through personal, social, health and economic education (PSHE) and relationships and sex education (RSE).
- Governing bodies and proprietors have overall strategic responsibility for filtering and monitoring systems designed to safeguard children online and the Governing Council will ensure the School has appropriate online filtering and monitoring systems in place, and will regularly review their effectiveness.
- They will ensure that the leadership team and relevant staff have awareness and understanding of the filtering and monitoring provisions in place, manage them effectively, and know how to escalate concerns when identified.
- They should review the [filtering and monitoring standards](#) and ensure all is being done to by the School to meet the standards.

¹ [Behaviour, Rewards and Sanctions](#)

- The School will comply with DfE and the Surrey County Council [Children Missing Education](#) requirements.
- The School will comply with regular data returns requested by the Local Authority, regarding all children, of statutory school age, attending alternative provision and/or on a reduced or modified timetable.
- Clear systems and processes are in place for identifying possible mental health concerns, including routes to escalate and clear referral and accountability systems.
- Enhanced DBS checks (without barred list checks, unless the governor is also a volunteer at the School) are in place for all Governors.
- Any weaknesses in safeguarding are remedied immediately.
- Through the Chair of Governors, receive and act upon any concerns about the Head via the whistleblowing or low-level concerns processes.

This will be done by:

- Regular scrutiny at Committee meetings (Safeguarding Committee, RMCC, and Education Committee in particular) including termly reports and an annual report.
- Regular meetings between the nominated Safeguarding governor and the DSL.
- Regular visits by the Nominated Safeguarding governor(s) to review practice which may include meeting with staff/pupils/key stakeholders.
- Periodic checks by the Nominated Safeguarding governor(s) of the SCR.
- External audits where necessary.

8. Confidentiality and Sharing and Withholding Information

All matters relating to child protection will be treated as confidential and only shared as per the [‘Information Sharing Advice for Practitioners’ \(DfE 2018\) guidance](#).

The school will refer to the guidance in the data protection: [toolkit for schools](#) - guidance to support schools with data protection activity, including compliance with the GDPR.

Information will be shared with staff within the school who ‘need to know’.

Relevant staff have due regard to GDPR principles which allow them to share (and withhold) information.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act 2018 and GDPR are not a barrier to sharing information where a failure to do so would place a child at risk of harm. There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.

All staff must be aware that they cannot promise a child to keep secrets which might compromise the child’s safety or wellbeing.

All staff will always undertake to gain parent/carers consent to refer a child to Social Care unless to do so could put the child at greater risk of harm, or impede a criminal investigation.

9. Child Protection Procedures

The following procedures apply to all staff working in the School and will be covered by training to enable staff to understand their role and responsibility.

The aim of our procedures is to provide a robust framework which enables staff to take appropriate action when there is **any** concern about a child’s welfare, about children in need, that a child is being harmed or abused or is at risk of harm or abuse.

The prime concern at all stages must be the interests and safety of the child. Where there is a conflict of interest between the child and an adult, the interests of the child must be paramount.

All staff are aware that very young children and those with disabilities, special needs or with language delay may be more likely to communicate concerns with behaviours rather than words. Additionally, staff will question the cause of knocks and bumps in children who have limited mobility.

If a member of staff suspects abuse, spots signs or indicators of abuse, or they have a disclosure of abuse made to them they must:

1. Act immediately. Make an initial record of the information related to the concern.
2. Report it to the DSL immediately.
3. The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available.
4. When speaking with the child, do so with tact, empathy, and neutrality. Listen but do not offer an opinion or ask leading questions. When asking questions always ask open questions and consider the **TED** principle of **T**ell me, **E**xplain to me, **D**escribe to me.
5. Make an accurate record (which may be used in any subsequent court proceedings) as soon as possible and within 24 hours of the occurrence, of all that has happened, including details of:
 - Dates and times of their observations
 - Dates and times of any discussions in which they were involved.
 - Any injuries
 - Explanations given by the child / adult
 - Rationale for decision making and action taken
 - Any actual words or phrases used by the child
6. The records must be signed and dated by the author or / equivalent on electronic based records
7. The DSL will decide whether it is appropriate to contact parents/guardians. Do not contact parents/guardians yourself.
8. In the absence of the DSL or their Deputies, staff must be prepared to refer directly to C-SPA (and the Police if appropriate) if there is the potential for immediate significant harm.

10. Following a report of concerns the DSL must:

1. [Using the SSCP Levels of Need](#), decide whether or not there are sufficient grounds for suspecting harm, in which case a request for support must be made to the C-SPA in the area the child resides and the Police if it is appropriate.
2. Normally the School should try to discuss any concerns about a child's welfare with the family and where possible to seek their agreement before making a referral to the C-SPA. However, this should only be done when it will not place the child at increased risk or could impede a Police investigation. The child's views should also be considered.

If there are grounds to suspect a child is suffering, or is likely to suffer, harm or abuse the DSL must contact the C-SPA. By sending a [Request for Support Form](#) by secure email to: cspa@surreycc.gov.uk. If a child is in immediate danger and urgent protective action is required, the Police (dial 999) must be called. The DSL must also notify the C-SPA of the occurrence and what action has been taken

3. If the DSL feels unsure about whether a referral is necessary they can phone the C-SPA to discuss concerns.
4. If there is not a risk of significant harm, the DSL will either actively monitor the situation or consider offering early help.
5. Where there are doubts or reservations about involving the child's family, the DSL should clarify with the C-SPA or the Police whether the parents should be told about the referral and, if so, when and by whom. This is important in cases where the Police may need to conduct a criminal investigation.
6. When a child needs urgent medical attention and there is suspicion of abuse the DSL or their Deputy should take the child to the accident and emergency unit at the nearest hospital, having first notified the C-SPA. The DSL should seek advice about what action the C-SPA will take and about informing

the parents, remembering that parents should normally be informed that a child requires urgent hospital attention.

7. The exception to this process will be in those cases of known FGM where there is a mandatory requirement for the teacher to report directly to the Police. The DSL should also be made aware.

11. Dealing with disclosures

11.1 All staff

- It is important to remember that a disclosure may happen at anytime. A member of staff who is approached by a child should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they need to pass information to other professionals to help keep the child and/or other children safe. The degree of confidentiality should always be governed by the need to protect the child.
- Additional consideration needs to be given to children with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.
- All staff should know who the DSL is and who to approach if the DSL is unavailable. All staff have the right to make a referral to the C-SPA or Police directly and should do this if, for whatever reason, there are difficulties following the agreed protocol, for example, they are the only adult on the School premises at the time and have concerns about sending a child home.
- Guiding principles for disclosure, the 6 R's (see Appendix 2: What to do if someone makes a disclosure):
 - Receive
 - Reassure
 - Respond
 - Record
 - Report
 - Remember

Be Ready:

- A pupil may wish to talk to you at any point. If this involves safeguarding you must speak to them immediately.
- **DO NOT ask the pupil to come back later or to make an appointment to talk to you.**
- Support the pupil by listening, reassuring, being available and transparent in what you will do.

11.2 What happens next?

It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. The member of staff should be informed by the DSL what has happened following a report being made. If they do not receive this information they should seek it out.

If they have concerns that the disclosure has not been acted upon appropriately, they might inform the Head or Safeguarding Governor of the School and/or may contact the C-SPA.

Receiving a disclosure can be upsetting for the member of staff and schools should have a procedure for supporting them after the disclosure. This might include reassurance that they have followed procedure correctly and that their swift actions will enable the allegations to be handled appropriately.

In some cases additional support might be needed, and staff should be encouraged to recognise that disclosures can have an impact on their own emotions.

12. Safeguarding concerns and allegations against adults who work with children - referral to the Local Authority Designated Officer (LADO)

Procedure

This procedure should be used in all cases in which it is alleged a member of staff, including supply staff, volunteer in a school/college, a contractor or another adult who works with children 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; or*
- *behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children*
- *behaved or been involved in an incident outside of a setting which did not involve children but could impact on their suitability to work with children*

In dealing with allegations or concerns against an adult, staff must:

- Report any concerns about the conduct of any member of staff, volunteer or other adult to the Head immediately.
- If an allegation is made against the Head the concerns need to be raised with the Chair of Governing Council as soon as possible. If the Chair is not available, then the LADO should be contacted directly (without informing the Head). If there is a conflict of interest in reporting the matter to the Head, appropriate staff should contact the LADO direct.
- There may be situations when the Head or Chair of Governing Council will want to involve the Police immediately if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.
- Once an allegation has been received by the Head or Chair of Governing Council they will contact the LADO (as part of their mandatory duty) on 0300123 1650 option 3 LADO or Email: LADO@surreycc.gov.uk immediately and before taking any action or investigation.
- Following consultation with the LADO inform the parents of the allegation unless there is a good reason not to.

In liaison with the LADO, the School will determine how to proceed and if necessary, the LADO will refer the matter to Children's Social Care and/or the Police.

If the matter is investigated internally, the LADO will advise the School to seek guidance from local authority colleagues in following procedures set out in part 4 of 'Keeping Children Safe in Education' (2023) and the SSCP procedures.

The School's internal *Procedure for dealing with safeguarding concerns and allegations against adults who work with children* (7j) is published on SharePoint and in the [Teams policy library](#).

13. Definitions of child abuse

The following definitions are taken from KCSIE 2023 and Working Together to Safeguard Children (2018). In addition to these definitions, all staff should be aware that child sexual and criminal exploitation are forms of child abuse. It should be understood that children can also be abused through honour-based violence, forced marriage or female genital mutilation.

All staff should be aware of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as substance misuse, deliberately missing education, serious violence (including violence linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images (youth produced sexual imagery) put children in danger.

To support the local context, all staff have access to the [Surrey Safeguarding Children Partnership Levels of Need Threshold Document](#).

13.1 What is abuse and neglect?

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can also be witnessing the ill treatment of others for example witnessing domestic abuse. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another child or children. Abuse can also take place wholly online or technology may be used to facilitate abuse offline.

13.2 Physical abuse

Physical abuse 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.

- **Impact of physical abuse:** can lead to neurological damage, physical injuries, disability and occasionally death. Harm may be caused directly by the abuse itself or by the abuse taking place within a wider family context of conflict. Physical abuse can be linked to aggressive behaviour, emotional behaviour problems and educational difficulties for children.

Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. But accidental injuries normally occur on the *bony prominences* – e.g. knees, shins. Injuries on the *soft* areas of the body are more likely to be inflicted intentionally and should therefore make us more alert to other concerning factors that may be present.

- **Possible signs:** bruising (without satisfactory explanation, burns (often recurring), bite marks, parents/guardians frequently alleging illness in a child, body covered up during hot weather, reluctance to take part in PE or shower, self-harm.

A body map can assist in the clear recording and reporting of physical abuse. The body map should only be used to record observed injuries and no child should be asked to remove clothing by a member of staff of the School.

In the context of the School, it is normal to ask about a noticeable injury. Concern should be increased when:

- the explanation given does not match the injury
- the explanation uses words or phrases that do not match the vocabulary of the child (adult words)
- no explanation is forthcoming
- the child (or the parent/carer) is secretive or evasive
- the injury is accompanied by allegations of abuse or assault

13.3 Neglect

Neglect is 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. It may also include a lack of responsiveness to a child's basic emotional needs. Neglect is a lack of care, but poverty and lack of information or adequate services can be contributory factors.

- **Impact of neglect:** Severe neglect of young children is associated with major impairment to growth and development including brain development. Persistent neglect can lead to serious impairment of health and development and long-term difficulties with social and emotional functioning, relationships and educational attainment. Children who experience neglect are at greater risk for developing mental health difficulties including depression. They may also experience relationship difficulties in later life including with their own children.

Key types of neglect:

Medical- withholding or failing to respond to medical needs including health and dental.

Emotional- lack of emotional warmth, touch, and nurturance

Nutritional- lack of access to proper diet, which can impact development.

Educational- poor school attendance and failure to ensure an education.

Physical- failure to meet a child's basic needs for food, clothing, shelter and not ensuring proper supervision or keeping them safe.

Neglect is a difficult form of abuse to recognise and is often seen as less serious than other categories. It is, however, very damaging: children who are neglected often develop more slowly than others and may find it hard to make friends and fit in with their peer group.

Neglect is often noticed at a stage when it may not pose a risk to the child. The duty to safeguard and promote the welfare of children (*What to do if You're Worried a Child is Being Abused* DfE 2015) would suggest that an appropriate intervention or conversation at this early stage can address the issue and prevent a child continuing to suffer until it reaches a point when they are at risk of harm or in significant need.

The [Neglect Risk Assessment Tool](#) is available to provide a more detailed information regarding the assessment of neglect. Neglect is often linked to other forms of abuse, so any concerns School staff have should be discussed with the DSL.

13.4 Emotional Abuse

The persistent emotional maltreatment of a child such as to cause severe and persistent 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 cyber bullying), 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 in isolation.

- **Impact of emotional abuse;** emotional abuse has an impact on a child's mental health, behaviour and self-esteem. It can be especially damaging in infancy and as a child is developing a sense of self. Issues such as domestic abuse, parental mental health and/or substance misuse problems may be more likely to expose children to emotional abuse.

It is sometimes possible to spot emotionally abusive behaviour from parents and carers to their children, by the way that the adults are speaking to, or behaving towards children. An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later

- Emotional abuse is difficult to define, identify/recognise and/or prove.
- Emotional abuse is chronic and cumulative and has a long-term impact.
- All kinds of abuse and neglect have emotional effects although emotional abuse can occur by itself.
- Children can be harmed by witnessing someone harming another person – as in domestic abuse.
- Most harm is produced in low warmth, high criticism homes, not from single incidents.

13.5 Sexual abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. Children might not understand that what's happening is abuse or that it's wrong. And they might be afraid to tell someone. Sexual abuse can happen anywhere – and it can happen in person or online.

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 online).

- **Impact of sexual abuse:** the experience of sexual abuse can significantly impact a child's self-esteem, emotional development and understanding of healthy sexual relationships. It can have both short- and

long-term effects and the impact of sexual abuse can last a lifetime. Experiencing sexual abuse can result in poor mental health, relationship problems, difficulty coping and trusting, addiction issues.

Sexual abuse is often perpetrated by people who are known and trusted by the child – e.g., relatives, family friends, neighbours, babysitters, and people working with the child in School, faith settings, clubs or activities. Children can also be subject to child sexual exploitation.

Sexual exploitation is seen as a separate category of sexual abuse. The SSCP professional guidance provides School staff with information regarding indicators of CSE (further information about CSE is available below).

Characteristics of child sexual abuse:

- it is often planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic
- grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent (this may occur online)
- grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives.

Most people who sexually abuse children are men, but women and other children can commit sexual abuse too.

14. Sexual violence and sexual harassment between children in schools

Child-on-Child Abuse - Policy Framework

The DfE states that: *“All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school or college and online.”* Child-on-child abuse is the term chosen by the DfE and, by definition, it applies to abuse by one child of another child – regardless of the age, or stage of development, or any age differential between them

Child-on-child abuse can take many forms including:

- bullying (including cyber-bullying, 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, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes, and online sexual harassment, which may stand alone or be a broader part of abuse
- consensual and non-consensual sharing of nude 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
- initiation/hazing type violence and rituals

Sexual violence and sexual harassment can occur between children of any age and sex. It can occur through a single child or a group of children sexually assaulting or sexually harassing a single child or group of children (and may occur inside or outside school, or online). It is more likely that girls will be victims and boys perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously.

Children who are victims of sexual violence and sexual harassment will find the experience stressful and distressing. This will, in all likelihood, adversely affect their education attainment as well as their emotional well-being. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physically and verbally) and are never acceptable.

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of school should not be downplayed and should be treated equally seriously. A victim should never be

given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, adults, and School staff are supported and protected as appropriate.

Policy

We believe that all children have a right to attend School and learn in a safe environment. Children should be free from harm by adults and other children in School.

We recognise that children are capable of abusing other children and this will be dealt with under our Safeguarding and Protecting Children Policy and Procedures and in line with KCSIE (2023) part 5 child-on-child sexual violence and harassment.. We recognise 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.

We are clear that sexual violence and sexual harassment is not acceptable. Abuse is abuse and will never be tolerated or passed off as *“banter”*, *“just having a laugh”*, it will never be tolerated and is not an *inevitable part of growing up*. We will minimise the risk of child-on-child abuse by:-

Prevention

- Taking a whole School approach to safeguarding and child protection
- Providing training to staff
- Providing a clear set of values and standards, underpinned by the School Rules, Staff Code of Conduct, and pastoral support; and by a planned programme of evidence-based content delivered through the curriculum.
- Engaging with specialist support and interventions.

Responding to reports of sexual violence and sexual harassment

- Children making any report of sexual violence or sexual harassment including “upskirting” (The Voyeurism Offences Act 2019) will be taken seriously, kept safe and be well supported.
- If the report includes an online element or involves mobile phones staff will be mindful of the Searching, Screening and Confiscation: advice for schools (DfE 1 September 2022) guidance.
- Staff taking the report will inform the DSL or the Deputy DSL immediately.
- Staff taking a report will never promise confidentiality.
- Parents or carers should usually be informed (unless this would put the child at greater risk).
- If a child is at risk of harm, is in immediate danger, or has been harmed, a Request for Support will be made to the C-SPA securely email: cspa@surreycc.gov.uk or telephone 0300 470 9100, as appropriate.

Risk Assessment

Following a report the DSL will make an immediate risk and needs assessment on a case-by-case basis of all children involved. A safety plan for any child involved will also be completed to ensure the safety of those children involved and the wider pupil body.

The risk assessment will consider;

- The victim, especially their protection and support.
- The alleged perpetrator, their support needs and any disciplinary action.
- for intra familial harms, any necessary support for siblings following incidents.
- All other children at the School.
- The victim and the alleged perpetrator sharing classes and space at School.
- Safety needs of the wider pupil body.

The risk assessment and safety plan will be recorded and kept under review.

Where there has been other professional intervention and/or other specialist risk assessments, these professional assessments will be used to inform the School's approach to supporting and protecting children.

Support regarding risk assessments can be accessed from the [Education Safeguarding Team](#) - (or email to education.safeguarding@surreycc.gov.uk)

Action: The DSL will consider

- The wishes of the victim.
- The nature of the incident including whether a crime has been committed and the harm caused.
- Ages of the children involved.
- Developmental stages of the children.
- Any power imbalance between the children.
- Any previous incidents.
- Ongoing risks.
- Other related issues or wider context.

Options:

- Manage internally.
- Early Help intervention.
- Request for support to the C-SPA.
- Report to the Police (generally in parallel with a request for support to the C-SPA).

Ongoing Response:

The DSL will manage each case individually and will ensure the risk assessment and safety plan is reviewed regularly with relevant partner agencies, for example the Police and Children's Social Care.

Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim.

The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart on School premises and on transport where appropriate. The DSL will also consider any safety needs of the whole pupil body.

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the School will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and may lead to the view that allowing the perpetrator to remain in the same School would seriously harm the education or welfare of the victim (and potentially themselves and other children).

Where a criminal investigation into sexual assault leads to a conviction or caution, the School will, if it has not already, consider any suitable sanctions in light of their behaviour policy, which may include consideration of permanent exclusion. Where the perpetrator is going to remain at the School, the Head should continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on School premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

The victim, alleged perpetrator and any other children and adults affected will receive appropriate support and safeguards on a case-by-case basis.

The School will take any disciplinary action against the alleged perpetrator in accordance with the relevant School behaviour policy.

The School recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.

15. Physical Abuse

While a clear focus of child-on-child abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from child to child can also be abusive. These are equally not tolerated and if it is believed that a crime has been committed, will be reported to the Police. The principles from the anti-bullying policy will be applied in these cases, with recognition that any Police investigation will need to take priority.

16. Harmful Sexual Behaviour

The [Brook Traffic Light Tool](#) (see [Appendix 3](#)) uses a traffic light system to categorise the sexual behaviours of young people and once Brook training has been undertaken it can be used to help professionals:

- Make decisions about safeguarding children and young people
- Assess and respond appropriately to sexual behaviour in children and young people
- Understand healthy sexual development and distinguish it from harmful behaviour
- By categorising sexual behaviours, School can work with other agencies to the same standardised criteria when making decisions and can protect children and young people with a multi-agency approach.

The School recognises that it is vital that professionals agree on how behaviours should be categorised regardless of culture, faith, beliefs, and their own experiences or values.

17. Anti-Bullying/Cyberbullying

The School recognises the importance of challenging abusive behaviour between peers. The school's policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures.

We keep a record of known bullying incidents which is shared with, and analysed by the Governing Council. All staff are aware that children with SEND and/or differences/perceived differences are more susceptible to being bullied/victims of child abuse.

When there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm' a bullying incident should be addressed as a child protection concern. If the anti-bullying procedures are seen to be ineffective, the Head and the DSL will also consider child protection procedures.

PSHE education regularly provides opportunities for children to understand bullying is wrong, its impact and how to deal with it.

18. Online Safety/Cybercrime

The School has an *Online Safety Policy* which explains how we try to keep children safe in School and how we respond to online safety incidents.

Children increasingly use electronic equipment on a daily basis to access the internet, share and view content and images via social media sites such as Facebook, twitter, Instagram, snapchat and voodoo and for online gaming.

Some adults and other children use these technologies to harm children. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing children to engage in extremist or sexual behaviour involving webcam photography or face-to-face meetings.

Children may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders.

Children are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated. The Assistant Head (Digital Strategy) and online safety co-ordinator is Mark Sartorius.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the DSL (or a deputy), will consider a referral into the [Cyber Choices](#) programme.

This programme aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

19. Racist Bullying and other 'Hate' Incidents

The School will not tolerate bullying or any other form of hostility motivated by prejudice based on disability, race, religion, sexual orientation or other protected characteristics of the Equality Act 2010. Our policy, procedures and prevention strategy on racist and other 'hate' incidents are set out separately in the Anti-Bullying Policy and Procedures and acknowledge that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of racist bullying and other 'hate' incidents.

20. Radicalisation, Extremism and Terrorism

[The Revised Prevent duty guidance for England and Wales \(2021\)](#) under section 26 of the Counter-Terrorism and Security Act 2015 places a duty on education and other children's services to have due regard to the need to prevent people from being drawn into terrorism.

Extremism is defined 'as 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs'. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

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

Some children are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal or dangerous. This can happen both online and offline.

The School is clear that exploitation of vulnerable children and radicalisation should be viewed as a safeguarding concern and follows the Department for Education guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism.

The School seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

School staff receive training to help identify early signs of radicalisation and extremism.

Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and the School follows the [DfE advice Promoting Fundamental British Values as part of SMSC \(spiritual, moral, social and cultural education\) in Schools \(2014\)](#).

The Head and the Designated Safeguarding Lead (DSL) will assess the level of risk within the School and put actions in place to reduce that risk. Risk assessment may include, [due diligence checks for external speakers and private hire of facilities](#), anti-bullying policy and other issues specific to the School's profile, community and philosophy.

When any member of staff has concerns that a child may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL in the first instance. They should then follow the safeguarding procedures and refer cases by e-mail to preventreferrals@surrey.pnn.police.uk following the [Prevent](#)

[referral process](#) and use the Prevent referral form. If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101 or 01483 632982 and ask to speak to the Prevent Supervisor for Surrey.

The Department for Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. See KCSIE Annex B for more information.

The DfE provides guidance and additional support (see KCSIE Annex B “Further Information”) including guidance on [the use of social media for online radicalisation](#). The Home Office has developed three e-learning modules on the Prevent Duty and Channel, links can be found in KCSIE Annex B.

20.1. Indicators of vulnerability to radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

Extremism is defined by the Crown Prosecution Service as:

- The demonstration of unacceptable behaviour by using any means or medium to express views which:
 - Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
 - Seek to provoke others to terrorist acts;
 - Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
 - Foster hatred which might lead to inter-community violence in the UK.

There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

Children may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that School staff are able to recognise those vulnerabilities.

Indicators of vulnerability include:

- Identity Crisis – the child is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
- Personal Crisis – the child may be experiencing family tensions; a sense of isolation; and low self esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
- Personal Circumstances – migration; local community tensions; and events affecting the child's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
- Unmet Aspirations – the child may have perceptions of injustice or a feeling of failure,
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration;
- Special Educational Needs and Disability (SEND) – children may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

The Home Office [revised Prevent duty guidance](#) should be referred to.

21. Domestic Abuse

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

The School is enrolled onto the Operation Encompass scheme, a joint project between Surrey Police, Surrey Domestic Abuse Service and Surrey Schools; where every school day our DSL is notified of all domestic abuse incidents that have occurred and been reported to Police in the previous 24 hours which involved a child at this School (72 hours on a Monday morning). This provides an opportunity for us to ensure the right support is in place at the right time for children who are experiencing domestic abuse.

22. Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of child sexual abuse.

It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. All staff are aware of the link between online safety and vulnerability to CSE.

Any concerns that a child is being or is at risk of being sexually exploited should be passed immediately to the DSL.

The School is aware there is a clear link between regular non-attendance at School and CSE. Staff will consider a child to be at potential CSE risk in the case of regular non-attendance at School and make reasonable enquiries with the child and parents to assess this risk.

All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) will consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

The DSL will consider the published SSCP guidance and advice when there is a concern that a child is being or is at risk of being sexually exploited or where indicators have been observed that are consistent with a child who is being or who is at risk of being sexually exploited.

In all cases if the DSL identifies any level of concern the DSL should contact the C-SPA and email a Request for Support Form. If a child is in immediate danger the Police should be called on 999.

The School is aware that often a child is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. As a consequence the child may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse. Children also rarely self-report CSE so staff must be particularly vigilant to potential indicators of risk.

The School includes the risks of sexual exploitation in the PSHE and RSE curriculum. Children will be informed of the grooming process and how to protect themselves from people who may potentially be

intent on causing harm. They will be supported in terms of recognising and assessing risk in relation to CSE, including online, and knowing how and where to get help.

23. Child Criminal Exploitation (CCE) and Gangs

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity.

There are a number of areas in which children are put at risk by gang activity, both through participation in, and as victims of, gang violence which can be in relation to their peers or to a gang-involved adult in their household.

A child who is affected by gang activity or serious youth violence may have suffered, or may be likely to suffer, significant harm through physical, sexual and emotional abuse or neglect.

Children can be particularly vulnerable to recruitment into gangs and involvement in gang violence. This vulnerability may be exacerbated by risk factors in an individual's background, including violence in the family, involvement of siblings in gangs, poor educational attainment, or poverty or mental health problems.

Criminal exploitation of children is a typical feature of county lines criminal activity. Key identifying features of involvement in county lines are when children are missing, when the victim may have been trafficked for transporting drugs, a referral to the National Referral Mechanism should be considered with Social Care and Police colleagues.

A child who is affected by gang activity, criminal exploitation or serious youth violence can be at risk of significant harm through physical, sexual and emotional abuse. Girls may be particularly at risk of sexual exploitation.

Any concerns that a child is being or is at risk of being criminally exploited will be passed without delay to the DSL. The School is aware there is a clear link between regular non-attendance at School and exploitation. Staff will consider a child to be at potential risk in the case of regular non-attendance at School and make reasonable enquiries with the child and parents to assess this risk.

A request for support to the C-SPA will be made when any concern of harm to a child as a consequence of gang activity including child criminal exploitation becomes known. The DSL will contact the C-SPA. If there is concern about a child's immediate safety, the Police will be contacted on 999.

For more information about **County Lines** please speak to the DSL and refer to KCSIE Annex B.

24. Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the [Modern Slavery Statutory Guidance](#).

25. Sharing nudes and semi-nudes: Guidance for staff responding to incidents

The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is unlawful.

Sharing Nudes/Semi-Nudes refers to both images and videos where:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18.

- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

All incidents of this nature should be treated as a safeguarding concern and in line with the UKCCIS guidance [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)

Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child is child sexual abuse and should be responded to.

If a member of staff becomes aware of an incident involving making or sharing nudes/semi-nudes, they should follow the child protection procedures and refer to the DSL immediately.

The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff must not view, copy, or print the images.

The DSL should hold an initial review meeting with appropriate School staff and hold subsequent interviews with the children involved (if appropriate).

Parents and carers should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the child at risk of harm.

At any point in the process if there is concern a child has been harmed or is at risk of harm a request for support should be made to the C-SPA and/or the Police as appropriate.

Immediate request for support at the initial review stage should be made to Children's Social Care/Police if:

- The incident involves an adult.
- There is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to SEND).
- What you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent.
- The imagery involves sexual acts.
- The imagery involves anyone aged 12 or under.
- There is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.

If none of the above apply then the DSL will use their professional judgement to assess the risk to children involved and may decide, with input from the Head, to respond to the incident without referral to the C-SPA or the Police.

During the decision making the DSL will consider if:

- There is a significant age difference between the sender/receiver.
- There is any coercion or encouragement beyond the sender/receiver.
- The imagery was shared and received with the knowledge of the child in the imagery.
- The child is vulnerable, for example subject to Child in Need, Child Protection or Early Help plans, Looked After, SEND.
- There is a significant impact on the children involved.
- The image is of a severe or extreme nature.
- The child involved understands consent.
- The situation is isolated or if the image been more widely distributed.
- There other circumstances relating to either the sender or recipient that may add cause for concern.
- The children have been involved in incidents relating to youth produced sexual imagery previously.

If any of these circumstances are present the situation will be referred according to our child protection procedures, including referral to the C-SPA or the Police.

The DSL will record all incidents of making, sharing and sending nudes and semi-nudes including the actions taken, rationale for actions and the outcome.

26. Upskirting

Upskirting is the act of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification or to cause the victim humiliation, distress or alarm. Upskirting is now a criminal offence under the Voyeurism (Offences) Act 2019.

27. Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act (2003). It is a form of child abuse and violence against women. [A mandatory reporting duty requires teachers to report 'known' cases of FGM in under 18s](#), which are identified in the course of their professional work, to the police.

The duty applies to all persons in School who are employed or engaged to carry out 'teaching work' in the School, whether or not they have qualified teacher status.

The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the Designated Safeguarding Lead, however the DSL should be informed.

If a teacher is informed by a girl under 18 that an act of FGM has been carried out on her or a teacher observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth, the teacher should personally make a report to the Police force in which the girl resides by calling 101. **The report should be made immediately.**

School staff are trained to be aware of risk indicators of FGM.

Concerns about FGM outside of the mandatory reporting duty should be reported using the School's child protection procedures. Staff should be particularly alert to suspicions or concerns expressed by female children about going on a long holiday during the summer holiday.

There should also be consideration of potential risk to other girls in the family and the wider community. Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the Police, including dialling 999 if appropriate.

There are no circumstances in which a teacher or other member of staff should examine a girl.

28. Forced Marriage

A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

Forced marriage is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.

A forced marriage is not the same as an arranged marriage which is common in many cultures. The families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

School staff should never attempt to intervene directly as a School or through a third party. Contact should be made with the C-SPA and/or the Forced Marriage Unit 200 7008 0151.

29. Honour-based abuse

Honour based abuse (HBA) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

Honour based abuse might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion;
- want to get out of an arranged marriage; become involved with a boyfriend or girlfriend from a different culture or religion;
- want to get out of an arranged marriage;
- want to get out of a forced marriage
- wear clothes or take part in activities that might not be considered traditional within a particular culture

It is considered a violation of human rights and may be a form of domestic and/or sexual abuse.

30. Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. It is important that young people are given practical advice on how to keep themselves safe and provision will focus on building pupils' confidence and abilities rather than simply warning them about all strangers. Refer to the DSL and KCSIE Annex B for further advice about how to support our pupils if they are affected by these issues.

31. Children and the court system

Children and young people are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. Refer to the DSL and KCSIE Annex B for further advice about how to support our pupils if they are affected by this issue.

Children may also be involved with the courts due to family separation and the making of child arrangements orders. CAFCASS, Child and Family Court Advisory Support Service, may be engaged with families and children and the School may be asked to engage and will provide support to pupils during this process.

32. Children with family members in prison

[NICCO](#), the National Information Centre on Children of Offenders, provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children. More information is available in KCSIE Annex B and from the DSL.

33. Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (and deputies) should be aware of contact details and referral routes to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Homelessness can also occur for 16-17 year olds who are living independently from their parents/guardians. Children's Social Care will be the lead agency for these children and the DSL will ensure appropriate referrals are made based on individual children's circumstances.

34. One Chance Rule

All staff are aware of the 'One Chance' Rule' in relation to forced marriage, FGM and HBA. Staff recognise they may only have one chance' to speak to a child who is a potential victim and have just one chance to save a life.

The School are aware that if the victim is not offered support following disclosure that the 'One Chance' opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBA cases.

35. Private Fostering Arrangements

A [private fostering](#) arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 years old or 18 years old if the child is disabled.

Looked After Children by the local authority or those who are placed in residential schools, children's homes or hospitals are not considered to be privately fostered.

Private fostering occurs in all cultures and children may be privately fostered at any age.

The School recognises that most privately fostered children remain safe and well but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the child has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Social Care immediately. However, where a member of staff becomes aware that a child may be in a private fostering arrangement they will raise this with the DSL and the DSL will notify the C-SPA immediately.

36. Looked After Children

The most common reason for children becoming looked after is because of abuse and neglect.

The School will ensure that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child and contact arrangements with birth parents or those with parental responsibility.

The DSL and Nominated Governors for looked after children will have the appropriate level training to equip them with the knowledge and skills to undertake their role.

The DSL has details of the child's social worker and the name and contact details of the Surrey County Council's Head of Virtual School.

37. Children with Special Educational Needs (SEN) and Disabilities

We are aware that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- being more prone to peer group isolation than other children;
- the potential for children with SEN and disabilities (or certain medical conditions) being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers. To address these additional challenges, we provide extra pastoral support for children with SEN and disabilities.

38. Children Missing Education

All children are entitled to an efficient, full time education which is suitable to their age, ability, aptitude and any SEND they may have.

The School recognises that children missing education can be a vital warning sign of a range of safeguarding possibilities. They are also at significant risk of underachieving, being victims of abuse and harm, exploitation, radicalisation, and becoming NEET (not in education, employment or training) later in life.

Where possible the School will hold more than one emergency contact number for each child.

The School will ensure that there is a record of joiners and leavers as defined in [The Education \(Pupil Registration\) \(England\) 2006](#).

When removing a child's name, the School will notify the Local Authority of: (a) the full name of the child, (b) the full name and address of any parent with whom the child normally resides, (c) at least one telephone number of the parent, (d) the child's future address and destination school, if applicable, and (e) the ground in regulation 8 under which the child's name is to be removed from the School register. The School will make reasonable enquiries to establish the whereabouts of a child jointly with the Local Authority, before deleting the child's name from the School register if the deletion is under regulation 8(1), sub-paragraphs (f) (iii) and (h) (iii) of [The Education \(Pupil Registration\) \(England\) 2006](#).

The School will:

- Enter pupils on the admissions register on the first day on which the School has agreed, or has been notified, that the pupil will attend the School.
- Notify the Local Authority within five days of adding a child's name to the admission register. The notification must include all the details contained in the admission register for the new pupil.
- Monitor each child's attendance through their daily register and follow the School's procedure in cases of unauthorised absence.
- Remove a child's name from the admissions register on the date that the child leaves the School.
- The School will notify the Local Authority when they are about to remove a child's name from the School register under any of the fifteen grounds listed in the regulations, no later than the date that the child's name is due to be removed.
- Where parents notify the School, in writing, of their intention to Electively Home Educate (EHE) the School will forward a copy of the letter to the Local Authority Education Inclusion Team.
- Where parents orally indicate that they intend to withdraw their child to be home educated and no letter has been received, the School will not remove the child from roll and will notify Education Inclusion Team at the earliest opportunity.

39. Pupils Missing Out On Education (PMOOE)

Most children engage positively with school and attend regularly. However, in order to flourish, some children require an alternative education provision or may require a modified timetable to support a return to full time education provision. It is recognised that children accessing alternative provision or a reduced or modified timetable may have additional vulnerabilities. Ofsted refer to these as Pupils Missing Out On Education (PMOOE), because they are not accessing their education in school in the 'usual way'.

- The School will gain consent (if required in statute) from parents to put in place alternative provision and/or a reduced or modified timetable;
- The School will ensure that and parents (and the Local Authority where the child has an Education Health Care Plan (EHCP)) are given clear information about alternative provision placements and reduced or modified timetables: why, when, where, and how they will be reviewed;
- The School will keep the placement and timetable under review and involve parents in the review. Reviews will be frequent enough to provide assurance that the off-site education and/or modified timetable is achieving its objectives and that the child is benefitting from it;
- The School will monitor and track children attending alternative provision to ensure that the provision meets the needs of the child;
- The School will comply with regular data returns requested by the Local Authority, regarding all pupils, of statutory school age, attending alternative provision and/or on a reduced / modified timetable;
- The School leadership will report to governors any formal direction of a child to alternative provision to improve behaviour.
- The School leadership will report to governors information regarding the use and effectiveness of alternative provision and modified/reduced timetables.

40. School Attendance and Behaviour

Additional policies and procedures are in place regarding School attendance and behaviour.

The School recognises that absence from School and exclusion from School may be indicators of abuse and neglect, including the exploitation of children. The DSL will regularly liaise with members of School

staff with responsibility for behaviour and attendance to ensure risk is identified and appropriate intervention is in place to protect children from harm.

The School will work in partnership with Surrey Police and other partners for reporting children that go missing from the School site during the School day. Staff will be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

41. Restrictive Physical Intervention

We acknowledge that staff must only ever use physical intervention as a last resort, when a child is or at immediate risk of harming themselves or others, and that at all times it must be the minimal force necessary to prevent injury to another person. Such events should be fully recorded and signed by a witness.

Staff who are likely to need to use physical intervention will be appropriately trained in Crisis Prevention Institute (CPI) techniques.

Staff understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection and/or disciplinary procedures.

We recognise that sometimes touch is appropriate in the context of working with children, and all staff have been given safe practice guidance to ensure they are clear about their professional boundaries.

When applying disciplinary measures such as physical intervention or isolation for children with SEND the School will consider the risks, given the additional vulnerabilities of these children.

Surrey County Council guidance [Touch and the use of restrictive Physical Intervention When Working with Children and Young People](#) provides further detailed information. Please also see the School's Restrictive Physical Intervention Policy and Procedure (B3b).

42. Whistleblowing

We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.

All staff, including temporary staff/supply staff and volunteers should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the School's safeguarding arrangements. If it becomes necessary to consult outside the School, they should speak in the first instance, to the Area Schools Officer or LADO in accordance with the Whistleblowing Policy.

The NSPCC whistleblowing helpline is also available for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about a way a concern is being handled by their School. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk.

St John's is a community that promotes respect and mutual tolerance. We hope that pupils, staff parents and guardians will always feel able to take up any issues or worries that they may have with the School.

Parents should be informed about any concerns regarding their children, as the adults with primary legal responsibility for their welfare. It is important that we are honest and open in our dealings with parents. However, safeguarding concerns must be referred to the DSL or the Head who will decide on the appropriate response. In a very few cases, it may not be right to inform parents of our concerns immediately as that action could prejudice any investigation or place the child at further risk. In such cases advice will be sought and followed from the C-SPA.

Every pupil should feel able to raise concerns with any member of staff whom they feel they can trust and they are made aware of this through the Pupil Handbook. Pupils, parents and staff must feel that they can raise any concern, no matter how small, and the School recognises that listening is an important part of

safeguarding children against abuse and neglect. Any expression of dissatisfaction or disquiet in relation to a pupil will be listened to and acted upon in order to safeguard his/her welfare. A copy of the School's complaints procedure is available on the School's website and can be sent to any parent on request

Staff should feel able to raise concerns about poor or unsafe practice and potential failures in the School's safeguarding regime. The whistleblowing policy (available on SharePoint) is in place for such concerns to be raised with the School Management and Governing Council. All staff are given training on this. Where a staff member feels unable to raise an issue with the School, and they feel it is necessary to seek advice outside the School, advice can be sought from Public Concern at Work on 020 7404 6609, or helpline@pcaw.co.uk.

For both pupils and staff there will be immunity from retribution or disciplinary action for whistleblowing in good faith. Whistleblowing regarding the Head should be made to the Chair of the Governing Council in the first instance.

43. Health and safety, extended school activities and educational visits

The School's *Health and Safety Policy* and *Educational Visits Policy* are set out in separate documents and reflect the consideration given to the protection of our children both physically and within the School environment and away from the School when undertaking 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 (usually the Operations Manager) will check that the service or activity providers have appropriate procedures in place.

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 Educational Visits Policy when arranging and organising off-site trips and must use the online management tool (Evolve) to manage the trip. This will ensure that all trips have the necessary documentation and have been risk assessed. In the base overseas and risky activities an external consultant will add their approval.

44. Photography and images

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reason. Sadly, some people abuse children through taking or using images, so we must ensure that we have appropriate safeguards in place. To protect children, we will:

- Seek their and their parents' consent for photographs to be taken or published (for example on our website or in newspapers or publications).
- Ensure that children are appropriately dressed.
- Encourage children to tell us if they are worried about any photographs that are taken of them.

Further guidance for staff on the taking and storing of photographs and images of pupils is contained in the Staff 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 will be subject to appropriate vetting checks.

CCTV is located around the School but it is not installed in classrooms, changing rooms or toilet areas. The CCTV system is registered with the Information Commissioner's Office.

Photographs, digital images or videos of pupils may be taken by parents and family members, either on site or when pupils are involved in organised activities off site. Parents and family members are welcome to take images of School events which may include images of other pupils. To respect the privacy of others and in some cases for protection purposes, these images should not be made publicly available on social networking sites or on other public areas of the internet. If the behaviour of the 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 much detail as possible, to allow the concern to be followed up. Police will be informed in cases of serious concern.

45. Boarding

Children can be particularly vulnerable in residential settings and boarding staff should be particularly alert to pupil relationships and the potential for peer abuse. Boarding policies and procedures, including additional training, will make appropriate provision for responding to these issues. Further guidance is provided to boarding staff within the Boarding Handbook. In managing safeguarding within the boarding environment, the School complies with the National Minimum Standards for Boarding Schools (2022).

Staff must be vigilant to the fact that flexi-boarders and those who are new to boarding may treat boarding as a 'sleepover' and not respect appropriate boundaries.

Safeguarding procedure during boarding hours:

The Assistant Head (Pastoral) will be the Safeguarding Advisor and DDSL for boarding and will provide the first point of contact for boarding staff during boarding hours.

During boarding hours if boarding staff or staff on site are concerned about the well-being or safety of a child, staff must immediately contact: Mr Ben Peart, Assistant Head (Pastoral)
Mobile: 07391 682165
bpeart@stjohns.surrey.sch.uk

If appropriate, the Assistant Head (Pastoral) will contact the DSL or Deputy DSLs or the Head to report the incident and clarify next steps.

A rota confirming personnel and contact details will be published. Boarding staff will be informed directly, and the rota will be clearly displayed in appropriate locations within all Boarding Houses.

46. Monitoring and review

The DSL will ensure that this policy is reviewed at least annually, and its procedures and implementation are updated and reviewed regularly, working with the Governing Council as necessary. 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 Council.

The Governing Council will undertake an annual review of this policy and its procedures including good cooperation with local agencies and of the efficiency with which the relevant duties have been discharged. The annual review and any changes to the policy will be signed off by the Governing Council at a full meeting, where the review will be discussed and the discussion minuted.

Any child protection incidents at the School will be followed by a review of procedures within the School. 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.

In addition to this safeguarding is reviewed in the following ways:

- Bi-weekly meetings between the Head, Deputy Head (Pastoral), and DSL.
- Regular meetings of the safeguarding team (including Nominated Governor for Safeguarding).
- Safeguarding as a standing agenda item at Governing Council, Senior Management Team (SMT) and Senior House Staff (SHS), and HoD meetings.
- Regular meetings with nominated Governor(s).
- Bi-weekly review of Early Help pupils with Senior House Staff.
- Bi-weekly meeting of the Deputy Head (Pastoral) and DSL to review pupils with pastoral and safeguarding need
- Discussions with School Prefects and Heads of School.
- Pupil questionnaires.

- Regular review of parental concerns and parental questionnaires.
- Logs of bullying and/or racist/hate behaviour incidents are reviewed regularly.
- Daily management of filtering and monitoring alerts, and review of weekly reports.

47. Further advice on safeguarding and child protection is available from:

[Surrey County Council Education Safeguarding Team](#)

NSPCC: <http://www.nspcc.org.uk/>

ChildLine: <http://www.childline.org.uk/pages/home.aspx>

Anti-Bullying Alliance: <http://anti-bullyingalliance.org.uk/>

Beat Bullying: <http://www.beatbullying.org/>

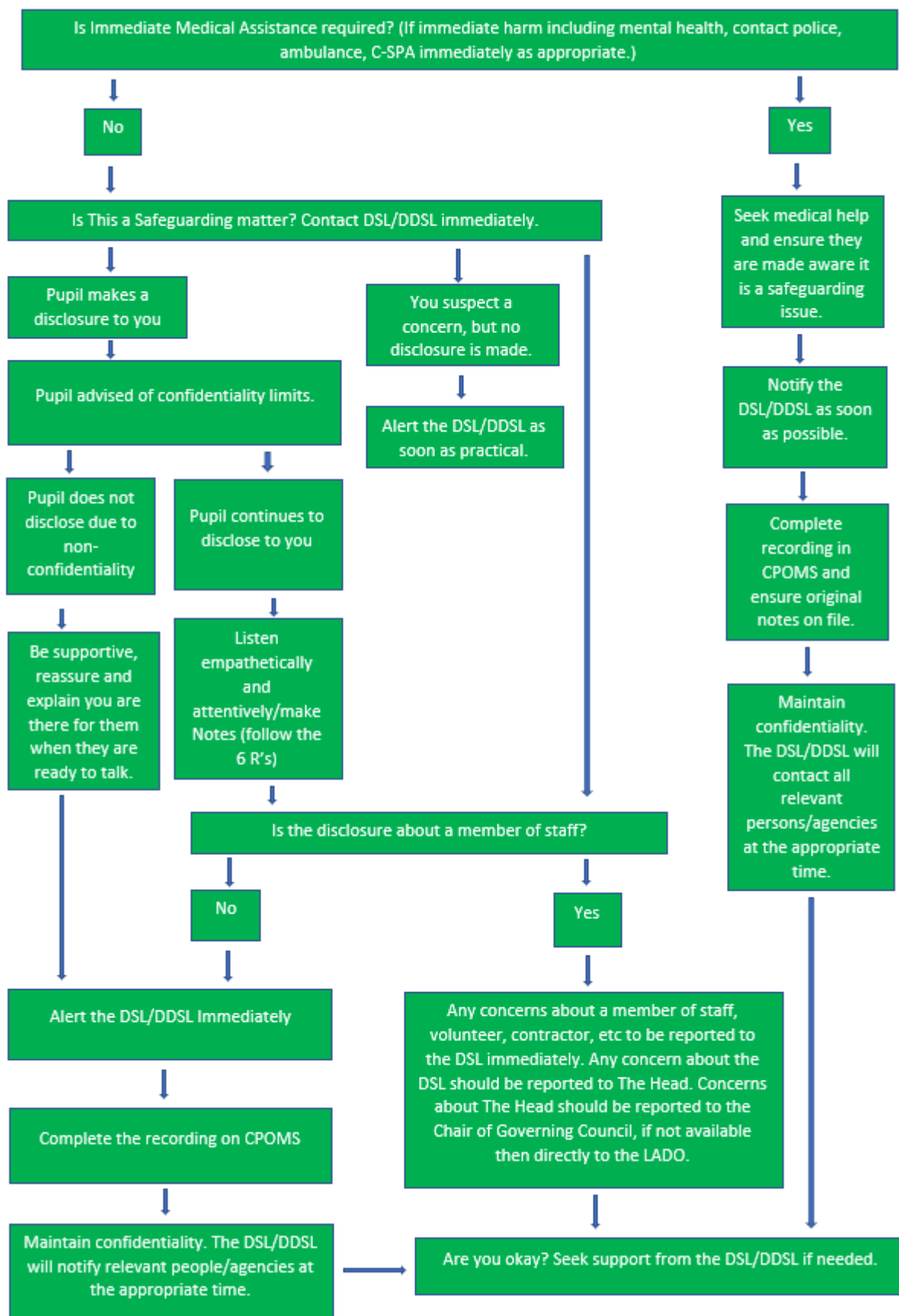
Childnet International –making the internet a great and safe place for children. Includes resources for professionals and parents <http://www.childnet.com/>

Thinkuknow (includes resources for professionals and parents) <https://www.thinkuknow.co.uk>

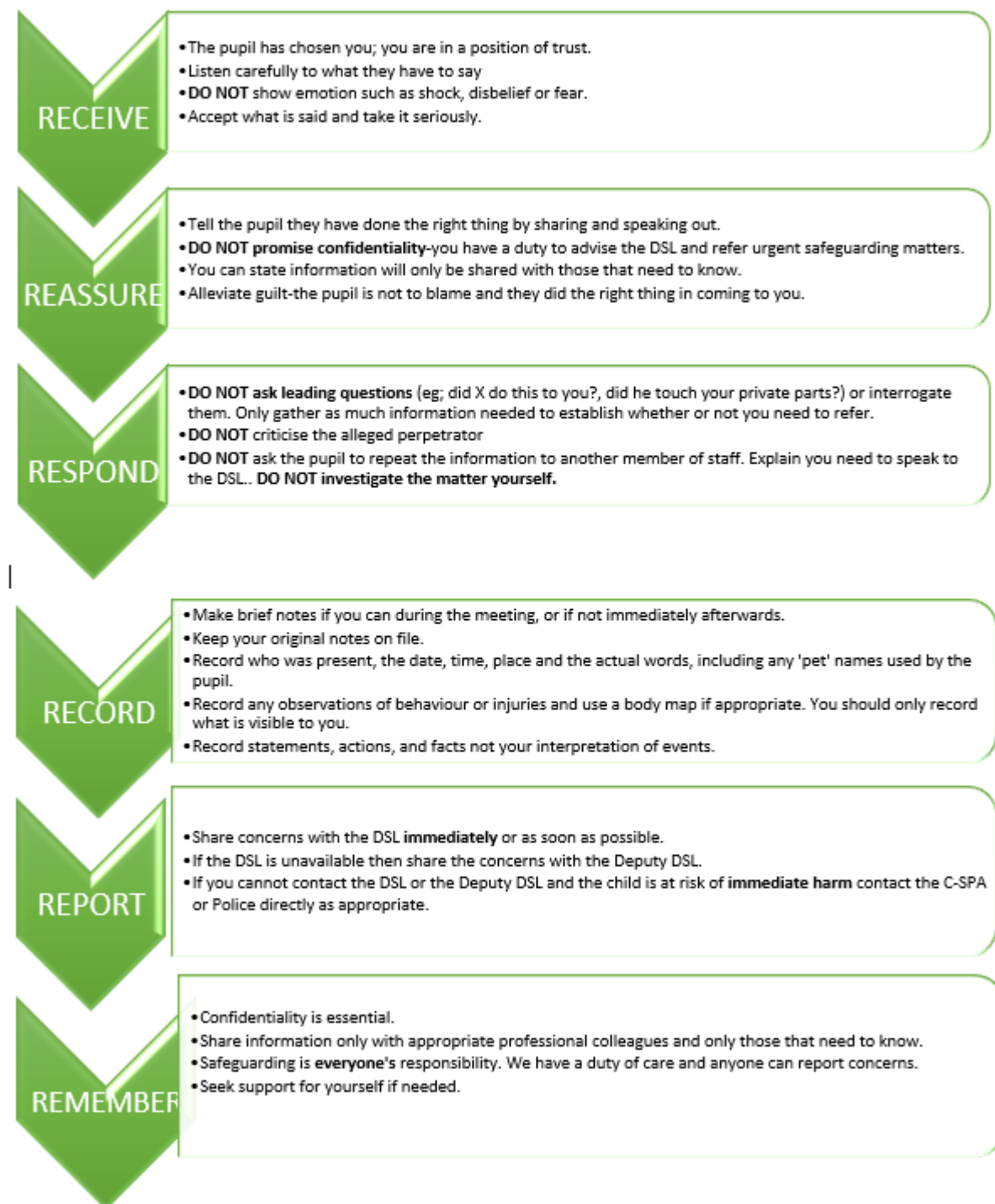
Safer Internet Centre <http://www.saferinternet.org.uk/>

Contextual Safeguarding Network <https://www.contextualsafeguarding.org.uk/>

Appendix 1: What to do if you suspect a pupil is suffering or likely to suffer significant harm.



Appendix 2: What to do if someone makes a disclosure - the six R's





SEXUAL BEHAVIOURS

●●● TRAFFIC LIGHT TOOL

Behaviours: age 9 to 13 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

Green behaviours

- solitary masturbation
- use of sexual language including swear and slang words
- having girl/boyfriends who are of the same, opposite or any gender
- interest in popular culture, e.g. fashion, music, media, online games, chatting online
- need for privacy
- consensual kissing, hugging, holding hands with peer

Amber behaviours

- uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- verbal, physical or cyber/virtual sexual bullying involving sexual aggression
- LGBT (lesbian, gay, bisexual, transgender) targeted bullying
- exhibitionism, e.g. flashing or mooning
- giving out contact details online
- viewing pornographic material
- worrying about being pregnant or having STIs

Red behaviours

- exposing genitals or masturbating in public
- distributing naked or sexually provocative images of self or others
- sexually explicit talk with younger children
- sexual harassment
- arranging to meet with an online acquaintance in secret
- genital injury to self or others
- forcing other children of same age, younger or less able to take part in sexual activities
- sexual activity e.g. oral sex or intercourse
- presence of sexually transmitted infection (STI)
- evidence of pregnancy

What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Behaviours: age 13 to 17 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

Green behaviours

- solitary masturbation
- sexually explicit conversations with peers
- obscenities and jokes within the current cultural norm
- interest in erotica/pornography
- use of internet/e-media to chat online
- having sexual or non-sexual relationships
- sexual activity including hugging, kissing, holding hands
- consenting oral and/or penetrative sex with others of the same or opposite gender who are of similar age and developmental ability
- choosing not to be sexually active

Amber behaviours

- accessing exploitative or violent pornography
- uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- concern about body image
- taking and sending naked or sexually provocative images of self or others
- single occurrence of peeping, exposing, mooning or obscene gestures
- giving out contact details online
- joining adult-only social networking sites and giving false personal information
- arranging a face to face meeting with an online contact alone

Red behaviours

- exposing genitals or masturbating in public
- preoccupation with sex, which interferes with daily function
- sexual degradation/humiliation of self or others
- attempting/forcing others to expose genitals
- sexually aggressive/exploitative behaviour
- sexually explicit talk with younger children
- sexual harassment
- non-consensual sexual activity
- use of/acceptance of power and control in sexual relationships
- genital injury to self or others
- sexual contact with others where there is a big difference in age or ability
- sexual activity with someone in authority and in a position of trust
- sexual activity with family members
- involvement in sexual exploitation and/or trafficking
- sexual contact with animals
- receipt of gifts or money in exchange for sex

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Brook has taken every care to ensure that the information contained in this publication is accurate and up-to-date at the time of being published. As information and knowledge is constantly changing, readers are strongly advised to use this information for up to one month from print date. Brook accepts no responsibility for difficulties that may arise as a result of an individual acting on the advice and recommendations it contains.

Brook Sexual Behaviours Traffic Light Tool adapted with permission from True Relationships & Reproductive Health. (2012). Traffic Lights guide to sexual behaviours in children and young people: identify, understand and respond. Brisbane: True Relationships & Reproductive Health, Australia.