



REIGATE GRAMMAR SCHOOL



REIGATE ST MARY'S
PREPARATORY AND CHOIR SCHOOL

Safeguarding and Child Protection Policy

Including Early Years Foundation Stage

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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

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

Local Authority Designated Officer (LADO)

Tel: 0300 123 1650
or 0300 200 1006
Email: LADO@surreycc.gov.uk

Surrey Children's Partnership Safeguarding Board

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

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Reigate Grammar School Key Staff (Tel: 01737 222231)

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Deputy Designated Safeguarding Lead (DDSL)	Mary-Ann Collins Senior Deputy Head	mac@reigategrammar.org
Deputy Designated Safeguarding Lead (DDSL)	Nick Lobb Online Safety Coordinator Designated Teacher for Child Looked After	njl@reigategrammar.org
Deputy Designated Safeguarding Lead (DDSL)	Rev Phil Jackson Chaplain	pmj@reigategrammar.org
Deputy Designated Safeguarding Lead (DDSL)	Vicky Papadopoulou Pastoral Support Worker/ELSA	vxp@reigategrammar.org
Deputy Designated Safeguarding Lead (DDSL)	Brendan Stones Deputy Head	bps@reigategrammar.org
Deputy Designated Safeguarding Lead (DDSL)	Elizabeth Taylor Director of Sixth Form	eet@reigategrammar.org
Deputy Designated Safeguarding Lead (DDSL)	Nicola Harvey School Nurse	nch@reigategrammar.org

Governor Responsibilities for Child Protection and Safeguarding at RGS and RSM

Chair of Governors	Mr Mark Eley	01737 222231 (RGS) 01737 244880 (RSM) chairman@reigategrammar.org
Lead Governor for Safeguarding and Online Safety at RGS	Mr Luke Herbert	01737 222231 (RGS) 01737 244880 (RSM)
Lead Governor for Safeguarding and Online Safety at RSM	Mrs Lisa Page	01737 222231 (RGS) 01737 244880 (RSM)

Contents

Concerned about a child?	2	22. Domestic Abuse	33
Important Contact Details for Use by Anyone with Concern	2	23. Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)	34
Safeguarding Statement: It's everyone's responsibility and it could happen here	5	24. Serious Violence	36
Terminology	5	25. Modern Slavery	36
1. Introduction	6	26. Female Genital Mutilation (FGM)	36
2. Policy Principles and Values	7	27. Forced Marriage	37
3. Policy Aims	7	28. So-called 'Honour'-Based Abuse (HBA)	37
4. Supporting Children	8	29. One Chance Rule	38
5. Prevention/Protection	9	30. Child Abduction	38
6. Professional expectations, roles and responsibilities	9	31. Children and the Court System	38
7. Roles and Responsibilities	11	32. Children with family members in prison	38
8. Confidentiality, Sharing and Withholding Information	19	33. Homelessness	38
9. Reporting and responding to Safeguarding Concerns	19	34. Private Fostering Arrangements	39
10. If Staff are Concerned about a Child's Welfare	19	35. Looked After Children and Previously Looked After Children	39
11. Early Help	21	36. Children with Special Educational Needs and Disabilities or Health Issues	39
12. Dealing with Disclosures and Safeguarding Concerns	21	37. Children Absent From Education including unexplainable and/or persistent absences	39
13. Safeguarding concerns and allegations (including non-recent) against adults who work with children, including Low Level Concerns – referral process	23	38. Pupils Missing Out of Education (PMOOE)	40
14. What is child abuse?	25	39. School Attendance and Behaviour	41
15. What is abuse and neglect?	25	40. Restrictive Physical Intervention	41
16. Sexual violence and sexual harassment between children in schools and child-on-child abuse – we have a zero tolerance approach	26	41. Whistleblowing	41
17. Anti-Bullying/Cyberbullying	30	42. Children who are particularly vulnerable	42
18. Online Safety	30	43. Mobile Devices and Photography/Videos	42
19. Sharing Nudes and Semi-Nudes	31	44. Specialist Setting	43
20. Racist Incidents	32	Appendix 1: What is child abuse?	44
21. Radicalisation, Extremism and Terrorism	32	Appendix 2: Continuum of Support for families living in Surrey	49
		Appendix 3: Where there are concerns about a child	50
		Appendix 4: Sexual violence	51
		What is consent?	51
		Sexual harassment	51
		Safeguarding Policy Declaration	53

Safeguarding Statement: It's everyone's responsibility and 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 – **it's everyone's business**.

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

We are alert to the signs of abuse, neglect and exploitation 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:

- Providing help and support to meet the needs of children as soon as problems emerge;
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing impairment of children's 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 stepparents, foster carers and adoptive parents.

Early Help is support for all children of different ages that improves a family's resilience and outcomes and reduces the chance of a problem getting worse. .

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*

DSL where appropriate also refers to Deputy Designated Safeguarding Lead (DDSL)

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, neglect and exploitation, female genital mutilation or other so-called honour-based violence, and threats like radicalisation and sexual exploitation.

I. Introduction

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002 (as amended), the Education (Independent School Standards) Regulations 2014, the Non-Maintained Special Schools (England) Regulations 2015 and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended).

All action taken will be in accordance with statutory, national, and local guidance – this includes:

- [Working Together to Safeguard Children 2023](#) which sets out the multi-agency working arrangements to safeguard and promote the welfare of children and young people and protect them from harm; in addition, it sets out the statutory roles and responsibilities of settings.
- [‘What to do if you are Worried a Child is Being Abused’ 2015 - Advice for Practitioners](#)
- [Keeping Children Safe in Education \(KCSIE, 2024\)](#) is statutory guidance issued by the Department for Education (DfE) which all schools and colleges must have regard to when carrying out their duties to safeguard and promote the welfare of children.
- [Early Years Foundation Stage Statutory Framework](#) is statutory guidance which sets standards that school and childcare providers must meet for the learning, development, and care of children from birth to 5 years in Ofsted registered settings – see RSM
- [Local Guidance from the Local Safeguarding Partnership: Surrey Safeguarding Children Partnership \(SSCP\) including SSCP Procedures.](#) **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.**

This policy applies to all members of staff and governors/proprietors in the setting.

Guidance and documents referred to in this policy:

- [Surrey Safeguarding Children Partnership protocols, guidance and procedures](#)
- [Working Together to Safeguard Children 2023](#)
- [Keeping Children Safe in Education 2024](#)
- [Disqualification under the Childcare Act 2006 \(updated 2019\)](#)
- [FGM Act 2003 Mandatory Reporting Guidance 2015 \(updated January 2020\)](#)
- [‘What to do if you are worried a child is being abused’ 2015](#)
- [Teachers' standards](#)
- [Information sharing: advice for practitioners providing safeguarding services](#)
- [The Equality Act 2010](#)
- [Early years foundation stage \(EYFS\) statutory framework](#)
- Surrey County Council Safeguarding Children Missing Education (CME) and Educated Other Than at School (EOTaS)
- Surrey County Council Touch and The Use Of Physical Intervention When Working With Children And Young People

This policy should be read in conjunction with the following policies where applicable:

- Recruitment
- Whistleblowing
- Code of Conduct
- Behaviour
- E-Safety
- Attendance
- Health and Safety

Equalities Statement

With regards to safeguarding we will consider our duties under the [Equality Act 2010](#) and our general and specific duties under the [Public Sector Equality Duty](#). General duties include:

- Eliminate discrimination, harassment, victimisation, and other conduct that is prohibited by the Equality Act 2010.
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it.
- Foster good relations across all protected characteristics between people who share a protected characteristic and people who do not share it.

Staff are aware of the additional barriers to recognising abuse, neglect and exploitation in children with Special Educational Needs and Disabilities (SEND). This will be in line with our SEND Policy.

We also adhere to the principals of and promote anti-oppressive practice in line of the [United Nations Convention of the Rights of the Child](#) and the [Human Rights Act 1998](#).

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's everyone's responsibility and it could happen here'**.
- We maintain a **zero-tolerance** approach to sexual violence and sexual harassment

- 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.
- 2.6. We will act in the best interests of the child and ensure that our decisions around safeguarding take a child-centred and co-ordinated approach.

3. Policy Aims

- To provide staff with the framework to promote and safeguard the wellbeing of children and in doing so ensure they meet their statutory responsibilities.
- To ensure consistent good practice across the school and ensure that safeguarding follows a whole school approach.
- Clarify safeguarding expectations for members of the school community, staff, governing body, children, and their families.

- Contribute to the establishment of a safe, resilient, and robust safeguarding culture built on shared values; that children are treated with respect and dignity, taught to treat each other and staff with respect, feel safe, have a voice and are listened to.
- Support contextual safeguarding practice recognising that the school's site can be a location where harm can occur.
- Set expectations for developing knowledge and skills within the school community (staff, children, parents/carers) to the signs and indicators of safeguarding issues and how to respond to them.
- Early identification of need for vulnerable learners and provision of proportionate interventions to promote their welfare and safety.
- Work in partnership with children, parents/carers, and other agencies in the Surrey Safeguarding Children's Partnership, or other safeguarding partnerships where appropriate.

4. Supporting Children

We will support all children by:

- 4.1. Providing a safe place and stability in the lives of children who have been abused or who are at risk of harm. We recognise that a child who is abused or witnesses abuse and/or violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth. Research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn
- 4.2. Our school will support all children by:
 - Encouraging self-esteem and self-assertiveness, through the curriculum and through positive relationships within our community, whilst not condoning aggression or bullying.
 - Promoting a caring, safe and positive environment within the school.
 - Ensuring children are taught to understand and manage risk through Personal, Social, Health and Economic Education (PSHEE) and Relationship and Sex Education (RSE) and Health Education through all aspects of setting life, including staying safe online.
 - Responding sympathetically to any requests for time out to deal with distress and anxiety e.g. in The Wellbeing Centre at RGS; Wellbeing Room at RSM
 - Offering details of pastoral support and **opportunities for children to be listened to** within school. At RGS examples are the school counsellor, chaplain, pastoral support workers, peer mentors, school nurse, ELSA trained staff and 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 sessions. 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 at school or beyond.
 - Notifying the C-SPA without delay if there is an immediate risk of significant harm.
 - We will provide continuing support to children about whom there have been concerns who leave the school by ensuring that information is shared confidentially with the child's new setting. We will ensure the School records are forwarded as a matter of priority and within statutory timescales.
- 4.3. 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.
- 4.4. The Designated Safeguarding Lead will consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children

who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

- 4.5. We recognise we play 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. 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 feel safe within the setting or 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, including staff with specialist training;
 - Include safeguarding across the curriculum, including PSHEE opportunities which equip children with the skills they need to keep themselves and other safe, including online and to know to whom they should turn to for help. It is also recognised that effective education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special education needs or disabilities. 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;
 - Provide preventative education by creating a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia and sexual violence and sexual harassment;
 - 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. Professional expectations, roles and responsibilities

We will ensure that:

- 6.1. **the school operates safer recruitment procedures in line with KCSIE 2024 and this includes statutory checks on staff suitability to work with children and disqualification regulations.**
- 6.2. Details of the DSL and DDSL are available on the website, noticeboards around school and at reception and at RGS on the staff cards.
- 6.3. all staff receive and read, understand and adhere to:
 - Part 1 of the statutory guidance KCSIE 2024 or Annex B. This applies to the Governing Body in relation to Part 2 of the same guidance.
 - The school's *Safeguarding and Child Protection Policy* (which includes the safeguarding response to children missing in education and the names and role of the DSL and DDSLs)
 - *The Staff Behaviour Policy (Code of Conduct)*

In addition to this, all staff will be aware of the systems in place which support safeguarding and will receive, read, understand and adhere to the following:

- The *Behaviour Policy*
- The *Anti-Bullying Policy*
- The *Acceptable Use Policy*
- *E-Safety Policy*
- *Whistleblowing*
- *Behaviour*
- *Anti-Bullying*
- *Attendance*
- *Touch and the use of restrictive physical intervention (RSM)*
- *Intimate Care (RSM)*
- *Missing Child Policy (RSM)*

6.4. all staff receive safeguarding and child protection training at induction, **including Prevent and Online Safety** (which amongst other things includes an understanding of expectations, applicable roles and responsibilities in relation to filtering and monitoring) **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 I and Annex B and also the Safeguarding Policy, which includes Children Absent from Education and child-on-child 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.

Staff Induction – these are not intended to be exhaustive	
Explain and discuss (<i>KCSIE</i>)	Provide (<i>KCSIE</i> Part One and Annex B)
Safeguarding policy (including response to children absent/missing from education and child-on-child Abuse)	Safeguarding Policy (including children absent/missing from education and child-on-child 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 (which amongst other things includes an understanding of expectations, applicable roles and responsibilities in relation to filtering and monitoring)	Online Safety Policy
Part One of <i>KCSIE and Annex A</i>	Part One of <i>KCSIE and Annex B</i>

- 6.5. all members of staff are trained in and receive updates in online safety and reporting concerns.
- 6.6. 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.

- 6.7. 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
- 6.8. 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 Safeguarding and Child Protection policies and procedures in place.
- 6.9. community users organising activities for children are aware of the school's *Safeguarding and Child Protection Policy*, guidelines and procedures.
- 6.10. 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.
- 6.11. **all staff will be given the latest copy of *Keeping Children Safe in Education Part 1 (KCSIE)* and *Annex B* 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.
- 6.12. staff are given 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. Maintain an attitude of **"It could happen here"** and is "everyone's responsibility".
- 7.2. Maintain a zero-tolerance approach to sexual violence and sexual harassment.
- 7.3. Read and understand Part 1 of statutory guidance KCSIE 2024. Those working directly with children will also Annex B. Those who do not work directly with children may be given the option to read Annex A instead.
- 7.4. Provide a safe environment in which children can learn,
- 7.5. Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to.
- 7.6. Ensure children know that there are adults in the school whom they can approach if they are worried or have concerns.
- 7.7. Be aware of indicators of abuse, neglect and exploitation understanding that children can be at risk of harm inside and outside of the setting, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse, neglect and exploitation so that staff are able to identify cases of children who may be in need of help or protection.
- 7.8. Be able to identify vulnerable learners and take action to keep them safe. Information or concerns about learners will be shared with the DSL where it includes those:
 - who may need a social worker and may be experiencing abuse, neglect or exploitation.
 - requiring mental health support
 - may benefit from early help.
 - where there is a radicalisation concern
 - where a crime may have been committed

- 7.9. **All staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.**
- 7.10. **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.**
- 7.11. 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. Mental Health and Behaviour in Schools Guidance can be found here: <https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>
- 7.12. Where children have suffered abuse, neglect and exploitation, 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.
- 7.13. Know who the DSL and Deputy DSLs, Chair of Governors and Governor responsible for safeguarding are and know how to contact them.
- 7.14. **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**.
- 7.15. Plan opportunities within the curriculum for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe.
- 7.16. Attend training in order to be aware of and alert to the signs of abuse, neglect and exploitation.
- 7.17. Know how to respond to a pupil who discloses harm or abuse following training of *Working together to Safeguard Children 2023* and *What to do if you are worried a child is being Abused, 2015*.
- 7.18. 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 DDSL should be informed.
- 7.19. Be prepared to refer directly to the Single Point of Access (C-SPA), and the police if appropriate, if there is a risk of significant harm and the DSL or DDSLs are not available.
- 7.20. Report low level concerns (as defined in KCSIE 2024) about any member of staff/supply staff or contractor to the DSL/Headmaster, or if it is a low level concern about the Headmaster, it should be reported to the Chair of Governors.
- 7.21. Follow the allegations procedures, as set out in this policy and KCSIE 2024, if the disclosure is an allegation against a member of staff, supply staff, volunteer or contractor.
- 7.22. Provide support for children subject to Early Help, Child in Need or Child Protection and be involved where appropriate, in the implementation of individual plans to further safeguard vulnerable learners and understand their academic progress and attainment and maintain a culture of high aspirations for this cohort.
- 7.23. A member of staff who is approached by a child should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they need to pass information to other professionals to help keep the child and/or other children safe. The degree of confidentiality should always be governed by the need to protect the child.
- 7.24. Notify the DSL or their Deputy of any child on a child protection plan or child in need plan who has unexplained absence.
- 7.25. Be aware that children may not feel ready or know how to tell someone that they are being abused, exploited or neglected and/or they may not recognise these experiences as harmful. This could be due to their vulnerability, disability and/or sexual orientation or language barriers.
- 7.26. Will identify children who may benefit from early help, liaising with the DSL in the first instance. Options may include managing support for the child internally via the school's pastoral support and/or liaise with other agencies that support children and provide early help. In some

circumstances it may be appropriate for a member of school staff to act as the lead professional in early help cases.

7.27. 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.

7.28. **The Headmasters will ensure that:**

- 7.28.1. 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.
- 7.28.2. 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.
- 7.28.3. the School staff have appropriate knowledge of part 5 of *Keeping Children Safe In Education* guidance (child on child sexual violence and sexual harassment)
- 7.28.4. 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 the case. And that comprehensive records of all allegations are kept
- 7.28.5. 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.
- 7.28.6. the school fully contributes to inter-agency working in line with *Working Together to Safeguard Children 2023 guidance*.
- 7.28.7. 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 safeguarding 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.
- 7.28.8. Deputy DSLs are trained to the same standard as the DSL and the role is explicit in their job description.
- 7.28.9. adequate and appropriate DSL cover arrangements are in place for any out of hours/out of term activities.
- 7.28.10. systems are in place for children to express their views and give feedback which operate with the best interest of the child at heart.
- 7.28.11. opportunities are provided for a co-ordinated offer of Early Help when additional needs of children are identified.
- 7.28.12. 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.
- 7.28.13. that pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.
- 7.28.14. ensure that allegations or concerns against staff and other adults 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.
- 7.28.15. 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.

7.28.16. 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.

7.29. The Designated Safeguarding Lead

Duties are further outlined in KCSIE (2024) Annex C.

Details of the DSL and DDSLs are available on the website, staff information cards (RGS), pamphlets at reception and on posters around the school.

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 and understanding the filtering and monitoring systems in place) in the setting, this responsibility is not able to be delegated.
- Liaise with the Surrey County Council and other boroughs as appropriate, and work in partnership with other agencies in line with Working Together to Safeguard Children (2023).
- Where necessary contact Surrey's Child Protection Consultation Line for advice and support (0300 470 9100 option 3).
- Manage and submit a Request for Support Form for a child if there are concerns about suspected harm or abuse, to the C-SPA, and act as a point of contact and support for setting staff. Requests for support should be sent securely by email to cspa@surreycc.gov.uk using the [Request for Support Form](#) urgent referrals should be made by telephone 0300 470 9100, or 03311 435554.
- Report concerns that a child may be at risk of radicalisation or involvement in terrorism, use the [Prevent referral form](#) to refer cases by email to preventreferrals@surrey.pnn.police.uk. If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought **dial 101** or **07795 043842** or **01865 555 618** and ask to speak to the Prevent Supervisor for Surrey. The DfE 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.
- Follow relevant DfE guidance and KCSIE 2024 on 'Child on Child abuse' when a concern is raised that there is an allegation of a child abusing another child within the setting.
- 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.
- Be available during term time (during school hours) for staff 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.
- Ensure that the names of the DSL and DDSL, are clearly advertised, with a statement explaining the setting's role in referring and monitoring cases of suspected abuse.
- 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.
- Have a secure working knowledge of SSCP procedures and understand the assessment process for providing early help and statutory intervention, in line with Surrey's [Continuum of Need Matrix](#).
- 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.
- Have a working knowledge of how Surrey County Council conduct an initial child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Understand the lasting impact that adversity and trauma can have, including on the children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes.
- Understand and support the settings delivery with regards to the requirements of the Prevent duty and provide advice and guidance to staff on protecting children from radicalisation.
- Liaise with staff (especially pastoral support, behaviour leads, health colleagues and the SENDCO) on matters of safety and safeguarding and consult Surrey's Continuum of Need Matrix to inform decision making and liaison with relevant agencies.
- Be alert to the specific needs of children in need, those with Special Educational Needs and Disability (SEND) and young carers.
- Understand the risks associated with online activity and be confident that they have the up-to-date knowledge and capability to keep children safe whilst they are online at school; in particular understand the additional risks that children with SEND face online and the associated and appropriate support they require.
- DSL training should be updated at least every two years and their knowledge and skills refreshed at regular intervals but at least annually.
- Work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at the setting.
- Keep up to date, 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 safeguarding/child protection file is marked on the child's main file record.
- Ensure that when a child transfers setting (including in-year), their safeguarding/child protection file is passed to the new setting as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be

transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.

- If the transit method requires that a copy of the safeguarding/child protection file is retained until such a time that the new setting acknowledges receipt of the original file, the copy should be securely destroyed on confirmation of receipt.
- Ensure that where a child transfers to a setting and is on a child protection plan, child in need plan or is a child looked after, their information is passed to the new setting immediately and that the child's social worker is informed. In addition, consideration should be given to a multi-agency settings transition meeting if the case is complex or on-going.
- 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 [Surrey's FaST Resolution Process](#) enquiries under section 47 of the Children Act 1989 and Police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the [Statutory guidance - PACE Code C 2019](#).
- Ensure that the case holding Social Worker is informed of any child currently with a child protection plan who is absent without explanation.
- Organise safeguarding and child protection induction, regularly updated training and a minimum of annual updates (including online safety) for all staff, keep a record of attendance and address any absences.
- Ensure each member of staff has access to, and understands, the safeguarding and child protection policy and procedures, especially new and part-time staff.
- Ensure that in collaboration with the leadership and governors, the Safeguarding and Child Protection Policy is reviewed annually, and the procedures and implementation are updated and reviewed regularly.
- Ensure that the Safeguarding and Child Protection Policy is available publicly and that parents know that referrals about suspected abuse or neglect may be made and the role of the school in this.
- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school leadership staff.
- Establish and maintain links with the SSCP 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 biennial (s157 s175) Statutory Audit for Safeguarding Arrangements and Termly Safeguarding Data Collections via The Virtual College – ENABLE to Surrey County Council.

7.30. **The Deputy Designated Safeguarding Lead(s)**

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

- be trained to the same standard as the Designated Safeguarding Lead and the role is explicit in their job description.
- provide support and capacity to the DSL in carrying out delegated activities of the DSL. However, the lead responsibility of the DSL cannot be delegated.

- in the absence of the DSL, carry out the activities necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the DSL the deputy DDSLs will assume all of the functions above.

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

- 7.31.1. there is a whole school approach to safeguarding, involving everyone in the setting and ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- 7.31.2. a nominated governor for safeguarding is identified.
- 7.31.3. 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.
- 7.31.4. the SSCP is informed in line with local requirements about the discharge of duties via the annual safeguarding audit. We also report to governors six (6) times a year at the termly Board meetings, as well as at a termly sub-committee with a focus on Education and Welfare, including safeguarding.
- 7.31.5. ensure recruitment, selection and induction follow safer recruitment practice including all appropriate checks.
- 7.31.6. at least one member of the governing body has completed safer recruitment training to be repeated every five years.
- 7.31.7. staff have been trained appropriately and this is updated in line with guidance and all staff have read KCSIE (2024) part I and Annex B and that mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance.
- 7.31.8. as part of the requirement for all staff to undergo regular updated safeguarding training (which includes online safety and the requirement for children to be taught about safeguarding), this is considered as part of the whole setting safeguarding approach and wider staff training and curriculum planning.
- 7.31.9. in considering the above training requirements, the governing body should have regard to the [Teachers' Standards](#) which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all children.
- 7.31.10. 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.
- 7.31.11. Take a proportionate risk-based approach to the level of information that is provided to temporary staff, volunteers and contractors.
- 7.31.12. the school has procedures for dealing with allegations of abuse against staff (including the Headmasters), volunteers, contractors 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.**
- 7.31.13. **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 2024.**
- 7.31.14. 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.

- 7.31.15. 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.
- 7.31.16. should ensure that all members of staff receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the setting are effective and support the delivery of a robust whole setting approach to safeguarding. Training should be regularly updated.
- 7.31.17. The child's wishes and feelings are considered when determining what action to take and what services to provide.
- 7.31.18. 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).
- 7.31.19. the governors and school will regularly review the effectiveness of filtering and monitoring systems in place to safeguard children online. We use the Smoothwall web filtering system that is effective in identifying both illegal and inappropriate content. The Smoothwall filter is configured as a hybrid 'on-prem' cloud system. We use the Smoothwall Active Monitor on school computers. This detects keystrokes and images using keyword checks and screen capture with alerts to key staff in real time. The senior school also uses Senso to monitor Teams Chat activity through O365 on any device. The system uses keyword checking and chat capture with alerts to staff in real time.
- 7.31.20. Ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.
- 7.31.21. the School will comply with DfE and the Surrey County Council Policy Guidance for Safeguarding Children Missing Education and Education Other Than At School.
- 7.31.22. 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
- 7.31.23. The SSCP is informed in line with local requirements about the discharge of duties via the Biennial (s 157 s 175) Statutory Audit for Safeguarding Arrangements and Termly Safeguarding Data Collections via [PHEW](#) to Surrey County Council.
- 7.31.24. the governors will ensure that the school has clear systems and processes in place for identifying possible mental health concerns, including routes to escalate and clear referral and accountability systems.
- 7.31.25. Ensure that safeguarding and child protection files are maintained and set as set out in KCSIE 2024 Annex C.
- 7.31.26. enhanced DBS checks (without barred list checks, unless the governor is also a volunteer at the school) are in place for all Governors.
- 7.31.27. Ensure section 128 checks are undertaken as defined in KCSIE 2024.
- 7.31.28. ensure where the governing body hires or rents out the school facilities or premises to organisations or individuals (for example community groups, sports associations or service providers to run community or extra-curricular activities) they should ensure that appropriate arrangements are in place to keep children safe.
- 7.31.29. Ensure that any weaknesses in Safeguarding are promptly addressed.

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 **DfE Data Protection guidance for schools** (DfE, 2024b) and [Information Sharing Advice for Practitioners \(DfE 2024\) guidance](#).
- 8.2. Information will be shared with staff within the school who 'need to know'.
- 8.3. Relevant staff have due regard to GDPR principles which allow them to share (and withhold) information.
- 8.4. 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.
- 8.5. All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing.
- 8.6. 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. Reporting and responding to Safeguarding Concerns

- 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**¹
- 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:

¹ **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**.

- Date and time
 - Place
 - Who was present
 - Context
 - Details of disclosure/concern (using the child's words)
 - Demeanour/non-verbal behaviours of the child
 - Child's voice
 - Any injuries using a body map to record these
 - Rationale for decision making and action taken
 - Action/s taken
- e. The records must be signed and dated by the author electronically on **My Concern**. **Anyone can make a referral**. In the absence of the DSL or their deputies, all staff must be prepared to and know how to refer directly to C-SPA (and the police if appropriate) if there is the potential for immediate significant harm, or contact the consultation line at the C-SPA for support and advice

Following a report of concerns the DSL must:

1. Use the Continuum of Support for Children and Families in Surrey and Continuum of Support Matrix to decide whether or not there are sufficient grounds for suspecting **harm, in which case a request for support must be made** to the C-SPA and the police if it is appropriate.

Normally the school should try to discuss any concerns about a child's welfare with the parents//carers 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**. For example:

- sexual/organised abuse is suspected
- the fabrication of an illness is suspected
- where the discussion could impede a Police investigation or Social Work enquiry

Where there are doubts or reservations about involving the child's family, the DSL should clarify with the C-SPA or the police whether the parents should be told about the referral and if so, when and by whom. This is important in cases where the police may need to conduct a criminal investigation. The child's views should also be considered. For example:

- sexual/organised abuse is suspected
- the fabrication of an illness is suspected
- where the discussion could impede a Police investigation or Social Work enquiry

2. If it is suspected that a child is suffering, or is likely to suffer, harm or abuse the DSL must contact the C-SPA. If the DSL feels unsure about whether a referral is necessary, they can phone the C-SPA consultation line to discuss concerns.
3. The DSL can 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. When a child needs urgent medical attention and there is suspicion of abuse the DSL 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/carers, remembering that parents/carers should normally be informed that a child requires urgent hospital attention.
5. The exception to this process will be in those cases of known FGM where there is a [mandatory reporting duty](#) for the teacher to report directly to the Police where they either:

- Are informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observe 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 that the act was necessary for the girl's physical or mental health or for the purposes connected with labour or birth.

The DSL should also be made aware.

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.

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 frequently missing/goes missing from education, home or care;
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit;
- has a parent or carer in custody or is affected by parental offending;
- 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 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, school nurse, pastoral support workers and ELSAS . 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 and Safeguarding Concerns

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.

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
- 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
- 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 and hand them to the DSL for the safeguarding 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/marks/injuries
- 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
- Please seek support for yourself e.g. through HR, School Counsellor, Chaplain, DSL team, SLT or your line manager.

7. Review (led by DSL)

- Has the action taken provided good outcomes for the child?

- Was a rationale recorded for decisions?
- 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 have not been acted upon appropriately they should inform the Headmaster or Safeguarding Governor of the school and/or contact the C-SPA for advice.

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 via HR.

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/DDSL 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 around allegations

[Surrey's LADO procedure](#) will be followed where it is alleged that anyone working in the setting that provides education for children under 18 years of age, including supply staff, volunteers and contractors or another adult who works with children 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 that might make an individual unsuitable to work with children - known as **transferable risk**).
- The School may also receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities).

In dealing with allegations or concerns against an adult, staff must, **without delay**:

- 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 immediately and before taking any action or investigation.**
- Following consultation with the LADO inform the parents of the allegation unless there is a good reason not to.

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

If the matter is 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 KCSIE(2024) and the SSCP procedures.

Low-Level Concerns

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – than an adult working in or behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and;
- Does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Low level concerns can exist on a wide spectrum, from the inadvertent, or 'thoughtless', or behaviour that may look inappropriate but might not be in specific circumstances, through to that which is ultimately intended to enable abuse, for example, grooming type behaviour.

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.

Staff must share all concerns with the Headmaster or DSL without delay so that it can be dealt with appropriately, sensitively, proportionately and in a timely manner. The school will address any unprofessional behaviour at an early stage and will support the individual to correct it.

If the concern has been raised via a third party, the Headmaster/DSL 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 can be reported to the Headmaster or the DSL. If it is about the Headmaster, 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. If the school has any doubt as to whether a low-level concern in fact meets the harm threshold, the Headmaster (or DSL in consultation with the Headmaster) will consult with the LADO and take a collaborative decision making approach.

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.

Low level concerns will not be included in references unless they relate to issues which would normally be disclosed, for example, misconduct or poor performance.

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 the 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's 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 (2023)*. 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 Surrey's [Continuum of Need Matrix](#).

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. There are four categories of abuse:

1. Physical Abuse
2. Emotional Abuse
3. Sexual Abuse
4. Neglect

See Appendix I for further details.

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

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

Abuse

Context

Child-on-child abuse including sexual violence and sexual harassment can occur between children of any age and sex and can happen online or offline. It can occur through a single child or a group of children sexually assaulting or sexually harassing a single child or group of children

Incidents of child-on-child 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 child-on-child abuse, such abuse may still be taking place and is simply not being reported.

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

Child-on-child concerns should be reported to the DSL.

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

It is important that all victims are taken seriously and offered appropriate support 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.

Child-on child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying) abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery) [UKCIS guidance: Sharing nudes and semi-nudes advice for education settings](#)
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and

- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

See **Appendix 4** for further details around consent and definition of rape.

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 (2024).

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

- **Having a zero-tolerance approach to child-on-child abuse.**
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up. **It will not be tolerated or passed off as mere ‘banter’ or ‘having a laugh’, or just ‘boys being boys’. We believe that failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.**
- Recognising, acknowledging and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported
- **challenging physical behaviours (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. We believe that 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 child-on-child 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 child-on-child abuse that all children involved whether perpetrator or victim are treated as being ‘at risk’.

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, Pastoral Support Worker, School Counsellor, Chaplain, Deputy Head
- Children making any report of sexual violence or sexual harassment including “upskirting” (The Voyeurism Offences Act 2019) will be taken seriously, kept safe and be well supported.

If the report includes an online element staff will be mindful of the [Searching, screening and confiscation at school](#) guidance.

- The key consideration is for staff not to view or forward illegal images of a child. The guidance provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection
- 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**
- 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 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:

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the setting should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

- 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
- That sexual violence and sexual harassment can take place within intimate personal relationships between children.
- Importance of understanding intra familiar harms and any necessary support for siblings following incidents
- Ongoing risks to victim, other children, adult students, or staff
- Other related issues or wider context

Confidentiality:

The victim may ask the setting not to tell anyone about the sexual violence or sexual harassment. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies. The DSL should consider:

- parents or carers should normally be informed (unless this would put the victim at greater risk)
- the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care, and
- rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.

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)
- Concerns, discussions, decisions and reasons for decisions will be recorded

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.

The school will consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

The school recognises that children who have experienced sexual violence display a wide range of responses to their experiences including clear signs of trauma, physical and emotional responses, or no overt signs at all.

Physical Abuse

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

Harmful Sexual Behaviour (HSB)

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. HSB can occur online and/or face-to-face and can also occur simultaneously between the two. HSB will be considered in a child protection context.

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.

17. Anti-Bullying/Cyberbullying

Our school policies on anti-bullying are set out in a separate document and includes measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying.

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 children who identify as Lesbian, Gay, Bisexual, Transgender, Queer or Questioning (LGBTQ+) are more susceptible to being bullied/victims of child abuse.

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

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 Headteacher and the DSL will also consider child protection procedures.

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

LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help settings counter homophobic, biphobic and transphobic bullying and abuse.

18. 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. The aim is to empower us to protect and educate pupils, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. The school also has procedures on the use of mobile and smart technology.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk, content, contact, conduct and commerce.

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 online 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)**.

The setting will follow the guidance around [harmful online challenges and online hoaxes](#) when supporting children and sharing information with parents/carers.

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.

19. 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.

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.

If it does not become a police matter, we will discuss with the young person (and their family) steps to get an explicit image or video removed if it’s been posted online.

- Report the image to the site or network hosting it.
- Children and young people under 18 who are worried that a sexual image or video of them may have been shared online can use Childline and IWF’s [Report Remove tool](https://www.iwf.org.uk/report/) to see if it can be taken down. <https://www.iwf.org.uk/report/>

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.

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

[Prevent duty guidance: England and Wales \(2023\)](#) 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 becoming terrorists or supporting 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.

Radicalisation refers to ‘the process of a person legitimising support for, or use of, terrorist violence.’

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.

It is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children’s behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL making a Prevent referral.

The DSL should report concerns that a child may be at risk of radicalisation or involvement in terrorism, use the [Prevent referral form](#) to refer cases by e-mail to preventreferrals@surrey.pnn.police.uk. If the matter is urgent then Police must be contacted by dialling **999**. In cases where further advice from the Police is sought speak to the Prevent Supervisor for Surrey **07795 043842**. The DfE has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (**0800 0113764**).

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

Opportunities are provided in the curriculum to enable children to discuss issues of religion, ethnicity and culture and the setting follows the [Promoting fundamental British values through SMSC - GOV.UK \(www.gov.uk\)](#)

The 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.

Although not a cause for concern on their own, possible indicators when taken into consideration alongside other factors or context may be a sign of being radicalised.

Further information and a list of such indicators can be found at [Managing Risk of Radicalisation in your Education Setting](#).

22. Domestic Abuse

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

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 definition of domestic abuse can be found here: <https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted>

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. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the DSL in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs.

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.

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

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

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

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

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

All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the DSL 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.

Indicators 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/suspicions 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 wellbeing.

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.

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.

In all cases if the DSL identifies any level of concern the DSL should contact the C-SPA and 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 PHSE and RSE curriculum. Child Criminal Exploitation (CCE) and Gangs – Serious Violence.

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. Children are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt.

Any concerns that a child is being or is at risk of being criminally exploited will be passed without delay to the DSL. The DSL will then contact the C-SPA and if there is concern about a child's immediate safety, the Police will be contacted on 999.

We are 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 setting and make reasonable enquiries with the child and parents to assess this risk.

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

- Absence or increased 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 could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. Staff are aware that violence can often peak in the hours just before and after the children attend school which includes travelling to and from the school.

A request for support to the C-SPA will be made when any concern of harm to a child as a consequence of gang activity including child criminal exploitation becomes known. Any member of staff who has concerns that a child may be at risk of harm should immediately inform the DSL. The DSL will contact the C-SPA. If there is concern about a child's immediate safety, the Police will be contacted on **999**.

24. Serious Violence

There are a number of indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include:

- increased absence from the setting
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries
- Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Staff are aware that violence can often peak in the house just before and after the children attend the setting which includes travelling to and from the setting.

25. Modern Slavery

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

26. Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act (2003). It is a form of child abuse and violence against women.

A mandatory reporting duty, [Mandatory reporting of female genital mutilation: procedural information - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/mandatory-reporting-of-female-genital-mutilation-procedural-information) requires teachers to report directly and immediately to the Police 101 where they either:

- are informed by a girl under 18 that an act of FGM has been carried out on her; or
- observe 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 that the act was necessary for the girl's physical or mental health or for the purposes connected with labour or birth.

The duty applies to all persons who are employed or engaged to carry out 'teaching work' 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 DSL; however, the DSL should be informed.

Staff are trained to be aware of risk indicators of FGM.

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

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

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

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.

27. Forced Marriage

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

Forced marriage is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014. In addition, since February 2023, it is also a crime to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. This applies to non-binding, unofficial 'marriages' as well as legal marriages.

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**.

28. So-called 'Honour'-Based Abuse (HBA)

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.

HBA might be committed against people who:

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

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

29. 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.

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 and 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. 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.

34. 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.

35. Looked After Children and Previously Looked After Children

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

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.

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

The designated teacher for looked after children will have the appropriate level of training to equip them with the knowledge and skills to undertake their role. The designated teacher will work with Surrey's Head of Virtual School for both looked after children and previously looked after children.

36. Children with Special Educational Needs and Disabilities or Health Issues

Children with SEND or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children, the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs, and
- communication barriers and difficulties in managing or reporting these challenges.
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in settings or the consequences of doing so

Any reports of abuse will require close liaison with the DSL and the SENDCO. We will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

37. Children Absent From Education including unexplainable and/or persistent absences

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 when children are absent from education, this can be a vital warning sign of a range of safeguarding possibilities. They 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)

Most children engage positively with school and attend regularly. However, 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. Ofsted refer to these as PMOOE because they are not accessing their education in a setting in the 'usual way'.

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 continues to be responsible for the safeguarding of that pupil. The setting will obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment.

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.

39. School Attendance and Behaviour

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

The school recognises that children being absent, particularly repeatedly and/or for prolonged periods and exclusion from 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 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.

Staff who are likely to need to use physical intervention will be appropriately trained e.g. At RSM staff are MAPA trained.

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.

See Behaviour Policy for further information on the use of Reasonable Force.

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

Staff may call: **0800 028 0285** (8:00am to 8:00pm, Monday to Friday) and email: help@nspcc.org.uk

Whistleblowing regarding either of the Headmasters should be made to the Chair of the Governing Body, Mark Elsey who may be contacted via email at chairman@reigategrammar.org or via the Bursar, Helena Briggs via bursar@reigategrammar.org or by telephone on **01737 222231**.

42. Children who are particularly vulnerable

Reigate Grammar School and Reigate St Mary's recognise that some children are more vulnerable to abuse, neglect and exploitation 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/procedures 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 Anti-Bullying Policy for further information.

44. Specialist Setting

- a. **Choristers are accompanied usually by the** Head of Choral Music, or other appropriate staff during offsite services and performances.
- b. **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 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
- Anti-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: What is child abuse?

The following definitions are taken from Working Together to Safeguard Children (2023). 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 Surrey's [Continuum of Need Matrix](#).

Forms of abuse and neglect

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

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

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, 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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

For further information on indicators of abuse can be accessed via [NSPCC](#).

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

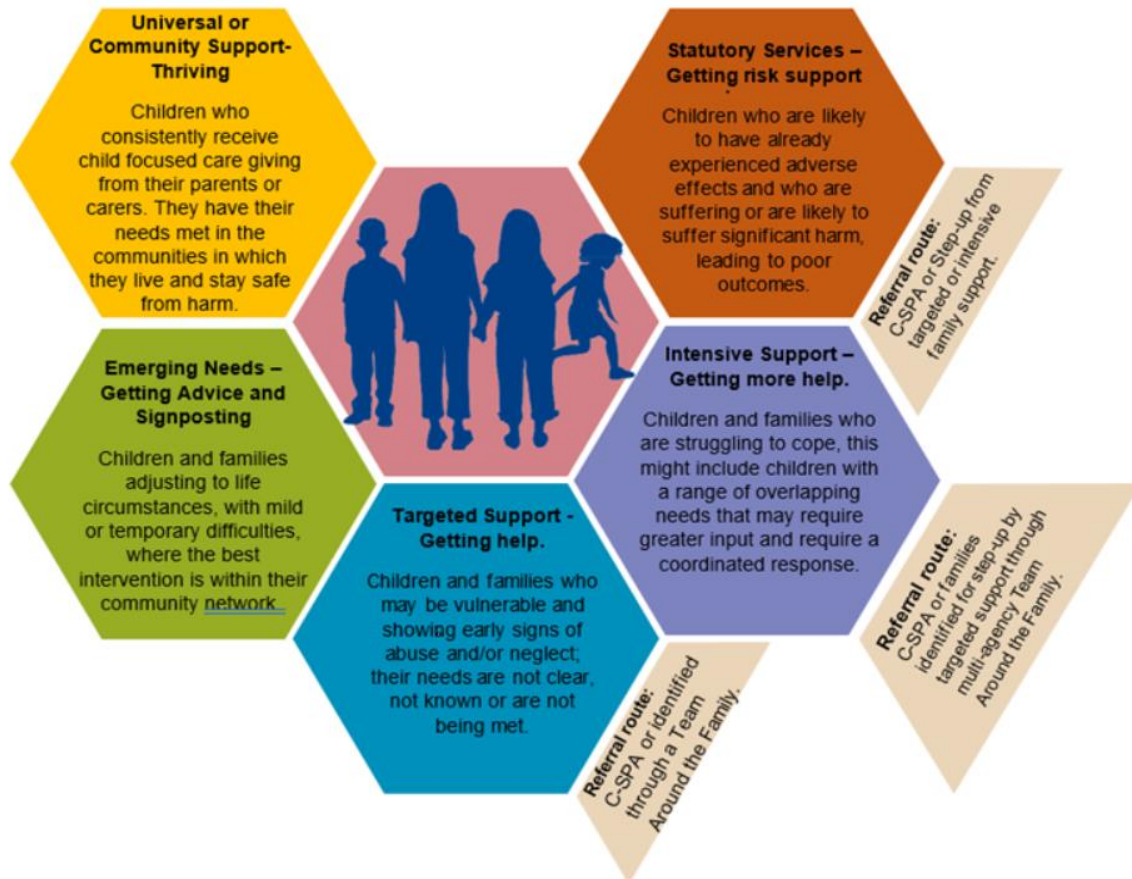
Physical observations:

- 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

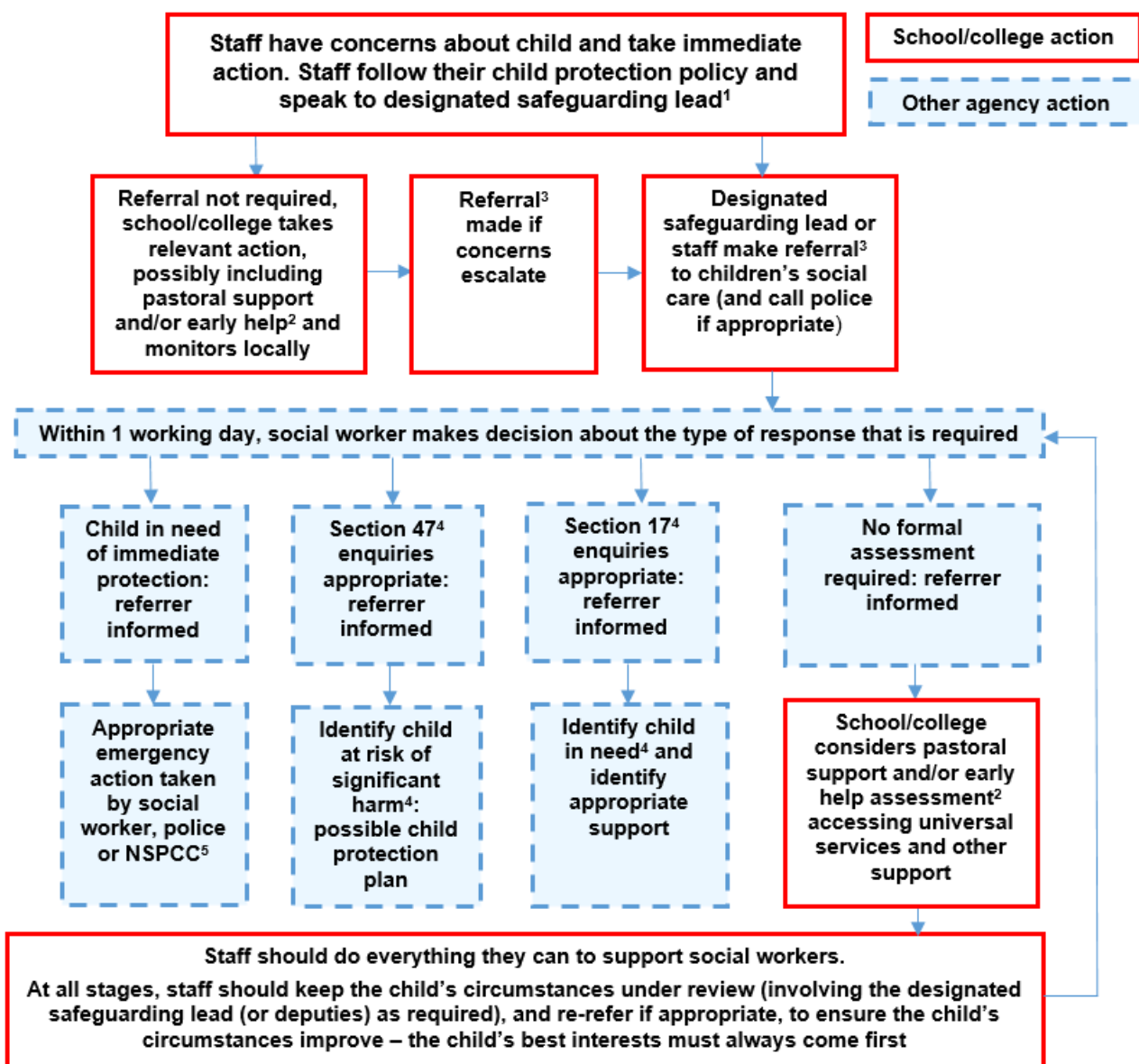
Behavioural observations:

- 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.

Appendix 2: Continuum of Support for families living in Surrey



Appendix 3: Where there are concerns about a child



1. In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.
2. Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.
3. Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).
4. Under the Children Act 1989, 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. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).
5. This could include applying for an Emergency Protection Order (EPO).

Appendix 4: Sexual violence

It is important that settings are aware of sexual violence and the fact children can, and sometimes do, abuse other children in this way and that it can happen both inside and outside of setting. When referring to sexual violence in this advice, we do so in the context of child-on-child sexual violence.

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (NOTE- Settings should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

Causing someone to engage in sexual activity without **consent:** A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (NOTE – this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

What is consent?

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

- a child under the age of 13 can never consent to any sexual activity
- the age of consent is 16
- sexual intercourse without consent is rape.

Further information about consent can be found here: [Rape Crisis England & Wales - Sexual consent.](#)

Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of the setting. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- sexual "jokes" or taunting
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes. Settings should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim.
- displaying pictures, photos or drawings of a sexual nature
- upskirting (this is a criminal offence), and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

- consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of U18s is a criminal offence. [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people)
- sharing of unwanted explicit content
- sexualised online bullying
- unwanted sexual comments and messages, including, on social media
- sexual exploitation; coercion and threats, and
- coercing others into sharing images of themselves or performing acts they're not comfortable with online.

It is important that settings consider sexual harassment in broad terms. Sexual harassment (as set out above) creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.



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)