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Safeguarding and Child Protection Policy

September 2024

Table of Contents

1: Application, Related Policies & Guidance.	5
2: Introduction.	6
Policy Monitoring and Review	7
3: Key Personnel	7
Concerns about a child	8
Concerns or allegations about an adult.	9
Prevent.	9
Boarding School Association (BSA).	9
4: Policy Principles & Values.	9
5: The School's Aims	10
6: Roles and Responsibilities	11
School Staff	11
The Head	12
The Designated Safeguarding Lead (DSL).	13
The Deputy Designated Safeguarding Leads (DDSLs)	15
The Governing Body	16
7: Induction and Training.	17
Induction	17
Ongoing Staff Training	18
DSL Training	18
Training for Governors	18
8: Our Campus and environment.	19
Use of mobile phones, cameras & other photographic/video devices.	19
Internet Filtering & Monitoring Software & Security Systems	20
9: Confidentiality and Sharing Information	21
Communication with parents/guardians.	22
Methods for children of all ages to report worries or abuse, including bullying and child-on- child abuse	22

Children with particular vulnerabilities, including special educational needs and disabilities or physical health issues	23
Children who are lesbian, gay, bisexual or trans (LGBT)	24
What staff should do if there are concerns about a child	25
Dealing with a disclosure.....	26
Action by the DSL following a report of a concern or a disclosure.....	28
Child Protection Procedures Flowchart.....	29
What happens after a referral is made?.....	31
Early Help.....	31
10: Procedures relating to allegations against staff	32
Reporting an allegation	33
Informing the Local Authority Designated Officer (LADO)	33
Procedures	34
Allegation outcomes.....	35
Record keeping and references.....	35
Non recent allegations	36
Low Level Concerns	37
Safer Recruitment.....	38
11: Boarding... ..	39
12: Abuse, Neglect and other Safeguarding Issues	40
What is abuse and neglect?	41
Physical abuse.	41
Emotional abuse.....	43
Sexual abuse.....	44
Neglect	46
Affluent neglect	47
Specific Safeguarding Issues	47
13: Child-on-Child Abuse	48
Upskirting.....	50
Youth produced sexual imagery - nudes/semi-nudes, sexting.....	50

14: Sexual Behaviour, Sexual Violence and Sexual Harassment.	50
Sexual Behaviour.....	50
Sexual violence and sexual harassment	51
Responding to reports of sexual violence and sexual harassment.....	52
Preventative Strategies to minimise the risk of Child-on-child abuse.	54
15: Anti-Bullying/Cyberbullying	55
16: Online Safety...	56
17: Racist Incidents.	56
18: Substance Abuse and Misuse...	57
19: Radicalisation and Extremism (Also see the school’s Prevent Policy)	57
Indicators of vulnerability to radicalisation.....	58
Channel.....	59
Visiting Speakers.	60
20: Domestic Abuse.	60
21: Child Sexual Exploitation (CSE).	61
22: Child Criminal Exploitation (CCE), Including County Lines.	61
23: Honour-based abuse (including FGM and Forced Marriage).	63
Honour Based Abuse.	63
Female Genital Mutilation (FGM).....	64
Forced Marriage	65
24: Private Fostering Arrangements.	65
25: Looked After Children.	65
26: Children Missing Education	66
Pupils Missing Out on Education	67
27: Restrictive Physical Intervention (also see Policy on Use of Force and Restraint)	67
28: Whistleblowing...	67
29: Mental Health.	68
30: Statutory Guidance and documents.	68

1: Application, Related Policies & Guidance

This policy applies to governors, staff, parents, volunteers, contractors and visitors to the School. Whenever the term 'staff' is used, it applies to all categories of staff, including supply and self-employed staff, contractors, volunteers, students and those on work experience.

It applies to all children, including those in the EYFS, on and off the school site whilst they are the responsibility of the School. It also applies to children and pupils from other establishments visiting the school. The term 'children' includes everyone under the age of 18.

The policy should be read in conjunction with other school policies related to safeguarding. These include, but are not limited to:

- Induction Policy (Staff Handbook Section 1.10)
- Day Trips Policy (Staff Handbook Section 2.19)
- Site Security, Visitors & Contractors (Staff Handbook Section 2.22)
- Use of Technology in School - Student (Staff Handbook Section 2.25)
- Visiting Speakers Checklist (Staff Handbook Section 2.3)
- Use of School Facilities by External Organisations (Staff Handbook Section 2.30)
- Uncollected Child Policy (Staff Handbook Section 2.32)
- Pastoral Care, Boarding & Tutors (Staff Handbook 2.5)
- Boarding Principles & Practice (Staff Handbook 2.6)
- Behaviour Management Policy (Staff Handbook Section 2.8)
- Admissions Policy (Staff Handbook Section 3.1)
- Planning Residential Trips or Expeditions Policy (Staff Handbook Section 3.10)
- Policy on Substance Use & Misuse (Staff Handbook Section 3.2)
- Policy on Use of Force and Restraint (Staff Handbook Section 3.20)
- Prevent Policy (Staff Handbook Section 3.29)
- Anti-Bullying Policy (Staff Handbook Section 3.3)
- Online Safety Policy (3.30)
- Relationships & Sex Education Policy (Staff Handbook Section 3.5)
- Whistle Blowing Policy (Staff Handbook Section 5.19)
- Recruitment Selection and Disclosures Policy and Procedure (Staff Handbook Section 5.30)
- Staff Behaviour and Code of Conduct (Staff Handbook Section 5.8)
- Fire Safety Policy (Staff Handbook Section 6.17)
- Health and Safety Statement of General Policy (Staff Handbook Section 6.2)
- Risk Assessment Policy (Staff Handbook Section 6.7)
- First Aid and Medical Emergencies Policy (Staff Handbook Section 7.2)
- Missing Child Procedure and EYFS Policy (Staff Handbook Section 7.4)

This policy pays due regard to:

- Education (Independent School Standards) Regulations 2014
- DfE statutory guidance 'Keeping Children Safe in Education' (KCSIE September 2024)
- 'Working Together to Safeguard Children 2023'
- Prevent Duty Guidance England and Wales 2023
- The National Minimum Standards for Boarding Schools (2022)
- Statutory Framework for the Early Years Foundation Stage (2023)
- It also follows the procedures laid down by the school's local safeguarding partnership which is Surrey Safeguarding Children Partnership (SSCP).
- A full list of statutory and other guidance, with links to the associated documents, may be found in section 28 of this policy.

2: Introduction

The safety and welfare of all children at Frensham Heights School is always given the highest priority. Our goal is to know everyone in our community as an individual and to provide a secure and caring environment so that every student can learn in safety. The school is alert to the signs of all forms of abuse and neglect, including abuse by other children, and through the use of technology. Procedures are in place to ensure that children receive effective support and protection as early as possible.

All members of staff have a duty to safeguard children and must therefore familiarise themselves and comply with this policy at all times.

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 the 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”

(KCSIE September 2024)

Child Protection refers to the actions that are taken to protect specific children who are identified as in need and/or suffering or likely to suffer, significant harm.

“Safeguarding and promoting the welfare of children is everyone’s responsibility. ‘Children’ includes everyone under the age of 18. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child.”

(KCSIE September 2024)

Frensham Heights School prides itself on its ethos and history of mutual respect. Parents/guardians and others with parental responsibility also play an important role in supporting the school. Copies of this policy, together with other policies related to safeguarding, are on our website (or available by request from the School Secretary). Open communications are essential; the school works closely with parents/guardians so they will always feel able to discuss with the school any issues or worries that they may have. Any concerns about the welfare of a child or the actions of an adult will be dealt with in accordance with this policy.

Full contact details for the school personnel with overall responsibility for safeguarding and for the Surrey Safeguarding Children Partnership can be found in the section below.

Policy Monitoring & Review

The DSL for Frensham Heights School will ensure that the procedures set out in this Policy and the implementation of these procedures are updated and reviewed regularly, working with the Governors as necessary.

Any child protection incidents will be included in termly reports made to the Governing Body and this policy and its implementation will be reviewed and reflected upon after serious cases. Where an incident involves a member of staff, the Local Authority Designated Officer (LADO) may assist in this review to determine whether any improvements can be made to the school’s procedures. Any deficiencies or weaknesses with regard to child protection arrangements at any time will be remedied without delay.

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

3: Key Personnel

The Designated Safeguarding Lead (DSL) is the member of staff within the school who takes overall responsibility for safeguarding matters. There are a number of deputies (DDSL) appointed to assist.

Designated Safeguarding Lead (DSL) is:

Jack Talman

Contact details:

dsl@frensham.org

Work Mobile: 07798640669

Named 2nd DDSL

Jo Dalziel	Assistant Head (Pastoral, Progress & Behaviour)	jodalziel@frensham.org
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Other DDSLs

Carys Willman	Senior School Nurse	caryswillman@frensham.org
Sian Owen	Head of Boarding & Wellbeing	sianowen@frensham.org
Meghan Guy	Junior School	meghanguy@frensham.org
Sarah Gibson	EYFS	sarahgibson@frensham.org

The nominated Safeguarding Governor is:

Greg West

Contact details: via susiebirdsall@frensham.org

The Head is:

Ben McCarey

Contact details: head@frensham.org

The Chair of Governors is:

Simon Wilcox

Contact details: via susiebirdsall@frensham.org

The Local Authority

The school is situated in Surrey and therefore follows the guidance of the Surrey Safeguarding Children Partnership (SSCP).

Concerns about a child

If a child is in immediate danger the police should be called by dialling 999.

Anyone who has concerns about a child should inform the DSL or any DDSL of any concerns they may have. Everyone, including staff, are also welcome to contact the SSCP directly.

Surrey Children's Single Point of Access (C-SPA) is the conduit for access to children's services, and also provides advice and guidance. C-SPA will decide whether a referral needs to go to a social worker or whether more information or an Early Help Assessment is needed. The C-SPA can be contacted as follows:

Tel: 0300 470 9100 (Monday – Friday 9am – 5pm)

Out of hours: 01483 517898 to speak to the emergency duty team.

Email: cspa@surreycc.gov.uk

The Surrey Education Safeguarding Team are also available to give advice.

Email: education.safeguarding@surreycc.gov.uk

Concerns or allegations about an adult

The Local Authority Designated Officer (LADO) service manages concerns or allegations concerning individuals who work with or volunteer with children.

Duty LADO Tel: 0300 123 1650 (option 3)

Email: LADO@surreycc.gov.uk

Prevent

Concerns that individuals may be at risk of being drawn into terrorism due to their vulnerabilities, associations or ideology are referred by completing the Prevent Referral Form accessible through: <https://www.healthysurrey.org.uk/community-safety/professionals/prevent/referral-process>

If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101 or 01483 632982 and ask to speak to the Prevent Supervisor for Surrey.

The Department for Education has also set up a dedicated email address, online platform and telephone helpline for staff and governors to raise concerns around Prevent. The details are as follows:

Email: counter.extremism@education.gov.uk

Online platform: [Contact: Preventing extremism in education settings](#)

Phone Number: (020 7340 7264).

Boarding School Association (BSA)

As a member of the BSA, the School follows its "Commitment to Care Charter" (2022). Any safeguarding cases which result in a full referral to an external body such as the local authority or the police, including those cases which relate to the conduct of a member of staff or to serious abuse by one child on another, will be reported to the BSA.

The BSA Director of Safeguarding and Standards, Dale Wilkins, can be contacted as follows:

Telephone (+44 (0)7876 072377)

Email safeguarding@boarding.org.uk

4: Policy Principles & Values

- The safety and welfare of every child is paramount.

- The safety and welfare of children is embedded within all the school's processes and procedures.
- All children regardless of age, sex, gender, ability, culture, race, language, religion or sexual identity have an equal right to be protected from harm and to feel safe and secure.
- All staff (and volunteers) have a role in the prevention of harm and abuse and an equal responsibility to act immediately on any concern, suspicion or disclosure that may indicate a child is at risk, either in the school or in the community.
- The school is fully aware of its responsibilities and maintains an ethos of "It could happen here" and a willingness to "think the unthinkable".
- The school works in close partnership with other agencies to protect and safeguard children.
- The curriculum includes numerous opportunities for children to develop the skills they need to stay safe, including online; this is largely through its Horizons (PSHE) program which thoroughly meets all requirements of the government statutory guidance on Relationships, Sex and Health Education (RSHE).

5: The School's Aims

The school aims to:-

- Establish and maintain an ethos where children feel safe and secure, are encouraged to talk and are always listened to.
- Ensure that all children know that adults in the school are people who will understand their problems and that they can approach any member of staff if they are worried or in difficulty.
- Ensure children know how to raise any concerns they may have with staff.
- Ensure children are taught to understand and manage risk through Personal, Social & Health Education (PSHE) and Relationship, Sex and Health Education (RSHE) and through all aspects of school life. This includes online safety. This is mainly delivered through our Horizons program.
- Consult with children regularly e.g. through questionnaires, surveys, within lessons and through the School Council.
- Provide high quality pastoral care with appropriate and timely help for children through the school's internal support services when required, including providing details of helplines, counselling or other avenues of support.
- To be alert to the risks to pupils online and to ensure, through appropriate filtering and monitoring systems, that they are safeguarded in school from potentially harmful and inappropriate content. This is also demonstrated in the school's Use of Technology in School Policy (Staff Handbook 2.25) and Online Safety Policy (Staff Handbook 3.30).
- Ensure robust school safeguarding systems and procedures are in place and that they are followed by all members of the school community in accordance with statutory guidance and the locally agreed inter-agency procedures of Surrey Safeguarding Children Partnership.
- To support staff who act as whistleblowers in raising concerns about poor or unsafe practice and potential failures of the Trust's safeguarding regime
- To be alert to the medical needs of pupils with mental and physical health conditions and to the needs of those with Special Educational Needs or disabilities;

- Ensure that children attend school regularly and do not suffer through repeated absenteeism.
- Contribute effectively to Early Help assessments of need and support for those children who have suffered or are at risk of harm and/or neglect.
- Develop and promote effective working relationships with other agencies, including Surrey and Hampshire Safeguarding Boards, Early Help providers, the Police, Health and Social Care.
- Ensure safer recruitment practices are followed and that all staff are recruited in accordance with the school's Safer Recruitment Policy and Part Three of KCSIE. This is outlined in full in the school's 'Recruitment, Selection and Disclosures Policy and Procedures' (Staff Handbook Section 5.30).
- Ensure all staff understand their responsibility to report any concerns, including 'low level' concerns, about the conduct of staff members, volunteers or other adults and are aware of how to do this.
- Ensure all safeguarding records are transferred securely and immediately if a child moves to a new setting and that safeguarding information is requested from feeder schools.
- Work closely with parents and guardians ensuring that they are made aware of the responsibilities of staff members regarding child protection procedures through the publication of the Safeguarding Policy on the school's website.
- Ensure the school lettings policy ensures the suitability of adults working with children on the school site at any time and ensures that any groups who use the school premises have effective child protection policies and procedures in place.

6: Roles and Responsibilities

School Staff

School staff are expected to:-

- Provide a safe environment in which children can learn.
- Establish and maintain an environment where children feel secure, are encouraged to talk and know they will be listened to.
- To adhere to the school's Staff Code of Conduct
- Understand that safeguarding is **everyone's responsibility** and maintain an attitude of "It could happen here" and also be willing to "think the unthinkable".
- Read and understand, Part 1 of Keeping Children Safe in Education and Annex A
- Read and understand the school's Safeguarding & Child Protection Policy and Procedures i.e. this document.
- Know the identity of the school's DSL and DDSLs.
- Attend termly Safeguarding updates and training sessions during Staff Conference Days as well as during weekly Staff Notices meetings in order to meet the statutory requirement for at least annual training on Safeguarding.
- Attend of complete annual training on Online Safety and Prevent.
- Be aware of the signs of abuse and neglect, including child-on-child abuse.

- To be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or be threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This must not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.
- To build and develop trusted relationships with children and young people which facilitate communication.
- Be aware that that even if there are no reports of child-on-child abuse or any other forms of abuse, it does not mean it is not happening, it may just not have been reported.
- Report to the DSL any concerns about any child, however minor it may appear. If you feel the child is in imminent/immediate danger this reporting should take priority; and contact should be made with the DSL immediately (obtaining cover if needed). If the DSL is not contactable a Deputy DSL must be informed.
- Know how to report any concerns (in person to the DSL or any DDSL, via CPOMS or by calling the DSL's mobile if urgent) and ensure that these are recorded.
- Know how to respond to a child who discloses harm or abuse.
- Be 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.
- Take immediate action if they have a mental health concern about a child, by following the relevant policy and reporting to the DSL and Health Centre Team.
- Plan opportunities within the curriculum for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe, including online.
- Report any recurrent or long-term absenteeism of any child to the DSL.
- Notify the DSL or Deputy immediately if any child on a Child Protection plan or Child In Need plan or any child reported to staff as having been identified by the pastoral team at high risk has unexplained absence.
- Understand Early Help and be prepared to identify and support children who may benefit from Early Help, including early help provided by the school.
- To understand the child protection process, including Section 17 and Section 47 assessments under the Children's Act (1989).
- Provide support for children subject to Early Help, Child in Need or Child Protection that is in keeping with their plan.
- To report to the Head any concerns about the conduct of adults, this includes behaviour outside school that might indicate an individual is unsuitable to work with children. To report any concern about the Head to the Chair of Governors.
- To be aware of methods within school to report low level concerns as well as concerns that meet the harm threshold and to follow these procedures. Concerns that meet the harm threshold must be reported to the head which can be done via head@frensham.org .
- To identify children at risk of being drawn into terrorism and to challenge extremist ideas which may be used to legitimise terrorism.

The Head

The role of the Head is to:

- Ensure that safeguarding is always given the highest priority.
- Ensure that the school actively promotes an ethos of safeguarding, so the safety and welfare of children is embedded within all the school's processes and procedures.
- Have read and understood Keeping Children Safe in Education, thereby ensuring that the school's policies and procedures follow statutory guidance.
- Ensure that KCSIE Part 1 & Annex A and the School's Safeguarding and Child Protection Policy are understood and implemented by all staff.
- Ensure the school fully contributes to inter-agency working in line with Working Together (2023).
- Monitor the effectiveness of this policy and procedures and liaise with the Governing Body and senior leaders over any proposed amendments.
- Ensure the appointment of a DSL who is a member of the SLT and has the necessary seniority to carry out the role.
- Allocate sufficient time, training, support and resources, including cover arrangements where necessary, to the DSL and DDSLs to enable them to carry out their roles effectively.
- Ensure children are provided with opportunities throughout the curriculum to learn about keeping safe, including keeping themselves safe online.
- Ensure systems are in place, which are easily understood and easily accessible for children to report any concerns, including concerns related to bullying and child-on-child harassment and abuse.
- Ensure all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the school's Whistle-blowing Policy.
- Deal with reports regarding concerns or allegations related to the conduct of adults (this includes behaviour outside of school that might indicate an individual is unsuitable to work with children)
- Seek advice and liaise with the Local Authority Designated Officer (LADO) regarding concerns about adults in accordance with KCSIE and Local Authority SSCP.
- Be trained in safer recruitment and ensure that attitudes to safeguarding are explored with potential staff during recruitment interviews.
- Ensure at least one member of each interview panel has undergone Safer Recruitment training, if there is not a panel conducting interviews then the individual will have completed the safer recruitment training.
- Ensure all staff are recruited in accordance with Part 3 of KCSIE and appropriate preemployment checks are carried out and recorded in the school's Single Central Register.

The Designated Safeguarding Lead (DSL)

A detailed breakdown of the responsibilities of the DSL can be found in Annex C of KCSIE.

The DSL is a member of the Senior Leadership Team and holds the lead responsibility for safeguarding and child protection (including online safety) in the school. The DSL may delegate tasks to appropriately trained deputies (DDSLs), but the ultimate lead responsibility always remains with the DSL. This responsibility cannot be delegated, except under exceptional circumstances such as the long-term absence of the DSL.

Responsibilities of the DSL include

- To actively promote a culture of safeguarding so the safety and welfare of children is embedded within all the school's processes and procedures
- To encourage and promote a school culture of listening to children, including taking account of their wishes and feelings.
- To act as source of support and expertise for the whole school community
- To liaise with school staff (especially SLT, Heads of Year, Heads of House, Support for Learning and Health Centre Nurses) on matters of safety and safeguarding.
- To ensure that the school's Safeguarding and Child Protection Policy (i.e. this policy) and its procedures comply with statutory guidance and guidance from Surrey SCP.
- To ensure that the school's Safeguarding Policy and other associated policies are known and understood by staff and implemented appropriately.
- Ensure that the names of the Designated Safeguarding Lead and Deputies, are clearly displayed around the school, with a simple statement explaining how all concerns should be referred.
- Be available during term time (during school hours) for staff in school to discuss any safeguarding concerns. Appropriate and adequate cover arrangements will be arranged by the DSL and the school leadership for any out of hours/term activities.
- To ensure appropriate action is taken when any concern is raised, including communication with parents and referral and liaison with other agencies when required.
- Report to the Head any significant safeguarding concerns and all concerns which require the involvement of other agencies.
- To ensure any reports of child-on-child abuse are recorded and appropriate action is taken by following the school's Behaviour Policy, Anti-bullying Policy and statutory requirements as appropriate.
- Be alert to the specific needs of children in need, those with SEND and young carers.
- Undertake regular interagency training, and additional training as required, to ensure the knowledge and skills required to carry out the role are secure.
- Have a secure working knowledge of Surrey SCP procedures and understand the assessment process for providing early help and statutory intervention, including the local authority levels of need criteria and referral arrangements.

- Be aware of the requirement, in specific circumstances, for children to have an Appropriate Adult present. Further information can be found in the Statutory guidance – Police and Criminal Evidence Act (PACE) Code C 2023.
- Understand and support the school with regards to the requirements of the Prevent duty and provide advice and guidance to staff on protecting children from radicalisation.
- Understand the risks associated with online activity and have the up-to-date knowledge and capability to keep children safe whilst they are online at school; including additional risks that children with SEND face online and the associated and appropriate support they require.
- Keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children’s social care or the Prevent program etc.
- Ensure that when a student’s transfers school (including in year), any Child Protection file is passed to the new school as soon as possible, and in any event, no later than within the first 5 days of the start of the child transferring. Records must be sent separately from the main student’s file; secure transit and confirmation of receipt must be ensured.
- Ensure that where a student transfers school and is on a Child Protection Plan or is a Looked After child, their information is passed to the new school immediately and that the child’s social worker is informed. Consideration will be given to a multi-agency schools transition meeting if the case is complex or on-going.
- Ensure for those children with active involvement from Children’s Services that the case holding Social Worker is immediately informed of any child who is absent without explanation.
- Ensure that all staff receive child protection and safeguarding induction, in line with KCSiE (2024) and Surrey SCP procedures, as well as regularly updated training, at least annually, including online safety, prevent and child-on-child abuse.
- Ensure that, in collaboration with the school leadership and governors, this child protection policy is reviewed annually, and the procedures and implementation are updated and reviewed regularly.
- Ensure that this Child Protection Policy is available publicly and that parents are aware that referrals about suspected harm and abuse will be made and the role of the school in this.
- Contribute to and provide, with the Head and Chair of Governors, the “Audit of Statutory Duties and Associated Responsibilities” to be submitted annually to the Surrey SCP Education Safeguarding Team.
- To work closely with the Head and SLT to ensure that Safeguarding policy and practices are well-understood and being implemented in a proper way.
- To report termly to the Governing Body.

The Deputy Designated Safeguarding Leads (DDSL’s):

All Deputy DSLs will:

- Be trained to the same standard as the Designated Safeguarding Lead and have the skills and expertise necessary to fulfil their role.
- Provide support to the DSL in carrying out their role; however, the lead responsibility of the DSL cannot be delegated.
- In the short term 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, a nominated deputy will act as DSL.
- On returning to school the deputy must ensure the DSL is fully briefed on any safeguarding matters which have arisen during the absence.

The Governing Body

- To ensure that safeguarding is always given the highest priority, and that the school promotes an ethos of safeguarding, so the safety and welfare of children is embedded within all the school's processes and procedures.
- To attend safeguarding induction training and annual safeguarding training.
- To ensure there is an effective and compliant Safeguarding Policy in place, which pays due regard to KCSIE, Working Together and the requirements of Surrey SCP.
- To be aware of their obligations under the Human Rights Act 1998 and the Equality Act 2010. Further information can be found at [Human Rights | Equality and Human Rights Commission and Equality Act 2010: advice for schools](#).
- To ensure the policy is available publicly on the school website.
- To ensure systems are in place, which are easily understood and easily accessible for children to report concerns, including abuse.
- To ensure the Safeguarding and Child Protection Policy is reviewed annually (as a minimum) and any identified weaknesses are remedied immediately. The review to include the effectiveness of procedures and their implementation and that the school contributes to effective inter-agency working in line with Working Together to Safeguard Children (2023).
- To ensure that mechanisms are in place to assist staff at all levels to understand and discharge their role and responsibilities as set out in Keeping Children Safe in Education (2024).
- To ensure that the school has a Designated Safeguarding Lead who is a member of the Senior Leadership Team and that the role is explicit in the role holder's job description.
- To ensure that safer recruitment procedures are followed in accordance with Part 3 of KCSIE and that all appropriate checks are carried out on all staff before starting their employment.
- To ensure appropriate pre-employment checks are carried out and recorded in the school's Single Central Register.
- Ensuring that there is at least one person on every recruitment panel who has completed safer recruitment training.
- At least one member of the governing body has completed safer recruitment training, to be refreshed at least every five years.
- To ensure that the school has procedures for dealing with allegations against members of staff that comply with Part 4 of KCSIE and Surrey SCP.
- To utilise the experiences and expertise of staff when reviewing the safeguarding policy and give opportunities for staff members to refine safeguarding procedures.

- To ensure IT systems have filters installed to guard against the risk of any inappropriate internet activity, whilst not over-blocking which may place unreasonable restrictions on what children can be taught. One governor to hold a specific responsibility for oversight of the School's Monitoring and Filtering systems.
- To ensure that the leadership team and relevant staff have an awareness and understanding of the IT provisions in place, manage them effectively and know how to escalate concerns when identified.
- Appoint and support a nominated governor for safeguarding who meets with the DSL on a termly basis, so trends, concerns and significant issues can be discussed, reflected upon and supported in a process of continual improvement.
- Ensure the Surrey SCP is informed in line with local requirements about the discharge of duties via the annual safeguarding audit.

7: Induction and Training

It is important that all staff have regular training to enable them to recognise the possible signs of abuse and neglect and know what to do if they have any concerns whatsoever about a child or the conduct of an adult.

Induction

All newly recruited staff are provided with the following documents and given in-house training on their content as part of their induction.

- Keeping Children Safe in Education, Part 1 and Annex A.
- The school's Safeguarding and Child Protection Policy (includes the identity and the role of the DSLs and Deputies, procedures on child-on-child abuse and the response to children who go missing from education)
- Staff Behaviour & Code of Conduct
- Online Safety Policy
- Whistleblowing Policy
- Behaviour Management Policy
- Guidance on Missing Child Policy
- Anti-bullying Policy

The school takes a risk-based approach to the level of information provided when training other temporary staff, contractors and volunteers, ensuring they have the information they need to do all they can to keep children safe.

Ongoing Staff Training

- At the beginning of the academic year, all staff are provided with the new version of Part 1 and Annex A of Keeping Children Safe in Education and the school's updated Safeguarding Policy and must confirm that they have read and understood these documents.

- Members of staff are given regular updates (within Staff Conference INSET days as well as in a during Staff Notices meetings) on safeguarding issues, in line with statutory advice and guidance from Surrey SCP. This includes information on reporting concerns; early help and referral processes; dealing with child-on-child abuse (including sexual violence and sexual harassment); online safety and Prevent.
- All staff have access to an online training course on “Supporting Mental Health and Wellbeing of Children and Young People”.
- All staff employed by the School (part time or full time) are required to attend the Safeguarding Updates in Staff Conference or to catch up on this content if not able to attend.
- Staff are also able to access online courses in response to changes in legislation or to update their safeguarding knowledge on specific topics.
- Staff who are not employed directly by the school and are self-employed peripatetic teachers are provided with KSCIE Part 1 and Annex A and the school’s Safeguarding Policy and associated policies and are required to confirm that they have read and understood these. They are also expected to either annually attend the Frensham Safeguarding Update Training session in September, or confirm that they have watched a video of this training, or provide evidence of recent alternative safeguarding training.

DSL Training

The DSLs and deputies complete additional Level 3 Safeguarding training every two years to ensure they understand the duties associated with their roles. This may be completed through Surrey or the online platform provided by the school.

Training for Governors

- The training of governors aims to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole-school approach to safeguarding.
- Annually all governors are provided with Part 1, Part 2 and Annex A & B of Keeping Children Safe in Education.
- The governor responsible for safeguarding has received additional specific safeguarding training and undertakes refresher training every two years, as a minimum.
- All governors are provided with Safeguarding Training, including Prevent and Online Safety when they join the Board. KCSiE and Safeguarding training is then updated annually. Governors also complete an online course in Safeguarding for Governors and the Prevent Duty for governors annually.

8: Our Campus and environment

With a large and dispersed campus, the risk of the physical environment of the school must be considered and everything possible is done to minimise the risk to children. Risk assessments are in

place to show the risks which have been considered and the procedures put in place to mitigate those risks. These include:

- a security system that requires all visitors to sign in at Reception – staff ensure any visitors for whom they are responsible are signed in and badged and are accompanied with at all times unless they have undergone DBS and other relevant Safeguarding checks.
- All staff know to politely challenge anyone on the school premises not wearing a visitors' badge that they do not recognise, whether this person may be a member of staff, parent or visitor. This ensures that children are safeguarded from strangers on site. As a small staff body, the majority of staff know each other and this policy helps to develop those bonds.
- There is an "open door" policy. Staff usually keep doors to classrooms wide open and never lock doors when working in rooms with children.
- Open plan classrooms with viewing panels in doors to enable clear sight of children and staff.

During free time (morning break, lunchtime and after school until 5.30) staff are on duty at various locations across the school site to supervise student activity. Due to the size of the school campus staff cannot cover every area at all times so students are informed where staff will be so they can find them if needed.

Use of mobile phones, cameras & other photographic/video devices

(Also see: Staff Code of Conduct, Code of Conduct for Technology)

Whole School Policy

- Cameras, mobile phones or other devices are not allowed in any areas where children may be washing or changing, nor should photography be used in any way that may offend or cause distress.
- Staff must not take video footage or photographs of children except for school purposes.
- School devices must be used wherever possible.
- If personal devices are used, photographs or videos of children must be uploaded to the school's system as soon as possible and permanently deleted from the personal device.
- Photographs should not be taken of children without their parents' permission. General permission is given via the Single Consent Form and contract.
- The list of those children whose parents have not consented to their child being photographed is available from External Relations / School Secretary and is also available on Teams/All staff/Files.
- No photograph or film taken in school may be published (this includes on any social media platform such as Instagram, Facebook, X or YouTube, regardless of privacy settings) without the consent of each person recorded and, in the case of a child, without the explicit consent of their parents.

- Visitors, volunteers and contractors in school are not permitted to take photographs in any areas of the school without specific permission from the Head.

Specific to the EYFS and the N-3 area

- Neither staff nor children may use their personal mobile phones to take photographs or videos within the EYFS setting, including when nursery and Reception children are in the school grounds.

A box is available in each EYFS classroom (or staff working room) where personal mobile phones should be stored when working with this age group. This applies to all staff, senior school students and volunteers.

Students' mobile phones

Students below Year 12 are not allowed to use their phones to school. Information on this can be found in the Use of Technology – Students policy and on posters around the school.

Boarders in Years 7-11 may bring a phone to school, but it must be kept in the boarding house during the school day. Further restrictions are in place for younger students in the boarding houses in the evenings.

Day students, who need a phone for safety purposes whilst travelling, are also allowed to bring a phone to school but are not to access it or use it during the school day.

Sixth Form students and staff are encouraged to minimise use of mobile phones when around the school site and the Dining Hall is designated a mobile phone free area.

Internet Filtering and Monitoring Software & Security Systems

The school follows the Department for Education's published filtering and monitoring standards. As a result:

- The school assigns responsibility to manage filtering and monitoring systems to the IT Manager and DSL, who review the filtering and monitoring provision annually.
- The system is maintained to ensure that it blocks harmful and inappropriate content without unreasonably impacting teaching and learning.
- The school also has effective monitoring strategies in place that meet their safeguarding needs.

The school has appropriate filtering and monitoring systems in place and regularly reviews their effectiveness. The school uses 'Smoothwall' as this meets all statutory requirements. 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. The IT Manager and DSL

automatically receive alerts when children attempt and are blocked from seeing inappropriate content online.

The DSL decides when to follow up these attempts but will always follow up on any serious alert concerning students in KS3 or below or when repeated alerts are shown for older students or when the alert shows particularly concerning activity.

The DSL decides when to follow up with parents, but this will usually be the case for KS3 students unless there is any safeguarding reason not to. Parents may be informed for students in KS4 or above depending on the seriousness of the alert.

The IT Manager and DSL are also immediately informed via Teams, mobile phone and email if any student searches online for anything with reference to suicide. These alerts are immediately followed up

The Head, DSL and Governors regularly review data from this software in order to reflect upon its effectiveness and recognise any patterns that may need looking into. The annual review also considers these issues to. There is a named governor with specific responsibility for oversight of Filtering and Monitoring Software.

All staff understand how these systems work and how the school responds to alerts raised by these. This is included in Safeguarding Induction Training for new staff as well as a part of regular Safeguarding updates for staff.

The school understands that students may find ways around the monitoring and filtering systems using mobile phones. This is one reason why students below Year 12 are not allowed to use mobile phones in school. The risks of online behaviour area focus within the Horizons (PSHE) Programme. Boarding staff also pay particular attention to this in their pastoral care for boarders.

The school maintains online security protection procedures in place in order to safeguard their systems, staff and learners and reviews the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

9: Confidentiality and Sharing Information

Staff should not assume a colleague, or another professional will take action and share information that might be critical in keeping a child safe. All staff must be aware that they have a professional responsibility to share information, including with other agencies, in order to safeguard children and that Data Protection regulations are not a barrier to sharing information.

Matters relating to child protection will be shared in line with the guidance in 'Information Sharing Advice for Practitioners' (DfE 2024). The guidance states that the most important consideration is whether sharing information is likely to safeguard and protect a child and that data protection

legislation and guidance must not be allowed to stand in the way of sharing information to safeguard children.

Matters relating to child protection and safeguarding are personal to children and families; in this respect they are confidential, and the Head or DSL will only disclose information about a child to other members of staff on a need-to-know basis.

Communication with parents/guardians

- All parents are made aware from this policy on the school's website that the school is required to follow statutory guidance and local procedures in respect of reporting cases of concern and/or suspected abuse.
- Parents are made aware in the policy, and from notices in the school, of the identities of the DSL and Deputy DSL's with whom they may discuss concerns.
- The school always aims to work closely with parents to help support children and their families; however, it will always put the duty of care to the child as its priority and will refer concerns if a child may be at risk of harm or has suffered harm.
- The DSL will normally request a meeting with the parents of the child about whom there are concerns to discuss the matter. The DSL will explain the reasons for the school's concerns and the course of action the school intends to take.
- The school will usually obtain parental consent for any referral, however referrals to Children's Services or the LADO (or initial advice from either service) do not require prior parental consent. The DSL must act in the best interests of the child even if this results in making a referral against the parents' wishes.
- If the DSL believes that notifying parents might in any way increase the risk to the child or if there are any other extenuating circumstances, initial advice will be sought from Children's Services prior to notifying the parents. This may result in an immediate referral without parents first being notified.
- If there is an allegation which involves a member of staff, parents of the child(ren) involved will be informed as soon as possible, but only after the school has consulted with the LADO and has obtained the LADO's consent.
- If a parent has any safeguarding concerns they should contact the school's DSL immediately.

Methods for children of all ages to report worries or abuse, including bullying and child-on-child abuse

Frensham prides itself on the pastoral care within the school and especially the excellent relationships that students and staff enjoy. The school does all it can to create a culture where young people can speak out or share their concerns with staff. Students report that they feel comfortable and confident to share any worries they may have, or any concerns about other students, and that their concerns are listened to and acted upon. The school has a variety of reporting mechanisms in place to make it easy for students to report any worries. Staff record any concerns reported on CPOMS or, in an emergency, directly to the DSL or a DDSL .

At Frensham students can report concerns by:

- Speaking directly to any member of staff, this is publicised through Horizons lessons (PSHE), posters around the school and reinforced through School Notices regularly.
- Approaching their tutor, Head of Year, our school counsellors or Health Centre staff.
- For Years N-6, dropping a note into a worry box in their school areas.
- For Year 7-13 there is an anonymous online form that is promoted on Teams and in School Notices regularly and can be accessed via a QR code on posters in toilets – or found in the files area of the Whole School Team. This is a genuinely anonymous reporting tool that alerts the DSL if a report is made.
- Contacting an external organisation such as Childline (advertised on posters around school)

Children with particular vulnerabilities, including special educational needs and disabilities or physical or mental health issues

Staff must be aware that children with special educational needs or disabilities (SEND) or certain health conditions, including mental health conditions, can face additional safeguarding challenges and additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's 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.
- communication barriers and difficulties in managing or reporting these challenges.
- Affected cognitive understanding – for example, being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in school or the consequences of doing so.

Other factors which may make a child particularly vulnerable to abuse include when a child is:

- living in a home where there is domestic abuse;
- a young carer;
- showing signs of engaging in anti-social or criminal behaviour;
- affected by known parental substance misuse;
- affected by (a) parent(s) suffering with mental health problems or living in chaotic, neglectful and unsupportive home situations;
- an asylum seeker;
- living away from home;
- vulnerable to being bullied, or engaging in bullying;
- living in temporary accommodation;

- living transient lifestyles;
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality;
- involved directly or indirectly in prostitution or child trafficking;
- a child who does not have English as a first language;
- a 'Looked After' Child (LAC) or child in care or who has returned home to their family from care. This includes those who are subject to a care order or temporarily classed as looked after on a planned basis for short breaks or respite care.

Particular vigilance will be exercised in respect of students who are the subjects of Child Protection Plans and any incidents or concerns involving them will be reported immediately to the allocated Social Worker and confirmed in writing. If the student in question is a looked-after child, this will also be brought to the notice of the Local Authority DSL Designated Person with responsibility for children in public care.

Children who are lesbian, gay, bisexual or trans (LGBT)

The school will work with children and families to support all children who identify as LGBT and ensure they are safe in school.

When supporting a gender questioning child, the school will take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. The school will refer to our Guidance for Schools and Colleges in relation to Gender Questioning Children, when deciding how to proceed.

The school provides separate boys and girls toilets and changing rooms. Children may not use those which are different to the biological sex they were assigned at birth. Alternative single cubicle accessible toilets and changing rooms are provided which any child may use if they wish.

At 6th form, boarding arrangements will be taken on the merits of the individual case, while ensuring all children in the boarding house are kept safe

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.

LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and delivered at Frensham within the Horizons Programme.

The school will work with children and families to support all children who identify as LGBT and ensure they are safe in school.

What staff should do if there are concerns about a child (also see flowchart below)

Abuse and neglect are complex issues and are rarely stand-alone events; therefore, all staff need to be vigilant and alert to any possible signs of distress in children.

Staff may also become concerned about a child without a disclosure being made or without specific concrete evidence. There may be a change in a child's behaviour or their work may show signs of confusion or distress. Children with disabilities, special needs or with language delay may also be more likely to communicate concerns with behaviours rather than words.

There may also be concerns raised about a parent's interaction with a child or issues such as parental alcohol misuse, domestic violence or mental health issues within a family which may put a child at risk of harm.

If there is any concern at all or a belief something observed or disclosed could be a part of a larger pattern, these small incidents must be reported and recorded on CPOMS. In many safeguarding cases, it is not one major incident which triggers a referral but a series of what appears to be more minor events. ***It is therefore of the utmost importance that all concerns reported to the DSL immediately and recorded.***

The policy of the school requires that referrals to external agencies are made by the school's DSL or a DDSL; however, anybody can make a referral and in exceptional or emergency circumstances staff may raise concerns directly with Children's Services. If, at any point, there is a risk of immediate serious harm to a child a member of staff should call the police immediately by calling 999.

The following procedures apply to all staff. The aim of these procedures is to provide a robust framework which enables staff to take appropriate action when they are concerned about a child. At all stages the interests of the child must be paramount.

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

1. Make an initial record of the information related to the concern (using CPOMS where possible if not making notes as soon as is possible after the conversation with the child).
2. Report it to the DSL or a DDSL immediately (in person or via CPOMS or mobile)
3. The DSL will consider if there is a requirement for immediate intervention, however, urgent medical attention should not be delayed if the DSL is not immediately available.

4. Make an accurate record using CPOMS as soon as possible and within 24 hours of the occurrence, of all that has happened, including details of:
 - Dates and times of their observations
 - Dates and times of any discussions in which they were involved.
 - Any injuries
 - Explanations given by the child / adult
 - Rationale for decision making and action taken
 - Any actual words or phrases used by the child

The records must be signed and dated by the author or equivalent on electronic based records.

If more than one member of staff has witnessed an incident or heard a child reveal information, each member of staff should be involved with any report made on CPOMS and should be named as being a witness or involved in the report.

Dealing with a disclosure

A member of staff who is approached by a child should listen carefully and be reassuring. They should reassure the child that the information is being taken seriously and that he/she will be supported and kept safe.

No child who discloses information should ever be given the impression that they are creating a problem by reporting information, including reports of sexual violence or sexual harassment, and no children must ever be made to feel ashamed for making a report.

Staff must never promise confidentiality and should explain that they may need to pass information to other professionals to help keep the child or other children safe.

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.

Guiding principles, the seven R's

Receive

- Listen to what is being said, without displaying shock or disbelief,
- Accept what is said and take it seriously,
- Keep an open mind. Staff should not make an immediate decision as to whether or not abuse has taken place,
- Make a note of what has been said as soon as practicable.

Reassure

- Reassure the child, but only so far as is honest and reliable,
- Don't make promises you may not be able to keep e.g. 'I'll stay with you' or 'everything will be alright now' or 'I'll keep this confidential',
- Do reassure, for example, you could say: 'I believe you', 'I am glad you came to me', 'I am sorry this has happened', 'We are going to do something together to get help'.

Respond

- Respond to the child 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 you?' or 'Did she hurt you?', 'Was it X who did this to 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 criticise the alleged perpetrator; the students may care about him/her, and reconciliation may be possible,
- Do not attempt any examination or remove a child's clothes to look further at an injury. Under no circumstances should photographs be taken of a child's injury,
- Do not ask the child 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 students that it will be a senior member of staff,
- Do not attempt to investigate matters further; your role is to listen, record and report your concerns to the DSL,
- Do not speak to anyone else, including parents, until you have spoken to the DSL. The DSL will decide with whom the information can be shared and what needs to happen next.

Report

- Share concerns with the DSL immediately,
- If you are not able to contact your DSL or a DDSL, and the child is at risk of immediate harm, contact the C-SPA or Police directly, as appropriate,
- If you are dissatisfied with the level of response you receive following your concerns, you should press for re-consideration.

Record

- If possible, make some very brief notes at the time, and write them up as soon as possible,
- Keep your original notes secure (if written down) until you can pass them to the DSL,
- 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,
- Be specific – e.g. describe actual behaviour rather than state 'inappropriate behaviour' occurred,
- If appropriate, complete a body map to indicate the position of any noticeable bruising,
- Record facts and observable things, rather than your 'interpretations' or 'assumptions'.

Remember

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

- Get some support for yourself if you need it,
- If the disclosure reveals the use of technology, refer to the guidance later in this document in about sexting, nudes and semi-nudes.

Review (led by DSL to ensure policy and procedures are robust)

- Has the action taken provided good outcomes for the child?
- Did the procedure work?
- Were any deficiencies or weaknesses identified in the procedure? Have these been remedied?
- Is further training required?

Preserving evidence

All evidence (which may include a student's work, scribbled notes, iPads, mobile phones containing text messages, computers) must be safeguarded and preserved.

If evidence is found on an electronic device, the device involved should be confiscated and set to flight mode or, if this is not possible, it should be turned off.

- Staff should not view images, look for further images, copy or print any images or forward images by email or any other electronic means. This is particularly important if indecent images e.g. sexting, nudes or semi-nudes are found as this is illegal.
- If the imagery has already been viewed by accident (e.g. if a student has shown it to a member of staff before he/she could ask them not to), this must be reported to the DSL immediately.
- Do not delete the imagery or ask the student to delete it.
- Do not ask the student(s) who are involved in the incident to disclose information regarding the imagery.
- Do not share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any student(s) involved.
- Do explain that you need to report it and reassure them that they will receive support and help.

Further advice can be found in [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/444444/Sharing_nudes_and_semi-nudes_advice_for_education_settings_working_with_children_and_young_people_-_GOV.UK.pdf) .

Action by the DSL following a report of a concern or a disclosure

The DSL will refer to the SSCP document [Effective-family-resilience-SSCP-Dec-2020-v7-1.pdf \(surreyscp.org.uk\)](https://www.surreyscp.org.uk/wp-content/uploads/2020/12/Effective-family-resilience-SSCP-Dec-2020-v7-1.pdf) to determine whether or not a referral needs to be made and what support the child and family may require. They will often use the Surrey Effective Support Windscreen within this document for guidance.

Decisions will depend on the nature of the concern. It may include one or more of the following:

- (a) monitoring the student in school (with a specific review date set)
- (b) seeking advice from C-SPA or Surrey Education Safeguarding Team
- (c) a discussion with parents
- (d) early help intervention from the school and/or another agency (see below)
- (e) referral to Children's Services
- (f) referral to the LADO
- (g) report to the police

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.

If the DSL feels unsure about whether a referral is necessary, they will contact Children's Services from the child's home county, or from Surrey if they are an overseas student to discuss their concerns. For example, Surrey offer a helpful consultation line which the DSL will often make use of in these cases.

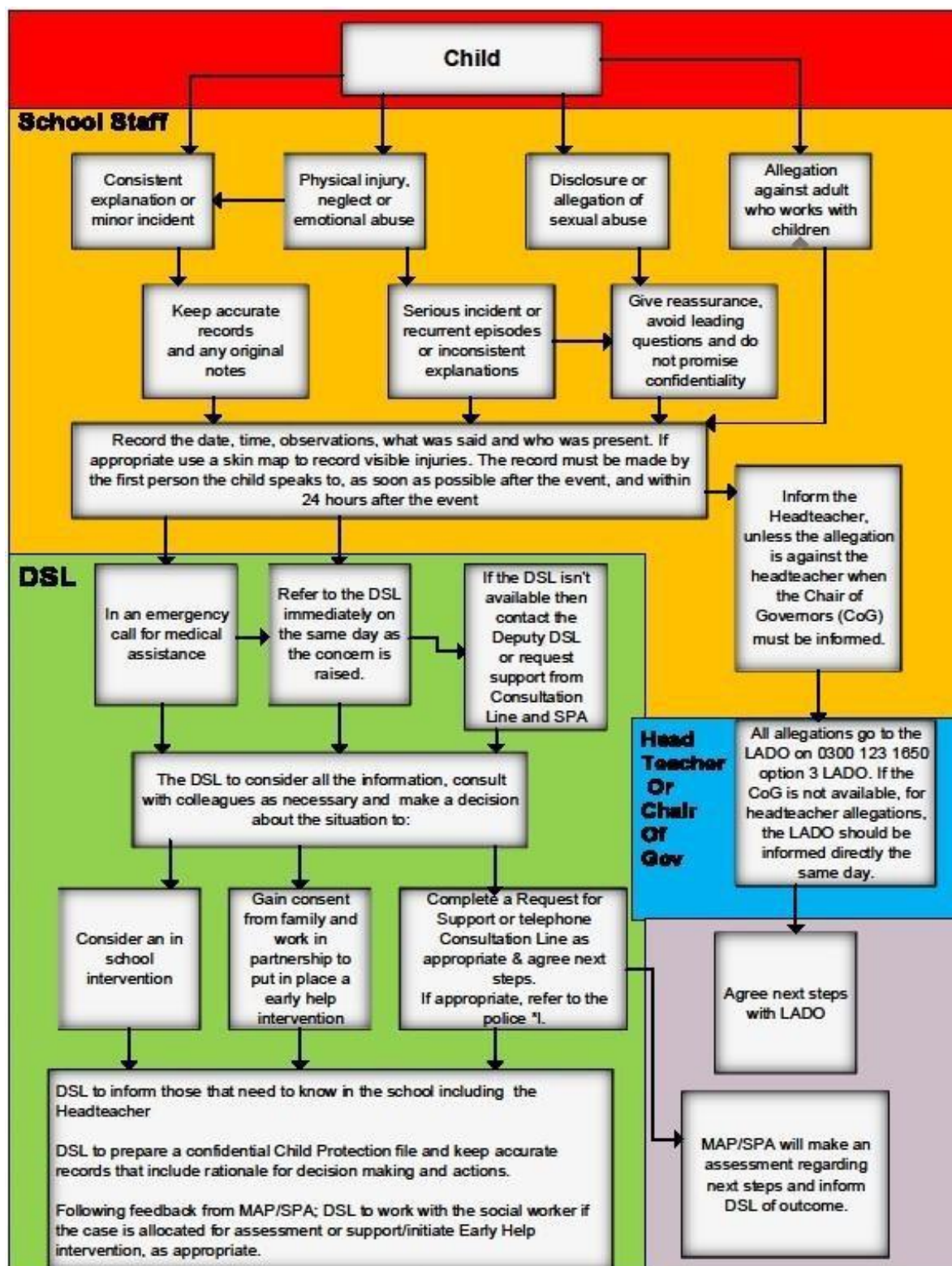
If a referral is required, the DSL will usually discuss any concerns with the child's parents /guardians and where possible seek their agreement before making a referral to the Surrey C-SPA. However, this will only be done when it will not place the child at increased risk or impact a police investigation. The child's views will also be considered.

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.

If there are grounds to suspect a child is suffering, or is likely to suffer, harm or abuse the DSL will contact the C-SPA as soon as possible, and no later than the same day by using the referral form provided on the Surrey C-SPA website here [Surrey Children's Services Request for Support Form - Surrey Safeguarding Children Partnership \(surreyscp.org.uk\)](https://www.surreyscp.org.uk) .

If a child is in need of urgent medical attention and there is suspicion of abuse, the DSL, a DDSL or a member of the Health Centre medical team should take the child to the accident and emergency unit at the nearest hospital, having first notified the C-SPA. The DSL should seek advice about what action the C-SPA will take and about informing the parents, remembering that parents should normally be informed that a child requires urgent hospital attention.

Child Protection Procedures Flowchart



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

What happens after a referral is made?

It is important that concerns are followed up and it is everyone's responsibility to ensure that this happens. The member(s) of staff making the initial report will be informed by the DSL that the matter is being followed up and may be informed of the action taken if appropriate to do so. However, due to confidentiality, the DSL will only share additional information with staff on a need-to-know basis.

If the child's situation does not appear to be improving, the staff with the concerns should request the DSL to re-consider the action taken.

If there are concerns that the disclosure has not been acted upon appropriately, the member of staff should inform the Head or the Safeguarding Governor of the school and may also contact the C- SPA directly if concerns remain.

Receiving a disclosure can be upsetting for members of staff and the DSL will always endeavour to offer support and reassurance. In some cases, additional counselling may be needed, and staff should be encouraged to recognise that disclosures can have an impact on their own emotional wellbeing. This can be obtained through the school counsellor, or the 24 hours telephone counselling support line run by DAS First for Justice (on behalf of the school insurance MARSH) Telephone number 01179330687 (referencing our policy number obtainable from the DSL or the HR office).

Early Help

Early help means providing support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. This may be from an outside agency but can also include additional support provided from within the school. Where a child or family would benefit from early help from one or more outside agencies the DSL will make an early help referral to SSCP. The DSL may also ask for signposting from the Surrey Locality Early Help Officer who can provide a list of suggested agencies to pass on to a child or family.

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

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory EHCP);
- has a mental health need;
- 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 or county lines;
- is frequently missing/goes missing from education, home or care;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;

- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- has experienced multiple suspensions, is at risk of being permanently excluded from school and in Alternative Provision or a Pupil Referral Unit;
- is a privately fostered child; and/or
- is persistently absent from education, including persistent absences for part of the school day.

All staff should be aware of the early help process and understand their role in it. This includes identifying emerging problems, liaising with the DSL, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.

For an Early Help assessment to be effective it needs the agreement of the child and their parents or carers and should involve the child and their family as well as any professionals who are working with them. If parents and/or the child do not consent to an early help assessment, then the DSL will make a judgment as to whether, without help, the needs of the child will escalate. If so, a referral to children's social care may be necessary.

10: Procedures relating to allegations against staff

The school adheres to the statutory guidance as laid out in KCSIE Part 4 when dealing with any allegations about adults in the school. The following procedures will be used in all cases in which it is alleged a member of staff, including supply staff, volunteer, contractor or any another adult within the school 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.

The procedures will be followed regardless of whether the school is where the abuse is alleged to have taken place.

Allegations made against any adults from external organisations or individuals using school premises will be treated in the same way as any other allegations and passed on to the LADO.

Reporting an allegation

A member of staff receiving an allegation of abuse about another member of staff or volunteer, or with concerns about a member of staff or volunteer, should report this immediately to the Head. If the Head is absent, the report should be made to the Chair of Governors.

If an allegation or concern is made against the Head, this must be reported to the Chair of Governors immediately, without first notifying the Head. If the Chair of Governors is not available, then the LADO should be contacted directly. The contact details for the Chair of Governors and the LADO may be found in the section on Key Personnel at the beginning of this policy.

In any instance where there may be a conflict of interest about reporting an allegation or concern to the Head or to the Chair of Governors the LADO should be contacted directly.

Any concerns about the behaviour of a member of staff, including low level concerns, must be reported to the Head by

- completing the online form via a QR code on posters displayed around staff areas for low level concerns – this alerts the DSL who will take the concern to the Head
- emailing the Head directly
- speaking to the Head in person

If the situation requires an urgent response all efforts should be made to contact the Head direct. If this is not possible, the concern should be expressed to the Chair of Governors or LADO (details can be found in Section 3).

Informing the Local Authority Designated Officer (LADO)

An allegation of abuse by an adult will always result in a senior person at the school (as detailed above) contacting the LADO, who will advise on the next steps to be taken.

Under no circumstances will the school conduct an investigation without first informing the LADO and seeking advice about the course of action to be taken. Borderline cases may be discussed without identifying individuals in the first instance.

All discussions with the LADO will be recorded in writing.

If an allegation is made against a current member of staff or volunteer, the School's priority is to

- Look after the welfare of the child - the DSL is responsible for ensuring that the child is not at risk and for referring cases of suspected abuse to the relevant local authority MASH or C-SPA as described earlier.

Investigate and support the person subject to the allegation - the case manager (usually the Head, unless the Head is the subject of the allegation) should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

Procedures

The Head will record any information which has been provided, including dates, times, locations, names of potential witnesses and ascertain if there is any CCTV footage.

An initial assessment of the allegation will be made by the LADO and the Head to judge whether:

- there is need for immediate action to protect a child/children
- the allegation is demonstrably false
- there has been inappropriate behaviour or poor practice that can be dealt with through the school's disciplinary procedures

If the LADO decision is that no further action is necessary, the Head and the LADO, must

- record the decision and the justification for it
- agree on what information should be put in writing to the individual concerned and by whom

If the LADO advises that a strategy meeting is needed, or police or Local Authority Children's Social Care need to be involved, the case manager will not speak to the accused person or the parents or carers until those agencies have been consulted and have agreed what information can be disclosed.

If further investigations are required before deciding how to proceed, the Head will decide, with the LADO, who will investigate; this may be an independent investigator provided by the Local Authority.

The School also has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. Information is confidential and should not be shared with other staff or with children or parents who are not directly involved in the investigation.

Individuals will be informed of concerns or allegations as soon as possible and given an explanation as to the likely course of action. They will be advised to contact their trade union representative or a colleague for support. They will also be informed about the need for confidentiality and to avoid contact with any children or families involved in the investigation.

The Head, with advice from the LADO, will make the decision whether or not to suspend an individual.

The parents or guardians of the child(ren) involved will be informed as soon as possible. The LADO, and any other agencies involved, will determine what information can be disclosed. They will also be kept informed of the progress of the case in relation to their child, including the outcome of any disciplinary process. Parents and carers will also be made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against teachers.

The Head will take advice from the LADO and other agencies to agree:

- Who needs to know and, importantly, exactly what information can be shared

- How to manage speculation, leaks and gossip
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it should arise

In the case of any allegation being made against a member of the boarding staff, the Head in consultation with the LADO, will consider the need for alternative accommodation arrangements for the member of staff pending the investigation.

Allegation outcomes

Outcomes of allegations against members of staff may be defined as:

- **Substantiated** – there is sufficient evidence to prove the allegation
- **False** – there is sufficient evidence to disprove the allegation
- **Malicious** – there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **Unsubstantiated** – this is not the same as a false allegation. It means that there is insufficient evidence to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
- **Unfounded** – to reflect cases where there is no evidence or proper basis which supports the allegation being made

Ultimately the options open to the school depend on the nature and circumstances of the allegations and the evidence and information available. This will range from taking no further action, to dismissal or a decision not to use the person's services in future.

The School will finalise an investigation even if the person leaves, resigns or ceases to provide their services before the investigation is concluded. It is important that every effort is made to reach a conclusion in all cases of allegations which affect the welfare of children, including any in which the person concerned refuses to cooperate.

If an allegation is unsubstantiated and the person returns to work, the school will support that person through offering for example, a phased return or a mentor. The school will also consider how to manage the contact with the child(ren) and/or adults who made the allegation.

Record keeping and references

Allegations that are found to be malicious will be removed from personnel records. However, for all other allegations, the following information is kept on the personnel file of the person accused:

a clear and comprehensive summary of the allegation

- details of how the allegation was followed up and resolved
- a note of any action taken, and decisions reached and the outcome as categorised above
- a copy provided to the person concerned, where agreed by the Local Authority Children's Social Care or the police; and a declaration on whether the information will be referred to in any future reference

Records provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time.

Records will be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

Allegations that are proved to be unsubstantiated, false, malicious or unfounded should not be referred to in employer references.

Referral to the Disclosure & Barring Service (DBS) and Teaching Regulation Agency (TRA) If an allegation is substantiated and the person is dismissed, resigns, or otherwise ceases to provide his/her services or the school ceases to use the person's services, the school has a legal duty to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. A report will be made to the DBS within one month of the individual leaving the school.

For those staff engaged in teaching duties, the school also has a legal responsibility to report matters to the Teaching Regulation Agency (TRA) which may result in a prohibition order being issued by the Secretary of State for Education. The reasons an order would be considered are: 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'. Further guidance is published on the [TRA website](#).

Non recent allegations

Abuse can be reported no matter how long ago it happened.

Where an adult makes an allegation to a school or college 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.

Where the school has information to indicate that a former staff member is working with children in another location this will also be reported to the LADO in that location and to the senior management of the school where that member of staff is currently working.

Low Level Concerns

As part of its whole safeguarding ethos, the school ensures that it promotes an open and transparent culture in which staff feel confident to report all concerns about adults working in or on behalf of the school (including supply teachers, volunteers and contractors).

Staff are also encouraged to self-refer if they believe they have found themselves in a situation which could be misinterpreted or on reflection they realise they have behaved in a way that falls below the expected professional standards.

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', that an adult working in or on 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 allegation harm threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- deliberately humiliating a child
- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone/other device
- engaging with a child on a 1:1 basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating or offensive language
- Engaging in personal email, messaging, use of social media sites or other communication between adults and students outside agreed protocols.

Low level concerns which do not meet the harms threshold must be shared responsibly, and with the right person, and recorded and dealt with appropriately. This enables the school to identify inappropriate behaviour early, minimise the risk of abuse, and ensure that adults working in or on behalf of the school are clear about professional boundaries and act in accordance with the ethos and values of the school.

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

Staff must report any low level concerns to the Head or the DSL using the methods outlined above.

When a low-level concern has been raised by a third party, the Head will collect as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved and to any witnesses. The name of the person making the report will be noted and requests to remain anonymous will be respected as far as reasonably possible. The school will also consider if

any wider issues in the school enabled the behaviour to occur or contributed to it and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence.

All low-level concerns will be recorded in writing. The record will include details of the concern, the context in which the concern arose, and the action taken. They will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)

All records of concerns will be logged by the Head and will be reviewed, with the DSL as needed, so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it will be referred to the LADO.

For all other cases, where the allegation concluded to be either, unfounded, false, malicious or unsubstantiated the case manager (and if they have been involved the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

Safer Recruitment

(for full details see Recruitment, Selection and Disclosures Policy and Procedures)

Safer recruitment is an essential aspect of keeping our students safe and it applies to all categories of staff including self-employed staff, supply staff, contractors, governors and volunteers.

The school's recruitment process is a consistent and thorough process of collating, analysing and evaluating information from and about applicants at all stages of the recruitment process. The school follows the statutory guidance on safer recruitment and employment of staff as set out in Part 3 of KCSIE and the 2018 Childcare Disqualification Regulations.

The school is required to ensure that staff are suitably vetted before taking up their appointment. These checks include:

- A satisfactory enhanced check with the Disclosure & Barring Service (DBS)
- The taking up of references
- Verification of identity
- Verification of right to work in the UK
- Where appropriate, verification of qualifications
- Where appropriate, overseas police checks
- Suitable challenge and Exploratron for gaps in employment during (as part of the interview process)
- A check to ensure staff in regulated activity are not barred from working with children
- A self-declaration to ensure compliance with regulations made under the 2018 Childcare Disqualification Regulations

- For staff engaged in teaching duties, a check that there is no prohibition order issued by the (TRA) or any restrictions imposed by a similar overseas professional body
- Where appropriate, a check to ensure the person is not barred from taking part in the management of an independent school
- A medical fitness questionnaire and declaration
- As part of the shortlisting process, the school will carry out an online search and social media check as part of their due diligence on shortlisted candidates. This is completed only by the person who is responsible to satisfying the 'safer recruitment' element of the interview. Shortlisted candidates will be informed that this will be part of the recruitment process.

Staff involved in recruitment also receive the appropriate training in safer recruitment and this is updated no less than every five years.

11: Boarding

This section of this policy was written in line with and follows all statutory government guidance with specific reference to the National Minimum Standards for Boarding.

Boarders are and have always been an integral part of the Frensham Heights community. There are three boarding houses each with dedicated boarding parents and a specific Head of House. There is also a Head of Boarding who oversees all aspects of the boarding at Frensham. The boarding community includes students from Year 7 up to Year 13. There are overseas boarders, full-time boarders here throughout term time, weekly boarders who return home at weekends and flexi-boarders who will do a few days a week.

As with all children in the school, arrangements are made to safeguard and promote the welfare of boarders and all such arrangements have regard to any guidance issued by the Secretary of State.

Boarders, along with all other students, are taught in line with the requirements of the statutory 'Relationships and sex education (RSE) and health education' guidance from 2019 across the curriculum of the school and specifically within the 'Horizon' programme. This includes lessons that help all students, including boarders, understand how to stay safe online. All boarders attend these lessons and are also supported in staying safe by the particular staff within their boarding houses. The Health Centre also provides support in relation to students' health.

Specific areas of Safeguarding Support for Boarders

The National Minimum Standards for Boarding refers to several areas of safeguarding that boarders need to be specifically aware of and that staff need to keep in mind in order to keep boarder safe. These are as follows:

The school's policy on sexual relationships between children (and importance of boarders understanding this policy) is referred to in this policy and the 'School Rules' on the school website. Boarders are made aware of this and understand this as part of their boarding induction. Horizons lessons continue to support their understanding of healthy relationships.

The school's approach to child-on-child abuse is also included elsewhere within this policy as well as the Relationship and Sex Education Policy. The school is aware that boarding offers particular risks associated with children sharing overnight accommodation. Boarding houses are overseen by staff who have a particular awareness of these risk and practices are in place to keep children safe overnight. Boarders have access to an on-call system overnight and students are always able to contact staff for help throughout the night and when in the boarding house.

The Health Centre is on call from 5.30pm on a Monday evening until 8am on Friday morning for out of hours medical assistance. Over the weekend resident duty staff are always available.

The school's approach to harmful online content and how boarders' devices are managed in terms of bringing a device into the school, and harmful content that may already be downloaded on to it, and the opportunity to download harmful content via 3,4 and 5G that will bypass the school's filtering and monitoring systems is specifically addressed in our Online Safety Policy. Students are educated about online safety in ICT lessons, the Horizons programme and across the school curriculum. The school's filtering system blocks access to harmful online content and staff in the houses monitor and challenge concerning online behaviour when possible. Parents are asked to limit what technology can come into the house and we work with parents to support their children and put relevant age limits on accounts for services such as Netflix and to have controls on phones where appropriate.

12: Abuse, Neglect and other Safeguarding Issues

All school staff should be aware that abuse, neglect and other safeguarding issues are rarely standalone events that can be covered by one specific definition or label. In most cases, multiple issues will overlap with one another.

The following information on abuse, neglect and specific safeguarding issues are taken from KCSIE (2024), where further information is available. To support the local context, all staff have access to the [Surrey Safeguarding Children Partnership Levels of Need Threshold Document](#).

All staff should be 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 should consider whether children are at risk of abuse or exploitation in situations within their family home life and also 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.

All staff should be aware that technology is a significant component in many safeguarding issues. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

What is abuse and neglect?

The following indicators that abuse may be occurring are not exhaustive and are also not definitive that abuse is taking place. If staff are ever unsure about possible signs of abuse, they must always contact the DSL.

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, including where they see, hear or experience its effects. 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.

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 seeing, hearing or experiencing the effects of domestic abuse

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.'

Physical abuse

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

Indicators of physical abuse

Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Accidental injuries normally occur on the bony prominences – e.g. knees, shins.

Injuries on some areas of the body are more likely to be inflicted intentionally and should therefore make staff 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. A body map is available on CPOMS for staff to use as appropriate.

Under no circumstances should a photograph of a child's injuries be taken.

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

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

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.
- Deliberate burning may also be indicated by the pattern of an instrument or object – e.g., electric fire, cooker, cigarette.
- Bite marks,
- Scalds with upward splash marks or tide marks.
- Untreated injuries
- Recurrent injuries or burns
- Bald patches.

Staff 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.

Emotional abuse

This is defined as the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development.

It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children.

These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another.

It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur in isolation.

It is sometimes possible to spot emotionally abusive behaviour from parents/guardians 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.

Staff should be concerned if a child displays any of the following indicators.

Behaviour:

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

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

Social responses may include:

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

Emotional responses may include:

- 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

Sexual abuse

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

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

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

Indicators of sexual abuse

Sexual abuse is often perpetrated by people who are known and trusted by the child – e.g. relatives, family friends, neighbours, babysitters, and people working with the child in school, faith settings, clubs or activities.

Children can also be subject to child sexual exploitation. Sexual exploitation is seen as a separate category of sexual abuse. The SSCP professional guidance provides school staff with information regarding indicators of CSE (further information about CSE is also available below).

Characteristics of child sexual abuse:

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

Most people who sexually abuse children are men, but some women sexually abuse too.

Staff should be concerned if they see any of the following possible indicators:

Physical observations:

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

Behavioural observations:

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

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

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's physical or mental health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

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

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

The Neglect Risk Assessment Tool is available from Surrey Family Services here <https://surreyscp.org.uk/neglect/> to provide a more detailed information regarding the assessment of neglect. In the event of this being needed, the DSL will seek support and advice of the Early Help team at SSCP.

Indicators of 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

Affluent neglect

Staff should also be aware of the impact of affluent neglect, which refers to the neglect experienced by children in more wealthy families. This can be more difficult to spot, as the type of neglect experienced by children in these circumstances is often emotional.

Parents may work very long hours, leaving children in the care of paid carers. This can create an emotional disconnect and leave children feeling lonely, with their emotional needs unfulfilled by their parents. As well as not spending quality time with their children, affluent parents may also put a high amount of pressure on their children to succeed academically, or in other pursuits such as sport or music, which can sometimes lead to psychological and emotional problems for children.

It may also be the case that such parents aren't sufficiently present or available to know about what their children are doing, which can lead to increased risks for their children, who may have the financial means to facilitate drug abuse and the independence to engage in harmful sexual activity.

Specific Safeguarding Issues

KCSIE Annex B gives information on specific safeguarding issues and links to further information and resources that staff should be aware of to enable them to recognise potential signs of abuse.

Staff should refer to KCSIE or liaise with the DSL if further information is required. The issues marked with an asterisk are explained in more detail in the following sections of this policy.

Child abduction and community safety incidents

Children and the court system

Children missing education (CME)*

Children with family members in prison

Child criminal exploitation (CCE) and child sexual exploitation (CSE)*

County lines and/or gangs*

Modern slavery and the National Referral Mechanism

Cybercrime*

Domestic abuse (DA)*

Homelessness

So-called 'honour-based' abuse, including FGM and forced marriage*

Preventing radicalisation*

The Prevent duty*

Channel*

Additional support and information on the Prevent Duty

Child-on-child abuse*

Upskirting*

13: Child-on-Child Abuse

(Also see Anti-Bullying Policy and Behaviour Management Policy)

The school recognises that children are capable of abusing other children. This is most likely to include but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships
- 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) Also see DfE [Searching Screening and Confiscation Advice](#) for schools and the UK Government [Sharing nudes and semi nudes: advice for education settings working with children and young people](#) which outlines how to respond to an incident of nudes and semi-nudes being shared,
- 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.

Child-on-child abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up" and the school will take swift action to intervene where it occurs.

The threshold for dealing with an issue of student behaviour or bullying as a safeguarding matter is subject to guidance from the SSCP and professional judgement. However, it may be appropriate to regard a young person's behaviour as abusive if:

- there is a large difference in power (for example age, size, ability, development) between the young people concerned,
- the perpetrator has repeatedly tried to harm one or more other children,
- there are concerns about the intention of the alleged perpetrator,
- there is 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm'.

Any incident will be treated as a child protection concern where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm thereby warranting a response under Safeguarding Procedures rather than the school's Behaviour Management Policy or Exclusion Policy.

All children involved in an incident of child-on-child abuse, whether alleged victim or alleged perpetrator, will be treated as "at risk" and supported. They will be offered support by the school, as appropriate, such as confidential counselling, support from the boarding and pastoral care staff or support from Health Centre staff.

The school recognises the gendered nature of child-on-child abuse and that it is more likely that girls will be victims and boy's perpetrators; however, all child-on-child abuse is unacceptable and must be taken seriously. Staff must always be mindful of developing and promoting positive attitudes towards the opposite sex and of promoting and displaying an ethos of mutual respect and equality.

All staff must understand, that even if there are no reports in the school it does not mean child-on-child abuse is not happening, it may be the case that it is just not being reported. It is important if staff have any concerns regarding child-on-child abuse they must speak to the DSL or a deputy DSL immediately.

Any child can be vulnerable to child-on-child abuse and staff should be alert to signs of such abuse amongst all children. However, some children may be more vulnerable than others. For example, children who are questioning or exploring their sexuality, SEND children and/or children who may be perceived as being different. Abuse may also be directed against a child as a result of a specific characteristic such as age, gender, disability, ethnicity, race, religion or belief. These factors may make it more difficult for a child to report abuse.

A student against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from the SSCP on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all students, including the victim(s) and alleged perpetrator.

If it is necessary for a child to be interviewed by the police in relation to allegations of abuse or any other allegations, the School will ensure that, subject to the advice of the SSCP, parents are informed as soon as possible and that the children involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from the SSCP or police as appropriate.

Upskirting

All staff are made aware that 'upskirting' is a criminal offence. Upskirting is described as, "taking a picture under a person's clothing without them knowing, with the intention of

viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm”.

Any incident of upskirting must be reported to the DSL following the reporting procedures outlined in this policy.

Youth produced sexual imagery - nudes/semi-nudes, sexting

Youth produced sexual imagery is one of a number of ‘risk-taking’ behaviours associated with the use of digital devices, social media or the internet. It includes the sending of sexually explicit photos, images, text messages, or e-mails by using a phone or other mobile device. By having in their possession indecent images of a person under 18, or distributing them to someone else, children are unlikely to be aware that they could be breaking the law as these are offences under the Sexual Offences Act 2003. There are many different types of sexting and it is important to consider the facts carefully in each case.

The DSL or Deputy DSL must be informed immediately of any incidents. Staff should follow the guidance earlier in this policy (in the paragraph on preserving evidence), and must not view images, look for further images, copy or print any images or forward images by email or any other electronic means, as to do so could constitute a criminal offence.

The school’s approach to ‘nudes’ (Sexting/ youth produced sexual images) and Relationship and Sex Education is through a robust education programme led by specialist teachers in Horizons lessons as well as support from tutors in ‘Morning Talk’ PSHE lessons and an annual reminder of the school's expectations on appropriate use of technology. This includes training sessions for parents on the appropriate use of technology.

The malicious sharing of youth produced sexual imagery is a crime and will be treated as such. Following consultation with the SSCP the police may need to be informed.

14: Sexual Behaviour, Sexual Violence and Sexual Harassment

Sexual Behaviour

The boundary between what is part of normal childhood experimentation or abusive behaviour can be complex. The decision about whether behaviour is developmental, inappropriate or abusive will be determined by the concepts of consent, power imbalance and exploitation.

Developmental sexual activity occurs in children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. It is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

Abusive sexual activity includes any behaviour which involves coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base.

Children's sexual behaviour is usually categorised by professionals using the following 'traffic light' approach (Brook Sexual Behaviours Traffic Light Tool):

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

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

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

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

Amber behaviours signal the need to make a report to the DSL.

Red behaviours are outside safe and healthy behaviour.

They may be:

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

Red behaviours would indicate a need for a referral to Children's Social Care, usually via the DSL.

Sexual violence and sexual harassment

Sexual violence and sexual harassment can occur between children of **any age and sex**, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; it can occur online and face to face (both physically and verbally) and are never acceptable. All staff working with children are advised to maintain an attitude of '**it could happen here**' and be willing to "think the unthinkable".

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 well-being.

Reports of sexual violence and sexual harassment can be extremely complex to manage. It is essential that alleged victims are listened to, protected, offered appropriate support and

every effort is made to ensure their education is not disrupted. It is also important that other students (including alleged perpetrators) and school staff are supported and protected as appropriate.

There are signs and posters around the school informing students where they can go to for help or support. Students are also regularly reminded in Horizons lessons and as part of the school's pastoral provision of where they can access help and support and how to disclose any issues or concerns, they may have.

Responding to reports of sexual violence and sexual harassment

Children making any report of sexual violence or sexual harassment including upskirting will be taken seriously, kept safe and be well supported. Children who disclose information will never be given the impression that they are creating a problem by reporting information or made to feel ashamed for making a report. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously.

Staff must report any incident to the DSL or a Deputy DSL immediately, following the procedures and advice relating to disclosures outlined earlier in this policy.

The school will always do what it can to support an alleged victim and any alleged perpetrator in these situations. In cases where a report is found to be unsubstantiated, unfounded or malicious the school will also consider whether the allegation was made as a cry for help or whether disciplinary action needs to be taken in line with the school's behaviour policy.

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

If a report is made 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 approach to supporting and protecting children.

Support regarding risk assessments can be accessed from the Surrey Education Safeguarding Team by emailing education.safeguarding@surreycc.gov.uk as needed.

Action:

The DSL will consider

- The wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's or college's duty and responsibilities to protect other children. The nature of the incident including whether a crime has been committed and the harm caused.
- Ages of the children involved.
- Developmental stages of the children.
- Any power imbalance between the children.
- Any previous incidents.
- Ongoing risks.
- Other related issues or wider context.

The DSL will consult the SSCP Education Safeguarding Team for initial advice and support and guidance on how to respond and which of the following options to consider.

Options:

- Manage internally,
- Early Help intervention,
- Referral to the C-SPA,
- Report to the Police (in parallel with a referral to the C-SPA)

Where a report of rape, assault by penetration or sexual assault is made, the starting point is that this should be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator(s) is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach. The following advice may help schools and colleges decide when to engage the Police and what to expect of them when they do: [When to call the police.](#)

Where a report has been made to the police, the school or college should consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. They should also discuss the best way to protect the victim and their anonymity.

At this stage, schools and colleges will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk. In circumstances where parents or carers have not been informed, it will be especially important that the school or college is supporting the child in any decision they take. This should be with the support of local authority children's social care and any appropriate specialist agencies.

Whatever action is taken, the DSL will ensure that response is ongoing, 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.

The school will take any disciplinary action against the alleged perpetrator in accordance with the school's behaviour policy.

Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator will 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, in boarding settings if relevant, and on transport where appropriate.

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, this will, in all but the most exceptional of circumstances, lead to permanent exclusion of the student/perpetrator.

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 line with the school's Behaviour Policy, which may also include permanent exclusion.

Further information may be found in Part 5 of KCSIE 2023.

Young people and adults can also contact the NSPCC helpline, Report Abuse in Education on [0800 136 663](tel:0800136663) or email help@nspcc.org.uk

Preventative Strategies to minimise the risk of Child-on-child abuse

Various strategies are used to minimise the risk of child-on-child abuse:

- Taking a whole school approach to safeguarding & child protection, keeping the child at the centre,
- Providing a clear set of values and standards, underpinned by Frensham's Behaviour Management Policy and pastoral support; and by a planned programme of evidence-based content delivered through our Horizons programme,
- By challenging and responding to any inappropriate behaviour and/or language - a **zero-tolerance** approach to sexual violence and sexual harassment
- Ensuring that all staff are aware that "it could happen here"; and that if we are not aware of any cases, that doesn't mean that it isn't happening here, it just means we don't know about it yet, as well as a willingness to "think the unthinkable",
- Ensuring there are easy mechanisms for students to report any concerns,
- Ensure that all staff are aware that when they are discussing delicate topics surrounding this topic, that there may be some that have been impacted by sexual abuse of violence; either as a victim, through witnessing or through supporting another person who has been a victim,

- Providing training to staff
- Engaging with specialist support and interventions
- Using lessons, tutor time, Morning Talk and Horizons (PSHE & RSHE) time to help children understand, in an age-appropriate way, what child-on-child abuse is and always encouraging them to tell a trusted adult if someone is behaving in a way that makes them feel uncomfortable or threatened,
- The school keeps a specific record of all incidents involving sexual harassment or sexual violence so any patterns may be identified and so that appropriate interventions to prevent any future incidents may be implemented.

15: Anti-Bullying/Cyberbullying

(Also see Anti-Bullying Policy)

The school policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to a member of staff needing consideration under child protection procedures.

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

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

Our Horizons (PSHE) programme regularly provides opportunities for children to understand why bullying (including online bullying) is harmful, its impact and how to deal with it.

16: Online Safety

(See also Online Safety Policy)

The school has a separate online safety policy which explains how students are kept safe in school and the response to any online safety incidents. More details can be read in this policy.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.

- **contact:** being subjected to harmful online interaction with other users; for example: child-on-child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- **commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams.

Students are taught about online safety throughout the curriculum, including their use of social media and responding to harmful online challenges and hoaxes. All staff receive online safety training which is regularly updated. The DSL takes on the role of Online Safety Co-ordinator with responsibility for online safety in the school.

Technology, and risks and harms related to it, evolve, and change rapidly. The DSL carries out an annual review of their approach to online safety, supported by an annual risk assessment that considers and reflects the risks their children face.

Children with a particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent or cyber-enabled crime. If there are concerns about a child in this area, the DSL (or a DDSL), will consider a referral into the Cyber Choices programme from the National Crime Agency here <https://www.nationalcrimeagency.gov.uk/cyber-choices> .

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

Additional advice can be found at:

- [Cyber Choices - National Crime Agency](#),
- <https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/publicationslog/2020/when-to-call-the-police--guidance-for-schools-and-colleges.pdf>
- and National Cyber Security Centre - <https://www.ncsc.gov.uk/>

17: Racist Incidents

The school's policy on racist incidents acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. A record of racist incidents is kept and is reflected upon by senior leaders to consider any patterns or systemic elements that may need addressing.

18: Substance Misuse and Abuse

Also see the Substance Use and Misuse Policy in the Staff Handbook.

All staff should also be aware that instances of substance misuse and abuse can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. This can be in relation to legal substances, such as alcohol, or illegal substances.

Staff who become aware of concerns relating to substance misuse or abuse should inform the DSL who will consider whether and how to follow this up as a potential safeguarding concern. This may also be treated as a health concern and support will be offered to the child.

19: Radicalisation and Extremism (Also see the school's Prevent Policy)

[The Prevent Duty for 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 being drawn into terrorism.

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of the school's safeguarding approach.

- **Extremism** is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to: 1. negate or destroy the fundamental rights and freedoms of others; or 2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or 3. intentionally create a permissive environment for others to achieve the results in (1) or (2).
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat **must** be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

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

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

The school seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right /

Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

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

Opportunities are provided in the curriculum to enable students to discuss issues of religion, ethnicity and culture and the school follows the DfE advice Promoting Fundamental British Values as part of SMSC (spiritual, moral, social and cultural education) in Schools (2014). This is largely done through PSHE lessons in the Horizons Programme and Morning Talks but is also intrinsic in our heritage and values.

The school governors, the Head and DSL will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessment includes due diligence checks for external speakers and private hire of facilities, the anti-bullying policy and other issues specific to the school's profile, community and philosophy.

When any member of staff has concerns that a student may be at risk of radicalisation or involvement in terrorism, they report this to the DSL in the first instance. The DSL will then follow the safeguarding procedures and if appropriate will refer cases by e-mail to the contact details listed at the front of this policy.

Indicators of vulnerability to radicalisation

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

Indicators of vulnerability include:

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

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

More critical risk factors could include:

- Being in contact with extremist recruiters,
- Accessing violent extremist websites, especially those with a social networking element,
- Possessing or accessing violent extremist literature,
- Using extremist narratives and a global ideology to explain personal disadvantage,
- Justifying the use of violence to solve societal issues,
- Joining or seeking to join extremist organisations,
- Significant changes to appearance and / or behaviour,
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

Government and Department of Education guidance The Prevent Duty can be accessed via these links:

[Prevent duty guidance: England and Wales \(2023\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/prevent-duty-guidance-england-and-wales-2023)

[The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/guidance/prevent-duty-safeguarding-learners-vulnerable-to-radicalisation)

Government training courses on Prevent can be found here: [Prevent duty training - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/training-courses/prevent-duty-training) .

All staff complete annual training on Prevent to ensure they have up to date understanding of this programme and how to respond to any concerns regarding extremism or terrorism.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

Statutory guidance on Channel is available at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/964567/6.6271_HO_HMG_Channel_Duty_Guidance_v14_Web.pdf .

Visiting Speakers

(See the Staff Handbook for Frensham Visiting Speakers Checklist)

The Prevent statutory guidance requires schools to have clear protocols for ensuring that any visiting speakers are appropriately supervised, have suitable content and are suitable for the age and ability of the children concerned. The School's responsibility to our students is to ensure that they can critically assess the information that they receive.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these.

20: Domestic Abuse

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

The term domestic abuse is used to reflect that several abusive and coercive controlling behaviours are involved beyond violence. Slapping, punching, kicking, bruising, rape, ridicule, constant criticism, threats, manipulation, sleep deprivation, social isolation, and other coercive controlling behaviours all count as abuse. Living in a home where domestic abuse takes place is harmful to children and can have a serious impact on their behaviour, wellbeing and understanding of healthy, positive relationships. Children who witness domestic abuse are at risk of significant harm and staff must be alert to the signs and symptoms of a child suffering or witnessing domestic abuse. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

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

21: Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of child sexual abuse.

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

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

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

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

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

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

The school includes the risks of sexual exploitation in the Horizons (PSHE) curriculum. Students will be informed of the grooming process and how to protect themselves from people who may potentially be intent on causing harm. They will be supported in terms of recognising and assessing risk in relation to CSE, including online, and knowing how and where to get help.

22: Child Criminal Exploitation (CCE)

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

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, 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 well-being, or signs of assault or unexplained injuries.

Unexplained new possessions could also indicate that children have been approached by, or are involved with individuals associated with criminal networks or gangs.

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

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

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

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

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

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

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

23: Honour-based abuse (including FGM and Forced Marriage)

Honour Based Abuse

Honour based abuse (HBA) is a collection of practices, which are used to control behaviour and exert power within families to protect perceived cultural and religious beliefs and/or honour. Such abuse can occur when perpetrators perceive that an individual has shamed the family and/or community by breaking their honour code.

Honour based abuse can also be the term specifically used to describe murders in the name of so-called honour, sometimes called 'honour killings'. These are murders in which predominantly women are killed for perceived immoral behaviour, which is deemed to have breached the honour code of a family or community, causing shame.

The Police definition of so-called honour-based abuse is: 'a crime or incident, which has or may have been committed to protect or defend the honour of the family and/or community'.

Staff should respond in a similar way to cases of honour abuse as with domestic abuse and forced marriage:

- In facilitating disclosure,
- Developing individual safety plans,
- Ensuring the child's safety by according them confidentiality in relation to the rest of the family,
- Completing individual risk assessments

A child who is at risk of honour-based abuse is at significant risk of physical harm (including being murdered) and/or neglect and may also suffer significant emotional harm through the threat of violence or witnessing violence directed towards a sibling or other family member.

Significant harm is defined as a situation where a child is likely to suffer a degree of physical harm which is such that it requires a compulsory intervention by child protection agencies into the life of the child and their family.

Honour based abuse cuts across all cultures and communities, and cases encountered in the UK have involved families from Turkish, Kurdish, Afghani, South Asian, African, Middle Eastern, South and Eastern European communities. This is not an exhaustive list.

The perceived immoral behaviour which could precipitate a murder include:

- Inappropriate make-up or dress,
- The existence of a boyfriend/girlfriend,
- Kissing or intimacy in a public place,
- Rejecting a forced marriage,
- Pregnancy outside of marriage,
- Being a victim of rape,
- Inter-faith relationships,
- Leaving a spouse or seeking divorce.

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

Murders in the name of 'so-called honour' are often the culmination of a series of events over a period of time and are planned. There tends to be a degree of premeditation, family conspiracy and a belief that the victim deserved to die.

Incidents, in addition to those listed above, which may precede a murder include:

- Physical abuse,
- House arrest and excessive restrictions;
- Denial of access to the telephone, internet, passport and friends;
- Threats to kill,
- Pressure to go abroad. Victims are sometimes persuaded to return to their country of origin under false pretences, when in fact the intention could be to kill them.

Children sometimes truant from school to obtain relief from being policed at home by relatives. They can feel isolated from their family and social networks and become depressed, which can on some occasions lead to self-harm or suicide.

Families may feel shame long after the incident that brought about dishonour occurred, and therefore the risk of harm to a child can persist. This means that the young person's new boy/girlfriend, baby (if pregnancy caused the family to feel 'shame'), associates or siblings may be at risk of harm.

Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long lasting harmful consequences.

FGM is illegal in England and Wales under the FGM Act (2003). A mandatory reporting duty requires teachers to report 'known' cases of FGM in under 18s, which are identified in the course of their professional work, to the Police. The duty applies to all persons in school who are employed or engaged to carry out 'teaching work' in the school, regardless of whether they have qualified teacher status or not.

The duty applies to the individual who becomes aware of the case to make a report direct to the Police by dialling 101. The report should be made immediately. Those failing to report such cases may face disciplinary sanctions. The duty to report should not be transferred to the DSL, however the DSL must be informed. Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including dialling 999 if appropriate. There are no circumstances in which a teacher or other member of staff should examine a girl.

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 and is a criminal offence.

A forced marriage is not the same as an arranged marriage which is common in many cultures, when 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 government Forced Marriage Unit, available at fm@fcdo.gov.uk or telephone 020 7008 0151.

24: 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.

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

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

25: Looked After Children

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

The school ensures that staff have the necessary skills and understanding to keep looked after children safe. The DSL is the named person who has 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.

26: Children Missing Education

All children, regardless of their circumstances, are entitled to an efficient, full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. A child going missing from education, or not attending school regularly, is a potential indicator of abuse or neglect. The school also recognises that children missing education are at significant risk of underachieving, being victims of abuse, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.

Staff must be aware that repeated absence or patterns of absence may be an indicator of safeguarding concerns and this must be brought to the attention of the DSL.

The school will inform the local authority of any child who fails to attend school regularly or who has been absent without the school's permission for a continuous period of ten days or more. The DSL will inform Children's Services immediately about any unexplained absence relating to children with current social work or interagency involvement.

Where possible the school will hold the emergency contact details for three adults for each child in school. The school will ensure that there is a record of joiners and leavers as defined in The Education (Students Registration) (England) 2006.

When removing a child's name from the register, the Heads PA will notify the Local Authority of:

- the full name of the child,
- the full name and address of any parent with whom the child normally resides,
- at least one telephone number of the parent,
- the child's future address and destination school, if applicable, and
- the ground in regulation 8 under which the child's name is to be removed from the school register.

The school will make reasonable enquiries to establish the whereabouts of a child jointly with the Local Authority, before deleting the child's name from the school register if the deletion is under regulation 8(1), sub-paragraphs (f) (iii) and (h) (iii) of The Education (Students Registration) (England) 2006.

The school will:

- Enter students on the admissions register on the first day on which the school has agreed, or has been notified, that the students 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 students.
- Monitor each child's attendance through their daily register and follow the school's procedure in cases of unauthorised absence or concerns about repeated absences.
- 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/college, 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.

Pupils Missing Out on Education

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

The school will gain consent (if required in statute) from parents to put in place alternative provision and/or a reduced or modified timetable;

The school will ensure that parents (and the local authority where the student has an EHCP) are given clear information about alternative provision placements and reduced or modified timetables:

why, when, where, and how they will be reviewed;

The school will keep the placement and timetable under review and involve parents in the review.

Reviews will be frequent enough to provide assurance that the off-site education and/or modified timetable is achieving its objectives and that the students is benefitting from it;

The school will monitor and track children attending alternative provision to ensure that the provision meets all safeguarding requirements and meets the needs of the child.

27: Restrictive Physical Intervention

Also see the Policy on Use of Force and Restraint in the Staff Handbook.

Staff must only ever use physical intervention as a last resort, when a child is at immediate risk of harming him/herself or others. 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.

28: Whistleblowing

Also see the Whistleblowing Policy in the Staff Handbook.

The school recognises that children cannot be expected to raise concerns in an environment where staff fail to do so.

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

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

Whistleblowing regarding the Head should be made to the Chair of the Governors whose contact details are available at the front of this policy.

29: Mental Health

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by reporting the concern to the DSL and the Health Centre Team and following the procedures in this policy.

30: Statutory Guidance and documents

The following legislation, statutory guidance and other advisory documents informed the formulation of this policy.

- [Keeping Children Safe in Education \(2024\)](#)
- [Surrey Safeguarding Children Partnership protocols, guidance and procedures](#)
- [Working Together to Safeguard Children 2023](#)
- [Independent School Standards Regulations \(2014\)](#)
- [National Minimum Boarding Standards \(2022\)](#)
- [Disqualification under the Childcare Act 2006 \(updated 2018\)](#)
- [Prevent duty guidance: England and Wales \(2023\) - GOV.UK \(www.gov.uk\)](#)
- [The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK \(www.gov.uk\)](#)
- [The use of social media for on-line radicalisation \(July 2015\)](#)
- [Promoting the education of children with a social worker: Virtual School Head role extension \(June 2022\)](#)

- <https://surreyscp.org.uk/neglect/> including Neglect Screening Tool
- [Police and Criminal Evidence Act \(PACE\) Code C 2023](#)
- [FGM Act Mandatory Reporting Guidance 2020](#)
- [‘What to do if you are worried a child is being abused’ 2015](#)
- [Teacher Standards 2011 \(updated 2021\)](#)
- [DfE Preventing and Tackling Bullying Advice for Schools \(2017\)](#)
- [Information Sharing Advice for Practitioners Guidance 2024](#)
- [DfE Mental and Behaviour in School \(2018\)](#)
- [The Equality Act 2010 guidance for schools \(updated 2018\)](#)
- [SCC Safeguarding Children Missing Education \(CME\) and Educated Other Than at School](#)
- [DfE Searching Screening and Confiscation Advice for schools \(Updated 2023\)](#)
- [Relationships and sex education \(RSE\) and health education \(2019 updated 2021\)](#)
- [BSA Commitment to Care Charter](#)
- [Statutory Framework for the Early Years Foundation Stage \(2021\)](#)
- [DfE guidance ‘Teaching online safety in school’ \(Updated 2023\)](#)
- <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people>
- [Mental health and behaviour in schools: departmental advice \(2018\)](#)
- [DfE statutory guidance ‘Children missing education’ \(September 2016\)](#)
- [Teacher misconduct: the prohibition of teachers \(2022\)](#)
- [Meeting digital and technology standards in schools and colleges \(updated 2024\)](#)

Additional Support Material

Advice for:	Link:
PSHE Lesson plans and support from PSHE “rise above”	https://campaignresources.phe.gov.uk/schools/topics/mental-wellbeing/overview
Home Office: Preventing youth violence and Gang Involvement (2015)	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf
Child Centred Policing: When to call the Police	https://www.npcc.police.uk/SysSiteAssets/media/downloads/publications/ti-log/2020/when-to-callthe-police--guidance-for-schools-and-colleges.pdf
NSPCC – general and excellent supportive advice	http://www.nspcc.org.uk

Childline	Childline Childline
Online safety resources	https://www.thinkuknow.co.uk/
Anti-bullying advice	Anti-Bullying Alliance
Childnet – online safety information and resources	www.childnet.com
Safer Internet - online safety information and resources	Homepage - UK Safer Internet Centre