



REIGATE GRAMMAR SCHOOL



REIGATE ST MARY'S  
PREPARATORY AND CHOIR SCHOOL

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# Safeguarding and Child Protection Policy

## Including Early Years Foundation Stage

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<b>ISI Code:</b>	7a Safeguarding Policy
<b>Policy Author:</b>	Sarah Arthur, Deputy Head
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## Concerned about a child?

If you have concerns about the safety of a child, you should act immediately.

1. Speak to the DSL or one of the Deputy DSLs straight away and follow this up with a referral on *My Concern*
2. If you cannot speak to one of the DSL team, you must take action yourself by contacting the Children's Single Point of Access (see below) or in the event of an emergency where a child is at risk of immediate harm, dial 999.

*There is further information in the policy about how to respond to a disclosure.*

## Important Contact Details for Use by Anyone with Concern

The Surrey Children's Single Point of Access (C-SPA) is the umbrella term for the front door to support, information and advice for residents, families and those who work with Surrey Children.

### C-SPA

Tel: 0300 470 9100  
Email: [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk)

### Emergency Out of Hours Duty Team:

Tel: 01483 517898

### DFE advice and support about extremism

Tel: 020 7340 7264  
Email: [counter-extremism@education.gov.uk](mailto:counter-extremism@education.gov.uk)

### Local Authority Designated Officer (LADO)

Tel: 0300 123 1650  
or 0300 200 1006  
Email: [LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk)

### Surrey Children's Partnership Safeguarding Board

[www.surreyscb.org.uk](http://www.surreyscb.org.uk)

### Notification of Child Death

Tel: 01372 833319

### Forced Marriage Unit (including for advice about FGM)

Tel: 020 7008 0151

**Please contact Surrey police via 101 or if concerned for a child's immediate safety call 999**

## Reigate St Mary's Preparatory and Choir School Key Staff (Tel: 01737 244880)

<b>Headmaster</b>	<b>Marcus Culverwell</b>	<a href="mailto:headmaster@reigatestmarys.org">headmaster@reigatestmarys.org</a>
<b>Designated Safeguarding Lead (DSL)</b>	<b>Andrea Gower</b> Assistant Head	<a href="mailto:ajg@reigatestmarys.org">ajg@reigatestmarys.org</a>
<b>Early Years Designated Safeguarding Lead (EYDSL)</b>	<b>Sarah Page</b> Year 1 Class teacher	<a href="mailto:sjp@reigatestmarys.org">sjp@reigatestmarys.org</a>
<b>Deputy Designated Safeguarding Lead (DDSL)</b>	<b>Sam Selkirk</b> Head of Lower School	<a href="mailto:sas@reigatestmarys.org">sas@reigatestmarys.org</a>
<b>Deputy Designated Safeguarding Lead (DDSL)</b>	<b>Sarah Woodcock</b> Green Shoots Class teacher	<a href="mailto:swo@reigatestmarys.org">swo@reigatestmarys.org</a>
<b>Deputy Designated Safeguarding Lead (DDSL)</b>	<b>Barbara Hopkins</b> Extended Day Co-ordinator	<a href="mailto:bah@reigatestmarys.org">bah@reigatestmarys.org</a>
<b>Online Safety Coordinator</b>	<b>Simon Williams</b> Head of Digital Strategy	<a href="mailto:swi@reigatestmarys.org">swi@reigatestmarys.org</a>

## Reigate Grammar School Key Staff (Tel: 01737 222231)

<b>Headmaster</b>	<b>Shaun Fenton</b>	<a href="mailto:headmaster@reigategrammar.org">headmaster@reigategrammar.org</a>
<b>Designated Safeguarding Lead (DSL)</b>	<b>Sarah Arthur</b> Deputy Head	<a href="mailto:sja@reigategrammar.org">sja@reigategrammar.org</a>
<b>Deputy Designated Safeguarding Lead (DDSL)</b>	<b>Mary-Ann Collins</b> Senior Deputy Head	<a href="mailto:mac@reigategrammar.org">mac@reigategrammar.org</a>
<b>Deputy Designated Safeguarding Lead (DDSL)</b>	<b>Nick Lobb</b> Online Safety Coordinator Designated Teacher for Children Looked After	<a href="mailto:njl@reigategrammar.org">njl@reigategrammar.org</a>
<b>Deputy Designated Safeguarding Lead (DDSL)</b>	<b>Rev Phil Jackson</b> Chaplain	<a href="mailto:pmj@reigategrammar.org">pmj@reigategrammar.org</a>
<b>Deputy Designated Safeguarding Lead (DDSL)</b>	<b>Brendan Stones</b> Deputy Head	<a href="mailto:bps@reigategrammar.org">bps@reigategrammar.org</a>

## Governor Responsibilities for Child Protection and Safeguarding at RGS and RSM

<b>Chair of Governors</b>	<b>Mr Mark Eley</b>	01737 222231 (RGS) 01737 244880 (RSM) <a href="mailto:chairman@reigategrammar.org">chairman@reigategrammar.org</a>
<b>Lead Governor for Safeguarding and Online Safety at RGS</b>	<b>Mr Luke Herbert</b>	01737 222231 (RGS) 01737 244880 (RSM)
<b>Lead Governor for Safeguarding and Online Safety at RSM</b>	<b>Mrs Lisa Page</b>	01737 222231 (RGS) 01737 244880 (RSM)

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## Safeguarding Statement: *It could happen here*

This is a joint policy across both schools: Reigate Grammar School and Reigate St Mary's including the Early Years Foundation Stage. This policy therefore covers the welfare of children aged from 2-18 years. We recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils. We endeavour to provide a safe and welcoming environment where children are respected and valued and feel confident to talk if they are worried, believing they will be effectively listened to.

We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. Child protection forms part of the school's safeguarding responsibilities.

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.

## Terminology

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

- protecting children from maltreatment;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

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

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

**Child(ren)** includes everyone under the age of 18. 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.

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

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

**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.

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

**A child in need** is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development; or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

**Children suffering or likely to suffer significant harm.** The safeguarding partnership, with the help of other organisations as appropriate, have a duty to make enquires under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour-based violence, and extra-familial threats like radicalisation and sexual exploitation.

## I. Introduction

- I.1. 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 the following government publications: **Working Together to Safeguard Children, 2018 (last updated 2020)**, *Revised Safeguarding Statutory Guidance Framework for the Assessment of Children in Need and their Families, 2000*, and **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' 2021 (KCSiE), and Surrey Safeguarding Children Partnership (SSCP) Procedures.

The policy also reflects both the statutory guidance: **Keeping Children Safe in Education (KCSiE), 2021**; **Prevent Duty 2021**; and *Surrey Safeguarding Children Partnership (SSCP) Procedures*.

We also have regard to: *Disqualification under the Childcare Act, 2006 (updated 2019)*; *Teacher Standards, 2011*; *SCC Children Missing Education*; *SCC Touch and use of physical intervention when working with children and young people*; *Information Sharing 2018*; *FGM Act 2003 Mandatory Reporting Guidance 2016*, *Equality Act 2010*, *The Use of Social Media for On-Line Radicalisation 2015* and **When to Call the Police**.

**We work closely with Surrey Safeguarding Partnership** (and other safeguarding partnerships in different counties as appropriate). **We operate safeguarding procedures in line with locally agreed multi-agency safeguarding arrangements put in place by the safeguarding partners.**

- I.2. The Governing body takes seriously its responsibility under section 175/157 of the Education Act 2002 to safeguard and promote the welfare of children and to work together with other agencies to ensure that there are robust arrangements within our school to identify, assess and support those children who are suffering harm or at risk of suffering harm
- I.3. This policy applies to all members of staff and governors in the school.

### **Guidance and documents referred to in this policy.**

- [Surrey Safeguarding Children Partnership protocols, guidance and procedures](#)
- [Working Together to Safeguard Children 2018](#)
- [Keeping Children Safe in Education 2021 \(KCSiE\)](#)
- [Disqualification under the Childcare Act 2006 \(updated 2018\)](#)
- [FGM Act 2003 Mandatory Reporting Guidance 2020](#)
- ['What to do if you are worried a child is being abused' 2015](#)
- [Teacher Standards 2011](#)
- [Information Sharing Advice for Practitioners' guidance 2018](#)
- [The Equality Act 2010](#)
- [Sexual violence and sexual harassment between children in schools and colleges SCC Safeguarding Children Missing Education \(CME\) and Educated Other Than at School \(EOTaS\) – available on Services for Schools Portal](#)
- [SCC Touch and the use of physical intervention when working with children and young people – available on Services for Schools Portal](#)

### **Covid-19**

During the pandemic we will follow government and local partnership guidance. In the event of a lockdown, an additional addendum to the policy will be put in place outlining any additional safeguarding measures. Please see School Risk Assessment for further information.

In the event of absence of the DSL, the deputy DSLs will take on the responsibility and if necessary, we will provide cover across the two school sites.

## 2. Policy Principles and Values

The welfare of the child is paramount and RGS and RSM understand its duty to consider at all times the **best interests of the child, to create a culture of safety, equality and protection** and to **take action to enable all children to have the best outcomes.**

We maintain an attitude of **'It could happen here'**.

- 2.1. Children have a right to feel safe and secure: they cannot learn effectively unless they do so.
- 2.2. All children have a right to be protected from harm and abuse, this means that all children regardless of age, gender, culture, language, race, ability, sexual identity or religion have equal rights to protection, safeguarding and opportunities.
- 2.3. 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 (where we assess the risks and issues in the wider community surrounding a child), in accordance with statutory guidance.
- 2.4. 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.
- 2.5. 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

- 3.1. To demonstrate the school's commitment with regard to safeguarding and child protection to pupils, parents and other partners.
- 3.2. To raise the awareness of all teaching and non-teaching staff of their responsibilities to safeguard children through identifying and reporting possible cases of abuse.
- 3.3. To enable the school to effectively contribute to Early Help, assessments of need and support for those children.
- 3.4. To provide robust school systems and procedures that are followed by all members of the school community in cases of suspected abuse.
- 3.5. To develop and promote effective working relationships with other agencies, in particular Early Help providers, the Police, Health and Social Care.
- 3.6. We comply with the [Disqualification under the Childcare Act 2006 guidance issued in August 2018](#)
- 3.7. 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 guidance) and a single central record is kept for audit.

## 4. Supporting Children

- 4.1. We recognise that a child who is abused or who witnesses violence may feel helpless and humiliated, may blame themselves and find it difficult to develop and maintain a sense of self-worth.
- 4.2. We recognise that the 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.
- 4.3. We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal for example, they might be aggressive or withdrawn.
- 4.4. Our school will support all children by:

- Encouraging self-esteem and self-assertiveness, through the curriculum as well as our relationships, whilst not condoning aggression or bullying.
  - Promoting a caring, safe and positive environment within the school.
  - Responding sympathetically to any requests for time out to deal with distress and anxiety e.g. in The Snug at RGS;
  - Offering details of pastoral support and **opportunities for children to be listened to** within school. At RGS examples are: the school counsellor, chaplain, peer mentors, school nurse and online counselling service (Kooth), we also use mindfulness techniques to support students who are anxious. Pupils are given these details. At RSM pupils can access support through: the school counsellor, pastoral team, Bubbles, Learning Space and ELSA lessons. Both RGS and RSM also signpost external avenues such as helplines, counselling or other opportunities for external support.
  - Liaising and working together with all other support services and those agencies involved in the safeguarding of children, for example Early Help.
  - Notifying the C-SPA as soon as there is a significant concern.
  - We will provide continuing support to children about whom there have been concerns who leave the school by ensuring that information is shared confidentially with the child's new setting. We will ensure the School records are forwarded as a matter of priority and within statutory timescales.
- 4.5. As part of a broad and balanced curriculum, children are taught about safeguarding, including online, through various teaching and learning opportunities. Children are taught to recognise when they are at risk and how to get help when they need it.

## 5. Prevention/Protection

- 5.1. 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.
- 5.2. The school community will therefore:
- Work to establish and maintain an ethos where children feel secure, are encouraged to talk and are always listened to;
  - Include regular consultation with children e.g. through questionnaires, student councils and forums, participation in anti-bullying week, asking children to report whether they have had happy/sad lunchtimes/playtimes etc.
  - Ensure that all children know there is an adult in the school whom they can approach if they are worried or in difficulty;
  - Include safeguarding across the curriculum, including PSHEE, 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 and online-safety. Also focussed work in Year 6 to prepare for transition to secondary school and more personal safety/independent travel; and
  - 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:

- 6.1. **the school operates a safer recruitment procedures in line with KCSIE 2021 and this includes statutory checks on staff suitability to work with children and disqualification regulations.**
- 6.2. all staff receive and read and adhere to the schools' safeguarding arrangements, the schools' safeguarding statement, *Staff Behaviour Policy (Code of Conduct)*, *Safeguarding Policy* (which includes details on the school's safeguarding response to children missing in education), the role and names of the Designated Safeguarding Lead and their deputies, and [Keeping Children Safe in Education Part 1 and Annex B](#), or Annex A (which is a condensed version of Part one of Keeping children safe in education. It can be provided (instead of Part one) to those staff who do not directly work with children (if the governing body think it will provide a better basis for those staff to promote the welfare and safeguard children), *as well as the Behaviour Policy, Anti-Bullying Policy, Acceptable User Policy and E-Safety Policy* on induction.
- 6.3. all staff receive safeguarding and child protection training at induction, **including Prevent and Online Safety and Behaviour Policy** in line with advice from in line with advice from [SSCP](#) and receive safeguarding and child protection updates, as required, but at least annually. **As part of the induction, staff must read KCSiE Part 1 and Annex B (or Annex A for staff who do not directly work with children) and also the Safeguarding Policy, which includes Children Missing in Education and Peer on Peer Abuse.** The Induction meeting proves an opportunity for the new member of staff to discuss the main elements with the DSL. During the induction when staff meet with one of the DSLs and the role of the DSL and deputies is explained to them. They are asked to read **the Staff Code of Conduct** and key features are explained during induction e.g. **whistleblowing, acceptable use of ICT, staff/pupil relationships and guidance on appropriate use of social media and other forms of communications to help ensure professional roles are clearly understood.** In addition, guidance is given on 1:1 teaching situations such as music tuition. Please see Code of Conduct.

In summary, we will follow *KCSiE* guidance as set out below.

<b>Staff Induction – these are not intended to be exhaustive</b>	
<b>Explain and discuss</b> ( <i>KCSiE</i> )	<b>Provide</b> ( <i>KCSiE</i> Part One and Annex B or Annex A)
Safeguarding policy (including response to children missing education and Peer-on-Peer Abuse)	Safeguarding Policy (including children missing education and Peer-on-Peer Abuse)
Role of DSL – including identity of DSL and deputies – contained in Safeguarding Policy	Role of DSL and DDSLs
Explain Staff Code of Conduct	Staff Code of Conduct (including whistleblowing, acceptable use of IT, staff/pupil relationships, low level concerns, comms including use of social media)
Explain Pupil Behaviour Policy	Pupil Behaviour Policy (including measures to prevent bullying, including cyber bullying, prejudice-based and discriminatory bullying)
Online Safety Policy	Online Safety Policy
Part One of <i>KCSiE</i> and Annex B or Annex A (for staff who do not work directly with children)	Part One of <i>KCSiE</i> and Annex B and Annex A (for staff who do not work directly with children)

- 6.4. all members of staff are trained in and receive updates in online safety and reporting concerns.
- 6.5. all staff and governors have regular child protection awareness training, in line with advice from Surrey Safeguarding Partnership updated by the DSL as appropriate, to maintain their understanding of the **signs and indicators of abuse and to include Prevent and Online Safety.**  
**All members of staff maintain a zero tolerance approach to sexual violence and sexual harassment.**
- 6.6. the *Safeguarding Policy* is made available via the school website and parents/carers are made aware of this policy and their entitlement to have a copy. There is a printed copy held by the School Reception. All parents/carers are made aware of the responsibilities of staff members with regard to child protection procedures through the publication of the *Safeguarding Policy* on the school websites
- 6.7. the school provides a coordinated offer of Early Help when additional needs of children are identified and contributes to Early Help arrangements and inter-agency working and plans  
Our lettings policy will seek to ensure the suitability of adults working with children on School sites at any time and ensure that any groups who use the school premises have child protection policies and procedures in place.
- 6.8. community users organising activities for children are aware of the school's *Safeguarding Policy*, guidelines and procedures.
- 6.9. 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 harm and abuse.
- 6.10. **all staff will be given the latest copy of *Keeping Children Safe in Education Part 1 (KCSiE)* and *Annex B (just Annex A for staff who do not have direct contact with children)* and will record to say they have read and understood it.** This applies to the Governing Body in relation to Part 2 of the same guidance.
- 6.11. staff are given a card with a summary of key contact details e.g. C-SPA phone number and also the steps to respond in case of an allegation against a member of staff e.g. LADO contact details.

## 7. Roles and Responsibilities

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

- 7.1. Provide a safe environment in which children can learn.
- 7.2. Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to.
- 7.3. Ensure children know that there are adults in the school whom they can approach if they are worried or have concerns.
- 7.4. **Ensure only appropriately trained professionals 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.**
- 7.5. 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. Staff should raise concerns about the mental health of a child with the pastoral team and we use My Concern to track and monitor these concerns, escalating to relevant agencies, avenues of support as appropriate. KCSiE Paragraph 44 provides additional resources e.g. Mental Health and Behaviour in Schools Guidance:

<https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

- 7.6. 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.
- 7.7. **If staff have a mental health concern about a child that is also a safeguarding concern, immediate action will be taken**, following our policy and procedures and speaking to the DSL or a deputy and reporting it through **My Concern**.
- 7.8. Plan opportunities within the curriculum for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe.
- 7.9. Attend training in order to be aware of and alert to the signs of abuse.
- 7.10. Maintain an attitude of **"it could happen here"** with regards to safeguarding.
- 7.11. Know how to respond to a pupil who discloses harm or abuse following training of *Working together to Safeguard Children 2018* and *What to do if you are worried a child is being Abused, 2015*.
- 7.12. 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.
- 7.13. Be prepared to refer directly to the Single Point of Access (C-SPA), and the police if appropriate. We understand that we have a pivotal role to play in multi-agency safeguarding arrangements.
- 7.14. Report low level concerns (as defined in KCSIE 2021) about any member of staff/supply staff or contractor to the Headmaster, or if it is a low level concern about the Headmaster, it should be reported to the Chair of Governors.
- 7.15. Follow the allegations procedures if the disclosure is an allegation against a member of staff.
- 7.16. Follow the procedures set out by the Surrey Children's Safeguarding Partnership and take account of guidance issued by the Department for Education.
- 7.17. Provide support for children subject to Early Help, Child in Need or Child Protection that is in keeping with their plan.
- 7.18. Treat information with confidentiality but never promising to "keep a secret".
- 7.19. Notify the DSL or their Deputy of any child on a child protection plan or child in need plan who has unexplained absence.
- 7.20. Have an understanding of Early Help, and be prepared to identify and support children who may benefit from Early Help.
- 7.21. 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 schools 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.
- 7.22. Liaise with other agencies that support pupils and provide Early Help.
- 7.23. Know who the DSL and Deputy DSL are and know how to contact them.
- 7.24. Have an awareness of the role of the DSL, the schools *Safeguarding Policy, Behaviour Policy and Staff Code of Conduct*, and procedures relating to the safeguarding response for children who go missing from education.
- 7.25. 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.
- 7.26. Assist the Governing Body and Headmasters in fulfilling their safeguarding responsibilities set out in legislation and statutory guidance.

## 7.27. The Headmasters will ensure that:

- 7.27.1. the Child Protection and *Safeguarding Policy* and procedures are implemented and followed by all staff and all staff are aware of the role of the DSL, including the identity of the DSL and any deputies.
- 7.27.2. the School has appropriate policies in place that make it clear that sexual harassment, online sexual abuse and sexual violence (including sexualised language) is unacceptable, with appropriate sanctions and support in place.
- 7.27.3. the School staff have appropriate knowledge of part 5 the government's *Keeping Children Safe In Education* guidance.
- 7.27.4. all children are supported to report concerns about harmful sexual behaviour freely. That concerns are taken seriously and dealt with swiftly and appropriately, and children are confident that this is case. And that comprehensive records of all allegations are kept
- 7.27.5. 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 views and give feedback.
- 7.27.6. the school fully contributes to inter-agency working in line with *Working Together to Safeguard Children 2018* guidance.
- 7.27.7. sufficient time, training, support, resources, including cover arrangements where necessary, is allocated to the DSL and deputy(ies) DSL(s) to carry out their roles effectively, including the provision of advice and support to school staff on child welfare and child protection matters, to take part in strategy discussions/meetings and other inter-agency meetings and/or support other staff to do so; and to contribute to the assessment of children.
- 7.27.8. Deputy DSLs are trained to the same standard as the DSL and the role is explicit in their job description.
- 7.27.9. adequate and appropriate DSL cover arrangements are in place for any out of hours/out of term activities.
- 7.27.10. systems are in place for children to express their views and give feedback which operate with the best interest of the child at heart.
- 7.27.11. opportunities are provided for a co-ordinated offer of Early Help when additional needs of children are identified.
- 7.27.12. all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistleblowing procedures.
- 7.27.13. that pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.
- 7.27.14. ensure that allegations or concerns against staff are dealt with in accordance with the guidance from the Department of Education (DfE), Surrey Safeguarding Children Partnership (SSCP) and Surrey County Council (SCC). This means they liaise with the Local Authority Designated Officer (LADO), before taking any action and on an ongoing basis, where an allegation is made against a member of staff or volunteer.
- 7.27.15. statutory requirements are met to **make a referral to the Disclosure and Barring Service and additionally in the case of teaching staff to the Teacher Regulation Agency** where they think an individual has engaged in conduct that harmed (or is likely to harm) a child; or if the person otherwise poses a risk of harm to a child.

## 7.28. 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.
- have an “it could happen here” approach to safeguarding.
- liaise with the three safeguarding partners and work with other agencies in line with *Working Together to Safeguard Children*
- manage and submit a Request for Support Form<sup>1</sup> 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 [Surrey 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 email 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**).
- refer cases where a crime may have been committed to the Police as required. NB: NSPCC – [When to call the police](#) should help DSLs understand when they should consider calling the Police and what to expect when they do.
- liaise with the “case manager” and Local Authority Designated Officer (LADO) for child protection concerns in cases which concern a member of staff/supply staff/contractor or a volunteer; and refer cases where a person is dismissed or left service due to risk/harm to a child to the Disclosure and Barring Service and Teaching Regulation Agency, as required.
- record “low level concerns” in cases which concern a member of staff/supply staff/contractor or a volunteer. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that will be respected as far as reasonably possible.
- follow DfE and *KCSiE* guidance on ‘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.
- **follow KCSIE and DfE guidance contained in <https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>**
- **and be confident as to what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support when required.**
- **When there has been a report of sexual violence, make an immediate risk and needs assessment. Additionally, where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis and will be put in place as required.**

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<sup>1</sup> <https://www.surreyscb.org.uk/professionals/>

- be available during term time (during school hours) for staff in school to discuss any safeguarding concerns. Appropriate and adequate cover arrangements will be arranged by the DSL and the school leadership for any out of hours/term activities.
- act as a source of support and expertise in carrying out safeguarding duties for the whole school community.
- encourage and promote a culture of listening to children and taking account of their wishes and feelings, amongst all staff.
- access training and support to ensure they have the knowledge and skills required to carry out the role. DSL training should be updated at least every two years and their knowledge and skills refreshed at regular intervals but at least annually.
- have a secure working knowledge of SSCP procedures and understand the assessment process for providing early help and statutory intervention, including the local authority levels of need criteria and referral arrangements.
- have a clear understanding of access and referral to the local Early Help offer and will support and advise members of staff where early help intervention is appropriate.
- understand and support the school delivery with regards to the requirements of the Prevent duty and provide advice and guidance to staff on protecting children from radicalisation.
- liaise with School staff (especially pastoral support, behaviour leads, School health colleagues and the SENDCO) on matters of safety and safeguarding and consult the SSCP Levels of Need document to inform decision making and liaison with relevant agencies.
- be alert to the specific needs of children in need, those with SEND and young carers.
- understand the risks associated with online activity and be confident that they have the up to date knowledge and capability to keep children safe whilst they are online at school; in particular understand the additional risks that children with SEND face online and the associated and appropriate support they require.
- keep detailed, accurate records (either written or using appropriate secure online software), that include all concerns about a child even if there is no need to make an immediate referral and record the rationale for decisions made and action taken.
- ensure that an indication of the existence of the additional child protection file is marked on the pupil school file record.
- 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.
- 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 ongoing.
- if the transit method requires that a copy of the Child Protection file is retained until such a time that the new school acknowledges receipt of the original file, the copy should be securely destroyed on confirmation of receipt.
- ensure that all appropriate staff members have a working knowledge and understanding of their role in case conferences, core groups and other multi-agency planning meetings, to ensure that they attend and are able to effectively contribute when required to do so; where a report is required, this should be shared with the parents prior to the meeting.

- report to the Headmaster any significant issues for example, use of the [SSCP multi-agency escalation procedures](#), enquiries under section 47 of the Children Act 1989 and Police investigations
- ensure that the case holding Social Worker is informed of any child currently with a child protection plan who is absent without explanation.
- ensure that all staff sign to say they have read, understood and agree to work within the School's child protection policy, staff behaviour policy (code of conduct) and Keeping Children Safe in Education (KCSiE) Part 1 and Annex B (Annex A for staff who do not have direct contact with children) and ensure that the policies are used effectively.
- organise child protection and safeguarding induction, regularly updated training and a minimum of annual updates (including online safety) for all school staff, keep a record of attendance and address any absences.
- ensure that in collaboration with the school leadership and governors, the child protection policy is reviewed annually and the procedures and implementation are updated and reviewed regularly.
- ensure that the Child Protection Policy is available publicly and that parents are aware that referrals about suspected harm and abuse will be made and the role of the school in this.
- establish and maintain links with the Local Authority safeguarding partners to make sure staff are aware of training opportunities and the latest policies on local safeguarding arrangements.
- contribute to and provide, with the Headmaster and Chair of Governors, the "Audit of Statutory Duties and Associated Responsibilities" to be submitted to the Surrey County Council, Education Safeguarding Team.
- ensure that the names of the Designated Safeguarding and Child Protection Lead and deputies, are clearly advertised, with a statement explaining the school's role in referring and monitoring cases of suspected abuse.
- meet all other responsibilities as set out for DSLs in Keeping Children Safe in Education 2021.

#### 7.29. **The Deputy Designated Safeguarding Lead(s)**

In addition to the role and responsibilities of all staff the Deputy DSL:

- will be trained to the same standard as the Designated Safeguarding Lead and the role is explicit in their job description.
- will 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, carries out the activities necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the DSL the deputy will assume all of the functions above.

#### 7.30. **All members of The Governing Body understand and fulfil their responsibilities to ensure that:**

- 7.30.1. there is a whole School approach to safeguarding.
- 7.30.2. the school has effective safeguarding policies and procedures including a *Safeguarding Policy*, a *Staff Behaviour Policy or Code of Conduct*, a *Behaviour Policy* and a response to children who go missing from education. Ensure policies are consistent with Surrey Safeguarding Children's Partnership (SSCP) and statutory requirements, are reviewed annually and that the *Safeguarding Policy* is available on the school website.
- 7.30.3. the SSCP is informed in line with local requirements about the discharge of duties via the annual safeguarding audit. We also report to governors at the termly Board

Meetings and there is a formal annual report as well as a sub-committee with a focus on Education and Welfare, including safeguarding.

- 7.30.4. the school operates a safer recruitment procedure that includes statutory checks on staff suitability to work with children and disqualification regulations 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.
- 7.30.5. at least one member of the governing body has completed safer recruitment training to be repeated every five years.
- 7.30.6. staff have been trained appropriately and this is updated in line with guidance and all staff have read KCSIE (2021) part I and Annex B (or just Annex B for staff who do not work directly with children) and that mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance.
- 7.30.7. all staff including temporary staff/supply staff, volunteers and contractors are provided with the School's Safeguarding and Child Protection Policy and if applicable the Staff Code of Conduct.
- 7.30.8. the school has procedures for dealing with allegations of abuse against staff (including the Headmasters), 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.**
- 7.30.9. **Policies and processes are in place to deal with concerns (including allegations) which do not meet the harm threshold or "low level concerns" as defined in KCSIE 2021.**
- 7.30.10. a nominated governor for safeguarding is identified.
- 7.30.11. a member of the senior leadership team has been appointed by the Governing Body 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.
- 7.30.12. 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.
- 7.30.13. 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 (PSHEE) and relationship and sex education (RSE).
- 7.30.14. the governors and school will ensure application filters and monitoring systems are in place to safeguard children online, at RGS and RSM. School devices are monitored through Smoothwall which uses key stroke logging and screen capture technology. We also use the Lightspeed internet filter to block and manage internet searches to help support safe student use of the internet.
- 7.30.15. the School will comply with DfE and the Surrey County Council Children Missing Education requirements.
- 7.30.16. the School will comply with regular data returns requested by the Local Authority, regarding all children, of statutory School age, attending alternative provision and/or on a reduced or modified timetable
- 7.30.17. the governors will ensure that the school has clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.



7.30.18. enhanced DBS checks (without barred list checks, unless the governor is also a volunteer at the school) are in place for all Governors.

7.30.19. that any weaknesses in Safeguarding are remedied immediately.

## 8. Confidentiality, Sharing and Withholding Information

- 8.1. 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](#).
- 8.2. The school will refer to the guidance in the data protection toolkit for schools: [https://www.gov.uk/government/publications/data-protection-toolkit-for-schools\\_guidance\\_to\\_support\\_school\\_with\\_data\\_protection\\_activity\\_including\\_compliance\\_with\\_GDPR](https://www.gov.uk/government/publications/data-protection-toolkit-for-schools_guidance_to_support_school_with_data_protection_activity_including_compliance_with_GDPR).
- 8.3. Information will be shared with staff within the school who 'need to know'.
- 8.4. Relevant staff have due regard to Data Protection principles which allow them to share (and withhold) information.
- 8.5. 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 1998* 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.
- 8.6. All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing.
- 8.7. All staff will always undertake to gain parent/carers consent to refer a child to Social Care unless to do so could put the child at greater risk of harm, or impede a criminal investigation.

## 9. Child Protection Procedures

- 9.1. 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.
- 9.2. 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.
- 9.3. 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.
- 9.4. 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.
- 9.5. There are also a number of specific safeguarding concerns that we recognise our pupils may experience, such as domestic abuse and these are covered further on in the policy for more detail.

## 10. If Staff are Concerned about a Child's Welfare

**If a member of staff suspects abuse, spots signs or indicators of abuse, or they have a disclosure of abuse made to them, or are concerned about a child/children being drawn into terrorism they must:**

- a. Make an initial record of the information related to the concern, this can be done in person or via **My Concern**<sup>2</sup> or a **Concern Form (RSM)**
- b. Report it to the DSL immediately.
- c. 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.
- d. 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
- e. The records must be signed and dated by the author electronically on **My Concern** or via the **Concern Form**.
- f. **Anyone can make a referral.** In the absence of the DSL or their Deputy, staff must be prepared to refer directly to C-SPA (and the police if appropriate) if there is the potential for immediate significant harm.

#### 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 immediately** 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 considered.
3. 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 email to: [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk) or 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
4. If the DSL feels unsure about whether a referral is necessary they can phone the C-SPA to request support and discuss concerns.
5. If there is not a risk of significant harm, the DSL will either actively monitor the situation or consider offering Early Help.
6. In the case of pupils identified as being at risk of radicalisation, the DSL team will consider the level of risk to identify the most appropriate referral, which could include Children's Social Care, or **Channel** for example.
7. 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

<sup>2</sup> **My Concern** is secure safeguarding software, where staff can record concerns and the DSL/DDSLs will be alerted. It does not replace the important conversations which staff should always have with the DSL and DDSLs around concerns. In the event of a child being at risk of serious and/or immediate harm, staff must speak to the DSL/DDSL straight away or if they cannot contact them, they should call C-SPA or **999**.

and by whom. This is important in cases where the police may need to conduct a criminal investigation.

8. 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.
9. The exception to this process will be in those cases of known FGM where there is a mandatory requirement for the teacher to report directly to the police. The DSL should also be made aware.

## 11. Early Help

Any child may benefit from early help but all staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing/goes missing from care or from home;
- is misusing drugs or alcohol themselves;
- is at risk of modern slavery, trafficking or exploitation;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- has returned home to their family from care;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;
- is a privately fostered child.

Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

In the first instance, staff who consider that a pupil may benefit from early help should discuss this with the School's DSL/DDSLs. The DSL/DDSLs will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate, as well as considering what help can be offered from within the school setting for example, school counsellor. If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.

## 12. Dealing with Disclosures

### 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. Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe.**

## Guiding Principles: The Seven Rs

### 1. 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

### 2. 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'

### 3. 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

### 4. 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 (and no later than within 24 hours/one working day) and if a crime has been committed you must act immediately.**
- If you are dissatisfied with the level of response you receive following your concerns, you should press for re-consideration

### 5. Record

- If possible make some very brief notes at the time, and write them up as soon as possible onto My Concern
- Keep your original notes on file
- Record the date, time, place, person/s 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'

### 6. 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

### 7. 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?

## 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 Headmaster or Safeguarding Governor of the school and/or may contact the C-SPA.

## Supporting Staff

We recognise that staff working in the school who have become involved with a child who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting.

We will support such staff by providing an opportunity to talk through their anxieties through internal supervision with the DSLs and/or to seek further support as appropriate, for example from our Independent School Counsellor or an external source.

## Notifying Parents

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

However, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem advice will first be sought from children's social care.

Where there are concerns about forced marriage or honour-based violence parents should not be informed a referral is being made as to do so may place the child at a significantly increased risk.

## 13. Safeguarding concerns and allegations (including non-recent) against adults who work with children, including Low Level Concerns – referral process

### Procedure

This procedure should be used in all cases in which it is alleged a member of staff, **including supply staff**, volunteers and contractors in the school, or another adult who works with children.

### Allegations

It is an allegation if the person has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (also includes behaviour outside the school).

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

- Report any concerns about the conduct of any member of staff or volunteer to the relevant Headmaster immediately. If the Headmaster is absent then staff should refer to the Chair of Governors or to the LADO.
- Where the allegation relates to a member of supply staff provided by an agency the agency should be fully involved.
- If an allegation is made against the Headmaster, the concerns need to be raised with the Chair of Governors as soon as possible. If the Chair of Governors is not available, then the LADO (Local Authority Designated Office) should be contacted directly. Where the allegation is against the Headmaster, the Headmaster must not be informed of the allegation prior to contact with the chair and the LADO.

- Where there is a conflict of interest in reporting to the Headmaster, contact the LADO directly.
- If the concern is about the Chair of Governors, contact the LADO.
- There may be situations when the Headmaster or Chair of Governors will want to involve the police immediately if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.
- **Once an allegation has been received by the Headmaster or Chair of Governors they will contact the LADO (as part of their mandatory duty) on 0300 123 1650 option 3 LADO Email: [LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk) immediately and before taking any action or investigation.**
- Following consultation with the LADO inform the parents of the allegation unless there is a good reason not to.

In liaison with the LADO, the school will determine how to proceed and if necessary the LADO will refer the matter to Children's Social Care and/or the police. GDPR cannot stand in the way of safeguarding.

If the matter is to be investigated internally, the LADO will advise the school/college to seek guidance from local authority colleagues in following procedures set out in part 4 of 'Keeping Children Safe in Education' (2021) and the SSCP procedures.

## Low Level Concerns

**The purpose of considering low level concerns is to embed a culture of openness, trust and transparency in which our values and expected behaviours are consistently lived, monitored and reinforced by all staff. Low Level Concerns have been introduced as a new category in KCSIE 2021.**

Concerns may be graded low level if the concern does not meet the criteria for an allegation (the harms test); and the person has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Example behaviours include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

If the concern has been raised via a third party, the Headmaster should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Staff should be encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Low level concerns should be reported to the same persons as outlined above in Allegations i.e. concerns should be referred to the Headmaster in the first instance, unless it is about the Headmaster, in which case it should be referred to the Chair of Governors, or directly to the LADO. The Headmaster should not be informed of any allegations prior to contact with the Chair or the LADO.

Low level concerns should be recorded in writing, including:

- name\* of individual sharing their concerns
- details of the concern
- context in which the concern arose
- action taken

(\* if the individual wishes to remain anonymous then that should be respected as far as reasonably possible)

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO.

The records' review might identify that there are wider cultural issues within the school that enabled the behaviour to occur. This might mean that policies or processes could be revised or extra training delivered to minimise the risk of it happening again.

The school will be asked, as part of a routine ISI Inspection to confirm that they have disclosed to inspectors all instances of safeguarding concerns.

### **Non recent allegations**

If an adult makes an allegation to a school that they were abused as a child, the individual should be advised to report the allegation to the police. Non recent allegations made by a child, should be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children social care and the police. Abuse can be reported no matter how long ago it happened.

## **14. 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 Partnership Levels of Need Threshold Document](#)

## **15. 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. They may be abused by an adult or adults, or another child or children.

### **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.

### **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.

### **Sexual abuse**

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



The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including online).

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

## 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.

## 16. Indicators of Abuse

### Neglect

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

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

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

### **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.



## 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

## Emotional Abuse

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

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

## Indicators of Emotional Abuse

### Developmental issues:

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

### Behaviour issues:

- 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

#### **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. Concerns 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.

### 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. 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 educational 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.

## 17. Sexual violence and sexual harassment between children in schools and peer-on-peer abuse – we have a zero tolerance approach

### Abuse

#### Context

**Peer-on-peer abuse including sexual violence and sexual harassment can occur between two children of any age and sex and can happen online or off-line. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children e.g. sexual violence, sexual harassment, physical abuse (e.g. hitting, shaking, biting, hair pulling or otherwise causing physical harm), sharing nudes and semi-nudes (consensual and non-consensual), initiation/hazing type violence and rituals. It can also occur in intimate personal relationships between peers. It can be causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or engage in sexual activity with a third party. Bullying, including cyber-bullying, prejudice based and discriminatory bullying are also peer-on-peer abuse.**

**Incidents of peer-on-peer abuse, including sexual abuse, outside of school will be treated in the same way as incidents in school.**

**We understand that even if there are no reported cases of peer-on-peer abuse, such abuse may still be taking place and is simply not being reported.**

**We recognise that there can be a gendered nature of peer-on-peer abuse but that all peer-on-peer abuse is unacceptable and will be taken seriously.**

**Peer-on-peer concerns should be reported to the DSL.**

**The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019.**

**Upskirting<sup>3</sup>, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or to cause the victim humiliation, distress or alarm.**

**Upskirting is a criminal offence. Anyone of any gender can be a victim.**

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.

<sup>3</sup> For further information on upskirting please see Annex A KCSiE

**It is important that all victims are taken seriously and offered appropriate support and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and no victim should ever be made to feel ashamed for making a report.**

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 and staff are supported and protected as appropriate.

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 child protection policy and in line with KCSiE (2021) and following recommendations from the Sexual Violence and Sexual Harassment between Children in Schools and Colleges guidance (DfE 2021)**

**We have a zero-tolerance approach to peer-on-peer abuse.** We are clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up. **Peer-on-peer/child-on-child abuse is abuse and will not be tolerated or passed as mere ‘banter’ or ‘having a laugh’, or just ‘boys being boys’ and challenging behaviours (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.**

We recognise that it is more likely that girls will be victims and boys perpetrators, but all peer-on-peer abuse is unacceptable and we should be mindful that it can happen to anyone.

The threshold for dealing with an issue of pupil behaviour or bullying under the Safeguarding Policy is when ‘there is reasonable cause to suspect that a child is suffering, or likely to suffer significant harm’. Any such abuse will be referred to the relevant local agencies such as C-SPA. In the event of disclosures about peer-on-peer abuse that all children involved whether perpetrator or victim are treated as being ‘at risk’.

**We will minimise the risk of peer-on-peer/child-on-child abuse by:**

### **1. Prevention**

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

### **2. Responding to reports of sexual violence and sexual harassment**

- Children can report concerns to any member of staff and are regularly reminded of key staff that they can go to e.g. Head of Year, School Nurse, School Counsellor, Chaplain, Deputy Head
- Children making a report of sexual violence or sexual harassment including upskirting (which is a criminal offence) will be taken seriously, kept safe and be well supported.
- If the report includes an online element staff will be mindful of the Searching, Screening and Confiscation: advice for schools 2018 guidance.
- Staff taking the report will inform the DSL or the Deputy DSL immediately.
- Staff taking a report will never promise confidentiality.
- Reports will be recorded on **My Concern** and/or on the RGS Incident Form.
- 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 email: [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk) or telephone **0300 470 9100**, as appropriate.

### **3. 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 discipline 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 may be accessed from the [Education Safeguarding Team: 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

#### **The DSL decision making regarding the issue with the following possible options:**

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

#### **Ongoing Response:**

The DSL will manage each case individually and will ensure the risk assessment 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 relevant Headmaster should continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on school and college 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 and 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 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 2021](#) ( in particular Part 5)

[Sexual Violence and Sexual Harassment between Children in Schools and Colleges guidance \(DfE 2021\)](#)

The UK Council for Internet Safety (UKCIS): Sharing nudes and semi-nudes (December 2020)

## Harmful Sexual Behaviour

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

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

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

**Please see Appendix I for the Brook Traffic Light Tool.**

## 18. Counter-Bullying/Cyberbullying

Our school policies 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 body. All staff are aware that children with SEND and/or differences/perceived differences are more susceptible to being bullied/victims of child abuse. Children with SEND or some medical conditions can be more prone to peer-on-peer group isolation or bullying (including prejudice based bullying) than other children. They can also be disproportionately impacted by behaviours such as bullying, without always showing outward signs and can sometimes experience more barriers and difficulties in managing or reporting these challenges.

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 Headmaster and the DSL will also consider child protection procedures.

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

## 19. Online Safety

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

Children increasingly use electronic equipment on a daily basis to access the internet, share and view content and images via social media sites such as Facebook, twitter, Instagram, snapchat and 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. **Abuse can take place wholly on line or technology may be used to facilitate offline abuse.**

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

Children are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated. The School online safety co-ordinators are **Nick Lobb (RGS) and Simon Williams (RSM).**

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into **cyber-dependent crime.**

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the **Cyber Choices** programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Annex D of KCSiE 2021 provides helpful additional guidance about to ensure that pupils understand how to stay safe and behave online.

Please note that during a period of remote learning i.e. during a lockdown, students will be reminded about keeping safe during online learning.

## 20. Racist Incidents

We acknowledge that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of racist incidents.

## 21. Radicalisation, 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 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 Headmaster and the 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. They should then follow the safeguarding procedures and refer cases by email 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 non-urgent cases where police advice is sought then dial **101** 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**).

## 22. 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. The Department of Education guidance [The Prevent Duty](#) should be referred to.

### Recognising Extremism

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, art work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

## 23. 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.

**The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).**

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- a. physical or sexual abuse;
- b. violent or threatening behaviour;
- c. controlling or coercive behaviour;

- d. economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- e. psychological, emotional or other abuse.

People are 'personally connected' when they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of domestic abuse can be found here:

<https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted>

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

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.

#### What should I do if I suspect a family is affected by domestic abuse?

To talk through your concerns, call the Surrey Domestic Abuse Helpline on **01483 776822** or talk to your local outreach service:

East Surrey Domestic Abuse Services (Reigate & Banstead, Mole Valley and Tandridge): **01737 771350** or to make a referral to ESDAS' Services use our secure email address: [leigh.esdas@esdas.cjsm.net](mailto:leigh.esdas@esdas.cjsm.net).

The **National Domestic Abuse** helpline can be called free of charge and in confidence, 24 hours a day on 0800 2000 247.

## 24. 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. (DFE 2017)

All staff are aware of the link between online safety and vulnerability to CSE.

#### Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicious of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;

- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

### **Potential vulnerabilities include:**

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse;
- Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example);
- Recent bereavement or loss;
- Social isolation or social difficulties;
- Absence of a safe environment to explore sexuality;
- Economic vulnerability;
- Homelessness or insecure accommodation status;
- Connections with other children and young people who are being sexually exploited;
- Family members or other connections involved in adult sex work;
- Having a physical or learning disability;
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity.

More information can be found in: Child sexual exploitation: Definition and a guide for practitioners (DfE 2017).

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

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

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

The school is aware that 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 PHSEE and RSE 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.

## **25. Child Criminal Exploitation (CCE) and Gangs – Serious Violence**

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.

Staff should be aware of indicators which may signal that children are at risk from, or are involved with serious violent crime:

- Absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance signs of self-harm or significant change in wellbeing, Or signs of assault or unexplained injuries
- Unexplained gifts or new possessions
- Missing school

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

Criminal exploitation of children is a typical feature of **county lines** criminal activity<sup>4</sup>. County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas, using dedicated mobile phones, or other form of 'deal line'. Key identifying features of involvement in county lines are when children are missing, when the victim may have been trafficked (modern slavery) 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**.

## 26. Sharing Nudes and Semi-Nudes

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

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

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

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<sup>4</sup> <https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>

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

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

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

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

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

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

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

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

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

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

**During the decision making the DSL will consider if:**

- there is a significant age difference between the sender/receiver.
- there is any coercion or encouragement beyond the sender/receiver.
- the imagery was shared and received with the knowledge of the child in the imagery.
- the child is vulnerable, for example subject to child in need, child protection or early help plans, looked after, has a social worker, SEND.
- there is a significant impact on the children involved.
- the image is of a severe or extreme nature.
- the situation is isolated or if the image been more widely distributed.
- there other circumstances relating to either the sender or recipient that may add cause for concern.
- the children have been involved in incidents relating to youth produced imagery before.

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

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



## 27. Female Genital Mutilation (FGM)

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

The duty applies to all persons in school who is 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.**

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK.

Indications that FGM may have already taken place may include:

- difficulty walking, sitting or standing and may even look uncomfortable.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- frequent urinary, menstrual or stomach problems.
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations.
- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs.

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.

## 28. Forced Marriage

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

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

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

School staff should never attempt to intervene directly as a school or through a third party. Contact should be made with the C-SPA and/or the Forced Marriage Unit **020 7008 0151**.

## 29. Honour-Based Abuse (HBA)

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

**Honour based abuse might be committed against people who:**

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

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

## 30. Child Abduction

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org).

## 31. Children and the Court System

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children **5-11-year olds** and **12-17 year olds**.

- <https://www.gov.uk/government/publications/young-witness-booklet-for-5-to-11-year-olds>
- <https://www.gov.uk/government/publications/young-witness-booklet-for-12-to-17-year-olds>

## 32. Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. For further information, please see The National Information Centre on Children of Offenders, **NICCO** which provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

## 33. 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 is 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.

## 34. Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this



does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

Please see link to Surrey information:

- <https://www.healthysurrey.org.uk/community-health/homelessness#257360>

### 35. Private Fostering Arrangements

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

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 is 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.

### 36. Looked After Children

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

The designated teacher for looked after children and the DSL have details of the child's social worker and the name and contact details of the Surrey County Council's Head of Virtual School.

### 37. Children Missing 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. We monitor attendance and unexplained or unexpected absence is followed up.

The school asks parents to provide two emergency contacts and this is followed up if they do not. .

The school will ensure that there is a record of joiners and leavers as defined in [The Education \(Pupil Registration\) \(England\) 2006](#). (amended in 2016)

**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(s) 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. \(amended in 2016\)](#)

**The school will:**

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

### 38. Pupils Missing Out of Education (PMOOE)

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 a reduced or modified timetable may have additional vulnerabilities.

The school aims to work with parents to put in place a reduced or modified timetable

The school will ensure that 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 any modifications to the 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 governors of any formal direction of a pupil to alternative provision to improve behaviour.

The school leadership will report to governors information regarding the use and effectiveness of the use of alternative provision and modified timetables.

### 39. 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.

## 40. Restrictive Physical Intervention

We acknowledge that staff must only ever use physical intervention as a last resort, for example, when a child is or may be 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 Crisis Prevention Institute (CPI) techniques

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

We recognise that 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 ask to view a copy or download from the [Services for Schools Portal Resources](#)

## 41. Whistleblowing

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

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

**The NSPCC whistleblowing helpline** is available for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about a way a concern is being handled by their school. <https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/>

Staff may call: **0808 800 5000** (8:00am to 8:00pm, Monday to Friday) and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

Whistleblowing regarding either of the Headmasters should be made to the Chair of the Governing Body, James Dean who may be contacted via email at [chairman@reigategrammar.org](mailto:chairman@reigategrammar.org) or via the Bursar [sdo@reigategrammar.org](mailto:sdo@reigategrammar.org) or by telephone on **01737 22231**.

## 42. Children who are particularly vulnerable

Reigate Grammar School and Reigate St Mary's recognise that some children are more vulnerable to abuse and neglect and that additional barriers exist when recognising abuse for some children.

We understand that this increase in risk is due more to societal attitudes and assumptions or child protection procedures which fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment or circumstances.

In some cases, possible indicators of abuse such as a child's mood, behaviour or injury might be assumed to relate to the child's impairment or disability rather than giving a cause for concern. Or a focus may be on the child's disability, special educational needs or situation without consideration of the full picture, meaning that assumptions might be made about the indicators of possible abuse (e.g. behaviour, mood, injury) relate to the child's condition rather than considering that abuse may have taken place.

Some children may also find it harder to disclose abuse due to communication barriers, lack of access to a trusted adult or not being aware that what they are experiencing is abuse.

To ensure that all of our pupils receive equal protection we will give special consideration to children who are:

- Disabled or have special educational needs
- Young carers
- Affected by parental substance misuse, domestic abuse or parental mental health needs
- Adverse childhood experiences (ACEs)
- Having a social worker can mean they are more vulnerable to risk
- Asylum seekers
- Living away from home
- Vulnerable to being bullied or engaged in bullying
- Already viewed as a 'problem'
- Living in temporary accommodation
- Live transient lifestyles
- Living in chaotic and unsupportive home situations
- Vulnerable to discrimination on the grounds of race, ethnicity, religion, disability or sexuality
- At risk of sexual exploitation
- Do not have English as a first language
- At risk of female genital mutilation
- At risk of forced marriage
- At risk of being drawn into extremism.

### 43. Mobile Devices and Photography/Videos

Staff are aware that they must never use their personal mobile telephone or other electronic device to take photographs or videos of pupils. Only school devices may be used, please see separate policies for RGS and RSM for further details, However, please note that in the Early Years at RSM, personal mobile phones, tablets, cameras or other electronic devices must be kept in a locked cupboard and switched off.

We recognise that many children now have considerable access to the internet via mobile phone networks (i.e. 3G, 4G and 5G), which some of them may use to abuse their peers, to share indecent images consensually or non-consensually and view and share pornography and/or other harmful content.

We aim to educate pupils about the risks (and benefits) of new technologies to help them to manage these resources responsibly. Please see Online Safety Policy, PSHEE and RSE Policies and Counter-Bullying Policy for further information.

### 44. Specialist Setting

- Choristers are accompanied usually by the** Head of Choral Music, or other appropriate staff during offsite services and performances.
- EYFS:** we will inform Ofsted of allegations against people living or working on the premises, or of any other abuse alleged to have taken place on the premises as soon as practicable and within 14 days at the latest.

### Further Advice on Safeguarding and Child Protection

Further advice is available from the following websites:

- [Surrey County Council Education Safeguarding Team webpages](#)
- [NSPCC webpages](#)
- [Childline webpages](#)
- [CEOP ThinkuKnow webpages](#)
- [Anti-Bullying Alliance webpages](#)
- [Childnet International](#)
- [Safer Internet Centre webpages](#)
- [Contextual Safeguarding Network webpages](#)
- [Surrey Safeguarding Children Partnership webpages](#)
- [Lucy Faithfull Foundation webpages](#)
- [Surrey Self-Harm Protocols](#)

**This policy also links to our policies on:**

- Acceptable Use Policy – Staff (including use of mobile devices)
- Acceptable Use Policy – Pupils (including use of mobile devices)
- Administration of medicines
- Alcohol, Drugs and Tobacco
- Counter-Bullying
- Attendance
- Behaviour
- Code of Conduct
- Complaints Policy
- Curriculum
- Equality Policy
- E-Safety Policy
- Online Policy
- Health & Safety
- Intimate Care (RSM only)
- Mental Health and Wellbeing Policy (RGS)
- Pastoral Care Policy
- Physical intervention
- PSHEE
- Relationships and Sex Education
- Risk Assessment
- Safer Recruitment
- SEND Policy
- Teaching and Learning
- The Use of Mobile Technology in School Policy (RSM only)
- Whistleblowing

## Appendix I: Brook Sexual Behaviours Traffic Light Tool

This is intended to be used as a guide only. Please refer to the guidance tool at <https://www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool> for further information.

Print date: 01/10/2015 - Brook has taken every care to ensure that the information contained in this publication is accurate and up-to-date at the time of being published. As information and knowledge is constantly changing, readers are strongly advised to use this information for up to one month from print date. Brook accepts no responsibility for difficulties that may arise as a result of an individual acting on the advice and recommendations it contains.

Brook sexual behaviours traffic light tool adapted from Family Planning Queensland. (2012). Traffic Lights guide to sexual behaviours. Brisbane: Family Planning Queensland, Australia.

### Behaviours: age 0 to 5

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

<b>What is a green behaviour?</b>	<b>What is an amber behaviour?</b>	<b>What is a red behaviour?</b>
<p>Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability. They are reflective of natural curiosity, experimentation, consensual activities and positive choices</p> <p><b>What can you do?</b></p> <p>Green behaviours provide opportunities to give positive feedback and additional information.</p> <p><b>Green behaviours 0 to 5</b></p> <ul style="list-style-type: none"> <li>• holding or playing with own genitals</li> <li>• attempting to touch or curiosity about other children's genitals</li> <li>• attempting to touch or curiosity about breasts, bottoms or genitals of adults</li> <li>• games e.g. mummies and daddies, doctors and nurses</li> <li>• enjoying nakedness</li> <li>• interest in body parts and what they do</li> <li>• curiosity about the differences between boys and girls</li> </ul>	<p>Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.</p> <p><b>What can you do?</b></p> <p>Amber behaviours signal the need to take notice and gather information to assess the appropriate action.</p> <p><b>Amber behaviours 0 to 5</b></p> <ul style="list-style-type: none"> <li>• preoccupation with adult sexual behaviour</li> <li>• pulling other children's pants down/skirts up/trousers down against their will</li> <li>• talking about sex using adult slang</li> <li>• preoccupation with touching the genitals of other people</li> <li>• following others into toilets or changing rooms to look at them or touch them</li> <li>• talking about sexual activities seen on TV/online</li> </ul>	<p>Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental or power differences. They may pose a concern due to the activity type, frequency, duration or the context in which they occur.</p> <p><b>What can you do?</b></p> <p>Red behaviours indicate a need for immediate intervention and action.</p> <p><b>Red behaviours 0 to 5</b></p> <ul style="list-style-type: none"> <li>• persistently touching the genitals of other children</li> <li>• persistent attempts to touch the genitals of adults</li> <li>• simulation of sexual activity in play</li> <li>• sexual behaviour between young children involving penetration with objects</li> <li>• forcing other children to engage in sexual play</li> </ul>

## Behaviours: age 5 to 9 and 9 to 13

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

<p><b>What is a green behaviour?</b></p> <p>Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability and reflective of natural curiosity, experimentation, consensual activities and positive choices</p> <p><b>What can you do?</b></p> <p>Green behaviours provide opportunities to give positive feedback and additional information.</p> <p><b>Green behaviours 5 to 9</b></p> <ul style="list-style-type: none"> <li>• feeling and touching own genitals</li> <li>• curiosity about other children's genitals</li> <li>• curiosity about sex and relationships, e.g. differences between boys and girls, how sex happens, where babies come from, same-sex relationships</li> <li>• sense of privacy about bodies</li> <li>• telling stories or asking questions using swear and slang words for parts of the body</li> </ul> <p><b>Green behaviours 9 to 13</b></p> <ul style="list-style-type: none"> <li>• solitary masturbation</li> <li>• use of sexual language including swear and slang words</li> <li>• having girl/boyfriends who are of the same, opposite or any gender</li> <li>• interest in popular culture, e.g. fashion, music, media, online games, chatting online</li> <li>• need for privacy</li> <li>• consensual kissing, hugging, holding hands with peers</li> </ul>	<p><b>What is an amber behaviour?</b></p> <p>Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.</p> <p><b>What can you do?</b></p> <p>Amber behaviours signal the need to take notice and gather information to assess the appropriate action.</p> <p><b>Amber behaviours 5 to 9</b></p> <ul style="list-style-type: none"> <li>• questions about sexual activity which persist or are repeated frequently, despite an answer having been given</li> <li>• sexual bullying face to face or through texts or online messaging</li> <li>• engaging in mutual masturbation</li> <li>• persistent sexual images and ideas in talk, play and art</li> <li>• use of adult slang language to discuss sex</li> </ul> <p><b>Amber behaviours 9 to 13</b></p> <ul style="list-style-type: none"> <li>• 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</li> <li>• verbal, physical or cyber/virtual sexual bullying involving sexual aggression</li> <li>• LGBT (lesbian, gay, bisexual, transgender) targeted bullying</li> <li>• exhibitionism, e.g. flashing or mooning</li> <li>• giving out contact details online</li> <li>• viewing pornographic material</li> <li>• worrying about being pregnant or having STIs</li> </ul>	<p><b>What is a red behaviour?</b></p> <p>Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental, or power differences. They may pose a concern due to the activity type, frequency, duration or the context in which they occur.</p> <p><b>What can you do?</b></p> <p>Red behaviours indicate a need for immediate intervention and action.</p> <p><b>Red behaviours 5 to 9</b></p> <ul style="list-style-type: none"> <li>• frequent masturbation in front of others</li> <li>• sexual behaviour engaging significantly younger or less able children</li> <li>• forcing other children to take part in</li> <li>• sexual activities</li> <li>• simulation of oral or penetrative sex</li> <li>• sourcing pornographic material online</li> </ul> <p><b>Red behaviours 9 to 13</b></p> <ul style="list-style-type: none"> <li>• exposing genitals or masturbating in public</li> <li>• distributing naked or sexually provocative images of self or others</li> <li>• sexually explicit talk with younger children</li> <li>• sexual harassment</li> <li>• arranging to meet with an online acquaintance in secret</li> <li>• genital injury to self or others</li> <li>• forcing other children of same age, younger or less able to take part in sexual activities</li> <li>• sexual activity e.g. oral sex or intercourse</li> <li>• presence of sexually transmitted infection (STI)</li> <li>• evidence of pregnancy</li> </ul>
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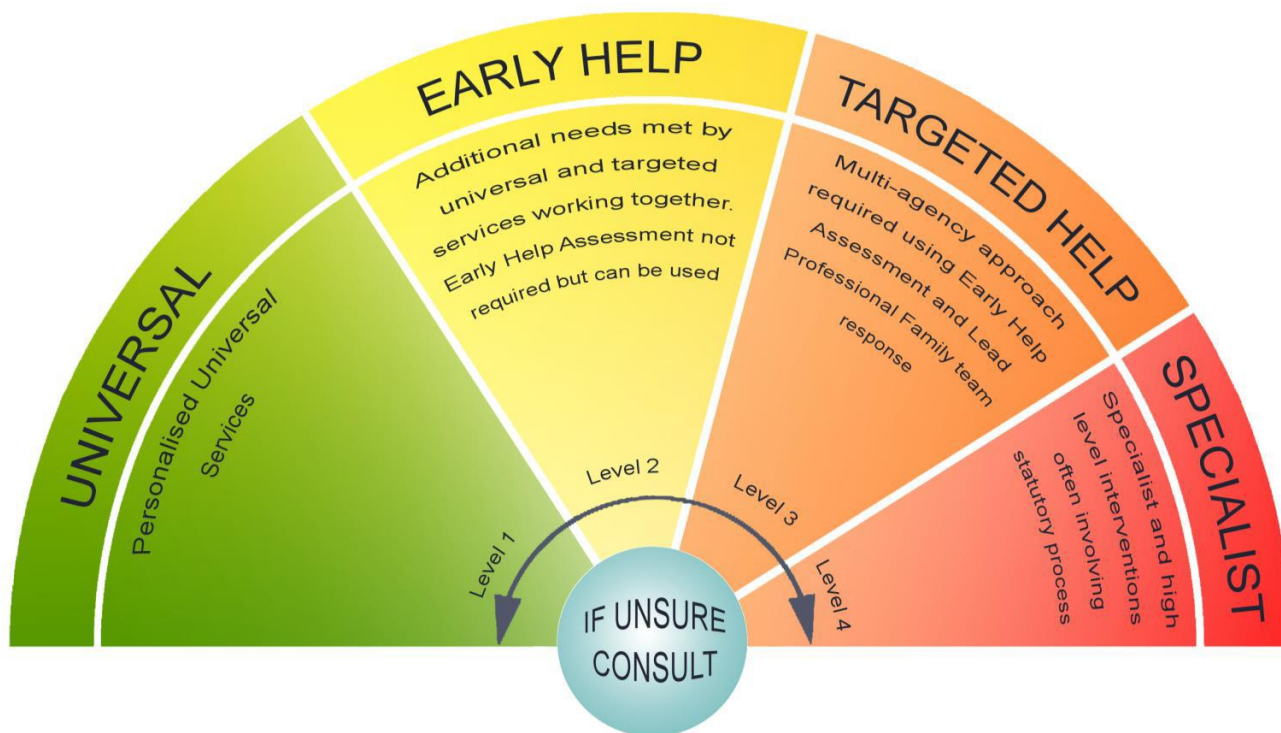


## Behaviours: age 13 to 17

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

<p><b>What is a green behaviour?</b></p> <p>Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability and reflective of natural curiosity, experimentation, consensual activities and positive choices</p> <p><b>What can you do?</b></p> <p>Green behaviours provide opportunities to give positive feedback and additional information.</p> <p><b>Green behaviours 13 to 17</b></p> <ul style="list-style-type: none"> <li>• solitary masturbation</li> <li>• sexually explicit conversations with peers</li> <li>• obscenities and jokes within the current cultural norm</li> <li>• interest in erotica/pornography</li> <li>• use of internet/e-media to chat online</li> <li>• having sexual or non-sexual relationships</li> <li>• sexual activity including hugging, kissing, holding hands</li> <li>• consenting oral and/or penetrative sex with others of the same or opposite gender who are of similar age and developmental ability</li> <li>• choosing not to be sexually active</li> </ul>	<p><b>What is an amber behaviour?</b></p> <p>Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.</p> <p><b>What can you do?</b></p> <p>Amber behaviours signal the need to take notice and gather information to assess the appropriate action.</p> <p><b>Amber behaviours 13 to 17</b></p> <ul style="list-style-type: none"> <li>• accessing exploitative or violent pornography</li> <li>• uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress</li> <li>• withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing</li> <li>• concern about body image</li> <li>• taking and sending naked or sexually provocative images of self or others</li> <li>• single occurrence of peeping, exposing, mooning or obscene gestures</li> <li>• giving out contact details online</li> <li>• joining adult-only social networking sites and giving false personal information</li> <li>• arranging a face to face meeting with an online contact alone</li> </ul>	<p><b>What is a red behaviour?</b></p> <p>Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental, or power differences. They may pose a concern due to the activity type, frequency, duration or the context in which they occur.</p> <p><b>What can you do?</b></p> <p>Red behaviours indicate a need for immediate intervention and action.</p> <p><b>Red behaviours 13 to 17</b></p> <ul style="list-style-type: none"> <li>• exposing genitals or masturbating in public</li> <li>• preoccupation with sex, which interferes with daily function</li> <li>• sexual degradation/humiliation of self or others</li> <li>• attempting/forcing others to expose genitals</li> <li>• sexually aggressive/exploitative behaviour</li> <li>• sexually explicit talk with younger children</li> <li>• sexual harassment</li> <li>• non-consensual sexual activity</li> <li>• use of/acceptance of power and control in sexual relationships</li> <li>• genital injury to self or others</li> <li>• sexual contact with others where there is a big difference in age or ability</li> <li>• sexual activity with someone in authority and in a position of trust</li> <li>• sexual activity with family members</li> <li>• involvement in sexual exploitation and/or trafficking</li> <li>• sexual contact with animals</li> <li>• receipt of gifts or money in exchange for sex</li> </ul>
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## Appendix 2: Effective Family Resilience Levels of Need





REIGATE GRAMMAR SCHOOL



REIGATE ST MARY'S  
PREPARATORY AND CHOIR SCHOOL

### Safeguarding Policy Declaration

I, the undersigned, confirm that I have received a copy of the Reigate Grammar School and Reigate St Mary's Safeguarding Policy.

I also confirm that I have read, understood and agree to adhere to the terms laid out in these procedures.

**Signed:** .....

**Print Name:** .....

**Date:** .....

*(Please remove this sheet and return the signed copy to HR)*

