

# Safeguarding and Protecting Children Policy and Procedures



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**Responsible person:** Assistant Head Safeguarding (Designated Safeguarding Lead)

**References:** [Surrey Safeguarding Children Partnership protocols, guidance and procedures](#)  
[Working Together to Safeguard Children 2018](#)  
[Keeping Children Safe in Education \(KCSIE\) January 2021 \(Post EU Exit\)](#)  
[Disqualification under the Childcare Act 2006 \(updated 2019\)](#)  
[FGM Act 2003 Mandatory Reporting Guidance 2016](#)  
[Prevent Duty 2015](#)  
['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](#)

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## Safeguarding Statement 2020

### “It could happen here”

The School recognises its moral and statutory responsibility to safeguard and promote the welfare of all children.

The School makes every effort to 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.

The purpose of this policy is to provide staff, volunteers and governors with the framework they need in order 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

Designated Safeguarding Lead (DSL): Andrew Bass

Mobile: 07730 206 671

Office: 01372 385 465

[abass@stjohns.surrey.sch.uk](mailto:abass@stjohns.surrey.sch.uk)

Deputy DSL: Alex Mogford

Mobile: 07720 270174

Office: 01372 385462

[amogford@stjohns.surrey.sch.uk](mailto:amogford@stjohns.surrey.sch.uk)

Deputy DSL: Rebecca Evans

Mobile: 07767 294026

Office: 01372 231575

[revans@stjohns.surrey.sch.uk](mailto:revans@stjohns.surrey.sch.uk)

Safeguarding Adviser for Boarding: Ashley Currie

Contact details: 01372 385493

Mobile: 07720 742278

[acurrie@stjohns.surrey.sch.uk](mailto:acurrie@stjohns.surrey.sch.uk)

The nominated Safeguarding Governors:

Mrs Angela Wright [safeguardinggovernor@stjohns.surrey.sch.uk](mailto:safeguardinggovernor@stjohns.surrey.sch.uk)

Mrs Ruth Marshall [RMarshall@stjohns.surrey.sch.uk](mailto:RMarshall@stjohns.surrey.sch.uk)

The Head: Rowena Cole

[rcole@stjohns.surrey.sch.uk](mailto:rcole@stjohns.surrey.sch.uk)

Office: 01372 373000

The Chair of the Governing Council: Mr John Willis

[jwillis@stjohns.surrey.sch.uk](mailto:jwillis@stjohns.surrey.sch.uk) or contact via:

Siân Graham, Secretary to the Governing Council [sgraham@stjohns.surrey.sch.uk](mailto:sgraham@stjohns.surrey.sch.uk)

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

**If there is a risk of immediate serious harm to a child contact the MAP (Surrey Multi–Agency Partnership) immediately. Telephone: 0300 470 9100 Mon – Fri from 9.00am until 5.00pm. Outside of these hours telephone 01483 517 898. In an emergency, dial 999 and request the appropriate emergency service.**

**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.

## COVID-19: 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, Senior Deputy Head (Deputy DSL) and Safeguarding Adviser for Boarding 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.

## Key External Agencies, Services and Professionals' Contact Details

If a child is in need of Early Help then the following hubs can be contacted to offer advice and coordinate a response:

Area	Contact Number	Email
North East area (Spelthorne, Elmbridge, and Epsom & Ewell)	0300 123 1610	<a href="mailto:earlyhelphubne@surreycc.gov.uk">earlyhelphubne@surreycc.gov.uk</a>
South East area (Mole Valley, Reigate, Banstead and Tandridge)	0300 123 1620	<a href="mailto:earlyhelphubse@surreycc.gov.uk">earlyhelphubse@surreycc.gov.uk</a>
North West area (Runnymede, Surrey Heath and Woking)	0300 123 1630	<a href="mailto:earlyhelphubnw@surreycc.gov.uk">earlyhelphubnw@surreycc.gov.uk</a>
South West area (Guildford and Waverley)	0300 123 1640	<a href="mailto:earlyhelphubsw@surreycc.gov.uk">earlyhelphubsw@surreycc.gov.uk</a>

The Local Authority Designated Officer (LADO): 0300 123 1650, [LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk) manages allegations against individuals who work or volunteer with children in Surrey.

SSCB Surrey Child Protection procedures are available [here](#)

SSCB Chair: 01372 833378, [SSCBchair@surreycc.gov.uk](mailto:SSCBchair@surreycc.gov.uk)

SSCB Support Team: 01372 833330, [sscb@surreycc.gov.uk](mailto:sscb@surreycc.gov.uk)

SSCB Training: 01372 833917, [sscb.training@surreycc.gov.uk](mailto:sscb.training@surreycc.gov.uk)

The Surrey Family Information Service is a free internet telephone and outreach service providing information and advice to parents of children 0-19, and young people up to 25 years where they have a disability or special educational needs.

Surrey Education Safeguarding Team can be contacted for advice on 01483 517 771 or at [education.safeguarding@surreycc.gov.uk](mailto:education.safeguarding@surreycc.gov.uk).

The Pupil Tracking Officer will be notified where any child is removed from the School and the whereabouts of their next school is unknown. Contact through 0208 541 9313

Police non-emergency: 101 or call 01483 632225 PC 40036 Briony Cole (Youth Officer, Mole Valley) [Briony.Cole@surrey.pnn.police.uk](mailto:Briony.Cole@surrey.pnn.police.uk)

OFSTED Safeguarding Children: 08456 404046 (Monday to Friday 8.00am to 6.00pm) email: [whistleblowing@ofsted.gov.uk](mailto:whistleblowing@ofsted.gov.uk)

DfE helpline for non-emergency advice for staff and governors: 0207 340 7246

DfE contact for extremism: 0207 340 7264 [counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk)

Disclosure and Barring Service: PO Box 181, Darlington, DL1 9FA, 01325 953795

Teaching Regulation Agency: 0345 609 0009

Assessment, Consultation and Therapy (ACT) team: [act@surreycc.gov.uk](mailto:act@surreycc.gov.uk) 01483 519606 can be contacted for advice where there are concerns about sexually harmful behaviour.

NSPCC whistleblowing advice line: [help@nspcc.org.uk](mailto:help@nspcc.org.uk) 0800 028 0285

Further advice on child protection is available from:

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

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

CEOPSThinkuknow: <https://www.thinkuknow.co.uk/>

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

## Terminology

**Safeguarding and promoting the welfare of children** is defined as:

- protecting children from maltreatment;
- preventing impairment of children's 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.
- Preventing impairment of children's mental or physical health or development

**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 the 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 a paid or a voluntary capacity.

**Child(ren)** includes everyone under the age of 18. 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 step-parents, 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.

**MAP** refers to the Surrey Multi Agency Partnership.

**C-SPA** refers to the Children's Single Point of Access and the Child Protection Consultation Line

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## 1. Introduction

This policy 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.

The policy also reflects, both statutory guidance 'Keeping Children Safe in Education' January 2021 (KCSIE), and [Surrey Safeguarding Children Partnership \(SSCP\) Procedures](#)

The Governing Council takes seriously its responsibility under section 175 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 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, is addressed to all members of staff (including teaching 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 & 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, either in the School or in the community, taking into account contextual safeguarding, in accordance with statutory guidance.

All professionals should make sure that their approach is child-centred. This means that they must consider, at all times, what is in the best interests of the child. It is important to note that no single professional can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

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 the School's commitment with regard to safeguarding and child protection to pupils, parents and other partners.
- To support the child's development in ways that will foster security, confidence and independence.
- To provide an environment in which children and young people feel safe, secure, valued and respected, feel confident, and know how to approach adults if they are in difficulties, believing they will be effectively listened to.
- To raise the awareness of all teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.
- To provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we, the School, contribute to assessments of need and support packages for those children.
- To emphasise the need for good levels of communication between all members of staff.
- To provide robust School systems and procedures that are followed by all members of the School community in cases of suspected abuse.
- 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 (January 2021) guidance), and a single central record is kept for audit.
- To ensure that we comply with the [Disqualification under the Childcare Act 2006 \(updated 2019\)](#)

#### **4. Supporting Children**

We recognise that School may provide a safe place and the only 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.

The School will support all children:

We will promote a caring, safe and positive environment within the School.

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. This includes online safety.

We will respond sympathetically to any requests for time out to deal with distress and 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 immediately if there is a significant concern.

We will provide continuing support to a child about whom there have been concerns who leaves the School by ensuring that information is shared under confidential cover to the child's new setting and ensure the School medical 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.

Ensure that all children know there is and can access an adult in the School whom they can approach if they are worried or in difficulty.

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 and 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.



## **6. Safe School, Safe Staff**

We will ensure that:

The School operates a safer recruitment procedure that includes statutory checks on staff suitability to work with children and disqualification by association regulations.

All staff receive information about the School's safeguarding arrangements, the School Rules, Staff Conduct Policy, Safeguarding and Protecting Children Policy and Procedures, the role and names of the Designated Safeguarding Lead and the deputy DSLs, and [Keeping Children Safe in Education part 1 and annex A](#).

All staff receive safeguarding and child protection training at induction in line with advice from Children's Safeguarding Partnership which is regularly updated and 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 and reporting concerns.

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 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 procedure will seek to ensure the suitability of adults working with children on School sites at any time.

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 Part 1 and Annex A of Keeping Children Safe in Education 2020 and will sign to say they have read and understood it. This 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.

The School keeps a visitors' book at reception. All visitors must sign in on arrival and sign out on departure. All visitors will be given a name badge with the title 'Visitor' which must be clearly displayed and worn at all times whilst on the premises. 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.

## 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 at least Part One, Annex A of KCSIE (2020).
- Have read and be familiar with this policy, the School Rules, Staff Conduct Policy, Whistleblowing Policy and Anti-Bullying Policy.
- Provide a safe environment in which children can learn.
- Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to.
- Ensure children know that there are adults in the School who they can approach if they are worried or have concerns.
- 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.
- Only appropriately trained professionals will attempt to make a diagnosis of a mental health problem.
- Staff however, 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.
- Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action will be taken, following our child protection policy and procedure and speaking to the designated safeguarding lead 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. Maintain an attitude of "it could happen here" with regards to safeguarding.
- Know how to respond to a pupil 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 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 Multi Agency Partnership (MAP), and the police if appropriate.  
We understand that we have a pivotal role to play in multi-agency safeguarding arrangements. All staff and governors ensure that the school or college contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children, if there is a risk of significant harm and the DSL or their Deputy is not available.
- Follow the allegations procedures ([section 12](#) below) if the disclosure is an allegation against a member of staff.
- Follow the procedures set out by the Children's Safeguarding Partnership and take account of guidance issued by the Department for Education.
- 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 promising 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.
- Have an understanding of 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.
- Know who the DSL and Deputy DSL are and know how to contact them, have an awareness of their respective roles.
- Be mindful that the Teacher Standards 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.
- 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 interagency meetings and/or support other staff to do so; and to contribute to the assessment of children.
- Provide opportunities 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.
- With the designated safeguarding lead ensure adequate and appropriate 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.
- That pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.
- Ensure that allegations or concerns against staff are dealt with in accordance with guidance from Department for Education (DfE), Children's Safeguarding Partnership ("CSP") and Surrey County Council (SCC).
- Ensure that statutory requirements are met to make a referral to the Disclosure and Barring Service and additionally in the case of teaching staff the Teaching 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:

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.
- Will have an "it could happen here" approach to safeguarding.
- The designated safeguarding lead and any deputies will liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children. NPCC- When to call the police should help designated safeguarding leads understand when they should consider calling the police and what to expect when they do.
- 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](mailto: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 pupil 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](mailto: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).
- Will refer cases where a crime may have been committed to the Police as required.
- Will liaise with the "case manager" and Local Authority "Designated Officer" for child protection concerns in cases which concern a member of staff 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.
- Will follow DfE and KCSIE (January 2021) guidance 'Peer on Peer/child on child Abuse' when a concern is raised that there is an allegation of a pupil abusing another pupil within the School ([see section 15](#))

- 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.
- Will encourage and promote a culture of listening to children and taking account of their wishes and feelings, amongst all staff.
- Will 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 and their knowledge and skills refreshed at regular intervals but at least annually.
- Will have a secure working knowledge of SSCP procedures and understands the assessment process for providing early help and statutory intervention, including the SSCP levels of need criteria and referral arrangements.
- Will 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.
- Will 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.
- Will 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.
- Will be alert to the specific needs of children in need, those with SEND and young carers.
- Will 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.
- Will 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.
- Will ensure that an indication of the existence of the additional child protection file is marked on the pupil School file record.
- Will ensure that when a pupil transfers school (including in year), their child protection file is passed to the new school as soon as possible, and within statutory timescales (separately from the main pupil file and ensuring secure transit) and that confirmation of receipt is received.
- Will 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.
- Will ensure 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.
- Will 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](#), under section 47 of the Children Act 1989 and police investigations.
- Will ensure that the case holding Social Worker is informed of any child currently with a child protection plan who is absent without explanation.
- Will 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 Conduct Policy) and Keeping Children Safe in Education (KCSIE 2020) Part 1 and annex A and ensure that the policies are used effectively.
- Will 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 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 Local Authority safeguarding partners to make sure staff are aware of training opportunities and the latest policies on local safeguarding arrangements.

- Will contribute to and provide, with the Head and Chair of Governors, the “Audit of Statutory Duties and Associated Responsibilities” to be submitted annually to the Surrey County Council, Education Safeguarding Team.
- Will ensure that the name of the designated members of staff for Child Protection, the Designated Safeguarding Lead and deputies, are clearly advertised in the school, 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 Keeping Children Safe in Education (January 2021).

#### **7.4 The Deputy Designated Safeguarding Leads:**

There are two Deputy DSLs: the Senior Deputy Head and the Deputy Head (Pastoral). 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 Senior Deputy Head 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 Senior Deputy Head will assume all of the functions above.

#### **7.5 The Safeguarding Adviser for Boarding:**

The Assistant Head (Pastoral) 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 Deputy DSLs, carries out the activities necessary to ensure the ongoing safety and protection of boarders.

#### **7.6 The Governing Council:**

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

- The School has effective safeguarding policies and procedures including a Safeguarding and Protecting Children Policy and Procedures, a Staff Conduct Policy, a Behaviour Policy and a response to children who go missing from education. Ensure 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.
- That the School operates a safer recruitment procedure that includes statutory checks on staff suitability to work with children and by ensuring that there is at least one person on every recruitment panel who has completed safer recruitment training, if there is not a panel conducting interviews then the individual will have completed the safer recruitment training.
- That at least one member of the Governing Council has completed safer recruitment training to be repeated every five years.
- Staff have been trained appropriately and this is updated in line with guidance and all staff have read Keeping Children Safe in Education (2020) part 1 and Annex A 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 are provided with the School’s Safeguarding and Protecting Children Policy and Procedures, School Rules and Staff Conduct Policy. 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.

- That a nominated governor for safeguarding is identified.
- That 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 undertake DSL 'New to Role' and 'Update' training every two years as well as attending DSL network events to refresh knowledge and skills.
- That 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 relationship and sex education (RSE).  
The governors, proprietors and school will ensure application filters and monitoring systems are in place to safeguard children online
- That the School will comply with DfE and Surrey County Council [Children Missing Education](#) requirements.
- That 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 or modified timetable
- That appropriate online filtering and monitoring systems are in place.
- 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. Governing bodies and proprietors will ensure they have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.
- Enhanced DBS checks (without barred list checks, unless the governor is in regulated activity at the School) are in place for all Governors.
- That any weaknesses in Safeguarding are remedied immediately.

## 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 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 Data Protection 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 General Data Protection Regulations 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. However, staff are aware that matters relating to child protection and safeguarding are personal to children and families, in this respect they are confidential and the Head or DSLs will only disclose information about a child to other members of staff on a need to know basis.

All staff will always undertake to share our intention to refer a child to Social Care with their parents /carers 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 they are concerned 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. 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. 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:

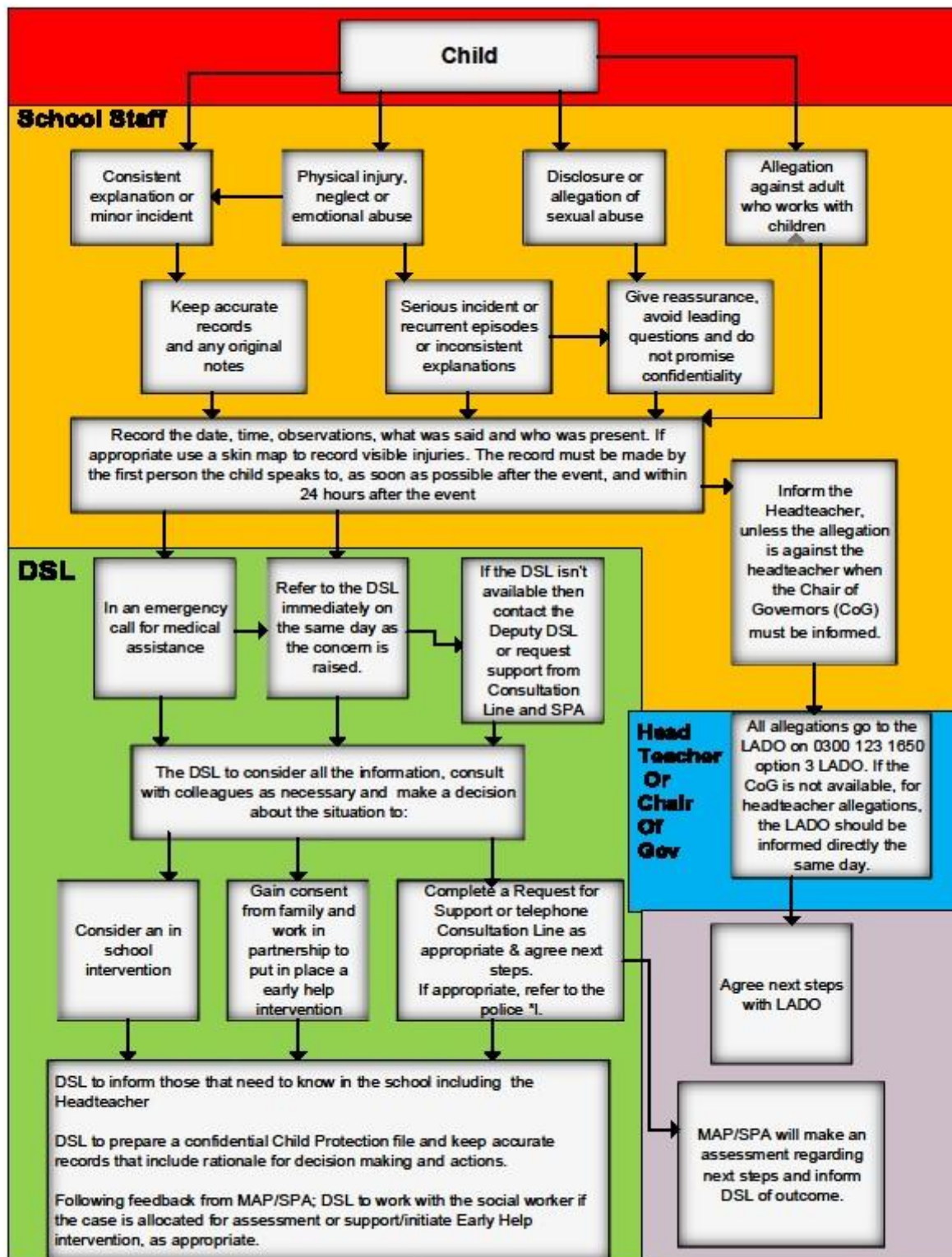
Dates and times of their observations  
Dates and times of any discussions in which they were involved. Any injuries  
Explanations given by the child / adult  
Rationale for decision making and action taken  
Any actual words or phrases used by the child

5. The records must be signed and dated by the author or / equivalent on electronic based records
6. 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 significant harm, in which case a referral must be made to the C-SPA 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 impact a police investigation. The child's views should also be taken into account.  
If there are grounds to suspect a child is suffering, or is likely to suffer, significant 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](mailto:cspa@surreycc.gov.uk) contact the C-SPA consultation line on 0300 470 9100 to discuss the concerns. 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 pupil is in need of 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.

## Child Protection Procedures Flowchart



\* In the cases of known FGM, the teacher who was made aware will also make contact with the police



## 11. Dealing with disclosures

### 11.1 All staff

- 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 may need to pass information to other professionals to help keep the child 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.

### 11.2 Guiding principles, the seven R's

#### Receive

Listen to what is being said, without displaying shock or disbelief.

Accept what is said and take it seriously.

Make a note of what has been said as soon as practicable.

#### Reassure

Reassure the pupil, but only so far as is honest and reliable.

Don't make promises you may not be able to keep e.g. 'I'll stay with you' or 'everything will be alright now' or 'I'll keep this confidential'.

Do reassure, for example, you could say: 'I believe you', 'I am glad you came to me', 'I am sorry this has happened', 'We are going to do something together to get help'.

#### Respond

Respond to the pupil only as far as is necessary for you to establish whether or not you need to refer this matter, but do not interrogate for full details.

Do not ask 'leading' questions i.e. 'did he touch your private parts?' or 'did she hurt you?' Such questions may invalidate your evidence (and the child's) in any later prosecution in court. Do not ask the child why something has happened.

Do not criticize the alleged perpetrator; the pupil may care about him/her, and reconciliation may be possible.

Do not ask the pupil to repeat it all for another member of staff. Explain what you have to do next and whom you have to talk to. Reassure the pupil that it will be a senior member of staff.

#### Report

Share concerns with the DSL immediately.

If you are not able to contact your DSL or the Deputy DSL, and the child is at risk of immediate harm, contact the C-SPA or Police, as appropriate directly.

If you are dissatisfied with the level of response you receive following your concerns, you should press for reconsideration.

#### Record

If possible make some very brief notes at the time, and write them up as soon as possible.

Keep your original notes on file.

Record the date, time, place, persons present and noticeable nonverbal behaviour, and the words used by the child. If the child uses sexual 'pet' words, record the actual words used, rather than translating them into 'proper' words.

If appropriate, complete a body map to indicate the position of any noticeable bruising.

Record facts and observable things, rather than your 'interpretations' or 'assumptions'.

#### Remember

Support the child: listen, reassure, and be available.

Complete confidentiality is essential. Share your knowledge only with appropriate professional colleagues.

Get some support for yourself if you need it.

### **Review (led by DSL)**

Has the action taken provided good outcomes for the child?

Did the procedure work?

Were any deficiencies or weaknesses identified in the procedure?

Have these been remedied?

Is further training required?

### **11.3 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 counselling 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**

The DFE has issued statutory guidance which all schools and local authorities must follow when a potential child protection allegation is made against a member of staff. The guidance is contained within the document: *Keeping Children Safe in Education (January 2021)*. It is expected that all staff and Governors involved in the management of allegations of abuse made against a member of staff or volunteer will comply at all times with statutory guidance.

### **12.1 The School's procedures**

The School's procedures for dealing with allegations made against staff or volunteers will be used where a member of staff has any safeguarding concerns about another member of staff or a volunteer, including where the member of staff/volunteer is alleged to have:

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

This procedure relates to members of staff who are currently working in the School regardless of whether the School is where the abuse is alleged to have taken place. Allegations against former members of staff or volunteers who are no longer working at the School will be referred to the police. Historical allegations of abuse will also be referred to the police. Where the School has information to indicate that the former staff member is working with children in another location this should also be reported to the LADO in that location and to the senior management of the School where that member of staff is currently working.

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

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

- Substantiated:** there is sufficient evidence to prove the allegation;
- False:** there is sufficient evidence to disprove the allegation;
- Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
- Unsubstantiated:** this is not the same as a false allegation. It means that there is insufficient evidence to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.

## **12.2 Reporting an allegation against staff or volunteers**

All allegations, complaints, concerns or suspicions against staff or volunteers including any made against the DSL or Deputy DSLs, should be reported directly to the Head, or in her absence to the Chair of Governors, unless that person is the subject of the concern (in which case see below).

All allegations, complaints, concerns or suspicions about the Head should be reported to the Chair of the Governors without the Head being informed; those about a member of the Governing Body should be reported to the Chair of Governors (or in his absence, the Vice Chair).

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

The Head or Chair of Governors (or Vice Chair), as appropriate, (the 'case manager') will immediately (within one working day) discuss **all** allegations or suspicions of abuse with the local authority designated officer (LADO). They will **not** investigate the case. Borderline cases will be discussed without identifying individuals in the first instance and following discussions the LADO will judge whether or not an allegation or concern indicates possible abuse. The LADO and the case manager will decide in the circumstances what further steps should be taken. This could involve informing parents. In the most serious cases the police will be informed. All discussions with the LADO will be recorded in writing.

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

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

If, at any point, there is a risk of immediate serious harm to a child a referral should be made to the C-SPA immediately. Any member of staff can make a referral.

## **12.3 Disclosure of information**

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

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

Where the LADO advises that a strategy discussion is needed, or police or Children's Social Care (CSC) services need to be involved, the case manager will not speak to the accused person or the parents or carers until those agencies have consulted and have agreed what information can be disclosed.

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

The case manager should take advice from the LADO, Police and Children's Social Care services to agree the following:

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

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

#### **12.4 Action to be taken in relation to the accused**

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

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

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

It may be necessary to undertake further enquiries to determine the appropriate action. If so, the LADO will discuss with the case manager how and by whom the investigation will be undertaken. The appropriate person will usually be a senior member of staff, but in some instances it may be appropriate to appoint an independent investigator as advised by the CSP.

#### **12.5 Suspension**

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

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

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

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

#### **12.6 Criminal proceedings**

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

#### **12.7 Return to work**

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

#### **12.8 DBS and TRA referrals and ceasing to use staff**

NB There is a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult; where the harm test is satisfied in respect of that individual; where the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that individual has committed a listed relevant offence; and that individual has been removed from working (paid or unpaid) in regulated activity, or suspended, or redeployed to work that is not regulated activity, or would have been removed had they not left.

Referrals should be made as soon as possible after the resignation or removal of the individual. Failure to make a Referral to the DBS in such circumstances constitutes an offence.

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

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

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

Where a teacher is dismissed (or would have been dismissed had he/she not resigned) for misconduct, separate consideration will be given as to whether a referral to the Teaching Regulation Agency (TRA) should be made. For information, the reasons for the TRA to consider whether a prohibition order might be appropriate are: 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'. The School will also inform the Charity Commission.

### **12.9 Timescales**

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

### **12.10 Unsubstantiated, false or malicious allegations**

Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Head will consider whether to take disciplinary action in accordance with the School's policy on Behaviour, Rewards, Sanctions and Discipline.

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

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

### **12.11 Record keeping and references**

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

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

The School will provide information regarding a substantiated allegation for the purposes of future references and DBS disclosures in accordance with the School's safer recruitment procedures. In cases where allegations are found to be false, malicious or unsubstantiated, reference will not be made in employer references.

### **12.12 School review**

At the conclusion of a case in which an allegation is substantiated, the LADO should review the circumstances of the case with the case manager to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future. This should include issues arising from the

decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified.

Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The LADO and case manager should consider how future investigations of a similar nature could be carried out without suspending the individual.

### **13. What is child abuse?**

The following definitions are taken from *Working Together to Safeguard Children* HM Government (2018). In addition to these definitions, it should be understood that children can also be abused by being sexually exploited, honour based violence, forced marriage or female genital mutilation. To support the local context, all staff have access to the [Surrey Safeguarding Children Partnership Levels of Need Threshold Document](#).

#### **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. 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. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults, or by another child or children.

#### **13.1 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.

#### **13.2 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.

#### **13.3 Sexual abuse**

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

The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative 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).

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

## 13.4 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. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate care-givers)
- ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

The [Neglect Risk Assessment Tool](#) is available to provide a more detailed information regarding neglect.

## 14. Indicators of abuse

### 14.1 Neglect

The nature of neglect:

Neglect is a lack of parental care but poverty and lack of information or adequate services can be contributory factors.

Far more children are registered to the category of neglect on Child in Need and Child Protection plans than to the other categories. As with abuse, the number of children experiencing neglect is likely to be much higher than the numbers on the plans.

Neglect can include parents or carers failing to:

- provide adequate food, clothing and shelter
- protect a child from physical and emotional harm or danger
- ensure adequate supervision or stimulation
- ensure access to appropriate medical care or treatment

NSPCC research has highlighted the following examples of the neglect of children under 12 years old:

- frequently going hungry
- frequently having to go to school in dirty clothes
- regularly having to look after themselves because of parents being away or having problems such as drug or alcohol misuse
- being abandoned or deserted
- living at home in dangerous physical conditions
- not being taken to the doctor when ill
- not receiving dental care.

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 does 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.

Neglect is often linked to other forms of abuse, so any concerns School staff should be discussed with the DSL.

### Indicators of neglect

The following is a summary of some of the indicators that may suggest a child is being abused or is at risk of harm.

It is important to recognise that indicators alone cannot confirm whether a child is being abused. Each child should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Don't keep it to yourself. The [Neglect Risk Assessment Tool](#) provides staff with a resource to identify and act on concerns regarding neglect.

#### **Physical indicators of neglect**

- Constant hunger and stealing food
- Poor personal hygiene - unkempt, dirty or smelly
- Underweight
- Dress unsuitable for weather
- Poor state of clothing
- Illness or injury untreated

#### **Behavioural indicators of neglect**

- Constant tiredness
- Frequent absence from school or lateness
- Missing medical appointments
- Isolated among peers
- Frequently unsupervised
- Stealing or scavenging, especially food
- Destructive tendencies

### **14.2 Emotional abuse**

The nature of emotional abuse:

Most harm is produced in *low warmth, high criticism* homes, not from single incidents.

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.

It is sometimes possible to spot emotionally abusive behavior 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 on.

#### **Indicators of emotional abuse**

##### **Developmental issues**

- Delays in physical, mental and emotional development
- Poor school performance
- Speech disorders, particularly sudden disorders or changes.

##### **Behaviour**

- Acceptance of punishment which appears excessive
- Over-reaction to mistakes
- Continual self-deprecation (I'm stupid, ugly, worthless etc)
- Neurotic behaviour (such as rocking, hair-twisting, thumb-sucking)
- Self-mutilation
- Suicide attempts
- Drug/solvent abuse



- Running away
- Compulsive stealing, scavenging
- Acting out
- Poor trust in significant adults
- Regressive behaviour – e.g., wetting
- Eating disorders
- Destructive tendencies
- Neurotic behaviour
- Arriving early at school, leaving late

### **Social issues**

- Withdrawal from physical contact
- Withdrawal from social interaction
- Over-compliant behaviour
- Insecure, clinging behaviour
- Poor social relationships

### **Emotional responses**

- Extreme fear of new situations
- Inappropriate emotional responses to painful situations (“I deserve this”)
- Fear of parents being contacted
- Self-disgust
- Low self-esteem
- Unusually fearful with adults
- Lack of concentration, restlessness, aimlessness
- Extremes of passivity or aggression

## **14.3 Physical abuse**

The nature of physical abuse:

Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly, it is not necessary to be concerned about most of these minor injuries. 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.

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.

### ***Indicators of physical abuse / factors that should increase concern***

- Multiple bruising or bruises and scratches (especially on the head and face)
- Clusters of bruises – e.g., fingertip bruising (caused by being grasped)
- Bruises around the neck and behind the ears – the most common abusive injuries are to the head
- Bruises on the back, chest, buttocks, or on the inside of the thighs
- Marks indicating injury by an instrument – e.g., linear bruising (stick), parallel bruising (belt), marks of a buckle
- Bite marks
- Deliberate burning may also be indicated by the pattern of an instrument or object – e.g., electric fire, cooker, cigarette
- Scalds with upward splash marks or *tide marks*
- Untreated injuries
- Recurrent injuries or burns
- Bald patches.

In the context of the School, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, 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 (adults 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

**You should be concerned if a child:**

- is reluctant to have parents/carers contacted
- runs away or shows fear of going home
- is aggressive towards themselves or others
- flinches when approached or touched
- is reluctant to undress to change clothing for sport
- wears long sleeves during hot weather
- is unnaturally compliant in the presence of parents/carers.
- has a fear of medical help or attention
- admits to a punishment that appears excessive.

**14.4 Sexual Abuse**

The nature of sexual abuse:

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 on pages 36).

**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 some women sexually abuse too.

***Indicators of sexual abuse***

**Physical observations:**

- Damage to genitalia, anus or mouth
- Sexually transmitted diseases
- Unexpected pregnancy, especially in very young girls
- Soreness in genital area, anus or mouth and other medical problems such as chronic itching
- Unexplained recurrent urinary tract infections and discharges or abdominal pain

**Behavioural observations:**

- Sexual knowledge inappropriate for age
- Sexualised behaviour or affection inappropriate for age
- Sexually inappropriate behaviour
- Hinting at sexual activity
- Inexplicable decline in education progress
- Depression or other sudden apparent changes in personality as becoming insecure
- Lack of concentration, restlessness, aimlessness
- Socially isolated or withdrawn
- Overly-compliant behaviour
- Acting out, aggressive behaviour
- Poor trust or fear concerning significant adults
- Regressive behaviour

- Onset of wetting, by day or night; nightmares
- Arriving early at school, leaving late, running away from home
- Suicide attempts, self-mutilation
- Suddenly drawing sexually explicit pictures
- Eating disorders or sudden loss of appetite or compulsive eating
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Become worried about clothing being removed
- Trying to be 'ultra-good' or perfect; overreacting to criticism.

## **15. Sexual violence and sexual harassment between children in schools - Peer on Peer /Child on Child Abuse:**

### **Context**

Peer on peer/Child on Child abuse can take different forms such as sexual violence and harassment, physical abuse, sexting (also known as youth produced sexual imagery), upskirting (taking a photo under a person's clothing without them knowing)<sup>1</sup>, initiation and rituals.

We recognise the gendered nature of peer on peer abuse; it is more likely that girls will be victims and boys perpetrators, but all peer on peer abuse is unacceptable and will be taken seriously.

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their education attainment as well as their emotional wellbeing. 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 important that all victims are taken seriously and offered appropriate support.

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, adult students 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 their peers and this will be dealt with under our Safeguarding and Protecting Children Policy and Procedures and in line with KCSIE (January 2021).

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*" and is not an *inevitable part of growing up*. We will minimise the risk of peer on peer abuse by:-

### **Prevention**

- Taking a whole School approach to safeguarding & child protection Providing training to staff
- Providing a clear set of values and standards, underpinned by the School Rules, Staff Conduct Policy, 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 a report of sexual violence or sexual harassment 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 2018) guidance.
- Staff taking the report will inform the DSL or the Deputy DSL immediately.

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<sup>1</sup> The act of placing equipment such as a camera or mobile phone beneath a person's clothing to take voyeuristic images without their permission was criminalised in the Voyeurism (Offences) Act 2019

- 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: [c-spa@surreycc.gov.uk](mailto:c-spa@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.

The risk assessment will consider;

- The victim, especially their protection and support.
- The alleged perpetrator, their support needs and any disciplinary action.
- All other children at the School.
- The victim and the alleged perpetrator sharing classes and space at School.

The risk assessment 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 pupils.

Support regarding risk assessments can be accessed from the [Education Safeguarding Team](mailto:education.safeguarding@surreycc.gov.uk) – [education.safeguarding@surreycc.gov.uk](mailto: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: The DSL decision making regarding the issue with the following possible options:-**

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

### **Ongoing Response:**

The DSL will manage each case individually and will ensure the risk assessment 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.

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 pupils).

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 affected children & adults 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.

### **Physical Abuse**

While a clear focus of peer on peer/child on child abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from pupils to pupils 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.

#### *References:*

*DfE Keeping Children Safe in Education January 2021*

[DfE Sexual Violence and Sexual Harassment between Children in Schools and Colleges May 2018](#)

## **16. Harmful Sexual Behaviour**

The [Brook Traffic Light Tool](#) (see [Appendix 1](#)) uses a traffic light system to categorise the sexual behaviours of young people and is designed 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 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**

The School has an E-safety policy which explains how we try to keep pupils safe in School and how we respond to online safety incidents. The School monitors IT systems and internet use to fulfil its safeguarding duty and

responsibilities; a web filtering system (Smoothwall) enforces restrictions and the School can view content accessed or sent via its systems.

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 such as webcam photography or face-to-face meetings.

Pupils 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.

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

## **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 are set out in the School's Anti-Bullying Policy. Repeated incidents or a single serious incident may lead to consideration under safeguarding and child protection procedures. We keep a record of racist bullying and other 'hate' incidents.

## **20. Radicalisation and Extremism and Terrorism**

[The Prevent Duty for England and Wales \(2015\)](#) 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 '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 School governors, 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 pupil 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](mailto: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 of Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).

### **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 Government in the Prevent Strategy 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.

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.

Pupils 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 student / pupil is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
- Personal Crisis – the student / pupil 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 student / pupil'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 student / pupil 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 – students / pupils 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.

More critical risk factors could include:

- Being in contact with extremist recruiters;
- Accessing violent extremist websites, especially those with a social networking element;
- Possessing or accessing violent extremist literature;
- Using extremist narratives and a global ideology to explain personal disadvantage;

- Justifying the use of violence to solve societal issues;
- Joining or seeking to join extremist organisations; and
- Significant changes to appearance and / or behaviour;
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

The Department of Education guidance [The Prevent Duty](#) can be accessed via this link.

## **21. Domestic Abuse**

Domestic abuse represents one quarter of all violent crime. It is actual or threatened physical, emotional, psychological or sexual abuse. It involves the use of power and control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, mental or physical ability. Domestic abuse can also involve other types of abuse.

We use the term domestic abuse to reflect that a number of abusive and controlling behaviours are involved beyond violence. Slapping, punching, kicking, bruising, rape, ridicule, constant criticism, threats, manipulation, sleep deprivation, social isolation, and other controlling behaviours all count as abuse.

Living in a home where domestic abuse takes place is harmful to children and can have a serious impact on their behaviour, wellbeing and understanding of healthy, positive relationships. Children who witness domestic abuse are at risk of significant harm and staff are alert to the signs and symptoms of a child suffering or witnessing domestic abuse.

The School is enrolled onto the Operation Encompass scheme, a joint project between Surrey Police, Surrey County Council, Surrey Domestic Abuse Service and Surrey Schools; where every School day morning 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 Children's Safeguarding Partnership 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 a child often 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 SRE curriculum. Pupils 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) & 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 young people 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.

The risk or potential risk of harm to the child may be as a victim, a gang member or both - in relation to their peers or to a gang-involved adult in their household. Teenagers 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. Any member of staff who has concerns that a child may be at risk of harm should immediately inform the DSL. The DSL will contact the C-SPA. If there is concern about a child's immediate safety, the Police will be contacted on 999.

### **24. Sharing nudes and semi-nudes: Guidance for staff responding to incidents**

The DSL and key safeguarding personnel (listed on page 4 of this policy) will be familiar with the [full guidance](#) from the UK Council for Internet Safety (UKCIS), and should refer to the full guidance rather than this paragraph which is an overview for all other school staff.

The latest advice for schools and colleges (UKCIS, 2020) defines this activity as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated.

This guidance does not apply to adults sharing nudes or semi-nudes of under 18-year olds. This is a form of child sexual abuse and must be referred to the police as a matter of urgency.

**If an incident comes to your attention report it to the DSL immediately.**

**Never** view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – **this is illegal.**

If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL (or DDSL) as well and seek support.

**Do not** delete the imagery or ask the young person to delete it.

**Do not** ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or DDSL).

**Do not** share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.

**Do not** say or do anything to blame or shame any young people involved.

**Do** explain to the child/children that you need to report it and reassure them that they will receive support and help from the DSL (or DDSLs and pastoral team).

You should confiscate the device(s), set to flight mode or, if this is not possible, power off.

The DSL (or one of the DDSLs) should hold an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and members of the senior leadership team.

And:

- there should be subsequent interviews with the children or young people involved (if appropriate)
- parents and carers should be informed at an early stage and involved in the process in order to best support the child or young person unless there is good reason to believe that involving them would put the child or young person at risk of harm
- a referral should be made to children's social care and/or the police immediately if there is a concern that a child or young person has been harmed or is at risk of immediate harm at any point in the process.

It is important to note that a disclosure may not be a single event and the child and young person may share further information at a later stage therefore multiple reviews and risk assessments may be needed depending on the situation.

The DSL will record all such incidents, including the actions taken, rationale for actions and the outcome.

## **25. 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.

## **26. 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 pupils 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 practicing 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.

## **27. 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.

## **28. 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.

## **29. 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 A for further advice about how to support our pupils if they are affected by this issue.

## **30. Children with family members in prison**

NICCO (<https://www.nicco.org.uk/>), 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 A and from the DSL.

## **31. 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.

## **32. 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.

## **33. 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.

Children looked after by the local authority or 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 pupil may be in a private fostering arrangement they will raise this with the DSL and the DSL will notify the C-SPA immediately.

## **34. Children Looked After**

The most common reason for children becoming looked after is as a result of abuse and neglect.

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

The designated teacher for children looked after (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.

The designated teacher for children looked after and children previously looked after will work in partnership with the Virtual School Assistant Head to discuss how Pupil Premium Plus funding can be best used to support the progress of children looked after in the School and meet the needs of the child's within their personal education plan.

### **35. 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 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.

### **36. Children Missing from Education**

All children, regardless of their circumstances, are entitled to an efficient, full time education which is suitable to their age, ability, aptitude and any special educational needs they may have.

The School recognises that children missing education are at significant risk of underachieving, being victims of abuse and harm, exploitation or 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 pupil.

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.
  - 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 the School will forward a copy of the letter to the Elective Home Education Team / Education Welfare. 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 Welfare at the earliest opportunity.

### **37. Pupils Missing Out On Education**

The vast majority of children engage positively with school and attend regularly. However, in order to flourish, some children require an alternative education offer 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 pupil has an 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 pupil 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 or modified timetable;
- The School leadership will report to governor's information regarding the use and effectiveness of the use of alternative provision and modified timetables.

### **38. 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.

### **39. 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 him/herself 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 "Positive Options" 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 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).

#### **40. Whistleblowing**

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

All staff 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.

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](mailto:helpline@pcaw.co.uk). If staff have concerns over how child protection issues are being handled then they can talk to the NSPCC whistleblowing advice line: [help@nspcc.org.uk](mailto:help@nspcc.org.uk) or 0800 028 0285.

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.

#### **41. Health & safety, extended school activities and educational visits**

The School's Health & 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.

## **42. 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 Conduct Policy.

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.

## **43. 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 (2015).

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 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 Ashley Currie

Mobile: 07720 742278

acurrie@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.

#### **44. Monitoring and review**

The DSL will ensure that this policy is reviewed 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. Safeguarding is a standing item on all Governing Council meetings.

Any child protection incidents at the School will be followed by a review of procedures with 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, Senior Deputy Head, DSL and Deputy Head (Pastoral).
- 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) meetings.
- Regular meetings with nominated Governor(s).
- Bi-weekly review of Early Help pupils with Senior House Staff.
- Discussions with School Prefects and Heads of School.
- Pupil questionnaires.
- Regular review of parental concerns and parental questionnaires.
- Logs of bullying and/or racist behaviour incidents are reviewed regularly.

#### **45. Other relevant policies**

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. This policy therefore complements and supports a range of other policies, for instance:

- Anti-Bullying
- Restrictive Physical Intervention
- Educational Visits Policy
- Visiting Speaker Policy
- Medical and First Aid Policy
- Health and Safety Policy
- E-Safety Policy
- Mental Health Handbook
- Recruitment, Selection and Disclosure Policy and Procedure
- 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.

#### **46. 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>

CEOPSThinkuknow: <https://www.thinkuknow.co.uk/>

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/>



# 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 can you do?

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

#### 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 can you do?

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

#### 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?

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

#### 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 can you do?

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

#### 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 can you do?

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

#### 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?

Red behaviours indicate a need for immediate intervention and action.

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.

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