

# Safeguarding Policy



CATERHAM  
SCHOOL



CATERHAM  
PREP

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## School Purpose Statement

Caterham School is one of the leading co-educational schools in the country. We are committed to providing an environment in which all pupils are challenged to be the best they can be and one in which pastoral care and well-being underpin academic, co-curricular and sporting excellence. The majority of our pupils are day pupils but we are also a thriving boarding community, which enriches the educational opportunity and experience for all. We believe in providing an education for life for all Caterhamians and we seek to ensure that the learning experience at our school blends the best of tradition with the exciting opportunities provided by new technology. Learning how to learn is a key facet of a Caterham education and is in our view an essential skill for life in the twenty-first century. We believe that a truly excellent school is about more than academic achievement alone: it is also about developing a passion for learning, a capacity for independent and critical thinking, self-awareness and resilience, self-confidence without arrogance and genuine interests that extend beyond the confines of the classroom.

At Caterham School we focus on developing the whole person, aiming to ensure that each pupil leaves here ready for the challenges of life at university and beyond and understanding their responsibilities towards others. We want our pupils to leave Caterham well equipped to engage positively with a rapidly changing world as accomplished problem solvers and innovators, confident in their ability to lead and with a clear appreciation of and respect for the views and potential of others. In so doing we remain true to our founding Christian principles and values.

## Safeguarding Statement - 'Safeguarding is everyone's business'

Caterham School recognises its moral and statutory responsibility to safeguard and promote the welfare of all children and all those who come into contact with the School. We make every effort to provide an environment in which children and adults feel safe, secure, valued and respected, and feel confident to talk if they are worried, believing they will be listened to effectively.

The purpose of this policy is to provide staff, volunteers and trustees with the framework they need in order to keep children safe and secure in our school. The policy also informs parents and carers how we will safeguard their children whilst they are in our care.

All staff should maintain an attitude of 'it could happen here' with regards to safeguarding.

## Terminology

Safeguarding and promoting the welfare of children is defined as:

- Providing help and support to meet the needs of children as soon as problems emerge;
- protecting children from abuse and maltreatment, whether within or outside the home, including online;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- taking action to enable all children to have the best outcomes.
- preventing impairment of children's mental or physical health or development.

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

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

**Abuse** - reference to abuse in the policy may also mean or include need, neglect or harm as appropriate.

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

**Child(ren)** for the School's purposes includes **all** pupils in the school, including those who are over 18. On the whole, this will apply to pupils of our school; however the policy will extend to visiting children and pupils from other establishments.

**Parents** refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

**Social Care** refers to Children's Services in the area in which the child is resident, unless a child is a Child Looked After then this will be the Children's Services in their home authority.

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

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

## Linked Policies

This policy has been developed in accordance with the principles established by government publications and guidance and those of the Surrey Safeguarding Children Partnership, including:

- [Surrey Safeguarding Children Partnership protocols, guidance and procedures](#)
- [Surrey Education Services \(Surreycc.gov.uk\)](https://www.surreycc.gov.uk) – Education Safeguarding Resources Hub

- [Working Together to Safeguard Children 2023](#)
- [Keeping Children Safe in Education 2024 \(KCSIE\)](#)  
[https://assets.publishing.service.gov.uk/media/6650a1967b792fff71a83e8/Keeping\\_children\\_safe\\_in\\_education\\_2024.pdf](https://assets.publishing.service.gov.uk/media/6650a1967b792fff71a83e8/Keeping_children_safe_in_education_2024.pdf)
- [After-school clubs, community activities and tuition: safeguarding guidance for providers \(updated Sept 23\)](#)
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)  
[https://assets.publishing.service.gov.uk/media/65d62b02188d770011038855/UKCIS\\_sharing\\_nudes\\_and\\_semi\\_nudes\\_advice\\_for\\_education\\_settings\\_Web\\_accessible.pdf](https://assets.publishing.service.gov.uk/media/65d62b02188d770011038855/UKCIS_sharing_nudes_and_semi_nudes_advice_for_education_settings_Web_accessible.pdf)
- [Disqualification under the Childcare Act 2006 \(updated 2019\)](#)
- [FGM Act 2003 Mandatory Reporting Guidance 2020](#)
- [‘What to do if you are worried a child is being abused’ 2015](#)
- [Teacher Standards 2011](#)
- [Information Sharing: advice for practitioners providing safeguarding services 2024](#)  
[https://assets.publishing.service.gov.uk/media/66320b06c084007696fca731/Info\\_sharing\\_advice\\_content\\_May\\_2024.pdf](https://assets.publishing.service.gov.uk/media/66320b06c084007696fca731/Info_sharing_advice_content_May_2024.pdf)
- [The Equality Act 2010](#)
- [Sexual violence and sexual harassment between children in schools and colleges](#)
- [Relationships Education, Relationships and Sex Education and Health Education \(RSHE\) \(DfE 2019, updated Sept 2021\)](#)
- [SCC Safeguarding Children Missing Education \(CME\) and Educated Other Than at School \(EOTaS\) – available on Surrey Education Services \(Education Safeguarding Team Resources Hub\)](#)
- [SCC Touch and the use of physical intervention when working with children and young people – available on Surrey Education Services \(Education Safeguarding Team Resources Hub\)](#)
- [When to call the police \(non-statutory guidance from the National Police Chiefs’ Council\)](#)
- [The Prevent Duty: Departmental advice for schools and childminders \(December 2023\)](#)
- [Early Years Foundation Stage Statutory Framework \(2021\)](#)
- [SSCB Early Help Levels of Need \(thresholds and guidance\)](#)
- [National Minimum Standards for Boarding Schools, 2022](#)
- [Independent School Standards Regulations 2014](#)
- [Data Protection Act 2018 Overview and GDPR \(updated Aug 2020\)](#)
- [Charities Act 2011](#)
- [Schools COVID-19 Operational Guidance, DfE \(updated Aug 2021\)](#)

This policy works in conjunction with the following internal school policies, procedures and records:

- Staff Recruitment Procedures
- Recruitment, Selection and Disclosure Policy and Procedure
- Whistleblowing Policy
- Single Central Register of Appointments
- Caterham School Code of Conduct (Staff Behaviour Policy)
- Behaviour Policy
- Attendance Policy
- Anti-Bullying Policy
- Online Safety Policy
- IT Acceptable Use Policy
- Restrictive Physical Intervention Policy
- Missing Pupil Policy
- Relationships and Sex Education Policy
- Health and Safety Policy
- Equality, Diversity and Inclusion Policy

## School Contacts (all e-mail addresses below are @caterhamschool.co.uk)

### Senior School:

Designated Safeguarding Lead:	Louise Fahey	louise.fahey@	Ext 363
Deputy DSLs:	Sarah Print-Griffiths	sarah.print-griffiths@	Ext 269
	Nick Mills	nick.mills@	Ext 231
	Rebecca Mugridge	rebecca.mugridge@	Ext 243
	Zoe Roberts	zoe.roberts@	Ext 320

Alternatively, the email address [dsl@caterhamschool.co.uk](mailto:dsl@caterhamschool.co.uk) can be used to reach the DSL team. Senior Management Team (SMT) Emergency Duty Phone (24 hours): 07476 299036.

- Louise Fahey is Assistant Head (Pastoral and Wellbeing) and sits on SMT
- Sarah Print-Griffiths is Deputy Head (Pastoral and Wellbeing)
- Nick Mills is Assistant Head (Boarding)
- Rebecca Mugridge is Head of Wellbeing
- Zoe Roberts is Assistant Head of First Year

### Prep School and Pre-Prep School:

Designated Safeguarding Lead:	Rebecca Moore (Prep Deputy Head)	rebecca.moore@	Ext 282
Deputy DSLs:	Katharine Sharpe	katharine.sharpe@	Ext 308
	Rosie Deale	rosie.deale@	
	Melanie Brown	melanie.brown@	
EYFS Safeguarding:	Joanna Cole (Head, Pre-Prep)	joanna.cole@	Ext 274

### Headmaster and Trustee Contacts

Headmaster: Ceri Jones	ceri.jones@	Ext 223
Chair of Trustees: Monisha Shah	ChairOfTrustees@	
Safeguarding Trustee: Deborah Grimason via Clerk of Trustees	suri.araniyasundaran@	

## External Agency Contacts

The School's local Children's Safeguarding Partnership is **Surrey Safeguarding Children Board (SSCB)**. The website can be found [here](#). **The Independent Schools Inspectorate (ISI)** website can be found [here](#). We also work closely with the Boarding Schools Association (BSA) whose website can be found [here](#). **Surrey Children's Services**: all concerns to go via Surrey's Single point of access (C-SPA) which responds to initial enquiries about children, young people and adults resident or working in Surrey. Tel: 0300 470 9100. This one number above is used for all enquiries. Support via email can be sought by sending a [Request for Support Form](#) by secure email to: [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk). Out of working hours (9.00am – 5.00pm) urgent enquiries must be directed to 01483 517898 gets you through to the emergency duty team or, in an immediate emergency, the Surrey police should be called on 999.

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

### **ANYONE CAN MAKE A REFERRAL.**

**Surrey Safeguarding Children Partnership (SSCP) information, including Child Protection procedures** are available [here](#).

**The Early Help Partnership Service** will assist the School, supporting enquires and the Lead Professional on 0208 541 9282. Further information is available at [www.surreycc.gov.uk/earlyhelp](http://www.surreycc.gov.uk/earlyhelp)

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

**Education Safeguarding in Surrey Schools** can be contacted for advice. . Email: [education.safeguarding@surreycc.gov.uk](mailto:education.safeguarding@surreycc.gov.uk). Secure email: [education.safeguarding@surreycc.gcsx.gov.uk](mailto:education.safeguarding@surreycc.gcsx.gov.uk). Tel: 01483 517771

**SSCP PREVENT**: Surrey's Prevent referral form and process can be found [here](#). The email address [preventreferrals@surrey.pnn.police.uk](mailto:preventreferrals@surrey.pnn.police.uk) has been created which will share the form with both the police and the Local Authority safeguarding team, to allow the safeguarding concerns to be assessed alongside any police risk.

**DfE PREVENT support**: The DfE's dedicated telephone helpline and mailbox for non-emergency advice for staff and trustees is 020 7340 7264. Email: [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk)

**FGM: The Diversity Crimes Unit (DCU)**, a dedicated Surrey Police team that deals with honour-based violence, forced marriage and female genital mutilation (FGM), can be reached on 01483 639673. Email: [diversitycrimesunit@surrey.pnn.police.uk](mailto:diversitycrimesunit@surrey.pnn.police.uk). The reporting of FGM is **mandatory**.

**OFSTED Safeguarding Children**: 0300 123 3155 (Monday to Friday 8.00am to 6.00pm). Email: [whistleblowing@ofsted.gov.uk](mailto:whistleblowing@ofsted.gov.uk)

**Disclosure and Barring Service**: 01325 953795. The government webpage can be found [here](#).

**Teaching Regulation Agency** information and details can be found [here](#). Tel: 0207 593 5393.

Further advice on child protection is available from:

**Children's Commissioner**: <http://www.childrenscommissioner.gov.uk/>

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

**Childline:** <https://www.childline.org.uk/>

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

## Equalities Statement

With regards to safeguarding we will meet our duties under the [Equality Act 2010](#). General duties include to eliminate discrimination, harassment, victimisation, and other conduct that is prohibited by the Equality Act 2010.

We aim to advance equality of opportunity between people who share a protected characteristic and people who do not share it, as well as to foster good relations across all protected characteristics between people who share a protected characteristic and people who do not share it.

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

Caterham School also adheres to the principals of and promotes anti-oppressive practice in line of the [United Nations Convention of the Rights of the Child](#) and the [Human Rights Act 1998](#).

The School's Equality, Diversity and Inclusion Policy provides further guidance.

## I - Introduction

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002, and in line with statutory guidance: 'Working Together to Safeguard Children' 2023, Revised Safeguarding Statutory Guidance 'Framework for the Assessment of Children in Need and their Families' 2000, 'What to do if You are Worried a Child is Being Abused' 2015, 'Relationships Education, Relationships and Sex Education (RSE) and Health Education' statutory guidance 2020 and 'Prevent duty guidance' 2023.

The policy also reflects both statutory guidance Keeping Children Safe in Education 2024 and [Surrey Safeguarding Children Partnership \(SSCP\) Procedures](#).

The Trustee Body takes seriously its responsibility under section 175 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure there are robust arrangements within our school to identify, assess, and support those children who are suffering harm or at risk of suffering harm.

This policy applies to all members of staff and trustees in the School.

## 2 - Policy Principles & Values

- The welfare of the child is paramount – to consider what is in the best interests of the child for the effective fulfilment of a child-centred approach to Safeguarding.
- Maintain an attitude of 'It could happen here'.
- Maintain a "zero-tolerance" approach to sexual violence and sexual harassment.
- Children have a right to feel safe and secure, they cannot learn effectively unless they do so.



- All children have a right to be protected from harm and abuse.
- All staff have a role in the prevention of harm and abuse and an equal responsibility to act immediately on any suspicion or disclosure that may indicate a child is at risk of harm, either in the School or in the community, taking into account contextual safeguarding, in accordance with statutory guidance.
- We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working to protect and safeguard children.
- Whilst the School will work openly with parents as far as possible, it reserves the right to contact Social Care or the police, without notifying parents, if this is believed to be in the child's best interests.
- We will always act in the best interests of the child and ensure that our decisions around safeguarding take a child-centred and coordinated approach.

### 3 - Policy Aims

The aims of these procedures are:

- To provide staff with the framework to promote and safeguard the wellbeing of children and in doing so ensure they meet their statutory responsibilities.
- To ensure consistent good practice across the School and ensure that safeguarding follows a whole school approach.
- Clarifying safeguarding expectations for members of the School's community, staff, Trustees, children, and their families.
- Contributing to the establishment of a safe, resilient, and robust safeguarding culture in the School built on shared values; that children are treated with respect and dignity, taught to treat each other and staff with respect, feel safe, have a voice and are listened to.
- Supporting contextual safeguarding practice recognising that the School's site can be a location where harm can occur.
- Setting expectations for developing knowledge and skills within the School's community (staff, children, parents/carers) to the signs and indicators of safeguarding issues and how to respond to them.
- Early identification of need for vulnerable learners and provision of proportionate interventions to promote their welfare and safety.
- Working in partnership with children, parents/carers, and other agencies in the Surrey Safeguarding Children's Partnership.

### 4 - Supporting Children

Our School will support all children.

We recognise that our School may provide a safe place and stability in the lives of children who have been abused or who are at risk of harm. We recognise that a child who is abused or witnesses abuse and/or violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth. We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

- We will promote a caring, consistent, safe and positive environment within the School.
- We will encourage self-esteem and self-assertiveness, through the curriculum and through positive relationships within the school community.
- We will ensure children are taught to understand and manage risk through the School's Wellbeing Programme (which includes Personal, Social, Health and Economic Education (PSHEE) and Relationship and Sex Education (RSE)) and through all aspects of school life. This includes staying safe online..
- We will respond sympathetically to any requests for time out to deal with distress and anxiety.
- We will offer details of helplines, counselling or other avenues of external support.
- We will liaise and work in partnership with other support services and agencies involved in Early Help and the safeguarding of children.
- We will notify Social Care without delay if there is an immediate risk of significant harm (see section 9 of this guide for reporting procedures).
- We will provide continuing support to children about whom there have been concerns who leave the school by ensuring that information is shared confidentially with the child's new setting. We will ensure the school records are forwarded as a matter of priority and within statutory timescales.
- The DSL will consider if it will be appropriate to share any additional information with a new school/ college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the new setting.

## 5 - Prevention / Protection

We recognise that the School plays a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection. The School will:

- Establish and maintain an ethos where children feel safe and secure, are encouraged to talk and are always listened to.
- Include regular consultation with children, such as through questionnaires, participation in anti-bullying activity, asking children to report whether they feel safe in the School.
- Ensure that all children know there is and can access a trained adult in the School whom they can approach if they are worried or in difficulty.
- Include safeguarding across the curriculum, including Wellbeing (which itself includes PSHEE), opportunities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help. In particular this will include anti-bullying work, online safety, accessing

emergency services, road safety, pedestrian and cycle training, as well as focussed work in Year 6 to prepare for transition to secondary schooling and more personal safety/independent travel. It is also recognised that effective education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special education needs or disabilities.

- Provide preventative education by creating a culture of zero tolerance for sexism, misogyny/ Misandry, homophobia, biphobia and sexual violence and sexual harassment.
- Ensure all staff are aware of school guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.

## 6 - Safe School, Safe Staff

We will ensure that:

- The School operates safer recruitment procedures in line with KCSIE 2024 and that it includes statutory checks on the suitability of staff to work with children.
- The name of the designated members of staff for child protection, the Designated Safeguarding Lead and Deputies, are clearly advertised in the School with a statement explaining the School's role in referring and monitoring cases of suspected harm and abuse.
- All staff receive start of year induction and ongoing information about the School's safeguarding arrangements, the School's Safeguarding Policy, which includes our Safeguarding Statement, whistleblowing and the CME safeguarding response, the Staff Behaviour Policy (Code of Conduct), the Online Safety Policy, the Behaviour Policy (for pupils), the role and names of the Designated Safeguarding Lead (and their deputies), and [Keeping Children Safe in Education Part 1 and Annex B](#).
- All staff receive safeguarding and child protection training at induction (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) in line with advice from Surrey Safeguarding Children Partnership. Training is regularly updated (for example, via email, and staff meetings), as required, but at least annually.
- All members of staff are trained in and receive regular updates in online safety and reporting concerns.
- All members of staff maintain a zero-tolerance approach to sexual violence and sexual harassment.
- All staff and trustees have regular child protection awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse.
- The Safeguarding Policy is made available via the school website and that parents/carers are made aware of it.
- All parents/carers are made aware of the responsibilities of staff members with regard to child protection procedures through the publication of the Safeguarding Policy and reference to it in the School Handbook.
- We provide a co-ordinated offer of Early Help when additional needs of children are identified and contribute to early help arrangements and inter-agency working and plans.

- Our lettings arrangements will seek to ensure the suitability of adults working with children on school sites at any time and ensure that any groups who use the school premises have child protection policies and procedures in place.

Community users organising activities for children are aware of the School's Safeguarding Policy, guidelines and procedures.

- All staff will be given a copy of Part 1 and Annex B of Keeping Children Safe in Education 2024 and will sign to say they have read and understood it. This applies to the Trustee Body in relation to Part 2 of the same guidance.

## 7 - Roles and Responsibilities

### **All School Staff:**

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

- Maintain an attitude of 'it could happen here' with regards to safeguarding.
- Understand that safeguarding is everyone's responsibility.
- Provide a safe environment in which children can learn.
- Maintain a "zero-tolerance" approach to sexual violence and sexual harassment.
- Read and understand Part 1 of KCSIE 2024. Those working directly with children will also read Annex B.
- Know who the DSL and Deputy DSLs are and know how to contact them.
- Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to.
- Ensure children know that there are adults in the School whom they can approach if they are worried or have concerns.
- Ensure all staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Only appropriately trained professionals will attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- Take immediate action if they have a mental health concern about a child that is also a safeguarding concern, following our Safeguarding Policy and procedures.
- Plan opportunities within the curriculum for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe.

- Be aware of indicators of abuse and neglect understanding that children can be at risk of harm inside and outside of the school, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.
- Be able to identify vulnerable learners and take action to keep them safe. Information or concerns about learners will be shared with the DSL where it includes those:
  - who may need a social worker and may be experiencing abuse or neglect
  - requiring mental health support
  - may benefit from early help
  - where there is a radicalisation concern
  - where a crime may have been committed
- Attend training in order to be aware of and alert to the signs of abuse, neglect and exploitation
- Know how to respond to a pupil who discloses harm or abuse following training of 'Working together to Safeguard Children' (2023), and 'What to do if you are worried a child is being abused' (2015).
- Record their concerns if they are worried that a child is being abused and report these to the DSL immediately that day. If the DSL is not contactable immediately a Deputy DSL should be informed.
- Be prepared to refer directly to the Children's Single Point of Access (C-SPA), and the Police if appropriate, if there is a risk of significant harm and the DSL or their Deputy is not available.
- Follow the allegations procedures, as set out in this policy and KCSIE 2024, if the disclosure is an allegation against a member of staff, supply staff, volunteer or contractor.
- Report low-level concerns (as defined in KCSIE 2024) about any member of staff/supply staff or contractor to the Headmaster.
- Follow the procedures set out by the Children's Safeguarding Partnership and take account of guidance issued by the Department for Education to safeguard children.
- Understand early help and be prepared to identify and support children who may benefit from early help. Liaise with other agencies that support pupils and provide early help.
- Provide support for children subject to early help, child in need or child protection and be involved where appropriate, in the implementation of individual plans to further safeguard vulnerable learners and understand their academic progress and attainment and maintain a culture of high aspirations for this cohort.
- A member of staff who is approached by a child should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they need to pass information to other professionals to help keep the child and/or other children safe. The degree of confidentiality should always be governed by the need to protect the child.
- Notify the DSL or their Deputy of any child on a child protection plan or child in need plan who has unexplained absence.

- Have an awareness of the role of the DSL, the School's Safeguarding Policy, Behaviour Policy (pupils), the Staff Code of Conduct, Online Safety Policy and KCSIE Part 1 and procedures relating to the safeguarding response for children who go missing from education.

Be aware that children may not feel ready or know how to tell someone they are being abused, exploited, or neglected, and/or they may not recognise these experiences as harmful. This could be due to their vulnerability, disability and/or sexual orientation or language barriers.

- Be mindful that the Teacher Standards states that teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- Assist the Trustee Body and Headmaster in fulfilling their safeguarding responsibilities set out in legislation and statutory guidance.

## **The Headmaster**

In addition to the role and responsibilities of all staff the Headmaster will ensure that:

- The School fully contributes to inter-agency working in line with Working Together to Safeguard Children 2023 guidance.
- The Safeguarding Policy and its procedures are implemented and followed by all staff.
- The School has appropriate policies in place that make it clear that sexual harassment, online sexual abuse and sexual violence (including sexualised language) is unacceptable, with appropriate sanctions and support in place.
- The School's staff have appropriate knowledge of part 5 of the government's 'Keeping children safe in education' guidance.
- All children are supported to report concerns about harmful sexual behaviour freely. That concerns are taken seriously and dealt with swiftly and appropriately, and children are confident that this is case. And that comprehensive records of all allegations are kept.
- All staff are aware of the role of the Designated Safeguarding Lead (DSL), including the identity of the DSL and their Deputies.
- Sufficient time, training, support, funding, resources, including cover arrangements where necessary, are allocated to the DSL to carry out their role effectively, including the provision of advice and support to school staff on safeguarding and child protection matters, to take part in strategy discussions/meetings and other inter-agency meetings and/or support other staff to do so; and to contribute to the assessment of children.
- Opportunities are provided for a co-ordinated offer of early help when additional needs of children are identified
- Deputy DSLs are trained to the same standard as the DSL and the role is explicit in their job description.
- Adequate and appropriate DSL cover arrangements are in place for any out of hours/out of term activities.
- Where there is a safeguarding concern that the child's wishes and feelings are taken into account when determining what action to take and what services to provide.

- Child-centred systems and processes are in place for children to express their views and give feedback.
- All staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistleblowing procedures.
- Pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.
- Allegations or concerns against staff are dealt with in accordance with guidance from Department for Education (DfE), Surrey Safeguarding Children Partnership (SSCP) and Surrey County Council (SCC).
- Statutory requirements are met to make a referral to the Disclosure and Barring Service and additionally in the case of teaching staff the Teacher Regulation Agency where they think an individual has engaged in conduct that harmed (or is likely to harm) a child; or if the person otherwise poses a risk of harm to a child.
- Record low-level concerns in cases which concern a member of staff/supply staff/contractor or a volunteer. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted; if the individual wishes to remain anonymous then that will be respected as far as reasonably possible.

### **The Designated Safeguarding Lead (DSL)**

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

- Hold the lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems in place) in the School. This responsibility is not able to be delegated.
- Have an 'it could happen here' approach to safeguarding.
- Liaise with the local authority and work in partnership with other agencies in line with Working Together to Safeguard Children.
- Where necessary contact Surrey's Child Protection Consultation Line for advice and support (0300 470 9100 option 3).
- Manage and submit a Request for Support Form for a child if there are concerns about suspected harm or abuse, to the C-SPA, and act as a point of contact and support for School staff. Requests for support should be made securely by email to [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk) using the [Request for Support Form](#) urgent referrals should be made by telephone 0300 470 9100 or 03311 435 554 (and ask for the priority line).
- Report concerns that a pupil may be at risk of radicalisation or involvement in terrorism, following the [Prevent referral process](#) and use the Prevent referral form to refer cases by e-mail to [preventreferrals@surrey.pnn.police.uk](mailto:preventreferrals@surrey.pnn.police.uk) . If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101 or 07795 043842 or 01865 555618 and ask to speak to the Prevent Supervisor for Surrey. The Department of Education has also set up a dedicated telephone helpline for staff and Trustees to raise concerns around Prevent (020 7340 7264).

- Refer cases where a crime may have been committed to the Police as required. NB: NPCC- [When to call the police](#) should help DSLs understand when they should consider calling the Police and what to expect when they do.
- Liaise with the case manager and Local Authority Designated Officer for child protection concerns in cases which concern a member of staff or a volunteer; and refer cases where a person is dismissed or left service due to risk/harm to a child to the Disclosure and Barring Service and Teaching Regulation Agency, as required.
- Follow DfE and KCSIE guidance, 'Child on Child Abuse', when a concern is raised that there is an allegation of a pupil abusing another pupil within the School.
- When there has been a report of sexual violence, make an immediate risk and needs assessment. Additionally, where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis and will be put in place as required.
- Be available during term time (during school hours) for staff in school to discuss any safeguarding concerns. Appropriate and adequate cover arrangements will be arranged by the DSL and the school leadership for any out of hours/term activities.
- Act as a source of support and expertise in carrying out safeguarding duties for the whole school community.
- Encourage and promote a culture of listening to children and taking account of their wishes and feelings, amongst all staff.
- Access training and support to ensure they have the knowledge and skills required to carry out the role. DSL training should be updated at least every two years and their knowledge and skills refreshed at regular intervals but at least annually.
- Have a secure working knowledge of SSCP procedures and understands the assessment process for providing Early Help and statutory intervention, in line with Surrey's Continuum of Need Matrix.
- Have a clear understanding of access and referral to the local Early Help offer and will support and advise members of staff where Early Help intervention is appropriate.
- Have a working knowledge of how Surrey County Council conduct an initial child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes.
- Understand and support the School's delivery with regards to the requirements of the Prevent Duty and provide advice and guidance to staff on protecting children from radicalisation.
- Liaise with school staff (especially pastoral support, behaviour leads, school health colleagues and the SENDCO) on matters of safety and safeguarding and consult Surrey's Continuum of Need Matrix to inform decision making and liaison with relevant agencies.
- Be alert to the specific needs of children in need, those with SEND and young carers.



- Understand the risks associated with online activity and be confident that they have the up to date knowledge and capability to keep children safe whilst they are online at school; in particular understand the additional risks that children with SEND face online and the associated and appropriate support they require.
- Work with the Headmaster and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at the school.  
Keep detailed, accurate records (either written or using the Caterham Holistic Information Portal, CHIP, which meets the standard of appropriate secure online software). These records will include all concerns about a child even if there is no need to make an immediate referral, as well as the rationale for decisions made and action taken.
- Ensure that an indication of the existence of the additional child protection file is marked on the pupil school file record.
- Ensure that when a pupil transfers school (including in-year), their child protection file is passed to the new school as soon as possible, and within statutory timescales (separately from the main pupil file and ensuring secure transit) and that confirmation of receipt is received. If the transit method requires that a copy of the Child Protection file is retained until such a time that the new school acknowledges receipt of the original file, the copy should be securely destroyed on confirmation of receipt.
- 
- Ensure that where a pupil transfers school and is on a child protection plan, child in need plan or is a child looked after, their information is passed to the new school immediately and that the child's social worker is informed. In addition consideration should be given to a multi-agency schools transition meeting if the case is complex or ongoing.
- Ensure that all appropriate staff members have a working knowledge and understanding of their role in case conferences, core groups and other multi-agency planning meetings, to ensure that they attend and are able to effectively contribute when required to do so; where a report is required, this should be shared with the parents prior to the meeting.
- Report to the Headmaster any significant issues, for example use of [Surrey's FaST Resolution Process](#) enquiries under section 47 of the Children Act 1989 and Police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the [Statutory guidance - PACE Code C 2019](#).
- Ensure that the case holding Social Worker is informed of any child currently with a child protection plan who is absent without explanation.
- Ensure that all staff sign to say they have read, understood and agree to work within the School's Safeguarding Policy, the Online Safety Policy, the Staff Code of Conduct, the Behaviour Policy (pupils) and Keeping Children Safe in Education (KCSIE) Part 1, and ensure that the policies are used effectively.
- Organise child protection and safeguarding induction, regularly updated training and a minimum of annual updates (including online safety) for all school staff, keep a record of attendance and address any absences.
- Ensure that in collaboration with the school leadership and trustees, the Safeguarding Policy is reviewed annually and the procedures and implementation are updated and reviewed regularly.

- Ensure that the Safeguarding Policy is available publicly and that parents are aware that referrals about suspected harm, exploitation and abuse will be made and the role of the School in this.
- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and leadership staff.
- Establish and maintain links with the SSCP to make sure staff are aware of training opportunities and the latest policies on local safeguarding arrangements.
- Contribute to and provide, with the Headmaster and Chair of Trustees, the biennial (s157 s175) Statutory Audit for Safeguarding Arrangements and Termly Safeguarding Data Collections via PHEW to Surrey County Council.
- Ensure that the names of the Designated Safeguarding Lead and deputies are clearly advertised, with a statement explaining the School's role in referring and monitoring cases of suspected abuse.
- Meet all other responsibilities as set out for DSLs in Keeping Children Safe in Education 2024.

### **The Deputy Designated Safeguarding Leads (DDSLs)**

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

- Be trained to the same standard as the Designated Safeguarding Lead and the role is explicit in their job description.
- Provide support and capacity to the DSL in carrying out delegated activities of the DSL; however, the lead responsibility of the DSL cannot be delegated.
- In the absence of the DSL, carries out the activities necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the DSL, a DDSL will assume all of the functions above.

### **Trustees**

All members of the Trustee Body understand and fulfil their responsibilities to ensure that:

- There is a whole school approach to safeguarding, involving everyone in the school and ensuring that safeguarding, and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- A nominated Trustee for Safeguarding is identified.
- The Trustees should ensure that all members receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the School are effective and support the delivery of a robust whole school approach to safeguarding. Training should be regularly updated.

- The child's wishes and feelings are considered when determining what action to take and what services to provide.
- The School has effective safeguarding policies and procedures including a Safeguarding Policy (including online safety), a Staff Behaviour Policy or Code of Conduct, a Behaviour Policy (pupils) and a response to children who go missing from education.
- Policies are consistent with SSCP and statutory requirements, are reviewed annually by the Trustees (as a minimum) and updated if needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt and that the Safeguarding policy is available on the school website.

The SSCP is informed in line with local requirements about the discharge of duties via the Biennial (s 157 s 175) Statutory Audit for Safeguarding Arrangements and Termly Safeguarding Data Collections via PHEW to Surrey County Council.

- The School operates a safer recruitment procedure that includes statutory checks on staff suitability to work with children and disqualification by association regulations and by ensuring that there is at least one person on every recruitment panel who has completed safer recruitment training, if there is not a panel conducting interviews then the individual will have completed the safer recruitment training.
- At least one member of the Trustee Body has completed safer recruitment training.
- Staff have been trained appropriately and this is updated in line with guidance and all staff have read Keeping Children Safe in Education Part 1 and Annex B, depending on their role, and that mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance.
- Ensure that, as part of the requirement for staff to undergo regular updated safeguarding training, including online safety and the requirement to ensure children are taught about safeguarding, the approach is integrated, aligned, and considered as part of the whole School safeguarding approach and wider staff training and curriculum planning.
- Considering the above training requirements, Trustees should have regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all children.
- All staff, including temporary staff and volunteers, are provided with the School's Safeguarding Policy and Staff Code of Conduct.
- Take a proportionate risk-based approach to the level of information that is provided to temporary staff, volunteers and contractors.
- The School has procedures for dealing with allegations of abuse against staff (including the Headmaster), volunteers and against other children and that a referral is made to the DBS and/or the Teaching Regulation Agency (as applicable) if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have had they not resigned.
- Policies and processes are in place to deal with concerns (including allegations) which do not meet the harm threshold, defined as low-level concerns in KCSIE 2024.

- A member of the senior management team has been appointed by the Trustee Body as the Designated Safeguarding Lead who will take lead responsibility for safeguarding and child protection and that the role is explicit in the role holder's job description.
- That on appointment, the DSL and deputy(ies) undertake interagency training (SSCP Foundation Modules 1&2) and also initially undertake DSL 'New to Role' with 'Refresher' training every two years as well as attending DSL network events, to refresh knowledge and skills.
- Children are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through the Wellbeing Programme, which includes within it Personal, Social, Health and Economic Education (PSHEE) and Relationship and Sex Education (RSE). The Trustees and school will regularly review the effectiveness of filtering and monitoring systems in place to safeguard children online.
- The leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.
- The School will comply with DfE and the Surrey County Council Policy Guidance for Safeguarding Children Missing Education and Education Other Than At School.
- The School will comply with regular data returns requested by the Local Authority, regarding all pupils, of statutory school age, attending alternative provision and/or on a reduced or modified timetable.
- Clear systems and processes in place for identifying possible mental health problems, including routes to escalate, and clear referral and accountability systems.
- Safeguarding and child protection files are maintained as set out in KCSIE 2024 Annex C.
- Enhanced DBS checks (without barred list checks, unless the trustee is also a volunteer at the School) are in place for Trustees.
- Section 128 checks are undertaken as defined in KCSIE 2024.
- Where Trustees hire or rent out school facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) they should ensure that appropriate arrangements are in place to keep children safe.
- Any weaknesses in safeguarding are remedied immediately.

## 8 – Confidentiality, Sharing and Withholding Information

All matters relating to child protection will be treated as confidential and only shared as per the 'Information sharing: advice for practitioners providing safeguarding services (2024) The School will refer to the guidance in the ['Data protection: toolkit for schools'](#) to support the School with data protection activity, including compliance with General Data Protection Regulation (GDPR).

Information will be shared with staff within the School who 'need to know'. Relevant staff have due regard to GDPR principles which allow them to share (and withhold) information.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act 1998 and GDPR are not a barrier to sharing

information where a failure to do so would place a child at risk of harm. There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.

All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing.

All staff will always undertake to gain parent/carers consent to refer a child to Social Care unless to do so could put the child at greater risk of harm or impede a criminal investigation.

## 9 - Child Protection Procedures

The following procedures apply to all staff working in the School and will be covered by training to enable staff to understand their role and responsibility. The aim of these procedures is to provide a robust framework which enables staff to take appropriate action when they are concerned that a child is being harmed or abused or is at risk of harm or abuse.

The prime concern at all stages must be the best interests and safety of the child. Where there is a conflict of interest between the child and an adult, the interests of the child must be paramount.

All staff are aware that very young children and those with disabilities, special needs or with language delay may be more likely to communicate concerns with behaviours rather than words. Additionally staff will question the cause of knocks and bumps in children who have limited mobility.

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

1. Make an initial record of the information related to the concern.
2. Report it to the DSL immediately.
3. The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available.
4. Make an accurate written record (which may be used in any subsequent court proceedings) as soon as possible and within 24 hours of the occurrence, of all that has happened, including details of:
  - Dates and times of their observations
  - Place
  - Who was present
  - Context
  - Details of disclosure/concern (using the child's words)
  - Demeanour/non-verbal behaviours of the child
  - Any injuries
  - Rationale for decision making
  - Actions taken
5. The records must be signed and dated by the author (or equivalent on CHIP).
6. In the absence of the DSL or a DDSL, **staff must be prepared to refer directly to the Children's Single Point of Access (C-SPA), and the police if appropriate**, if there is the potential for immediate significant harm.

**NB: A referral regarding significant harm must be made as soon as possible****Following a report of concerns, the DSL must:**

1. [Using the Continuum of Support for Children and Families in Surrey and Continuum of Support Matrix](#) decide whether or not there are sufficient grounds for suspecting significant harm, in which case a request for support must be made to the C-SPA and the police if it is appropriate.
2. Normally the School should try to discuss any concerns about a child's welfare with the family and where possible to seek their agreement before making a referral to the C-SPA. However, this should only be done when:

- it will not place the child at increased risk
- It will not impact a police investigation or social work enquiry.
- There is no suspicion of sexual/ organised abuse
- There is no suspicion of fabrication of an illness

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/carers should be told about the referral and, if so, when and by whom. This is important in cases where the Police may need to conduct a criminal investigation. The child's views should also be considered.

If there are grounds to suspect a child is suffering, or is likely to suffer, significant harm or abuse the DSL must contact the C-SPA, by sending a [Request for Support Form](#) by secure email to: [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk) contact the C-SPA consultation line on 0300 470 9100 to discuss the concerns. If a child is in immediate danger and urgent protective action is required, the Police (dial 999) must be called. The DSL must also notify the C-SPA of the occurrence and what action has been taken.

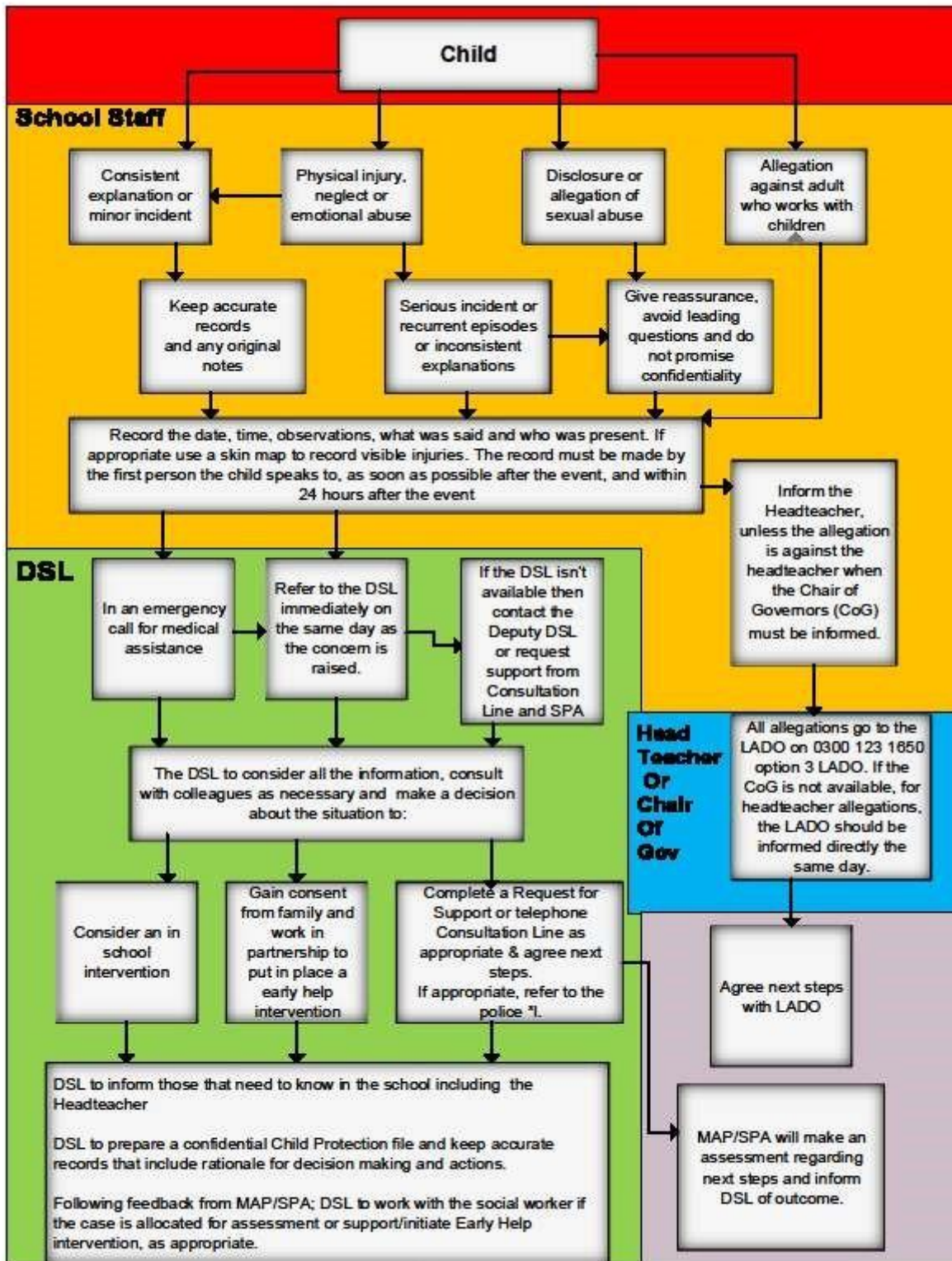
3. If the DSL feels unsure about whether a referral is necessary they can phone the C-SPA to discuss concerns.
4. If there is not a risk of significant harm, the DSL will either actively monitor the situation or consider offering Early Help.
5. When a pupil is in need of urgent medical attention and there is suspicion of abuse the DSL or their Deputy should take the child to the accident and emergency unit at the nearest hospital, having first notified the C-SPA. The DSL should seek advice about what action the C-SPA will take and about informing the parents, remembering that parents should normally be informed that a child requires urgent hospital attention.
6. The exception to this process will be in those cases of known FGM where there is a [mandatory reporting duty](#) for the teacher to report directly to the Police (also informing the DSL) where they either:
  - Are informed by a girl under 18 that an act of FGM has been carried out on her; or
  - Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for the purposes connected with labour or birth.

**Children with SEND – recognising, managing and reporting abuse and neglect**

Additional barriers can exist when recognising abuse and neglect in this group of children. All staff should maintain a level of professional curiosity, be open to noticing signs of change and acknowledge that trauma and distress present in a range of different ways. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- Children with SEND can be 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 to be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;
- communication barriers and difficulties in managing or reporting these challenges.

### Child Protection Procedures Flowchart



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



## 10 - Dealing with disclosures

### All staff

A member of staff who is approached by a child should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they may need to pass information to other professionals to help keep the child or other children safe. The degree of confidentiality should always be governed by the need to protect the child.

Additional consideration needs to be given to children with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.

All staff should know who the DSL is and who to approach if the DSL is unavailable.

**If the disclosure is of abuse, staff must not investigate. Report, as per guidance below.**

All staff have the right to make a referral to the C-SPA or Police directly and should do this if, for whatever reason, there are difficulties following the agreed protocol - for example, were they the only adult on school premises at the time and have concerns about sending a child home.

### Guiding principles: the seven Rs

#### Receive

- Listen to what is being said, without displaying shock or disbelief
- Accept what is said and take it seriously
- Make a note of what has been said as soon as practicable, where possible using the child's words

#### Reassure

- Reassure the pupil, but only so far as is honest and reliable
- Don't make promises you may not be able to keep e.g. 'I'll stay with you' or 'everything will be alright now' or 'I'll keep this confidential'
- Do reassure, for example, you could say: 'I believe you', 'I am glad you came to me', 'I am sorry this has happened', 'It must have taken a lot of courage to share this'

#### Respond

- Respond to the pupil only as far as is necessary for you to establish whether or not you need to refer this matter, but do not interrogate for full details
- Do not ask 'leading' questions i.e. 'did he touch your private parts?' or 'did she hurt you?' Such questions may invalidate your evidence (and the child's) in any later prosecution in court
- Do not ask the child why something has happened.
- Do not criticize the alleged perpetrator; the pupil may care about him/her, and reconciliation may be possible
- Do not ask the pupil to repeat it all for another member of staff. Explain what you have to do next and whom you have to talk to. Reassure the pupil that it will be a senior member of staff

#### Report

- Share concerns with the DSL immediately

- If you are not able to contact the DSL or a 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 on file
- Record the date, time, place, persons present and noticeable nonverbal behaviour, and the words used by the child. If the child uses sexual 'pet' words, record the actual words used, rather than translating them into 'proper' words
- If appropriate, complete a body map to indicate the position of any noticeable bruising
- Record facts and observable things, rather than your 'interpretations' or 'assumptions'

### **Remember**

- Support the child: listen, reassure, and be available
- Complete confidentiality is essential. Share your knowledge only with appropriate professional colleagues
- Get some support for yourself if you need it

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

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

### **What happens next?**

It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. The member of staff should be informed by the DSL what has happened following a report being made. If they do not receive this information they should seek it out.

If they have concerns that the disclosure has not been acted upon appropriately they might inform the Headmaster or the Safeguarding Trustee of the School and/or may contact the C-SPA .

Receiving a disclosure can be upsetting for the member of staff and schools should have a procedure for supporting them after the disclosure. This might include reassurance that they have followed procedure correctly and that their swift actions will enable the allegations to be handled appropriately.

In some cases additional counselling might be needed and staff should be encouraged to recognise that disclosures can have an impact on their own emotions.

## **11 – Safeguarding concerns and allegations against adults who work with children**

### **Procedure**

This procedure should be used in all cases in which it is alleged a member of staff including supply staff or volunteer in a school, or another adult who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour that may have happened outside of the School, that might make an individual unsuitable to work with children, known as transferable risk.
- The setting may also receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example, community groups, sports associations or extra-curricular activities)

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

- Report any concerns about the conduct of any member of staff or volunteer to the Headmaster immediately. Where there is a conflict of interest in reporting the matter to the Head, it must go straight to the LADO.
- If an allegation is made against the Headmaster, the concerns need to be raised with the Chair of Trustees as soon as possible. If the Chair of Trustees is not available, then the Safeguarding Trustee must be contacted and the LADO informed. **The Headmaster must not be informed prior to contact with the Chair/Safeguarding Trustee or the LADO.**
- There may be situations when the Headmaster or Chair of Trustees will want to involve the police immediately if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.
- Once an allegation has been received by the Headmaster or Chair of Trustees they will contact the LADO (as part of their mandatory duty) on 0300123 1650 option 3 LADO. Email: [LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk) immediately and before taking any action or investigation.
- Following consultation with the LADO, inform the parents of the allegation unless there is a good reason not to.

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

If the matter is investigated internally, the LADO will advise the School to seek guidance in following procedures set out in part 4 of 'Keeping Children Safe in Education' (2024) and the SSCP procedures.

## 12 - Low-level Concerns

The purpose of 'Low-level Concerns Reporting' is to keep pupils safe and to create and embed a culture of openness, trust and transparency in which Caterham's values and expected behaviour, set out in the Staff Code of Conduct are constantly lived, monitored and reinforced by all staff.

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 (a member of staff/supply staff/contractor or a volunteer) may have acted in a way that is inconsistent with the staff code of conduct,

including inappropriate contact outside of work, and does not meet the threshold of the harms test (an action which may cause harm or pose a risk of harm to a child) or is otherwise not considered serious enough to consider a referral to the LADO.

These behaviours can exist on a wide spectrum, from inadvertent to that which is ultimately intended to enable abuse. They include, for example:

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

These low-level concerns may form part of a wider pattern and **need to be reported to the Headmaster in a timely manner.**

- When a low-level concern has been raised by a third party, the Headmaster 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 Headmaster will record in writing reports of low-level concerns, including details of the concern, the context in which it arose and action taken.
- The name of the person reporting will be noted and wishes to remain anonymous will be respected as far as is reasonably possible.
- Records of low-level concerns will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and responded to.
- Where a pattern of behaviour is identified, the School will decide on a course of action. This might be internal disciplinary procedures, or referral to the LADO if the harms threshold is met.
- The School will consider if any wider cultural issues in school have enabled the behaviour to occur and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence.
- The rationale for all decisions and actions taken will be recorded.

Below offers clarity on the structure we use to report allegations and concerns, demonstrating where low-level concerns 'sit'.

- a) Concerns around teaching standards and the academic performance of colleagues should be raised in the first instance through the Head of Department, Deputy Head (Director of Studies) or Principal Deputy Head
- b) Allegations against staff are defined in KCSIE and should be reported to the Headmaster (or the Chair of Trustees in the case of allegations against the Headmaster) in line with the Safeguarding Policy. These include allegations that someone who works with children has:
  - Behaved in a way that has harmed a child, or may have harmed a child; and/or
  - Possibly committed a criminal offence against or related to a child; and/or
  - Behaved towards a child or children in a way that indicates they 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
- c) Low-level concerns, as detailed above. Where staff have such concerns, they do not need to determine how serious the concern is, but should immediately refer these concerns to the Headmaster (or the Chair of Trustees if concerning the Headmaster). If the Headmaster is absent, low-level concerns should be shared with the Designated Safeguarding Lead, who will pass them on immediately on the Headmaster's return.

Caterham School is an environment where staff are encouraged and feel confident to self-refer where they have found themselves in a situation that may present as a low-level concern.

### 13 – What is Child Abuse? (see Appendices 1 – 4 for indicators of abuse)

#### **What is child abuse?**

The following definitions are taken from *Working Together to Safeguard Children (2023)*. In addition to these definitions, it should be understood that children can also be abused by being sexually exploited, honour-based violence, forced marriage or female genital mutilation. To support the local context, all staff have access to Surrey's Continuum of Need Matrix.

#### **What is abuse and neglect?**

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

#### **Physical abuse**

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

#### **Emotional abuse**

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

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

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

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

### **Sexual abuse**

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

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

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

### **Neglect**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Caterham School uses the Graded Care Profile 2 Tool and Surrey Neglect Risk Assessment Tool to support with the initial identification of neglect.

## **14 Child-on-Child Abuse**

The school takes child-on-child abuse extremely seriously, whether inside school, outside school or online. **Any concerns at all must be reported to the DSL.** There are different forms that child-on-child abuse can take: these include sexual violence, sexual harassment, physical abuse, sexting (youth-produced sexual imagery), initiation/hazing type violence and rituals.

It should also be noted that abuse is abuse: **all** child-on-child abuse is unacceptable and Caterham adopts a zero tolerance approach.

Child-on-child abuse often has a gendered nature; we recognise that it is more likely that girls will be victims and boys perpetrators. We have clear processes for how victims, perpetrators and any other child affected will be supported; they will be heard properly and the reasons behind the behaviour addressed in line with our Behaviour and Anti-Bullying Policy.

We have a range of systems in place for children to confidently report abuse, knowing their concerns will be treated seriously, including the options given on the School's **You** poster, as well as the OurCaterham App on all pupils' iPads which offers an anonymous way to raise concerns with the Safeguarding Team and encourage the calling out of negative culture.

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

In cases where a pupil or pupils are at risk, risk assessments will be carried out and inform next steps.

### **Sexual Violence and Sexual Harassment: Context**

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

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

Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other pupils and school staff are supported and protected as appropriate.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying) abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery) [\\_Sharing nudes and semi-nudes: advice for education settings working with children and young people \(2024\)](https://assets.publishing.service.gov.uk/media/65d62b02188d770011038855/UKCIS_sharing_nudes_and_semi_nudes_advice_for_education_settings_Web_accessible.pdf)  
[https://assets.publishing.service.gov.uk/media/65d62b02188d770011038855/UKCIS\\_sharing\\_nudes\\_and\\_semi\\_nudes\\_advice\\_for\\_education\\_settings\\_Web\\_accessible.pdf](https://assets.publishing.service.gov.uk/media/65d62b02188d770011038855/UKCIS_sharing_nudes_and_semi_nudes_advice_for_education_settings_Web_accessible.pdf)
- 
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and

- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).
- See Appendix 9 for more detailed definitions of sexual violence

## Policy

We believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults and other children in school. We recognise that children are capable of abusing other children and their peers and this will be dealt with under our Safeguarding Policy and in line with KCSIE 2024. We are clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.

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

- making clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It will never be passed off as “banter”, “just having a laugh”, “a part of growing up” or “boys being boys”. We believe that failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.
- recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported.
- challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. As we believe that dismissing or tolerating such behaviours risks normalising them.

## Prevention

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

## Responding robustly to reports of sexual violence and sexual harassment

- Responses to reports of sexual violence and sexual harassment will be led by the guidance given in KCSIE 2024.
- Children making any report of sexual violence or sexual harassment including ‘upskirting’ (The Voyeurism Offences Act 2019) will be taken seriously, kept safe and be well supported. In responding to all reports of sexual violence and sexual harassment the safety and protection of the child is paramount. The needs and wishes of the victim must be taken into account at all times. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim’s daily experience as normal as possible, so that the school is a safe space for them.



- If the report includes an online element staff will be mindful of the [Searching, Screening and Confiscation: advice for schools 2022](#) guidance. The key consideration is for staff not to view or forward illegal images of a child. The guidance provides more details on what to do when viewing an image is unavoidable. In some cases it may be appropriate to preserve evidence by confiscating devices so police advice can be sought.
- Staff taking the report will inform the DSL or the Deputy DSL immediately.
- Staff taking a report will never promise confidentiality.
- Parents or carers should usually be informed (unless this would put the child at greater risk).
- If a child is at risk of harm, is in immediate danger, or has been harmed, a Request for Support will be made to the C-SPA securely email: [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk) or telephone 0300 470 9100, as appropriate.

## Risk Assessment

Following a report, the DSL will make an immediate risk and needs assessment on a case-by-case basis. It will consider:

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

The risk assessment will be recorded and kept under review. Where there has been other professional intervention and/or other specialist risk assessments, these professional assessments will be used to inform the School's approach to supporting and protecting pupils. Support regarding risk assessments can be accessed from the [Education Safeguarding Team](#) – [education.safeguarding@surreycc.gov.uk](mailto:education.safeguarding@surreycc.gov.uk).

## Action

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

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

## Confidentiality

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

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

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

## Options:

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

All concerns, discussions, decisions and reasons for decisions will be recorded and saved electronically in the pupil safeguarding folder.

## Ongoing Response

- The DSL will manage each case individually and will ensure the risk assessment is reviewed regularly with relevant partner agencies, for example the Police and Children's Social Care.
- Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, the School should be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately.
- Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim.
- The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart on school premises and on transport where appropriate.
- Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the School will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and may lead to the view that allowing the perpetrator to remain in the same School would seriously harm the education or welfare of the victim (and potentially themselves and other pupils).
- Where a criminal investigation into sexual assault leads to a conviction or caution, the School will, if it has not already, consider any suitable sanctions in light of the Behaviour Policy, which may include consideration of permanent exclusion. Where the perpetrator is going to remain at Caterham School, the Headmaster should continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on school premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

- The victim, alleged perpetrator and any other affected children and adults will receive appropriate support and safeguards on a case-by-case basis.
- The School will take any disciplinary action against the alleged perpetrator in accordance with the School's Behaviour Policy.
- The School recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.
- The School will consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.
- The School recognises that children who have experienced sexual violence display a wide range of responses to their experiences including clear signs of trauma, physical and emotional responses, or no overt signs at all.

### **Physical Abuse**

While a clear focus of child-on-child abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from pupils to pupils are also abusive. These are equally not tolerated and if it is believed that a crime has been committed, will be reported to the police.

The principles from the anti-bullying policy will be applied in these cases, with recognition that any police investigation will need to take priority.

## **15 - Harmful Sexual Behaviour**

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

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

- Make decisions about safeguarding children and young people
- Assess and respond appropriately to sexual behaviour in children and young people  
Understand healthy sexual development and distinguish it from harmful behaviour

By categorising sexual behaviours, the school can work with other agencies to the same standardised criteria when making decisions and can protect children and young people with a multi-agency approach.

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

The Brook Traffic Light Tool, profiled by age group, can be found in the appendices of this document:

- Appendix 6 – Age 0 to 5
- Appendix 7 – Age 5 to 9 and 9 to 13
- Appendix 8 – Age 13 to 17

## 16 - Anti-Bullying and Cyberbullying

Our school Anti-bullying Policy is set out in a separate document which includes measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying).

We keep a record of known bullying incidents which is shared with, and analysed by, the Trustee Body. All staff are aware that children with SEND and/or children who identify as Lesbian, Gay, Bisexual or Transgender (LGBT) are more susceptible to being bullied/victims of child abuse.

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

- These children being more prone to peer group isolation or bullying than other children
- Communication barriers and difficulties in managing or reporting these challenges
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/ behaviours in School or the consequences of doing so

Any reports of online abuse or bullying will require close liaison with the DSL and SENDCO.

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

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

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

The School's Wellbeing Programme (which includes PSHEE and RSE) regularly provides opportunities for children to understand bullying is wrong, its impact and how to deal with it.

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

## 17 - Online Safety

The School has an Online Safety Policy which empowers us to protect and educate pupils and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. The School also has a clear policy on the use of mobile and smart technology (including wearable technology), as detailed in the Online Safety Policy and the IT Acceptable Use Policies for pupils and for staff and Trustees.

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

Pupils increasingly use electronic equipment on a daily basis to access the internet, share, create and view content and images via social media sites and interact online. Unrestricted internet access may lead to significant safeguarding concerns, such as online abuse or sexual harassment, financial scams or exploitation, the sharing of indecent images (consensually or non-consensually), viewing and sharing

pornography, grooming, enticing children to engage in extremism or sexual behaviour and face to face meetings.

Pupils may also be distressed or harmed by accessing inappropriate or extreme content such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders.

Pupils are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated.

The School will follow the guidance around harmful online challenges and online hoaxes when supporting children and sharing information with parents/carers.

Pupils with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the DSL 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.

### **Filtering and Monitoring**

The School takes all reasonable steps to safeguard pupils online through appropriate Filtering and Monitoring systems, following the guidance in Filtering and Monitoring Standards for Schools and Colleges (2023) which can be found [here](#).

The DSL will work closely with the Senior Leadership Team, IT Department and named Trustee to ensure that systems are robust, effective and reviewed according to the guidance. Outcomes are recorded and inform reviews of the Safeguarding Policy, Online Safety policies, training, curriculum opportunities, procurement decisions and monitoring strategies.

A daily report is compiled by the School's filtering provider, Smoothwall, and sent to the DSL, Deputy Head (Innovation), Deputy Head/ DSL (Prep School), Assistant Head (Boarding) Head of Wellbeing, DDSL (Ass Head First Year) which lists all searches made by the school community which reach a safeguarding threshold. This report allows the DSL to explore potential patterns and risks in a timely manner in line with our safeguarding duties, including the PREVENT duty. A record of concerns and outcomes is maintained by the DSL.

All staff have a duty to support the School's Filtering and Monitoring responsibilities. The following concerns should be reported to the DSL:

- Witnessing or suspecting unsuitable material has been accessed
- Access unsuitable material
- Teaching activities which could create unusual activity on the filtering logs
- Being aware of a failure or abuse of the system
- Noticing abbreviations or misspellings that allow access to restricted material

### **Mobile Phones and Cameras in the Early Years**

All EYFS staff will ensure that the use of personal electronic devices with imaging and sharing capabilities (mobile phones, iPads, video recorders, cameras, smart watches, etc) are kept out of sight and reach of

pupils. This expectation extends to school trips. Pupils are not permitted to bring in devices, including watches, which have access to the internet.

The Government published guidance to all schools in February 2024 prohibiting the use of mobile phones during the school day. If senior pupils need to bring their phones to school they are expected to keep them switched off and out of sight during the school day. If pupils need to contact parents, they can approach their Head of Year or reception, who will be happy to help them.

## 18 - Sharing nudes and semi-nudes

The term 'sharing nudes and semi-nudes' means the sending or posting of nude or semi-nude images, videos, or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. Images, videos or live streams may involve more than one child.

Alternative definitions:

- youth produced sexual imagery
- Indecent imagery (this is the legal term used)
- 'Sexting' (this often refers to explicit messages rather than images)
- Image-based sexual abuse (often used when referring to the non-consensual sharing of nudes and semi-nudes)
- Deep fakes/ deep nudes may refer to digitally manipulated and AI generated nudes and semi-nudes

It is illegal to possess, distribute, show and make indecent images of anyone under the age of 18.

Nudes and semi-nudes refers to images, videos and live streams where:

- A person under the age of 18 creates and shares a nude or semi-nude image of themselves with a peer under the age of 18
- A person under the age of 18 shares a nude or semi-nude image created by another person under the age of 18 with a peer under the age of 18 or an adult
- A person under the age of 18 is in possession of a nude or semi-nude image created by a person under the age of 18.
- A person under the age of 18 digitally manipulates an image of a young person into an existing nude online or use AI to generate a new nude or semi-nude of a young person.

All incidents of this nature should be treated as a safeguarding concern and in line with the UKCIS guidance, which can be found [here](#).

Cases where sexual imagery of anyone under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child is child abuse and should be responded to. Staff should be alert to situations where an adult has presented themselves as someone under the age of 18 to groom, sexually abuse or blackmail children.

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

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

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

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

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

Immediate referral at the initial review stage should be made to Children's Social Care/Police if:

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

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

During the decision making the DSL will consider:

- Why the nude or semi-nude was shared. Was it consensual or was the child put under pressure or coerced? Was there encouragement/ coercion beyond the sender/ receiver?
- Whether the nude or semi-nude has been shared beyond its intended recipient? Was it shared with the knowledge of the child who produced the image?
- The ages of the children involved and any significant age difference between the sender/ receiver.
- Whether the concern is contained or has the image/ video been more widely shared?
- Whether there are any additional concerns about the child's vulnerability, such as subject to Child in Need, Child Protection or Early Help plans, SEND, LAC.
- The child's understanding of consent.
- The impact on the children involved and intention to cause harm.
- Whether the images are of a severe or extreme nature.
- Whether there are other circumstances relating to either the sender or recipient that may add cause for concern
- Whether the children have been involved in incidents relating to nudes and semi-nudes before.

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

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

## 19 - Racist Incidents

Our policy on racist incidents is set out in our Anti-Bullying Policy and our Equality, Diversity and Inclusion Policy. We acknowledge that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of racist incidents within our Anti-Bullying Log.

## 20 – Radicalisation, Extremism and Terrorism, including the Prevent Duty and Channel (see Appendix 5 for indicators of vulnerability)

[The Prevent Duty for England and Wales \(2023\)](#) under section 26 of the Counter-Terrorism and Security Act 2015 places a duty on education and other children's services to have due regard to the need to prevent people from being drawn into terrorism.

Extremism is defined as 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs'. We also include in our definition of extremism calls for the death of members of our armed forces.

Radicalisation refers to the process by which a person legitimises support for 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 with an electronic system. The use or threat **must** be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

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

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

The School seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, extremist Animal Rights movements and mixed or unclear ideologies.

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

The DSL should report concerns that a child may be at risk of radicalisation or involvement in terrorism, use the [Prevent referral form](#) to refer cases by e-mail to [preventreferrals@surrey.pnn.police.uk](mailto:preventreferrals@surrey.pnn.police.uk). If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101 or 07795 043842 to speak to the Prevent Supervisor for Surrey. The DfE has also set up a dedicated telephone helpline for staff and Trustees to raise concerns around Prevent (0800 0113764)

**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 school 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. The designated safeguarding lead should consider if it would be appropriate to share any information with the new school or school in advance of a child leaving. For example, information that would allow the new



school or school to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme, and have that support in place for when the child arrives. Statutory guidance on Channel is available at: [Channel guidance](#).

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

Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and the School follows the [DfE advice Promoting Fundamental British Values through SMSC \(spiritual, moral, social and cultural education\) in Schools \(2014\)](#).

The Trustees, the Headmaster and the Designated Safeguarding Lead will assess the level of risk within the School and put actions in place to reduce that risk. Risk assessment may include [due diligence checks for external speakers and private hire of facilities](#), the anti-bullying policy and other issues specific to the School's profile, community and philosophy.

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

Further information and a list of such indicators can be found at [Managing risk of radicalisation in your education setting](https://www.gov.uk/government/publications/the-prevent-duty-safeguarding-learners-vulnerable-to-radicalisation/managing-risk-of-radicalisation-in-your-education-setting) <https://www.gov.uk/government/publications/the-prevent-duty-safeguarding-learners-vulnerable-to-radicalisation/managing-risk-of-radicalisation-in-your-education-setting>

When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL in the first instance.

The Department of Education has also set up a dedicated Counter Extremism helpline for staff and Trustees to raise concerns around Prevent (020 7340 7264).

## 21 - Domestic Abuse

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

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

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

The School is enrolled onto the Operation Encompass scheme, a joint project between Surrey Police, Surrey Domestic Abuse Service and Surrey settings. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the DSL in the School before the child or children arrive the following day. This ensures that the School has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs.

## 22 – Child Abduction and Community Safety Incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. We do this through the Wellbeing programme, and assemblies, which focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org).

## 23 – Children and the Court System

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children: [5-11 year olds](#) and [12-17 year olds](#). The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service (which may be useful for parents, guardians and carers).

## 24 – Children with Family Members in Prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children. This information can be found [here](#).

## 25 – Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

In most cases school staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's social care will be the lead agency for these children and the DSL (or a deputy) should ensure appropriate referrals are made based on the child's circumstances.

## 26 - Child Exploitation (CSE) and Child Criminal Exploitation (CCE)

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

### **Child sexual exploitation**

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

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

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

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

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

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

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

The School is aware that a child often is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. As a consequence the child may resent what they perceive as interference

by staff. However, staff must act on their concerns as they would for any other type of abuse. Children also rarely self-report CSE so staff must be particularly vigilant to potential indicators of risk.

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

### **Child Criminal Exploitation**

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

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. Children are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt.

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

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/carers to assess this risk.

### **Serious Violence**

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

- increased absence from 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 wellbeing, or signs of assault or unexplained injuries
- unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

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

### **Modern Slavery and the National Referral Mechanism**

This section is included here because it has significant areas of overlap with CSE, CCE and County Lines. Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of

modern slavery, the support available to victims and how to refer them to the NRM is available in the [Modern Slavery Statutory Guidance](#); the link also offers guidance on how to identify and support victims.

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. The DSL will contact the C-SPA. If there is concern about a child's immediate safety, the Police will be contacted on 999.

## 27 - Female Genital Mutilation (FGM)

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

Whilst **all staff** should speak to the Designated Safeguarding Lead (or their deputy) with regard to any concerns about female genital mutilation (FGM), there [is a specific legal duty on teachers which requires them to report to the police 'known' cases of FGM in under 18s](#), identified in the course of their professional work.

A teacher must not transfer to the Designated Safeguarding Lead, however the DSL should be informed.

If a teacher is informed by a girl under 18 that an act of FGM has been carried out on her or a teacher observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth, the teacher should personally make a report to the police force in which the girl resides. The report should be made immediately.

School staff are trained to be aware of risk indicators of FGM.

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

There should also be consideration of potential risk to other girls in the family and practicing community. Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including dialling 999 if appropriate.

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

## 28 - Forced Marriage

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

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

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

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

## 29 – So-called 'Honour'-based Abuse (HBA)

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

Honour based abuse might be committed against people who:

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

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

## 30 - One Chance Rule

All staff are aware of the 'One Chance' Rule' in relation to forced marriage, FGM and HBA. Staff recognise they may only have one chance' to speak to a child who is a potential victim and have just one chance to save a life.

The School is aware that if the victim is not offered support following disclosure that the 'One Chance' opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBA cases.

## 31 - Private Fostering Arrangements

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

Children looked after by the local authority or who are placed in residential schools, children's homes or hospitals are not considered to be privately fostered.

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

The School recognises that most privately fostered children remain safe and well but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the child has been trafficked into the country.

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

## 32 - Looked After Children and Previously Looked After Children

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

Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child and contact arrangements with birth parents or those with parental responsibility.

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

The designated teacher and trustee for children looked after (who at Caterham is the Safeguarding Trustee) will have the appropriate level training to equip them with the knowledge and skills to undertake their role.

The designated teacher will work with Surrey's Head of virtual School for both looked after children and previously looked after children.

## 33 - Children Absent from Education

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

The School recognises that when children are absent from education, can be a vital warning sign of a range of safeguarding possibilities. They are also at significant risk of underachieving, being victims of abuse and harm, exploitation, radicalisation, and not being in education, employment or training (NEET) later in life.

Where possible the School will hold more than one emergency contact number for each pupil.

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

When removing a child's name, the School will notify the Local Authority of: (a) the full name of the child, (b) the full name and address of any parent with whom the child normally resides, (c) at least one telephone number of the parent, (d) the child's future address and destination school, if applicable, and (e) the ground in regulation 8 under which the child's name is to be removed from the School Register.

The School will make reasonable enquiries to establish the whereabouts of a child jointly with the Local Authority, before deleting the child's name from the School Register if the deletion is under regulation 8(1), sub-paragraphs (f) (iii) and (h) (iii) of [The Education \(Pupil Registration\) \(England\) 2006. \(amended 2016\)](#)

The School will:

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

### 34 - Pupils Missing Out on Education

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

- The School will gain consent (if required in statute) from parents to put in place alternative provision and/or a reduced or modified timetable.
- The School will ensure that parents (and the Local Authority where the child has an Education Health Care Plan (EHCP)) are given clear information about alternative provision placements and reduced or modified timetables: why, when, where, and how they will be reviewed.
- The School will keep the placement and timetable under review and involve parents in the review. Reviews will be frequent enough to provide assurance that the off-site education and/or modified timetable is achieving its objectives and that the pupil is benefitting from it.
- The School will monitor and track children attending alternative provision to ensure that the provision meets the needs of the child. The School continues to be responsible for the safeguarding of that pupil. The School will obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment.
- The School will comply with regular data returns requested by the Local Authority, regarding all pupils, of statutory school age, attending alternative provision and/or on a reduced or modified timetable.
- The school leadership will report to trustees any formal direction of a pupil to alternative provision to improve behaviour;
- The school leadership will report to Trustees information regarding the use and effectiveness of the use of alternative provision and modified timetables, as well as any formal direction of a child to alternative provision to improve behaviour.



### 35 - School Attendance and Behaviour

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

The School recognises that absence from school (particularly repeatedly and for prolonged periods) and exclusion from school may be indicators of abuse and neglect, including the exploitation of children. The DSL will regularly liaise with members of school staff with responsibility for behaviour and attendance to ensure risk is identified and appropriate intervention is in place to protect children from harm.

The School will work in partnership with Surrey Police and other partners for reporting children that go missing from the school site during the school day. Staff will be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

### 36 - Restrictive Physical Intervention

We acknowledge that staff must only ever use physical intervention as a last resort, when a child is at immediate risk of harming themselves or others, and that at all times it must be the minimal force necessary to prevent injury to themselves or another person. Such events should be fully recorded and signed by a witness and reported to the DSL. Guidance is contained in the School's Restrictive Physical Intervention Policy.

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

We recognise that touch is appropriate in the context of working with children, and all staff have been given 'Safe Practice' guidance to ensure they are clear about their professional boundaries.

When applying disciplinary measures such as physical intervention or isolation for children with SEND the School will consider the risks, given the additional vulnerabilities of these children.

Surrey County Council guidance, '[Touch and the use of Restrictive Physical Intervention When Working with Children and Young People](#)' provides further detailed information.

### 37 - Whistleblowing

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

All staff, including temporary staff/supply staff and volunteers, should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the School's safeguarding arrangements. If it becomes necessary to consult outside the School, they should:

- speak in the first instance, to the Area Schools Officer or LADO in accordance with the Whistleblowing Policy.
- staff are encouraged to use an external, independent and confidential service provided by Navex Global, who can be contacted on their freephone helpline number 0800 069 8180 and through the [Navex Global web pages](#)

The NSPCC whistleblowing helpline is also available for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about a way a concern is being handled by

the 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](mailto:help@nspcc.org.uk).

Whistleblowing regarding the Headmaster should be made to the Chair of Trustees whose contact details are on page 6 of this policy.

### 38 After school clubs, community activities, and tuition

School facilities and premises are used by or let to external groups during the holidays. Oversight of this is held by Julie Lynn, Commercial Manager, and Patrick Tinmouth, the Assistant Commercial Manager. Both are trained to DSL level, but in the case of any concerns or allegations that arise they would follow the procedures set out in [After-school clubs, community activities and tuition: safeguarding guidance for providers \(updated Sept 23\)](#), KCSIE 2024 and this Safeguarding Policy, alerting the School DSL, Principal Deputy Head and Headmaster as appropriate.

### 39 – Further Safeguarding Advice: links to useful websites

Further advice on safeguarding and child protection is available from:

[Surrey County Council Education Safeguarding Team](#)

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

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

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

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

National Bullying Helpline: 0845 22 55 787

Childnet International – making the internet a great and safe place for children. Includes resources for professionals and parents <http://www.childnet.com/>

Safer Internet Centre <http://www.saferinternet.org.uk/>

Contextual Safeguarding Network <https://www.contextualsafeguarding.org.uk/>

Lucy Faithfull Foundation

## Appendix I- Indicators of Physical Abuse

Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly, it is not necessary to be concerned about most of these minor injuries. But accidental injuries normally occur on the bony prominences – e.g. knees, shins.

Injuries on the soft areas of the body are more likely to be inflicted intentionally and should therefore make us more alert to other concerning factors that may be present.

A body map can assist in the clear recording and reporting of physical abuse. The body map should only be used to record observed injuries and no child should be asked to remove clothing by a member of staff of the School.

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

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

In the context of the School, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when:

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

You should be concerned if a child:

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

## Appendix 2 - Indicators of Emotional abuse

Emotional abuse is difficult to define, identify/recognise and/or prove. Most harm is produced in low warmth, high criticism homes, not from single incidents. Emotional abuse is chronic and cumulative and has a long-term impact. All kinds of abuse and neglect have emotional effects, although emotional abuse can occur by itself. Children can be harmed by witnessing someone harming another person – as in domestic abuse. It is sometimes possible to spot emotionally abusive behaviour from parents and carers to their children by the way that the adults are speaking to, or behaving towards, children. An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later on.

### Indicators of emotional abuse

#### Developmental issues

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

#### Behaviour

- Acceptance of punishment which appears excessive
- Over-reaction to mistakes
- Continual self-deprecation (I'm stupid, ugly, worthless etc)
- Neurotic behaviour (such as rocking, hair-twisting, thumb-sucking)
- Self-mutilation
- Suicide attempts
- Drug/solvent abuse
- Running away
- Compulsive stealing, scavenging
- Acting out
- Poor trust in significant adults
- Regressive behaviour – e.g., wetting
- Eating disorders
- Destructive tendencies
- Neurotic behaviour
- Arriving early at school, leaving late

#### Social issues

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

#### Emotional responses

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

## Appendix 3 – Indicators of Sexual Abuse

Sexual abuse is often perpetrated by people who are known and trusted by the child – 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 (further information about CSE is available on pages 45-46).

Characteristics of child sexual abuse:

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

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

### Indicators of sexual abuse

Physical:

- 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:

- 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, such as becoming insecure
- Lack of concentration, restlessness, aimlessness
- Socially isolated or withdrawn
- Overly-compliant behaviour
- Acting out, aggressive behaviour
- Poor trust or fear concerning significant adults
- Regressive behaviour,
- Onset of wetting, by day or night; nightmares
- Arriving early at school, leaving late, running away from home
- Suicide attempts, self-mutilation,
- Suddenly drawing sexually explicit pictures
- Eating disorders or sudden loss of appetite or compulsive eating
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Become worried about clothing being removed
- Trying to be 'ultra-good' or perfect; overreacting to criticism

## Appendix 4 – Indicators of Neglect

Neglect is a lack of parental care but poverty and lack of information or adequate services can be contributory factors. Far more children are registered to the category of neglect on Child in Need and Child Protection plans than to the other categories. As with abuse, the number of children experiencing neglect is likely to be much higher than the numbers on the plans.

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

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

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

### Indicators of neglect

The following is a summary of some of the indicators that may suggest a child is being abused or is at risk of harm. It is important to recognise that indicators alone cannot confirm whether a child is being abused. Each child should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it: don't keep it to yourself.

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

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

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

## Appendix 5 – Indicators of Vulnerability to Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

Extremism is defined by the Crown Prosecution Service as:

- The demonstration of unacceptable behaviour by using any means or medium to express views which:
  - Encourage, justify or glorify terrorist violence in furtherance of particular beliefs
  - Seek to provoke others to terrorist acts
  - Encourage other serious criminal activity or seek to provoke others to serious criminal acts
  - Foster hatred which might lead to inter-community violence in the UK.

There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

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

Indicators of vulnerability include:

- Identity Crisis – the child is distanced from their cultural / religious heritage and experiences discomfort about their place in society.
- Personal Crisis – the child 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 child'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 child 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 (SEND) – children may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism. The Department of Education guidance, [Protecting children from radicalisation: the Prevent Duty](#).

## Appendix 6 - Brook sexual behaviours traffic light tool, age 0 - 5

### Behaviours: age 0 to 5

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

#### What is a green behaviour?

Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability. They are reflective of natural curiosity, experimentation, consensual activities and positive choices

#### What can you do?

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

#### Green behaviours

- holding or playing with own genitals
- attempting to touch or curiosity about other children's genitals
- attempting to touch or curiosity about breasts, bottoms or genitals of adults
- games e.g. mummies and daddies,
- doctors and nurses
- enjoying nakedness
- interest in body parts and what they do
- curiosity about the differences between boys and girls

#### What is an amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.

#### What can you do?

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

#### Amber behaviours

- preoccupation with adult sexual behaviour
- pulling other children's pants down/skirts up/trousers down against their will
- talking about sex using adult slang
- preoccupation with touching the genitals of other people
- following others into toilets or changing rooms to look at them or touch them
- talking about sexual activities seen on TV/online

#### What is a red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental, or power differences. They may pose a concern due to the activity type, frequency, duration or the context in which they occur

#### What can you do?

Red behaviours indicate a need for immediate intervention and action.

#### Red behaviours

- persistently touching the genitals of other children
- persistent attempts to touch the genitals of adults
- simulation of sexual activity in play
- sexual behaviour between young children involving penetration with objects
- forcing other children to engage in sexual play

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

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



## Appendix 7 - Brook Sexual Behaviours: age 5 to 9 and 9 to 13

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

### What is a green behaviour? What is an amber

Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability and reflective of natural curiosity, experimentation, consensual activities and positive choices

#### What can you do?

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

#### Green behaviours 5-9

- feeling and touching own genitals
- curiosity about other children's genitals
- curiosity about sex and relationships, e.g. differences between boys and girls, how sex happens, where babies come from, same-sex relationships
- sense of privacy about bodies
- telling stories or asking questions using swear and slang words for parts of the body

#### Green behaviours 9-13

- solitary masturbation
- use of sexual language including swear and slang words
- having girl/boyfriends who are of the same, opposite or any gender
- interest in popular culture, e.g. fashion, music, media, online games, chatting online
- need for privacy
- consensual kissing, hugging, holding hands with peers

#### behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.

#### What can you do?

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

#### Amber behaviours 5-9

- questions about sexual activity which persist or are repeated frequently, despite an answer having been given
- sexual bullying face to face or through texts or online messaging
- engaging in mutual masturbation
- persistent sexual images and ideas in talk, play and art
- use of adult slang language to discuss sex

#### Amber behaviours 9-13

- uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- verbal, physical or cyber/virtual sexual bullying involving sexual aggression
- LGBT (lesbian, gay, bisexual, transgender) targeted bullying
- exhibitionism, e.g. flashing or mooning
- giving out contact details online
- viewing pornographic material
- worrying about being pregnant or having STIs

### What is a red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental, or power differences. They may pose a concern due to the activity type, frequency, duration or the context in which they occur

#### What can you do?

Red behaviours indicate a need for immediate intervention and action.

#### Red behaviours 5-9

- frequent masturbation in front of others
- sexual behaviour engaging significantly younger or less able children
- forcing other children to take part in sexual activities
- simulation of oral or penetrative sex
- sourcing pornographic material online

#### Red behaviours 9-13

- exposing genitals or masturbating in public
- distributing naked or sexually provocative images of self or others
- sexually explicit talk with younger children
- sexual harassment
- arranging to meet with an online acquaintance in secret
- genital injury to self or others
- forcing other children of same age, younger or less able to take part in sexual activities
- sexual activity e.g. oral sex or intercourse
- presence of sexually transmitted infection (STI)
- evidence of pregnancy

## Appendix 8 - Brook Sexual Behaviours: age 13 - 17

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

### What is a green behaviour? What is an amber behaviour?

Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability and reflective of natural curiosity, experimentation, consensual activities and positive choices

#### What can you do?

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

#### Green behaviours

- solitary masturbation
- sexually explicit conversations with peers
- obscenities and jokes within the current cultural norm
- interest in erotica/pornography • use of internet/e-media to chat online
- having sexual or non-sexual relationships
- sexual activity including hugging, kissing, holding hands
- consenting oral and/or penetrative sex with others of the same or opposite gender who are of similar age and developmental ability
- choosing not to be sexually active

#### What can you do?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.

#### What can you do?

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

#### Amber behaviours

- accessing exploitative or violent pornography
- uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress,
- withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- concern about body image
- taking and sending naked or sexually provocative images of self or others
- single occurrence of peeping, exposing, mooning or obscene gestures
- giving out contact details online
- joining adult- only social networking sites and giving false personal information
- arranging a face to face meeting with an online contact alone

### What is a red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental, or power differences. They may pose a concern due to the activity type, frequency, duration or the context in which they occur

#### What can you do?

Red behaviours indicate a need for immediate intervention and action.

#### Red behaviours

- exposing genitals or masturbating in public
- preoccupation with sex, which interferes with daily function
- sexual degradation/humiliation of self or others
- attempting/forcing others to expose genitals
- sexually aggressive/exploitative behaviour
- sexually explicit talk with younger children
- sexual harassment
- non-consensual sexual activity
- use of/acceptance of power and control in sexual relationships
- genital injury to self or others
- sexual contact with others where there
- is a big difference in age or ability
- sexual activity with someone in authority and in a position of trust
- sexual activity with family members
- involvement in sexual exploitation and/or trafficking
- sexual contact with animals
- receipt of gifts or money in exchange for sex

## Appendix 9 – Sexual Violence

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

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

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

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

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

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

What is consent?

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

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

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

## Sexual harassment

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

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

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- sexual “jokes” or taunting
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes. Schools should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim.
- displaying pictures, photos or drawings of a sexual nature
- upskirting (this is a criminal offence), and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of U18s is a criminal offence. UKCIS Sharing nudes and seminudes: advice for education settings
  - sharing of unwanted explicit content
  - sexualised online bullying
  - unwanted sexual comments and messages, including, on social media
  - sexual exploitation; coercion and threats, and
  - coercing others into sharing images of themselves or performing acts they’re not comfortable with online.

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