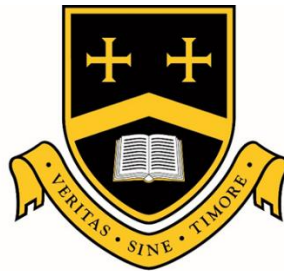


Safeguarding Policy



CATERHAM
SCHOOL



CATERHAM
PREP

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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 harm, 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.

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

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.

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.

Child looked after (CLA) – used internally in Surrey County Council rather than looked after children

C-SPA refers to the Children's Single Point of Access and the Child Protection Consultation Line

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.

The local safeguarding partnership has three partners:

1. Chief Executive of Surrey County Council (Children's Services)
2. Chief Executives of Surrey Heartlands and Frimley Integrated Care Boards, and
3. The Chief Constable of Surrey Police

MAP refers to the Surrey Multi-Agency Partnership

Parents refers to birth parents and other adults who are in a parenting role, for example stepparents, 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.

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.

Statutory means what has been decided or is controlled by the law. Statutory guidance tells us what schools and local authorities must do to follow the law.

Linked Policies and Legislation

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 \(Surreycc.gov.uk\) - Education Safeguarding Resources Hub](#)
- [Working together to safeguard children 2026](#)
- [Keeping children safe in education 2026 \(comes into force from 1 September 2026\)](#)
- [After-school clubs, community activities, and tuition - Safeguarding guidance for providers](#)
- [Sharing nudes and semi-nudes: advice for education settings working with children and young people \(updated March 24\)](#)
- [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](#)
- [Data \(Use and Access\) Act 2025: data protection and privacy changes - GOV.UK](#)
- [The Equality Act 2010](#)
- [Sexual violence and sexual harassment between children in Schools and colleges](#)
- [Relationships Education, Relationships and Sex Education and Health Education guidance \(updated July 25\)](#)
- [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 \(EYFS\) statutory framework - GOV.UK](#)
- [Surrey.-Early-Help-Strategy-2024-2027.pdf](#)
- [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](#)

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
- Mobile Phone and wearable devices 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
- First Aid Policy (including Administering Medicines)
- Administration of Medicines and Medical Care Policy
- EYFS Safer Eating and Food & Drink 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:	Cara Biggin-Evans	cara.biggin-evans@	Ext 214
	Nick Mills	nick.mills@	Ext 231
	Rebecca Mugridge	rebecca.mugridge@	Ext 243
	Will Law	will.law@	Ext 267
	Matthew Wood	matthew.wood@	Ext 324
	Sarah Print-Griffiths	sarah.print-griffiths@	

Alternatively, the email address 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
- Cara Biggin-Evans is Pastoral and Safeguarding Officer
- Sarah Print-Griffiths is Senior Deputy Head
- Nick Mills is Assistant Head (Boarding and Pastoral)
- Rebecca Mugridge is Head of Wellbeing
- Will Law is Deputy Head (Academic)
- Matthew Wood is Deputy Head (Admissions and Partnerships)

Prep School and Pre-Prep School:

Designated Safeguarding Lead:	Rebecca Moore (Head of School and DSL (Prep))	rebecca.moore@	Ext 282
Deputy DSLs:	Charlotte Bell Melanie Brown Leah Carter Suzie Flanagan	charlotte.bell@ melanie.brown@ leah.carter@ suzannah.flanagan@	
EYFS Safeguarding Lead & Deputy DSL:	Joanna Cole (Head, Pre-Prep)	joanna.cole@	Ext 274
Deputy DSL	Claire Veysey	claire.veysey@	

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@	Ext 274
Designated teacher for children looked after	Sarah Print-Griffiths	sarah.print-griffiths@	Ext 269
Designated teacher for young carers	Louise Fahey	louise.fahey@	Ext 363

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:**Children's Single Point of Access (C-SPA)**

Anyone can contact the C-SPA about a child, young person or parent/carer who needs support in Surrey. This could be a concern about how the child is developing, issues that the parent or carer is experiencing, or you suspect a child is being neglected or subjected to physical, sexual, or emotional abuse.

Surrey's Child Protection Consultation Line for advice and support (0300 470 9100 option 3).

If a child is in **immediate danger**, the police should be contacted on 999.

If it is not an emergency, but there is a concern that a child is at risk, C-SPA should be contacted by phone on 0300 470 9100.

Requests for support should be sent securely by email to cspa@surreycc.gov.uk using the [Request for Support Form](#).

You must contact the local authority that a pupil lives in - this government website will help identify which local council to report child abuse to and their contact details: [Report child abuse to a local council - GOV.UK](#).

Early help

Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. At Caterham School, we are keen to provide support to families as soon as a problem becomes visible. If an early help assessment is appropriate, the DSL or a deputy will lead on working together with other agencies and set up an inter-agency assessment, as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

Our DSL and/or deputy use the [Helping families early - Surrey County Council](#) information to explore emerging needs and – with consent from the child or family, complete an Early Help Assessment to ensure all identified needs are supported by the appropriate agencies. The partnership's [Early-Help-Strategy-2024-2027](#) sets out their aims for how professionals work effectively together to provide early help.

If early help support is appropriate, it will be kept under constant review. A referral to children's services may be required if the child's situation doesn't appear to be improving. The DSL is aware of the local escalation policy and procedures.

We are aware that any child may benefit from support before statutory intervention, including from universal services and community based Early Help, or the targeted early help level of Family Help.

Emergency Duty Team (EDT)

Emergency Duty Team (EDT), provides an emergency social care service for urgent situations which are out of normal office hours. If your call is not answered, please do leave a message and your contact details for someone to get back to you.

EDT is available **5pm-9am, Monday – Friday, Weekends 24 hours a day.**

Phone: 01483 517898

Email: edt.ssd@surreycc.gov.uk

The Local Authority Designated Officer (LADO):

Every local authority has a legal responsibility to appoint a LADO who is responsible for organising the response to concerns/allegations that an adult who works with children may have caused them or could cause them harm. They will be informed within one working day of any allegations that come to our attention. The LADO will give advice and guidance to employers, such as the Headteacher and the chair of governors/chair of trustees, to make sure that any allegation is dealt with fairly and quickly, ensuring that the child is protected effectively.

The LADO can be contacted by:

Email: LADO@surreycc.gov.uk

Telephone: 0300123 1650 option 3

Online: [LADO Referral Form](#)

OFSTED Safeguarding Children: 0300 123 3155 (Monday to Friday 8.00am to 6.00pm). Email: 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 safeguarding advice is available from:

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 are mindful that the Equality Act 2010 contains an exemption in relation to single-sex sport and will assess risk on an individual basis as necessary.

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)' statutory guidance 2025 and 'Prevent duty guidance' 2023.

The policy also reflects both statutory guidance Keeping Children Safe in Education 2026 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.

In accordance with The School Premises Regulations 2012, Caterham School toilet and washing facilities are provided for the sole use of pupils. Separate toilets are provided for girls and boys aged 8 and over and single-sex changing facilities are provided for children over 11. We do not allow children into toilets or changing facilities designated for the opposite sex, however alternative facilities are available for those children, who for whatever reason, require an individual space. The dignity, safety and privacy of all children is our priority.

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.
- Adults in our School know that keeping children safe is everybody’s responsibility and that all children, regardless of age, gender, culture, language, race, ability, sexual identity, religion, religion or lack of religion have equal rights to protection and opportunities.

3 - Policy Aims

The aims of these procedures are:

- To provide staff with the framework and guidance to safeguard children and in doing so ensure they meet their statutory responsibilities, recognise the signs of abuse, neglect and exploitation and understand how they should respond when they identify a concern.
- 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.
- To ensure effective communication with relevant partners, such as parents, staff and agencies. This includes sharing information quickly and appropriately with external agencies, such as the police and Children's Services, to get children the support they need in good time.

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, safe, inclusive, anti-discriminatory culture within the School, where racism and other forms of discriminatory behaviour are recognised, challenged and addressed as part of our safeguarding responsibilities.
- 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.

- As an Attachment Aware and Trauma Informed School, we recognise that strong, secure relationships are fundamental to learning, behaviour, and wellbeing. We understand that a pupil's experiences can influence their development and ability to self-regulate, and we are committed to responding with sensitivity, consistency, and compassion, helping all pupils to feel safe, valued, and supported whilst maintaining high standards of manners and behaviour.
- 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 monitor and track children known or thought to be at risk of harm.
- 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 activities, 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 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. This will include anti-bullying work, online safety, healthy relationships, accessing emergency services, road safety, 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 technology and have discussed safeguarding issues around the use of mobile technologies, wearable devices, AI and their associated risks.

6 - Safe School, Safe Staff

We will ensure that:

- The School operates safer recruitment procedures in line with KCSIE 2026 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 A](#).
- 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 A of Keeping Children Safe in Education 2026 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.
- Sign to confirm they have read and understood Part 1 of KCSIE 2026. Those working directly with children will also read Annex A.
- Know who the DSL and Deputy DSLs are and know how to contact them.
- Follow the School's procedures for identifying and reporting any concerns about the School's online filtering and monitoring systems.
- 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 be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. They will therefore 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.
- 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.

- Ensure that staff recognise that children may experience prejudice-based harm, including racism, faith-based prejudice, and other forms of discrimination and that such experiences may affect a child's welfare, wellbeing, mental health and willingness to seek help.
- 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, neglect, exploitation and modern slavery 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 safeguarding training appropriate to their role and remain alert to existing and emerging indicators of harm.
- Know how to respond to a pupil who discloses harm or abuse following training of 'Working together to Safeguard Children', and 'What to do if you are worried a child is being abused' (2015).
- Follow the School's safeguarding and child protection processes, sharing information quickly with the DSL when there are concerns about a child's safety and wellbeing, even when they are unsure. 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 2026, if the disclosure is an allegation against a member of staff, supply staff, volunteer or contractor.
- Report low-level concerns (as defined in KCSIE 2026) about any member of staff/ trainee teacher/ volunteer/ 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.
- Know that children who identify as, or who are perceived to be, lesbian, gay or bisexual or questioning their gender can be targeted by other children.
- Ensure that visitors are subjects to appropriate checks and supervised/ escorted as necessary.
- Have an awareness of the role of the DSL, the School's Safeguarding Policy, Behaviour Policy (pupils), Attendance Policy, 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 guidance.
- The Safeguarding Policy and other related policies and procedures are implemented and followed by all staff.
- Staff receive safeguarding training that is regularly updated.
- 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 the 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, which are used to inform a whole school approach to safeguarding
- 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). The Headmaster becomes the 'case manager' when an allegation is raised about a member of staff and make the final decision regarding all low-level concerns.
- 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 checking the effectiveness of the School's filtering and monitoring systems) 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 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 . 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 or if the DSL is unavailable.
- 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 Indicators.
- Have a clear understanding of access and referral to the local Early Help and Family Help offer and will support and advise members of staff where Early Help intervention is appropriate and working collaboratively and transparently with families where safeguarding concerns arise.
- Contributing to the assessment of children, including taking part and/or supporting staff to take part in strategy discussions, child protection conferences and meetings between multiple agencies.
- 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. Safeguarding files are stored securely with access limited to those who need it.
- Ensure that child protection files are kept up to date and maintained as per KCSIE.
- 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 2026.

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 an Online Safety Policy , 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 A, 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.
- Trustees sign to confirm they have read and understood this policy.
- 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 reporting and managing safeguarding concerns about adults who work at the School, (including the Headmaster), and ensuring 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 2026.
- 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.
- Safeguarding is a standing item on the agenda for Trustee meetings.
- Trustees take into account children who are more at risk of harm and any barriers that can make it difficult to recognise abuse and/or neglect, for example children with special education needs and disabilities (SEND).
- 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 2026.
- 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 2026.
- 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) and the Data (Use and Access) Act 2025.

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 2018, GDPR and the Data (Use and Access) Act 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. To keep children safe, we will share information in a timely manner including sharing information with agencies and professionals in line with the Working Together to Safeguard Children guidance. We respect that safeguarding matters are personal to families, so the DSL, deputy DSL and Headteacher will only share information about a child to members of staff and professionals on a need to know basis.

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 – What to do if you have concerns about a child's welfare

If any member of staff has concerns about a child's welfare, they must act on them immediately by following the procedures below. Our staff can use the What to do if you're worried a child is being abused guidance with the School's 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.

If a child is in immediate danger, or is suffering or likely to suffer significant harm

Call the police on **999** if a child is in immediate danger. **Anyone** can make a referral to children's services if a child is suffering or likely to suffer significant harm. The contact details are in 'External Agency Contacts' at the start of this document. If you make a direct referral, you will update the DSL or a deputy as soon as is practically possible.

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 harm or 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 will follow the process below:

The DSL and deputies are aware of the Continuum of Support for Children and Families in Surrey and Continuum of Support Indicators which will be used to inform their response to any safeguarding concern. If a referral is needed, then the DSL should make it. However, anyone, including children, can make a referral and if for any reason a staff member thinks a referral is appropriate and one hasn't been made, they can and should consider making a referral themselves. Where referrals are not made by the DSL, the DSL should be informed as soon as possible.

The School should try to discuss any concerns about a child's welfare with the parent/carer and where possible obtain their **consent** before making a referral to the C-SPA.

However, this should only be done when:

- it will not place the child at increased risk.
- or sexual/organised abuse is suspected.
- or the fabrication of an illness is suspected.
- or where the discussion could impede a Police investigation or Social Work enquiry.

Where there are doubts or reservations about involving the child's family, the DSL should clarify with the C-SPA or the Police whether the parents/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 it is suspected that a child is suffering, or is likely to suffer, harm or abuse the DSL must contact the C-SPA. If the DSL feels unsure about whether a referral is necessary, they can phone the C-SPA consultation line to discuss concerns.

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

If the School has not had any feedback from children's services within 72 hours of making the referral, this must be followed up. If after a referral, the referrer is dissatisfied with the response from children's services and/or the child's situation does not appear to be improving, the DSL (or whoever made the referral) should press for re-consideration to ensure their concerns have been addressed and, most importantly, the child's situation improves. The local escalation policy (Finding a Solution Together (FaST) resolving professional differences procedure will be used, where necessary.

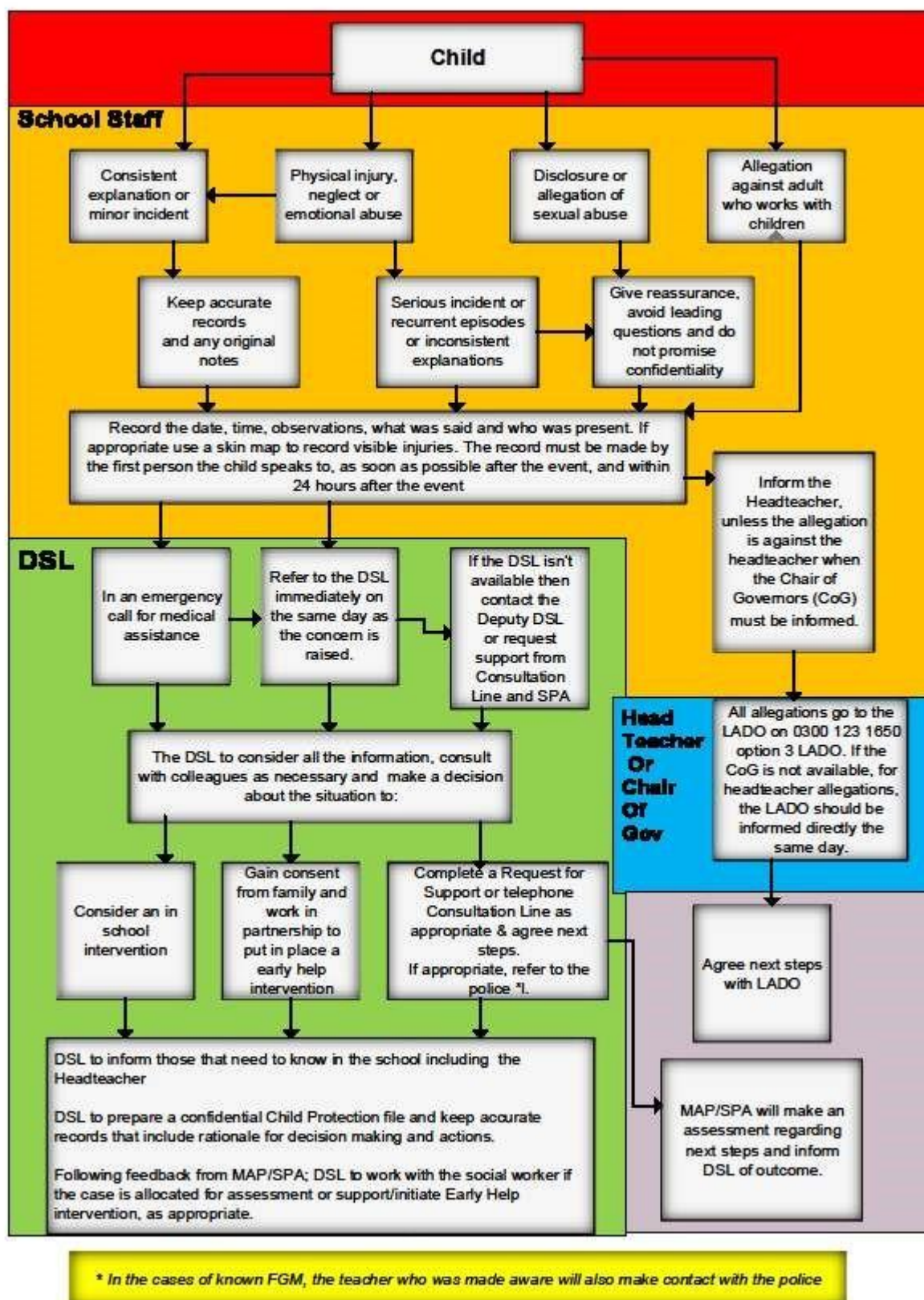
The exception to this process will be in those cases of known FGM where there is a [mandatory reporting duty](#) for the teacher to report directly to the Police (also informing the DSL) where they come to know that an act of FGM has been carried out on a child.

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



10 - Dealing with disclosures

All staff

We recognise that it takes a lot of courage for a child to disclose they are being harmed. Staff know that:

Children may not feel ready or know how to tell someone they are being harmed.

The child may not realise what is happening to them is harmful.

They may feel embarrassed, humiliated or are being threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.

Our staff know they must show professional curiosity, i.e. explore and try to understand what is happening for a child, rather than take what is being said on face value or making assumptions. We encourage staff to ask the child if they are OK or if they can help in any way. A child who makes a disclosure may have to tell their story more than once, such as to the police and social workers. At Caterham School, we know how important it is that a child's first experience of talking to a trusted adult about a worry is a positive one.

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.

Handling a disclosure

- Listen to the pupil carefully and believe in what they are saying. Do not be afraid of silence moments.
- Be careful not to express your own views or feelings and stay calm.
- Do not investigate. Only ask enough questions to work out if you need to share this matter with the DSL or a deputy. Only ask open questions, such as: How? When? Who? Where?, and open statements, such as "Tell me", "Describe" and "Explain". Otherwise, you may invalidate your and the child's evidence in any later court proceedings. Don't ask leading questions, such as 'Did she hurt you?'
- If there are injuries or marks on the child, do not examine the child intimately or take pictures.
- Reassure them that they have done the right thing by telling you. Do not say to the child that you wish they had told you sooner or promise that difficulties can be resolved.
- Do not automatically offer physical touch to comfort the child. Consider what may be comforting for the child, rather than how you prefer to be comforted.
- Tell the child it is not their fault, and you are taking them seriously.

- Explain what you will do next. Tell the child that you cannot keep what they have told you a secret and that you will pass this information onto someone who can help.

After a child has made a disclosure

- Write up the conversation as soon as possible.
- Make sure the DSL or a deputy is aware of the disclosure. If appropriate, contact children's services and/or the police directly and tell the DSL as soon as possible.
- Do not share the disclosure with **anyone** else unless children's services, the police or another relevant agency involved in the safeguarding process tells you to.
- Get support for yourself if you need it.

Recording a disclosure or safeguarding concern (as soon as possible, at the latest within 24 hours)

- Record the date, time, place and persons present.
- Use the child's own words, verbatim where possible, and stick to the facts and observable things. Avoid making assumptions and do not put your own judgement on it.
- Record any noticeable non-verbal behaviour. Detail any visible marks or injuries and record them on a body map.
- Keep any original notes you have made on file.
- If some/all staff are using a paper form, add in that staff should sign and date the write-up.
- Do not ask children to make written statements themselves or sign records.

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. Staff may wish to talk to a member of the safeguarding team or additional counselling may be needed. We recognise that a disclosure can have an impact on our 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 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' (2026) 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 Deputy Head (Academic)
- 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. Where the allegation is in relation to a member of supply staff or trainee teacher, the school will inform the agency/teacher training provider of the process for managing allegations and ensure they are fully involved in enquiries.

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
- The last bullet point includes behaviour that may have happened outside of school – this is known as transferable risk.

- c) Low-level concerns, as defined 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 or liaise with the LADO to determine how to proceed

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 for indicators of abuse)

What is child abuse?

The following definitions are taken from *Working Together to Safeguard Children (2026)*. 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. Children may also cause harm to other family members, often referred to as child to parent or care-giver abuse.

All staff should recognise that racism, faith-targeted abuse, and other forms of discriminatory behaviour may have a significant impact on a child's welfare, wellbeing and sense of safety and should be considered within safeguarding practice where appropriate.

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 verbal abuse, such as persistent criticism, belittling or name calling, as well as 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, causing 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 penetration with an object) 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.

Children can be sexually abused within the family, an institution or a community setting, and are more likely to know their abuser than not. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school's procedures for dealing with it. There are specific offences for children under 13, who can never provide valid consent to sexual activity and there are specific offences which make clear that sexual activity with a child under 16 is an offence, regardless of whether they agreed to that activity.

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 – including sexual violence and sexual harassment

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

Caterham School has a zero-tolerance approach to sexual harassment and sexual violence. We know that harmful sexual behaviour (HSB), 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, online and face to face.

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

- harmful sexual behaviour, sexual violence and sexual harassment, which may include misogyny/misandry
- 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 creating or sharing of nude and semi-nude images and/or videos, including those generated using AI (also known as sexting or youth produced sexual imagery) [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK](#)
- discriminatory behaviour, including racism, faithupskirting, 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 2026. We are clear that child on child abuse, 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 acknowledge 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

Staff should follow the 'Handling a disclosure' procedures set out on P28. A record should be made of the disclosure and the DSL informed immediately.

Additionally:

- Responses to reports of sexual violence and sexual harassment will be led by the guidance given in KCSIE 2026.
- 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.
- 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 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:

- Whether other people have been impacted by the behaviour.
- The person known to be directly impacted by the behaviour, especially their protection and support.
- The alleged instigator of the behaviour, their support needs and any sanctions.
- All other children at the School.
- The person impacted and the alleged instigator sharing classes and space at School.
- The time and location of the incident and any action that can make the school environment safer

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.

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.

Unsubstantiated, unfounded, false or malicious reports

If a report is found to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help, or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's services may be appropriate. If a report is shown to be deliberately invented or malicious, we will consider whether any disciplinary action is appropriate according to our behaviour policy.

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 safeguarding context.

Hackett's continuum provides a framework for professionals to make decisions about safeguarding children and young people.

[Understanding sexualised behaviour in children | NSPCC Learning](#)

Additionally, members of the safeguarding team are trained to use the [Brook Traffic Light Tool](#) to categorise the sexual behaviours of young people.

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.

Our DSL and DDSs will:

- have a good understanding of HSB.
- assist in planning the curriculum aimed at preventing HSB.
- ensure staff spot and report inappropriate behaviour to prevent an escalation.
- incorporate our approach to sexual violence and sexual harassment into the whole School approach to safeguarding.

Caterham School's curriculum addresses these issues via the following topics according to the age and stage of development of our children:

- Healthy and respectful relationships
- What respectful behaviour looks like
- Gender roles, stereotyping, equality
- Consent

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 Hackett Continuum Guide , can be found in Appendix 6 of this document:

Useful links:

[Surrey Safeguarding Children Partnership Procedures Manual- Harmful Sexual Behaviour](#)

[NSPCC Harmful Sexual Behaviours](#)

[Sexual development and behaviour in children | NSPCC Learning](#)

[Stop it Now](#)

[Shore Space](#)

[Responding to children who display sexualised behaviour](#)

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 questioning their gender, those from minority ethnic backgrounds, children open to children's services and children from low-income families 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 has additional vulnerabilities is not in itself an inherent risk factor for harm. However, some children can be targeted by other children. In some cases, a child who is perceived by other children to have additional vulnerabilities (whether they do or not) can be just as vulnerable.

Risks can be compounded where children who have additional vulnerabilities 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.

Healthy relationships and 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 and the use of smart devices

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 clear guidance on the responsible and safe use of mobile and smart technology (including wearable technology), as detailed in the Online Safety Policy, the AI 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. These are detailed in our Online Safety Policy and our Online Safety Risk Assessment.

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 and harmful content (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. We recognise the safeguarding risk posed by misinformation, disinformation (including fake news) and conspiracy theories.

Pupils are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated. Parents are invited to enhance their understanding of Online Safety through access to The Wellbeing Hub (Senior School), Tooled Up Education (Prep School) and School-led webinars.

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.

Smoothwall monitoring is applied to all School iPads, restricting access to inappropriate or harmful content or websites, whether a pupil is onsite or offsite. Between the hours of 8am – 6pm Monday to Friday (term time only) the safeguarding team will be notified of any concerns by email via an alert system.

The filtering and monitoring policies continue to operate on iPads 24/7, any further concerns are recorded in a report accessed by the DSL the following School day. The School will only be aware of concerns during School opening hours.

The report highlights any concern relating to online activity which reaches 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, Smart Devices and Cameras in the Early Years

EYFS staff must not use personal mobile phones, cameras or other personal electronic devices with imaging or sharing capabilities while caring for children. Such devices must be stored securely and kept out of sight and reach of children in accordance with the School's safeguarding procedures. Photographs/videos of EYFS children must only be taken for educational purposes using School-authorized devices and stored only on school systems.

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 regarding the use of mobile phones and smart devices during the School day. All schools should be mobile phone free environments by default whilst a pupil is on the school site.

If Prep pupils bring phones or devices to School, they must be handed to reception on entry to the School site and collected as they leave. If senior pupils (Years 1 – 5) need to bring phones or smart devices to School they are expected to download a school approved blackout app, keep them switched off and out of sight during the School day. Their phone should not be visible or heard. If pupils need to contact parents, they can approach their Head of Year or reception, who will be happy to help them. Pupils in Sixth Form are permitted to use technology appropriately in designated areas during breaktimes. Phones are not permitted in lessons or common areas.

Useful links:

[Childnet International](#)

[Safer Internet Centre webpages](#)

[Generative AI: product safety expectations](#)

18 – Concerns about nudes and semi-nudes

The term 'sharing nudes and semi-nudes' means showing, sending or posting 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 and may have been shared consensually or non-consensually.

Alternative definitions:

- Youth produced or self-generated 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.

Responding to any incident that comes to your attention:

- **Report** it to your designated safeguarding lead (DSL) or equivalent immediately, using the School's reporting procedures set out in this policy.
- **Never** view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal.
- **If you have already viewed the imagery** by accident (e.g. if a young person has shown it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- **Do not delete** the imagery or ask the young person to delete it.
- **Do not** ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL or a deputy.
- **Do not** share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- **Do not** say or do anything to blame or shame any young people involved.
- **Do** explain to them that you need to report it and reassure them that they will receive support and help from the DSL or a deputy.

Staff reserve the right to confiscate a device in the possession of a child if they have concerns about sharing nudes or semi-nudes in relation to the device. This is consistent with the Searching, screening and confiscation: advice for Schools guidance.

The DSL will follow the government's Sharing nudes and semi-nudes: advice for education settings working with children and young people guidance. Once they are aware of an incident, the DSL will hold an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.

The initial review meeting will consider the initial evidence and aim to establish:

- Whether there is an immediate risk to any child or young person.
- If a referral should be made to the police and/or children's social care.
- If it is necessary to view the image(s) in order to safeguard the child or young person – in most cases, images or videos should not be viewed.
- What further information is required to decide on the best response.
- Whether the image(s) has been shared widely and via what services and/or platforms. This may be unknown.
- Whether immediate action should be taken to delete or remove images or videos from devices or online services.
- Any relevant facts about the children or young people involved that would influence risk assessment.
- If there is a need to contact another education school or individual.
- Whether to contact parents or carers of the children or young people involved – in most cases they should be involved.

The DSL will make an immediate referral to the police and/or children's services if:

- The incident involves an adult.
- There is reason to believe that a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs).
- What they know about the images or videos suggests the content depicts sexual acts that are unusual for the young person's developmental stage, or are violent.
- The images involves sexual acts and any child in the images or videos is under 13.
- They have reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example if they are presenting as suicidal or self-harming.
- They become aware of a computer-generated indecent image of a child, commonly called 'deep fakes' and 'deep nudes' i.e. a digitally manipulated or artificial intelligence-generated nude and semi-nude.

If none of the above applies, we can decide to respond to the incident without involving the police or children's services. We may escalate the incident at any time if further information/concerns are disclosed at a later date. First, the DSL will be confident that they have enough information to assess the risks to any child involved and the risks can be managed within our School's pastoral support, behaviour procedures and, if appropriate, the local network of support.

The DSL or a deputy will contact children's services if any child or young person involved is already known to them. If, because of the investigation, the DSL (or equivalent) believes there are wider issues that meet the threshold for children's services' involvement, they will make a referral in line with this policy and local safeguarding procedures.

Viewing the imagery

The decision to view any imagery will be based on the professional judgement of the DSL or a deputy and will comply with this policy. Imagery will never be viewed if the act of viewing will cause significant distress or harm to a child. If a decision is made to view imagery, the DSL will be satisfied that viewing:

- Is the only way to make a decision about whether to involve other agencies because it is not possible to establish the facts from any child or young person involved.

- Is necessary to report it to a website, app or suitable reporting agency (such as the IVF) to have it taken down or support the child or parent/carer in making a report.
- Is unavoidable because a child or young person has presented it directly to a staff member or nudes or semi-nudes have been found on a School device or network.

Deletion of images

If the School has decided that other agencies do not need to be involved, then consideration will be given to deleting imagery from devices and online to limit any further sharing. This decision will be based on the DSL's or a deputy's judgement in line with the guidance. There is further information in the [Sharing nudes and semi-nudes](#) guidance..

Sextortion

Children might share nudes because of threats and/or pressures from relationships. They might also want to send nudes, but this is usually because they believe they will get something in return. Sextortion is when someone threatens to share or distribute nude or semi-nude images of another person if they don't do what is asked. It can happen to anybody, but a large amount of cases involve teenage boys. The explicit imagery may be used to blackmail the young person into sending more images, money, or in some cases, into recruiting more victims. Images can be both real or generated by artificial intelligence.

We are aware of the [alert guidance](#) and support provided by the National Crime Agency and CEOP, and will use it to respond to incidents.

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.

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence. It can occur over a period of time or quickly.

Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This includes calling for the death of members of the armed forces.

Terrorism is an action that:

- endangers or causes serious violence to a person/people
- causes serious damage to property, or
- seriously interferes or disrupts an electronic system.

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. 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 011 3764)

Staff and Trustees can also raise concerns by emailing counter.extremism@education.gsi.gov.uk, but this is not to be used in emergency situations.

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 \(2014\)](#).

To prevent children from being radicalised, we ensure:

- Our filtering and monitoring systems will prevent and protect children from accessing extremist material.
- Children are taught about British Values and staying safe online via the curriculum.
- Children are provided with a safe space to discuss controversial issues and the skills they need to challenge extremist views.
- Staff are trained to spot the indicators of radicalisation and extremism and how to report concerns as soon as possible.
- The DSL attends Prevent awareness training and is aware of the latest guidance.

- We perform a risk assessment assessing how our learners or staff may be at risk of being radicalised into terrorism (including online) using the counter terrorism local profile and updates from the local partnership.

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).

SSCP PREVENT: Surrey's Prevent referral form and process can be found [here](#). The email address 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

Useful links:

[Crime - Surrey Safeguarding Children Partnership](#)
[Prevent | Healthy Surrey](#)
[For Professionals - Prevent and Channel | Healthy Surrey](#)
[Protecting children from radicalisation: the prevent duty](#)
[Advice For Families | Counter Terrorism Policing](#)

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 and includes coercive or controlling behaviour. It can take place inside or outside the home. 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, including physical, sexual, emotional abuse and stalking). 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.

Useful links:

[Surrey Safeguarding Children Partnership Procedures Manual - Domestic Abuse](#)

[Homepage - Surrey Safeguarding Children Partnership](#)

[Surrey Against Domestic Abuse Strategy 2024-2029 | Healthy Surrey](#)

[Multi agency risk assessment conferences | Healthy Surrey](#)

[Request information under Clare's Law: Make a Domestic Violence Disclosure Scheme \(DVDS\) application | Metropolitan Police](#)

[NSPCC-UK domestic abuse Signs Symptoms Effects](#)

[Refuge what is domestic abuse/effects of domestic abuse on children](#)

[Safe Young Lives | Young people & domestic abuse - SafeLives](#)

[Domestic abuse: specialist sources of support - GOV.UK](#) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)

22- Concerns about mental health

Mental health problems affect around 1 in 6 children. A child might find the ways they are thinking, feeling or reacting becoming difficult to cope with. **We** recognise that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs. These could include:

- significant changes in behaviour
- ongoing difficulty sleeping
- withdrawing from social situations
- not wanting to do things they usually like
- physical signs of self-harm or neglecting themselves.

If you have a mental health concern about a child that is also a safeguarding concern, you will speak to the DSL or a deputy immediately, unless the child is in immediate danger, in which case you will call the police first.

Although you may be 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, only appropriately trained professionals should attempt to diagnose a mental health illness. Where necessary, the DSL or a deputy will inform parents, make a referral to Children's Single Point of Access (CSPA) and specialist services.

Useful links:

[Mindworks Surrey](#)

[Surrey Young Suicide Prevention Toolkit](#)

[The Surrey Self-Harm Protocol](#)

[We're Mind, the mental health charity | Mind](#)

23 – 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 and www.clevernevergoes.org.

24 – 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).

25 – 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](#).

26 – 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.

27 – Contextual Safeguarding, Child Exploitation (CSE) and Child Criminal Exploitation (CCE)

Contextual safeguarding, also known as 'risk outside the home', is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

We will maintain records of concerns about contextual safeguarding in accordance with our safeguarding procedures. We know the importance of information sharing, therefore if we identify contextual safeguarding concerns about the local area we will share this information with relevant partners. If there is a specific concern about a child, we will consult with children's services.

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. This may constitute modern slavery.

Both can occur online. Children can be exploited by adult males or females, as individuals or an organised network or gang. The victim may identify as being a part of this group. They may also be exploited by other children, who themselves may be experiencing exploitation. Where this is the case, it is important that the child perpetrator is also recognised as a victim. Our staff will be aware of a range of factors that could make a child more vulnerable to exploitation. We will provide additional support to children who have been exploited to help keep them in education.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions
- associate with other children involved in exploitation
- suffer from changes in emotional well-being
- misuse alcohol and other drugs
- go missing for periods of time or regularly come home late
- regularly miss School or education or do not take part in education

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. The abuse may include physical contact, such as assault by penetration or non-penetrative acts, such as masturbation, kissing and touching outside clothing.

Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology, such as involving children in the production of images or forcing children to look at sexual images. . 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 and County Lines

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. Any weapon related concern must be escalated to the DSL without delay. 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.

Useful links:

[Surrey Safeguarding Children Partnership Procedures Manual Child Sexual Exploitation](#)
[Surrey Safeguarding Children Partnership Procedures Manual Child Sexual Abuse in the Family Environment](#)
[Surrey Safeguarding Children Partnership Procedures Manual Child Criminal Exploitation](#)
[Crime - Surrey Safeguarding Children Partnership](#)
[Child sexual exploitation - Surrey County Council](#)
[Child sexual exploitation | Surrey Police](#)
[CEOP Safety Centre](#)
[Home | CSA Centre](#)
[Centre of expertise on child sexual abuse](#)
[Preventing Child Sexual Exploitation](#)
[Lucy Faithfull Foundation webpages](#)
[Child sexual exploitation: definition and guide for practitioners](#)

28 - 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. It involves removal, part removal or injury to the female genital internal or external organs for non-medical reasons. It is sometimes known as 'cutting' or female 'circumcision'.

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.

Teachers who come to know, in the course of their work, that FGM has been carried out on a child **must directly** report this to the police. Failure to do so can result in disciplinary sanctions. The teacher should tell the DSL or a deputy who will support them in making a direct report to the police. The teacher may need to support a referral to children's services. Staff will never examine children.

School staff should be aware of risk indicators of FGM.

Signs that FGM might happen:

- A relative or someone known as a 'cutter' visiting from abroad.
- A special occasion or ceremony takes place where a girl 'becomes a woman' or is 'prepared for marriage'.
- A female relative, like a mother, sister or aunt has undergone FGM.
- A family arranges a long holiday overseas or visits a family abroad during the summer holidays.
- A girl has an unexpected or long absence from School.
- A girl struggles to keep up in School.
- A girl runs away – or plans to run away - from home ([NSPCC](#)).

Signs FGM might have taken place:

- having difficulty walking, standing or sitting.
- spending longer in the bathroom or toilet.
- appearing quiet, anxious or depressed.
- acting differently after an absence from School or college.
- reluctance to go to the doctors or have routine medical examinations.
- asking for help – though they might not be explicit about the problem because they're scared or embarrassed ([NSPCC](#)).

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.

Useful information:

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. The reporting of FGM is **mandatory**.

Female Genital Mutilation Statutory Guidance

Surrey Safeguarding Children Partnership Procedures Manual Female Genital Mutilation

[Mandatory reporting of female genital mutilation: procedural information - GOV.UK](#)

29 – So-called ‘Honour’-based Abuse (HBA) and Forced Marriage

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, including FGM, forced marriage and practices such as breast ironing.

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.

A forced marriage is non-consensual. Either person could be forced/pressured in several ways, including physically, psychologically, financially, sexually and emotionally. It is a criminal offence in England and Wales.

An arranged marriage is different. 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 those who are considered for marriage.

We are aware that the legal age for marriage in the UK has risen to 18, regardless of parental consent. The DSL will follow the local safeguarding procedure and, if necessary, seek advice from the Forced Marriage Unit on 020 7008 0151 if a concern comes to their attention.

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.

Useful information:

[Freedom charity](#)

[Handling cases of forced marriage guidance](#)

[National FGM Centre](#)

[Forced marriage](#)

[Karma Nirvana](#)

30 - One Chance Rule

All staff are aware of the ‘One Chance’ Rule’ in relation to forced marriage, FGM, modern slavery 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, modern slavery and HBA cases.

Modern slavery is a crime whereby a person uses another person, by means of deception or coercion, as a possession for the purposes of exploitation. We are aware modern slavery exists in the UK and that some victims are children.

Common places modern slavery occurs includes:

- The sex industry, including brothels.
- Retail: nail bars, hand car washes.
- Factories: food packing.
- Hospitality: fast-food outlets.
- Agriculture: fruit picking.
- Domestic labour: cooking, cleaning and childminding.

Victims can be forced into criminal activities such as cannabis production, theft or begging.

The DSL will seek advice and support from children's services who may in turn make a referral to the National Crime Agency via the National Referral Mechanism (NRM). Further advice can be provided directly by the modern slavery helpline on 0800 012 1700.

Useful links:

[Crime - Surrey Safeguarding Children Partnership](#)

[Modern slavery - GOV.UK](#)

[Modern slavery: how to identify and support victims](#)

[Behind the Behaviour: Identifying the criminal exploitation of migrant children | ECPAT UK](#)

[Protecting children from trafficking and modern slavery | NSPCC Learning](#)

[Surrey Safeguarding Children Partnership Procedures Manual Children from Abroad, including Victims of Modern Slavery, Trafficking and Exploitation](#)

31 - Fabricated or induced illnesses

Staff at **Caterham School** are alert to the issues surrounding fabricated or induced illnesses. Fabricated or induced illness (FII) is a rare form of child abuse. It happens when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child. Our supporting children with medical needs policy details our procedure for ensuring reported medical needs are evidenced by medical professionals.

Useful link:

[The Royal College of Paediatrics and Child Health \(RCPCH\) guidance](#)

32 - 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.

33 - Children Potentially at Risk of Greater Harm

We know that all children need to be protected from harm. In addition, we recognise that some groups of children are potentially at greater risk of harm. The information in sections 34 to 41 highlights some of the groups of children this applies to.

34 - Children who have a social worker

Children may need a social worker due to safeguarding or welfare needs. Children may need help due to abuse, neglect and/or complex family circumstances. We recognise that a child's difficult experiences and trauma can leave them vulnerable to further harm, as well as disadvantaging them educationally.

When Children's services share with us which children have a social worker, we will use this information to make decisions in the child's best interest, i.e. their safety, welfare and educational outcomes.

35 – Children Looked After and Previously Looked After Children

These children are particularly vulnerable. The most common reasons for children becoming looked after is as a result of abuse and/or neglect. Staff will have the skills and knowledge to keep children looked after and previously looked after safe. Appropriate staff will have the information they need in relation to a looked-after child's legal status. For example, who has parental responsibility, who is not permitted to have contact and who is not permitted to know where the child is being educated, and the level of decision-making power the local authority has given the carer. The designated teacher for children looked after is Sarah Print-Griffiths.

The statutory guidance [Designated teacher for looked-after and previously looked after children](#) contains further information on the role and responsibilities of the designated teacher. The designated teacher ensures that the School has the up-to-date details of the allocated social worker and the Virtual School Headteacher in the local authority that looks after the child. The Virtual School has an additional role of managing extra funding which is used to support children looked after. The designated teacher will work with the Virtual School Head to discuss how the funding can be used to best support the child.

Useful links:

[Surrey Children's Services Procedure Manual Supporting the Education and Promoting the Achievement of Children with a Social Worker, Looked After and Previously Looked After Children Promoting the education of children with a social worker and children in kinship care arrangements: virtual School head role extension](#)

36 – Young Carers

At Caterham School, we are alert to the needs of young carers and recognise that caring responsibilities can impact on attendance, attainment, behaviour and wellbeing. Early identification of young carers is essential. We will liaise with appropriate services including additional support from external partners or the local authority and health services, to ensure young carers receive the right support at the right time.

37 - Children with special educational needs, disabilities and health issues

Our Special Educational Needs Co-ordinator and DSL work closely together to safeguard and support children who have special educational needs and disabilities (SEND), in particular when there are any reports of abuse. Our safeguarding curriculum is accessible and inclusive.

We are aware that children with SEND or certain medical or physical health conditions can face additional safeguarding challenges both online and offline, such as:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.
- These children being more prone to peer group isolation or bullying (including prejudice-based bullying), than other children.
- The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs, and the communication barriers and difficulties in managing or reporting these challenges.
- The need for intimate care or that these children are isolated from others and are more likely to be dependent on adults for care
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools, or the consequences of doing so.

Useful links:

[Surrey Safeguarding Children Partnership Procedures Manual Children with Disabilities/Complex Needs](#)

38 - Safeguarding children with medical conditions

Incidents relating to the management of a pupil's medical condition (including allergies) will not normally require a safeguarding referral. However, we will consider a referral where concerns indicate that a child may be at risk of harm because of their medical condition. This may include situations where important medical information is withheld from the school or where a child is repeatedly sent to school without essential medication or the school is not provided with effective professional guidance, placing them and others at risk or a child is persistently absent. Staff will follow the school's Allergy Policy, procedures for supporting pupils with medical conditions and report to the Designated Safeguarding Lead (DSL) where safeguarding concerns arise.

Useful links:

[Supporting pupils with medical conditions at school - GOV.UK](#)
[Allergy safety in schools - GOV.UK](#)

39 - Children who are questioning their gender

Some children and young people may question their gender and may require additional support consideration. The welfare, wellbeing and safeguarding of the child will always be the primary consideration in any decision-making. Responses will be individualised and based on the child's age, needs, wishes, circumstances and best interests. Staff will listen respectfully, respond sensitively and avoid making assumptions, while remaining alert to any safeguarding concerns, vulnerabilities, mental health needs, bullying, online harms or other risks that may affect the child.

Caterham School will normally work in partnership with parents when supporting a child who is questioning their gender. However, where involving parents could place a child at risk of significant harm, appropriate safeguarding procedures will be followed, and advice will be sought from the DSL. Any requests relating to social transition or other significant changes should be considered carefully on a case-by-case basis in discussion with the DSL, with decisions informed by safeguarding considerations,

professional judgement and, where appropriate, advice from relevant agencies. The school will take all reasonable steps to protect children who are questioning their gender from bullying, harassment, discrimination, abuse and victimisation and will maintain appropriate records of concerns, decisions and support arrangements.

40 - 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.

Attendance is closely monitored at Caterham School to support us in identifying safeguarding concerns and acting early. Our staff will be aware of our School's unauthorised absence and children missing education procedures. We notify children's services if a child who has a social worker is absent from School without a suitable explanation. To support the School's procedure for addressing children missing or absent from education, we aim to hold more than one emergency contact number for each child. We work in partnership with Surrey County Council Inclusion Service when patterns of absence give rise to concern, including notifying them when a child leaves our School without a new School being named.

Our Attendance Policy and procedures are set out in a separate document, which can be found on our website. The School follows the government's Working together to improve School attendance statutory guidance which sets out how Schools must work with the local authority children's services where School absence indicates safeguarding concerns.

Useful links:

[The Inclusion Service Resources Area \(Surrey Education Services\)](#)

[Inclusion Service - Pupils missing out on education \(PMOOE\) \(Surrey Education Services\)](#)

[Children Missing Education statutory government guidance](#)

[Surrey Safeguarding Children Partnership Procedures Manual Children Missing Education](#)

41 - 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.
- When our children attend an alternative provision provider, we continue to be responsible for their safety and wellbeing. We will satisfy ourselves that the placement can meet the child's needs and obtain written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. checks that we would otherwise perform on our own staff. This includes written confirmation that the alternative provider will inform us of any arrangements that may put the child at risk (i.e. staff changes), so that we can ensure ourselves that appropriate safeguarding checks have been carried out on new staff. We will always know where a child is based during School hours. This includes having a record of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. We will regularly review the alternative provision placements we make. Reviews will be at least half termly to provide assurance that the child is regularly attending, and the placement continues to be safe and meets the child's needs. Where safeguarding concerns arise, the placement will be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed. We follow the statutory guidance for alternative provision.
- Where a parent/carer expresses their intention to educate their child at home (also known as elective home education), we will work together with the parent/carer and other professionals to ensure that this decision has been made in the best interests of the child. We recognise that this is particularly relevant for children who have SEND, are vulnerable and/or have a social worker.
- 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.

Useful links:

[Education provision for SEND - Surrey County Council](#)

[Alternative Provision: Alternative Curriculum Pathways and Reintegration Support - Surrey County Council](#)

42 - 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.

43 - 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.

Members of staff in the safeguarding and boarding teams are appropriately trained in 'De-escalation and Positive Handling'.

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.

44 - 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. Any concerns raised with the DSL or members of the senior leadership team will be taken seriously. 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 that their genuine safeguarding concerns are being addressed 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.

Whistleblowing regarding the Headmaster should be made to the Chair of Trustees whose contact details are on page 7 of this policy.

45 - After School clubs, community activities, and tuition

School facilities and premises are used by or let to external groups during after school hours and 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 2026 and this Safeguarding Policy, alerting the School DSL, Principal Deputy Head and Headmaster as appropriate.

Where extended school activities are provided and managed by the school, our own safeguarding and child protection policy and procedures apply. When our children attend off-site activities, we will ensure that effective child protection arrangements, informed by thorough risk assessments, are in place.

46 – 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 50-51).

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

We use the following guidance to help identify and address cases of neglect.

Abuse & Neglect - Surrey Safeguarding Children Partnership

Graded Care Profile 2

Surrey Neglect Screening Tool

Surrey Safeguarding Children Partnership Procedures Manual Recognising Abuse and Neglect Handling Cases of Affluent Neglect in Schools

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 – Responding to children who display sexualised behaviour – the Hackett Continuum

It's important to be able to distinguish developmentally typical sexual behaviours from those that may be problematic or harmful, and make sure children get appropriate support. Always consider the child's holistic needs and safeguarding concerns alongside any sexualised behaviour and follow due procedures accordingly. This guide is a tool to support objective decision making about a child or young person's sexual behaviour and does not replace professional judgement or policy and legislation. Visit nspcc.org.uk/hsb for more information.



Problematic	
Hackett Continuum	
Inappropriate	Problematic
• Single instances of developmentally inappropriate sexual behaviour • Behaviour that may be socially acceptable within a peer group but not in wider society • May involve an inappropriate context for behaviour that would otherwise be considered normal	• Developmentally unusual and socially unexpected behaviour • May be compulsive • Consent may be unclear and the behaviour may not be reciprocal • May involve an imbalance of power • Doesn't have an overt element of victimisation
How to respond • Amber behaviours should not be ignored • Listen to what children and young people have to say and respond calmly and non-judgementally • Consider the child's developmental age as well as their chronological age, alongside wider holistic needs and safeguarding concerns about the problematic sexualised behaviour • Follow your organisation's child protection procedures and make a report to the person responsible for child protection • Your policy or procedure should guide you towards a nominated child protection lead who can be notified and will provide support • Consider whether the child or young person needs therapeutic support and make referrals as appropriate	

Harmful	
Abusive	Violent
• Intrusive behaviour • May involve a misuse of power • May have an element of victimisation • May use coercion and force • May include elements of expressive violence • Informed consent has not been given (or the victim was not able to consent freely)	• Physically violent sexual abuse • Highly intrusive • May involve instrumental violence which is physiologically and/or sexually arousing to the perpetrator • May involve sadism
How to respond • Red behaviours indicate a need for immediate intervention and action • If a child is in immediate danger, call the police on 999 • Follow your organisation's child protection procedures and make a report to the person responsible for child protection • Your policy or procedure should guide you towards a nominated child protection lead who should be notified and will provide support • Typically referrals to children's social care and the police would be required. Referrals to therapeutic services should only be made once statutory services have been informed and followed due procedures	

Appendix 7 – 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.