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Safeguarding and Child Protection Policy September 2021

Table of Contents

1: Application 5

2: Introduction 6

3: Key Personnel 6

Concerns about a child 7
Concerns or allegations about an adult 8
Prevent 8
Boarding School Association (BSA) 8

4: Policy Principles & Values 8

5: The School's Aims 9

6: Roles and Responsibilities 10

School Staff 10
The Head 11
The Designated Safeguarding Lead (DSL) 12
The Deputy Designated Safeguarding Leads (DDSL's): 13
The Governing Body 14

7: Induction and Training 15

Induction 15
Ongoing Staff Training 15
DSL Training 16
Training for Governors 16

8: Our Campus and environment 16

9: Confidentiality and Sharing Information 17

Communication with parents/guardians 18
Methods for pupils of all ages to report worries or abuse, including bullying and peer on peer abuse 19
What staff should do if there are concerns about a child 19
Dealing with a disclosure 20

Action by the DSL following a report of a concern or a disclosure 23

Child Protection Procedures Flowchart 24

What happens after a referral is made? 25

Early Help 25

10: Procedures relating to allegations against staff 26

Reporting an allegation 27
Informing the Local Authority Designated Officer (LADO) 27
Procedures 27

Allegation outcomes 29

Record keeping and references 29
Non recent allegations 30
Low Level Concerns 30
Safer Recruitment 32

11:Abuse, Neglect and other Safeguarding Issues 32

Children with special educational needs and disabilities or physical health issues 33
What is abuse and neglect? 34

Physical abuse 34

Emotional abuse 35

Sexual abuse 37

Neglect 38

Affluent neglect 39

Specific Safeguarding Issues 39

12:Peer on Peer/Child on Child Abuse 40

Upskirting 41
Youth produced sexual imagery - nudes/semi-nudes, sexting 42

13:Sexual Behaviour, Sexual Violence and Sexual Harassment 42

Sexual Behaviour 42
Sexual violence and sexual harassment 43

Responding to reports of sexual violence and sexual harassment 43

Risk Assessment 44

Preventative Strategies to minimise the risk of Peer on Peer abuse 45

14:Anti-Bullying/Cyberbullying 46

Online Safety /Cybercrime (see Online Safety Policy) 46

15:Racist Incidents 47

16: Radicalisation and Extremism (Also see the school's Prevent Policy) 47

Indicators of vulnerability to radicalisation 48
Channel 49
Visiting Speakers 50

17:Domestic Abuse 50

18:Child Sexual Exploitation (CSE) 51

19:Child Criminal Exploitation (CCE) 51

20:Honour-based abuse (including FGM and Forced Marriage) 52

Honour Based Abuse 52
Female Genital Mutilation (FGM) 54
Forced Marriage 54

21:Private Fostering Arrangements 55

22:Looked After Children 55

23:Children Missing Education 55

Pupils Missing Out on Education 56

24:Restrictive Physical Intervention (also see Policy on Use of Force and Restraint) 57

26:Mental Health 57

27:Statutory Guidance and documents 58

Appendices 59

Appendix 1: Additional Support Material 59
Appendix 2: Child Protection during Periods of Remote Learning 60
11:Safeguarding for children not attending school 63

1: Application

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 pupils, 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 students 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:

- Anti-Bullying Policy (Staff Handbook Section 3.3)
- Attendance Policy (In Staff Handbook Section 3.1)
- Behaviour Management Policy (Staff Handbook Section 2.8)
- Day Trips Policy (Staff Handbook Section 2.19)
- Planning residential Trips or Expeditions Policy (Staff Handbook Section 3.10)
- First Aid and Medical Emergencies Policy (Staff Handbook Section 7.2)
- Fire Safety Policy (Staff Handbook Section 6.17)
- Health and Safety Policy (Staff Handbook Section 6.2)
- Staff Behaviour and Code of Conduct (Staff Handbook Section 5.8)
- Induction Policy (Staff Handbook Section 1.11)
- Guidance on Missing Child Policy (Staff Handbook Section 7.4)
- Uncollected Child Policy (Staff Handbook Section 2.32)
- Recruitment, Selection and Disclosures Policy and Procedures (Staff Handbook Section 5.30)
- Relationships & Sex Education Policy (Staff Handbook Section 3.5)
- Risk Assessment Policy (Staff Handbook Section 6.7)
- Use of Technology in School- Student (Staff Handbook Section 2.25)
- Whistle Blowing Policy (Staff Handbook Section 5.19)
- Prevent Policy (Staff Handbook Section 3.29)
- Visiting Speakers Checklist (Staff Handbook Section 3.30)

This policy pays due regard to:

- Paragraphs 7 and 16 of the Schedule to the Education (Independent School Standards) Regulations 2014 (SI 2014 No.3283)
- DfE statutory guidance 'Keeping Children Safe in Education' (KCSIE September 2021)
- 'Working Together to Safeguard Children' (WT July 2018)
- The specific legal requirements in the "Safeguarding" section of Safeguarding and promoting children's welfare, Part 3 of the Statutory Framework for the Early Years Foundation Stage 2021
- 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 27 of this policy.

2: Introduction

The safety and welfare of all pupils at Frensham Heights School is always given the highest priority. Our goal is to know everyone as an individual and to provide a secure and caring environment so that every student can learn in safety. The school is alert to signs of all forms of abuse and neglect, including through the use of technology, and 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 pupils and must therefore familiarise themselves and comply with this policy at all times.**

Safeguarding and promoting the welfare of children is defined as:

- protecting children from maltreatment;
- 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 2021)

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. **Everyone** who comes into contact with children and their families and carers has a role to play in safeguarding children. In order to fulfil this responsibility effectively, all professionals 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." (Keeping Children Safe in Education (KCSIE September 2021).

Frensham Heights School prides itself on its history of mutual respect. Parents/guardians and others with parental responsibility also have an important role in supporting Frensham Heights. 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 take up any issues or worries that they may have with the School. 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.

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:
Becks Scullion – Deputy Head
Contact details: dsl@frensham.org Mob: 07798640669

Named 2nd DDSL
Carys Willman Senior Nurse: caryswillman@frensham.org Mob:07795660368

Other DDSL's

Andy Spink	Senior and Middle School	andyspink@frensham.org
Sian Owen	Head of Yrs 7&8	sianowens@frensham.org
Jo Dalziel	Head of Yrs 9,10,11	jodalziel@frensham.org
Paul Hughes	Yrs 9,10,11	paulhughes@frensham.org.uk
Daniel Pullen	Sixth Form	danielpullen@frensma.org
Amy Lee	Sixth Form	amylee@frensham.org
Nick Oram-Tooley	Junior School Yrs 4-6	nickoramtooley@frensham.org
Katherine Bluck -	Head of Junior School (N-6)	katherinebluck@frensham.org
Honesty Walker-	Head of EYFS (N-1):	honestywalker@frensham.org

The nominated Safeguarding Governor is:
Phil Ward
Contact details: via Susie Birdsall - Bursar@frensham.org (Clerk to the Governors)

The Head is:
Rick Clarke
Contact details: head@frensham.org

The Chair of Governors is:
Bill Bird
Contact details: via Susie Birdsall - Bursar@frensham.org (Clerk to the Governors)

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

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.

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 using a request for support form
https://www.surreyscp.org.uk/documents/efr-request-for-support-form/

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

Email: education.safeguarding@surreycc.gov.uk
Tel: 01483 517008
Education Safeguarding Team Manager: Clare Stewart

Concerns or allegations about an adult

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

Duty LADO Tel: 0300 123 1650 (option 3)
Email: LADO@surreycc.gov.uk

LADO Referral Form
https://www.surreyscp.org.uk/professionals/dealing-with-allegations-against-people-working-with-children/

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

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 telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).

Boarding School Association (BSA)

As a member of the BSA, the School follows its "Commitment to Care Charter" (2017). 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 pupil on another (peer on peer) will be reported to the BSA.

Head of Safeguarding and Standards: Dale Wilkins
Tel:07905 127650
email safeguarding@boarding.org.uk

4: Policy Principles & Values

- The 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, gender, ability, culture, race, language, religion or sexual identity have an equal right to be protected from harm and to feel safe and secure.
- The school is fully aware of its responsibilities and maintains an ethos of "It could happen here".
- All staff 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 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.

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 whom they can approach if they are worried or in difficulty.
- Ensure children are taught to understand and manage risk through personal, social, health and economic (PSHE) education and Relationship and Sex Education (RSE) and through all aspects of school life. This includes online safety. This is delivered through our Horizons program (PSHE).
- Consult with children regularly e.g. through questionnaires, participation in anti- bullying activities, asking children if they feel safe and happy and ensuring they know how to report their worries
- Provide pupils with appropriate and timely help through the school's internal support services if required, including details of helplines, counselling or other avenues of support.
- Ensure robust school systems and procedures are in place that are followed by all members of the school community if safeguarding concerns about pupils arise
- Ensure that pupils attend 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 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.
- Ensure all staff understand their responsibility to report any concerns, including 'low level' concerns, about the conduct of staff members, volunteers or other adults
- 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.
- Understand that safeguarding is **everyone's responsibility** and maintain an attitude of "It could happen here".
- Read and understand, Part 1 of Keeping Children Safe in Education and Annex B
- 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 Deputies.
- Attend regular safeguarding training, at least annually.
- Be aware of the signs of abuse and neglect, including peer on peer abuse
- Be aware that that even if there are no reports of peer on peer abuse it does not mean it is not happening, it may just not have been reported.
- Report to the DSL immediately any concerns about pupils, however minor they may appear. If the DSL is not contactable a Deputy DSL must be informed.
- Know how to record any concerns (via CPOMS or mobile if urgent)
- 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 this 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 pupils to the DSL.
- Notify the DSL or Deputy immediately if any child on a child protection plan or child in need plan 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.
- Provide support for children subject to Early Help, Child in Need or Child Protection that is in keeping with their plan.
- To follow the school's code of conduct for staff

- 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 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 B 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 (2018).
- 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 pupils to report any concerns, including concerns related to bullying and peer on peer 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 Surrey SCP.
- 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 pre-employment 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, 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 Heads of School, Heads of House, Director of Support for Learning and Health Centre nurses) on matters of safety and safeguarding
- To ensure that the school's Safeguarding 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 and Child Protection 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 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 peer-on-peer abuse are recorded and appropriate action is taken by following the school's Behaviour Policy, Anti-bullying Policy and Safeguarding procedures 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.

- 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.
- Using CPOMS, keep detailed, accurate records with a clear chronology that include **all** concerns about a child even if there is no need to make a referral; recording the rationale for decisions made and action taken.
- Ensure that an indication of the existence of the additional child protection file is marked on the student's school file record.
- Ensure that when a student's transfers school (including in year), their child protection file is passed to the new school as soon as possible, (separately from the main students file and ensuring secure transit) and that confirmation of receipt is received.
- Ensure that where a student transfers school and is on a child protection plan or is a child looked after, their information is passed to the new school immediately and that the child's social worker is informed. 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 Surrey SCP procedures, as well as regularly updated training and a minimum of annual updates, including online safety, peer on peer abuse.
- Ensure that in collaboration with the school leadership and governors, the child protection policy is reviewed annually, and the procedures and implementation are updated and reviewed regularly.
- Ensure that the Child Protection Policy is available publicly and that parents are aware that referrals about suspected harm and abuse will be made and the role of the school in this.
- 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.

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, including having a secure knowledge of SSCP inter-agency procedures.
- 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 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 ensure the policy is available publicly on the school website.
- To ensure systems are in place, which are easily understood and easily accessible for pupils 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 (2018).
- 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.
- 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. Currently done utilising Smoothwall Safeguarding and Filtering systems.
- To have policies and procedures in place relating to the use of cameras and technology within the EYFS.
- 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 B
- The school's Safeguarding and Child Protection Policy (includes the identity and the role of the DSLs and Deputies, and the response to children who go missing from education)
- Staff Code of Conduct
- Online Safety Policy
- Whistleblowing Policy
- Behaviour 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.

Ongoing Staff Training

At the beginning of the academic year, all staff are provided with Part 1 and Annex B of Keeping Children Safe in Education and the school's updated Safeguarding Policy and must sign to say they have read and understood these documents.

Members of staff are given regular updates (at least annually) 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 peer-on-peer abuse (including sexual violence and sexual harassment); online safety; Prevent.

All staff at FHS have access to an online training course on "Supporting Mental Health and Wellbeing of Children and Young People". All staff will have 20 minutes of training each month on a safeguarding topic based on a two-year syllabus as supported by Safeguarding Network.

Staff will also receive safeguarding and child protection updates at Staff Notices, Staff Conference and emails as required. All staff employed by the School (part time or full time) are required to attend the Safeguarding Updates in Staff Conference.

Full refresher courses are held to ensure all staff are re-trained every three years, in line with advice from Surrey SCP.

Staff may also access online courses in response to changes in legislation or to update their safeguarding knowledge on specific topics.

Key pastoral staff, and other staff who request it, are trained by a CEOP Ambassador in using and understanding the ThinkUKnow resources.

Staff who are not employed directly by the school and are self-employed peripatetic teachers are required to attend a Frensham Safeguarding update, or provide evidence of recent training. All peripatetic staff are required to complete the annual Frensham Safeguarding Quiz to demonstrate an understanding of Safeguarding at Frensham .

DSL Training

The DSLs and deputies complete inter-agency training every two years and take part in updates of specific safeguarding matters (at a minimum annually), in line with Annex C of KCSIE. They also undertake Prevent training.

Training for Governors

The governor responsible for safeguarding has received safeguarding training and undertakes refresher training every two years, as a minimum.

All governors are provided with Safeguarding Training when they join the Board, which is updated annually.

Annually all governors are provided with Part 1, Part 2 and Annex B of Keeping Children Safe in Education.

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 minimize 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:

- all staff wear a staff lanyard
- 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.
- All staff and volunteers are advised to politely challenge any stranger on the school premises not wearing a visitors' badge.
- there is an "open door" policy. Staff usually keep doors to classrooms wide open and never lock doors when working in rooms with pupils
- open plan classrooms with viewing panels in doors to enable clear sight of pupils and staff

Use of mobile phones, cameras & other photographic/video devices (Also see: Staff Code of Conduct, Code of Conduct for Technology)

Specific to the EYFS

- Neither staff nor children may use their personal mobile phones to take photographs or videos within the EYFS setting, including when nursery and Reception pupils are in the school grounds.
- A box is available in each EYFS classroom where personal mobile phones should be stored when working with this age group. This applies to all staff, senior school students and volunteers.

Whole School Policy (also applies to the EYFS apart from *)

- Cameras, mobile phones or other devices are not allowed in any areas where pupils 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 pupils except for school purposes.
- School devices must be used wherever possible.
- If personal devices are used, photographs or videos of pupils 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 pupils whose parents have not consented to their child being photographed is available from External Relations / School Secretary.
- No photograph or film taken in school may be published (this includes on any social media platform such as Instagram, Facebook, Twitter or YouTube, regardless of privacy settings) without the explicit 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.

Pupils' mobile phones

Students in Year 9 and above are allowed to bring their phones to school. Their use is covered in the Code of Conduct of use of Technology, which can be found in the Use of Technology – Students policy and on posters around the school.

Boarders in Year 7&8 may bring a phone to school, but it must be kept in the boarding house during the school day.

Day pupils, who need a phone for safety purposes whilst travelling, are also allowed to bring a phone to school. These must be kept in the Head of School's Office during the school day.

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 2018). The guidance states that the most important consideration is whether sharing information is likely to safeguard and protect a pupil and that data protection legislation and guidance must not be allowed to stand in the way of sharing information to safeguard pupils.

The guidance states that the information shared should be:

- **Necessary and proportionate -** Any information shared must be proportionate to the need and level of risk.
- **Relevant** - Only information that is relevant to the purposes should be shared with those who need it.
- **Adequate** - Information should be adequate for its purpose. Information should be of the right quality to ensure that it can be understood and relied upon.
- **Accurate** - Information should be accurate and up to date and should clearly distinguish between fact and opinion. If the information is historical then this should be explained.
- **Timely** - Information should be shared in a timely fashion to reduce the risk of harm.
- **Secure** - Wherever possible, information should be shared in an appropriate, secure way.
- **Record** - Information sharing decisions should be recorded whether or not the decision is taken to share.

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 deputies with whom they may discuss concerns.
- The school always aims to work with closely with parents to help support pupils and their families; however, it will always put the duty of care to the pupil as its priority and will refer concerns if a pupil may be at risk of harm or has suffered harm.
- The DSL will normally request a meeting with the parents of the pupil 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.
- 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 in the best interests of the pupil, 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 pupil 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 he/she should contact the school's DSL immediately.

Methods for pupils of all ages to report worries or abuse, including bullying and peer on peer abuse

Frensham prides itself on the pastoral care within the school and especially the excellent relationships that pupils and staff enjoy. Pupils report that they feel comfortable and confident to share any worries they may have, or any concerns about other pupils, 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 pupils to report any worries. Staff record any concerns reported on CPOMS or, in an emergency, directly to the DSL or a DDSL.

At Frensham pupils can report concerns by:

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

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 pupils.

Staff may also become concerned about a pupil without a disclosure being made or without specific concrete evidence. There may be a change in a pupil's behaviour or their work may show signs of confusion or distress. Pupils 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 pupil or issues such as parental alcohol misuse, domestic violence or mental health.

If there is any concern at all or a belief the matter could be a part of a larger pattern, these small incidents must still 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 are recorded and reported to the DSL immediately.

The policy of the school requires that all referrals to external agencies are made by the school's DSL; 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 pupil a referral should be made to Children's Services or the police immediately.
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 immediately (in person or via 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

Dealing with a disclosure

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

No pupils who disclose 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 victims 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 students, 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 students only as far as is necessary for you to establish whether or not you need to refer this matter, but do not interrogate for full details
- Do not ask 'leading' questions i.e. 'Did he touch your private parts?' or 'Did she hurt you?' '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 criticize the alleged perpetrator; the students may care about him/her, and reconciliation may be possible
- Do not attempt any examination or remove a pupil's clothes to look further at an injury. Under no circumstances should photographs be taken of a pupil's injury.
- Do not ask the students 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 the Deputy DSL, and the child is at risk of immediate harm, contact the C-SPA or Police, as appropriate directly
- If you are dissatisfied with the level of response you receive following your concerns, you should press for 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 'inapproriate 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 pupil'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 pupil 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 pupil to delete it.
- Do not ask the pupil(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 pupil(s) it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any pupil(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 UKCIS Education Group Sharing nudes and semi-nudes: advice for education settings working with children and young people.

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

The DSL will refer to the SCSP document 'Guidance for all practitioners on the levels of need' to determine whether or not a referral needs to be made and what support the child and family may require.

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

(a) monitoring the pupil 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, C- SPA or the Surrey Education Safeguarding Team will be contacted to discuss concerns.

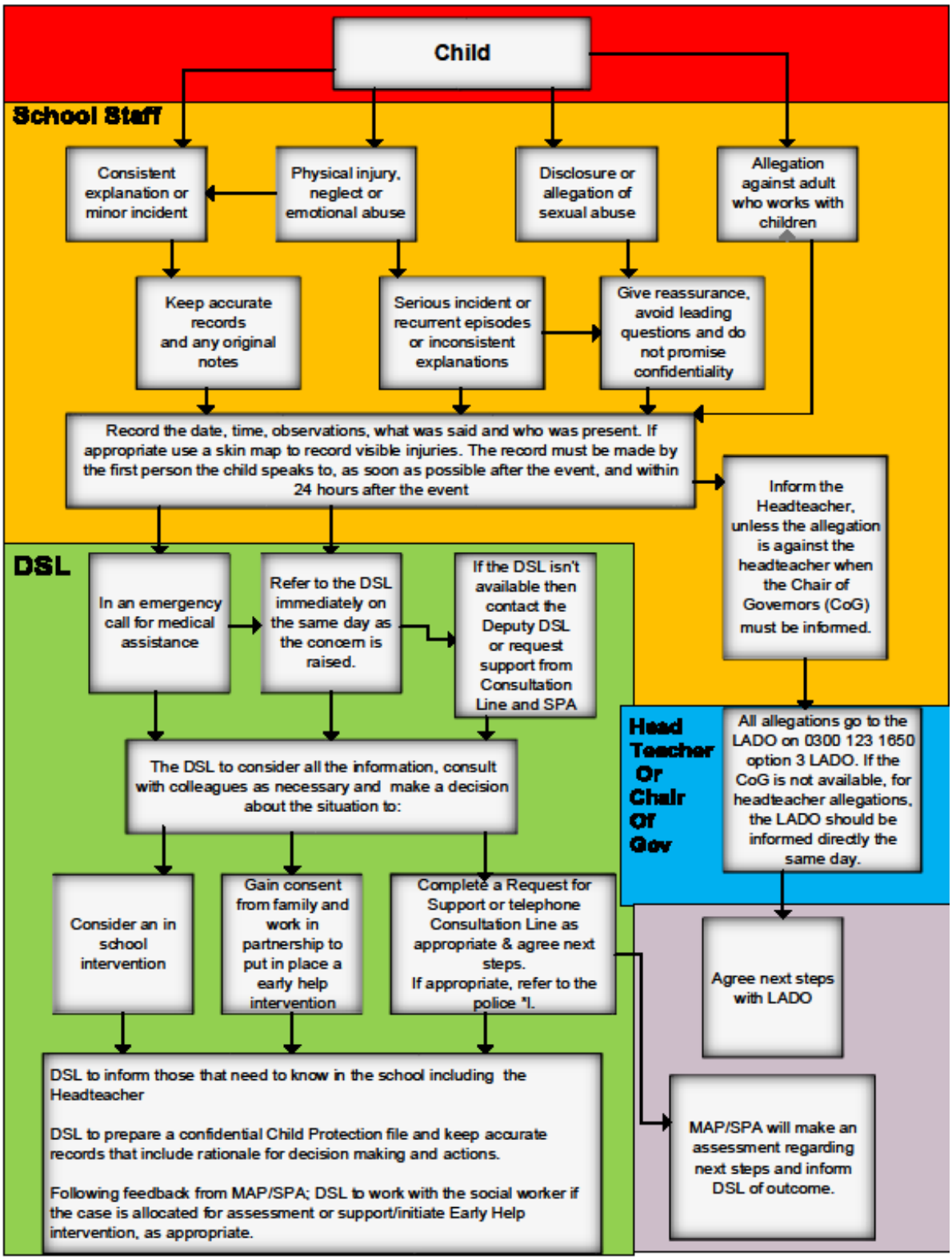
If a referral is required, the DSL will usually discuss any concerns with the child's parents/guardians and where possible seek their agreement before making a referral to the C-SPA. However, this will only be done when it will not place the child at increased risk or impact a police investigation. The 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 indicated in the SSCP section of Key Personnel at the beginning of this policy

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

Child Protection Procedures Flowchart



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 of the action taken and if they do not receive this information, they should seek it out.

If the pupil'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 COO's office).

Early Help

Early help means providing support as soon as a problem emerges at any point in a child's life. 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 SSSC.

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 care or from home;
- 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;

- is a privately fostered child; and
- 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 all of the 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.
The SSSC website contains further information on 'Early Help'.

https://www.surreyscp.org.uk/about-us/local-safeguarding-arrangements/helping-families-early-strategy/

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.

If an allegation concerns supply staff or an individual not directly employed by the school, the school will liaise with the LADO, to ensure allegations are dealt with properly.

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 (posters around staff areas)
- emailing the Head directly
- speaking to the Head in person

If the situation requires an urgent response and the child is at immediate risk, 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 C- 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 pupils
- 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 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.
Confidentiality and information sharing

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 pupils 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 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 allegations 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:

- 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, Email, messaging, use of social media sites or other communication between adults and pupils 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 Chair of Governors 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 if necessary, 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.

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

Safer recruitment is an essential aspect of keeping pupils 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:

- 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
- A satisfactory enhanced check with the Disclosure & Barring Service (DBS)
- 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.

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

11: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 (2021), 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 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 their peers 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.

Children with special educational needs and disabilities or physical health issues

Staff must be aware that children with special educational needs or disabilities (SEND) or certain 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 disproportionally impacted by behaviours such as bullying, without outwardly showing any signs;
- and communication barriers and difficulties in managing or reporting these challenges.

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

- living in a home where there is domestic abuse;
- is a young carer;
- is 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;
- asylum seekers;
- 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;
- do not have English as a first language;
- 'Looked After' Children (LACs) or children in care or who have 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.

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. 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. (KSCIE, 2021)

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 the soft 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
- Bite marks

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

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

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.

Indicators of emotional abuse

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.

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

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

Emotional responses

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

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 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.

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 care-givers) ensure access to appropriate medical care or treatment

The Neglect Risk Assessment Tool is available 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.

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. Staff should refer to KCSIE or liaise with the DSL if further information is required. The issues marked with an asterisk are also detailed below.

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
Peer-on-peer / child-on-child abuse*
Sexual violence and sexual harassment between children in schools and colleges*
Upskirting*
The response to a report of sexual violence and sexual harassment between children in schools and colleges*

12:Peer on Peer/Child on Child Abuse

(also see Anti-bullying Policy and Behaviour Management Policy)
The school recognises that children are capable of abusing their peers. 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 between peers;
- 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 (also see Part five KCSIE and DfE guidance *Sexual violence and sexual harassment between children in schools and colleges*;
- 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 UKCIS Education Group *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;

Peer on peer 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 pupil 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 peer on peer abuse, whether 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 the Health Centre staff.

The school recognises the gendered nature of peer on peer abuse and that it is more likely that girls will be victims and boy's perpetrators; however, all peer on peer abuse is unacceptable and must be taken seriously. Staff must always be mindful of developing positive attitudes within pupils 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 peer on peer 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 peer on peer abuse they must speak to the DSL or deputy DSL immediately.

Any child can be vulnerable to peer-on-peer 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 pupil 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 pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of the SSCP, parents are informed as soon as possible and that the pupils 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 including tutor led PSHE (Morning Talk sessions), specialist teachers in Horizons lessons, 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.

13:Sexual Behaviour, Sexual Violence and Sexual Harassment

Sexual Behaviour

The boundary between what is part of normal childhood experimentation or abusive behaviour can be blurred. 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:

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

For further information refer to the guidance tool at https://www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool

Sexual violence and sexual harassment

Sexual violence and sexual harassment can occur between two 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; they 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'**. KCSIE (2021)

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 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 pupils and school staff are supported and protected as appropriate.

There are signs and posters around the school informing pupils where they can go to for help or support.

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. Pupils 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 the 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 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.

Risk Assessment

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 will be accessed from the Education Safeguarding Team – education.safeguarding@surreycc.gov.uk as needed.

Action: The DSL will consider

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

The DSL in most circumstances will consult the SSCP Education Safeguarding Team for initial advice and support

Options:

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

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

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 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 pupil.

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:
Sexual violence and sexual harassment between children in schools and colleges: Advice for governing bodies, proprietors, headteachers, principals, senior leadership teams and designated safeguarding leads May 2018
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719902/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf

Young people and adults can also contact the NSPCC helpline, Report Abuse in Education on 0800 136 663 or email help@nspcc.org.uk

Preventative Strategies to minimise the risk of Peer on Peer abuse

Various strategies are used to minimise the risk of peer on peer 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 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.
- Ensuring there are easy mechanisms for pupils 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/ PSME time to help children understand, in an age-appropriate way, what peer on peer 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.

14:Anti-Bullying/Cyberbullying

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

Online Safety /Cybercrime (see 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.

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: peer to peer 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 and all staff receive online safety training which is regularly updated. The school online safety co- coordinators are Becks Scullion and Tim Tester who have received CEOP (Ambassador) training

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 deputy), will consider a referral into the Cyber Choices programme.

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

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK

15: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 via CPOMS and is reported and reflected on in Governors' termly meetings.

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

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

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 vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **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 PSME lessons 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

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

Indicators of vulnerability include:

- Identity Crisis – the student / 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.

The Department of Education guidance The Prevent Duty can be accessed via this link.
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445977/3799_Revised_Prevent_Duty_Guidance__England_Wales_V2-Interactive.pdf

The Department for Education non-statutory Prevent duty guidance can be accessed on:
https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty

The Channel General Awareness course can be accessed on the link below:
http://course.ncalt.com/Channel_General_Awareness/01/index.html

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: Channel guidance.

Visiting Speakers

(see the Staff Handbook for Frensham Visiting Speakers Check list)

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 pupils 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.

17:Domestic Abuse

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

The 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 peer on peer 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 all domestic abuse incidents that have occurred and been reported to Police in the previous 24 hours which involved a child at this school (72 hours on a Monday morning). This provides an opportunity for us to ensure the right support is in place at the right time for children who are experiencing domestic abuse.

18: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 PSHE and Horizons 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.

19: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 gifts or new possessions could also indicate that children have been approached by, or are involved with individuals associated with criminal networks or gangs" (DfE, 2019a)

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.

20: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 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
-

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. See Surrey Safeguarding Childrens Board: Recognition of Significant Harm Procedure.

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;
- Emotional abuse, including:
- 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. The families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

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

21: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 Children's Social Care as soon as possible. However, where a member of staff becomes aware that a students may be in a private fostering arrangement, they will raise this will the DSL and the DSL will notify the C-SPA.

22: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.

23: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 pupil 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 students 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 the needs of the child.

24:Restrictive Physical Intervention (also see Policy on Use of Force and Restraint)

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.

25:Whistleblowing (also see Whistleblowing Policy)

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.

26: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.

27:Statutory Guidance and documents

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

- Surrey Safeguarding Children Partnership protocols, guidance and procedures
- Working Together to Safeguard Children 2018
- Keeping Children Safe in Education 2021 (KCSIE)
- Disqualification under the Childcare Act 2006 (updated 2018)
- FGM Act 2003 Mandatory Reporting Guidance 2020
- 'What to do if you are worried a child is being abused' 2015
- Teacher Standards 2011
- DfE Preventing and Tackling Bullying Advice for Schools (2017)
- Information Sharing Advice for Practitioners' guidance 2018
- DfE Mental Health and Behaviour in School (2018)
- The Equality Act 2010
- Sexual violence and sexual harassment between children in schools and colleges
- SCC Safeguarding Children Missing Education (CME) and Educated Other Than at School (EOTaS) – available on Services for Schools Portal
- SCC Touch and the use of physical intervention when working with children and young people – available on Services for Schools Portal
- Relationships and sex education (RSE) and health education (2019)
- BSA Commitment to Care Charter
- Statutory Framework for the Early Years Foundation Stage (2021)
- Mental health and behaviour in schools: departmental advice (2018)
- Teacher misconduct: the prohibition of teachers (2018)
- Sexual violence and sexual harassment between children in schools and colleges (2021)
- Schools Covid 19 – Operational Guidance (September 2021)

Appendices

Appendix 1: Additional Support Material

Advice for:	Link:
PHE Promoting children's mental health and well being (2018)	https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/414908/Final_EHWB_draft_20_03_15.pdf
PHE Lesson plans and support from PHE "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/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf
NSPCC – general and excellent supportive advice	http://www.nspcc.org.uk
Childline	http://www.childline.org.uk/pages/home.aspx
Online safety resources	https://www.thinkuknow.co.uk/
Anti-bullying advice	http://anti-bullyingalliance.org.uk
Childnet – online safety information and resources	www.childnet.com
Safer Internet - online safety information and resources	http://www.saferinternet.org.uk

Appendix 2: Child Protection during Periods of Remote Learning

***1:*Scope and definitions**

This addendum applies during any period of school closure where education is provided remotely. It reflects the advice from the SSCB, Boarding Schools Association, ISBA, DfE and Surrey County Council as received during the Covid-19 pandemic of 2020/21.

It sets out changes to our normal child protection policy in light of the Department for Education's guidance
Schools Covid 19: Operational Guidance
https://www.gov.uk/government/publications/actions-for-schools-during-the-coronavirus-outbreak/schools-covid-19-operational-guidance#remote-education
DfE: Get help with remote education
https://get-help-with-remote-education.education.gov.uk/

Unless covered below, the school's Safeguarding and Child Protection Policy continues to apply, including the contact details for all personnel at the beginning of the Safeguarding Policy.

The Department for Education's (DfE's) definition of 'vulnerable children' includes those who:

- Have a social worker, including children:
- With a child protection plan
- Assessed as being in need
- those who are young carers
- Looked after by the local authority
- Have an education, health and care (EHC) plan

2:Core safeguarding principles

The School must still have regard to statutory guidance, Keeping Children Safe in Education (2021). and Working Together to Safeguard Children (2018), and must follow the procedures of Surrey SCP.

Although operating online and remotely, the school will still follow important safeguarding principles:

- The best interests of the child must come first
- If there is a safeguarding concern about any child, staff should report this to the designated safeguarding lead (DSL) immediately
- The DSL or a deputy will be available at all times (see section 5 for details of arrangements)
- It is essential that unsuitable people do not enter the school workforce or gain access to children
- Children must continue to be protected when they are online

3:Safeguarding all children

Staff and volunteers are aware that a period of remote learning is likely to be a difficult time and potentially puts all children at greater risk.

Staff and volunteers must continue to be alert to any signs of abuse, or effects on pupils' mental health (including those that are also safeguarding concerns), and act immediately.

In particular, children are likely to be spending more time online which puts them at greater risk. (see online section below).

4:Reporting concerns

All staff and volunteers must continue to act on any concerns they have about a child immediately. It is still vitally important to do this, however minor the concerns may appear. CPOMS will continue to be the means of communicating concerns

As a reminder, all staff should continue to work with and support children's social workers, where they have one, to help protect vulnerable children.

5:DSL (and Deputy) arrangements

The school aims to have a trained DSL or deputy DSL on site (or on call easily accessible) wherever possible and when children are on site. Details of all contacts are listed in the Key Personnel section at the start of this policy.

If the DSL (or Deputy) is working remotely, they can be contacted during normal school hours as needed. They are also available through the normal SMT on call procedure with telephone advice and support available for all members of staff after school hours.

If the DSL is unavailable for contact, all school staff and volunteers will be informed by using out of office messages on school email, and an all-staff communication via Teams and Outlook which deputy will be on duty and how to contact them.

The School will ensure that the DSL (and Deputies), wherever their location, know who the most vulnerable children in school are.

On occasions where there is no DSL or deputy on site, due to there being no children on site, there will also be a member of SLT available on call. They can be contacted by calling the duty SMT number 01252 792561

The senior leader will be responsible for liaising with the off-site DSL (or deputy) to ensure they (the senior leader) can:

- Identify the most vulnerable children in school
- Update and manage access to child protection files (all files are online, files are accessible remotely)

- Liaise with children's social workers where they need access to children in need and/or to carry out statutory assessments

6:Working with other agencies

The School will continue to work with children's social care, and with virtual school heads for looked-after and previously looked-after children.

The School will continue to update this addendum where necessary, to reflect any updated guidance from:

- Surrey SCP
- The local authority about children with education, health and care (EHC) plans, the LADO and children's social care, reporting mechanisms, referral thresholds and children in need
- Boarding School Association

7:**Monitoring attendance**

As most children will not be physically attending school during a period of school closure, attendance registers will not be completed in the usual way and consequently the school will not be in a position to monitor non-attendance.

However, the School will monitor engagement with online learning, through lesson and daily check ins with subject teachers and tutors/class teachers. These records will be held on Schoolbase online

The exception to this is where any child who is expected to attend school during the closure does not attend, or stops attending. In these cases, the School will:

- Follow up on their absence with parents or carers, by calling home and contacting the child directly via Teams
- Notify their social worker, where they have one

The School will make arrangements with parents and carers to ensure it has up-to-date emergency contact details, and additional contact details where possible.

8:**Peer-on-peer abuse**

The principles set out in Annex B of Keeping Children Safe in Education and the School Safeguarding Policy for managing reports and supporting victims of peer-on-peer abuse continue to apply.

Staff should continue to act on any concerns they have immediately, and should be aware that peer on peer online abuse is an area of increased potential concern during periods of remote schooling and school closure.

The School will continue to encourage parents to actively report concerns, using screen shots as evidence. This will be explored using Teams and Meetings with those concerned; investigations and conversations will continue to happen.

At the beginning of terms, all pupils will be reminded about etiquette, expectations and the school Acceptable Use of Technology Policy. Whilst accessing technology remotely, pupils will be reminded that school is still functioning and that school rules and expectations of behaviour are still applicable

9:**Concerns about a staff member or volunteer**

The principles set out in part 4 of Keeping Children Safe in Education relating to concerns about the conduct of adults continues to apply.

Staff must report any concerns immediately, in line with the procedures set out in the School's Safeguarding Policy.

The School will continue to refer any adult who has harmed or poses a risk of harm to a child or vulnerable adult to the Disclosure and Barring Service (DBS). It will also continue to refer any potential cases of teacher misconduct to the Teaching Regulation Agency.

10:Support for children who aren't 'vulnerable' but where there are concerns

The School has the option to offer places in school to children who don't meet the Department for Education's definition of 'vulnerable', but who still pose safeguarding concerns. These children are likely to be limited to those who have been identified as a "cause for concern" on the CPOMS system for the previous term, and where in the DSL and DDSL's opinion, being in the home environment has been part of the cause for concern or where the child is unable to access remote learning provision due to not having adequate access to the internet or a suitable space to work.

The DSL and DDSL will regularly remind pastoral staff to check in weekly with pupils and will encourage open channels of communication using Teams to ensure children are safe and comfortable in their home environment.

If appropriate the DSL would contact the Head and seek approval for inviting such children into school for a break in routine /continued support.

If these children do not attend school and remain at home, a contact plan will be put in place, as explained below.

11:Safeguarding for children not attending school

Contact plans

Contact plans are in place for all children with a social worker and for children where there are safeguarding concerns when:

- They won't be attending school (for example where the school, parent/carer and social worker, if relevant, have decided together that this would not be in the child's best interests); or
- They would usually attend but have to self-isolate

These plans set out:

- How often the school will make contact
- Which staff member(s) will make contact
- How they will make contact

If needed, an appropriate plan will be agreed with children's social care where relevant, which will be reviewed every two weeks. If contact with the pupil cannot be made, the named social worker, police or MASH/C-SPA team will be contacted as appropriate.

12:Online Safety

In school

Appropriate filtering and monitoring systems remain in place in school through and the IT Manager is available for technical support and for monitoring systems in place.

Outside school

Where staff are interacting with children online, they must continue to follow the staff behaviour policy/code of conduct/IT acceptable use policy.

The School's Home Learning Policy gives further advice and expectations for staff, students and parents on how technology will be used. Staff must continue to be alert to signs that a child may be at risk of harm online, and act on any concerns immediately, following the reporting procedures as set out ~~in section 3 of this addendum.~~ The Safeguarding Policy.

Staff must ensure that children also know how to report any concerns they may have to school, and signpost them to other sources of support too.

Working with parents and carers

The School will ensure parents and carers:

- Are aware of the potential risks to children online and the importance of staying safe online
- Know what the school is asking children to do online, including what sites they will be using and who they will be interacting with from school
- Are aware that they should only use reputable online companies or tutors if they wish to supplement the remote teaching and resources school provides
- Know where else they can go for support to keep their children safe online

The School will send all parents updates and reminders of expectations and where to go for additional support at the beginning of each term.

13:Mental health

Where possible, the current support systems for pupil mental health for all pupils will continue. The school counsellor will continue support for those pupils previously accessing support. Staff will also ensure that pupils know that they can still access this support by contacting them through Teams

All pupils, parents and staff will also be signposted to other resources to support good mental health at this time through Teams/Sharepoint.

When setting expectations for pupils learning remotely and not attending school, teachers will bear in mind the potential impact of the current situation on the mental health of both children and adults.

14:Staff recruitment, training and induction

Recruiting new staff and volunteers

The School continues to recognise the importance of robust safer recruitment procedures, so that adults and volunteers who work in school continue to be vetted for their suitability to work with children.

The School will continue to follow safer recruitment procedures as outlined in Part 3 of Keeping Children Safe in Education and the School's Recruitment Policy.

In urgent cases, in order to validate documents necessary for a DBS application and/or to verify identification and qualifications, any original certificates and documents may be scanned or viewed via online video link, rather than being presented to the School in person. This approach is in line with revised guidance from the DBS.

New staff must still present the original documents when they first attend work at school.

The School will continue to vet new volunteers, in line with the School Recruitment Policy. An enhanced DBS check with Barred List information will be obtained for any volunteers who are deemed to be in regulated activity.

The SCR will continue to be maintained to record the pre-appointment checks on any new staff, including supply staff, third party staff and volunteers.

15:Safeguarding induction and training

Staff and volunteers will be made aware of changes to procedures and local arrangements.
New staff and volunteers will continue to receive induction on safeguarding and the following documents:

- Keeping Children Safe in Education, Part 1 and Annex B

- The school's Safeguarding and Child Protection Policy (includes the identity and the role of the DSLs and Deputies, and the response to children who go missing from education)
- Staff Code of Conduct
- Online Safety Policy
- Whistleblowing Policy
- Behaviour Policy
- Anti-bullying Policy

The school will continue to take a risk based approach to the level of information provided when training other temporary staff, contractors and volunteers.

16:Keeping records of who is on site

In any period where the school is not operating during term time 'normally', a record will be kept of which staff and volunteers are on site each day.

17:Monitoring arrangements

This policy will be reviewed as guidance from Surrey SCP, the LA or DfE is updated, and as a minimum every 4 weeks whilst in a period of remote learning by the Deputy Head and DSL.
This addendum was approved by the full governing board in March 2020 and is reviewed as needed by the Senior Leadership Team.