Reigate Grammar School Group

Safeguarding and Child Protection Policy

Including Early Years Foundation Stage

Policy Author:	Sarah Arthur, Deputy Head plus RGS DSL Group
Date Reviewed:	August 2025
Next Review Due:	August 2026
Date Approved by Governing Body:	1 September 2025
Next Review by Governing Body Due:	September 2026

Concerned about a child?

If you have concerns about the safety of a child, you should act immediately.

1. **Speak to the DSL or one of the Deputy DSLs straight away and follow this up with a referral on our system**
2. **If you cannot speak to one of the DSL team, you must take action yourself by contacting the Children's Single Point of Access (see below) or in the event of an emergency where a child is at risk of immediate harm, dial 999.**

There is further information in the policy about how to respond to a disclosure.

Important Contact Details for Use by Anyone with Concern

The Surrey Children's Single Point of Access (C-SPA) is the umbrella term for the front door to support, information and advice for residents, families and those who work with Surrey Children. Requests for support should be securely by email to cspa@surreycc.gov.uk using the Request for Support Form

C-SPA	**Tel: 0300 470 9100 (option 3)** **Email: cspa@surreycc.gov.uk**
Emergency Out of Hours Duty Team	**Tel: 01483 517898** **Email: edt.ssd@surreycc.gov.uk**
DFE advice and support about extremism	**Tel: 020 7340 7264** **Email: counter-extremism@education.gov.uk**
Local Authority Designated Officer (LADO)	**Tel: 0300 123 1650** **Email: LADO@surreycc.gov.uk** Online LADO Referral Form

The LADO is responsible for organising the response to concerns/allegations that an adult working with children may have caused harm or could cause harm to them.

Surrey Children's Partnership Safeguarding Board	**www.surreyscb.org.uk**
Notification of Child Death	**Tel: 01372 833319**
Forced Marriage Unit (including for advice about FGM)	**Tel: 020 7008 0151**

Please contact Surrey police via 999 if concerned for a child's immediate safety

Please note that some of the children live beyond Surrey and if this is the case, their local authority team must be contacted instead of Surrey.

Reigate St Mary's Preparatory and Choir School Key Staff (Tel: 01737 244880)

Headmaster	**Marcus Culverwell**	headmaster@reigatestmarys.org
Designated Safeguarding Lead (DSL)	**Andrea Gower** Assistant Head (Pastoral)	ajg@reigatestmarys.org
Early Years Designated Safeguarding Lead (EYDSL)	**Sarah Page** Yr2 Class teacher	sjp@reigatestmarys.org
Deputy Designated Safeguarding Lead (DDSL)	**Sam Selkirk** Head of Lower School	sas@reigatestmarys.org
Deputy Designated Safeguarding Lead (DDSL)	**Nicola Tully** Teaching Assistant and Extended Day manager	nxt@reigatestmarys.org
Designated Safeguarding Lead (DDSL)	**Simon Williams** Head of Digital Strategy **Online Safety Coordinator**	swi@reigatestmarys.org

Reigate Grammar School Key Staff (Tel: 01737 222231)

Headmaster	**Shaun Fenton**	headmaster@reigategrammar.org
Designated Safeguarding Lead (DSL)	**Sarah Arthur** Deputy Head	sja@reigategrammar.org
Deputy Designated Safeguarding Lead (DDSL)	**Mary-Ann Collins** Senior Deputy Head	mac@reigategrammar.org
Deputy Designated Safeguarding Lead (DDSL)	**Charlotte Case** Head of Lower School	cdc@reigategrammar.org
Deputy Designated Safeguarding Lead (DDSL)	**Nicola Harvey** School Nurse	nch@reigategrammar.org
Deputy Designated Safeguarding Lead (DDSL)	**Martin Hetherington** Head of Upper School	mhh@reigategrammar.org
Deputy Designated Safeguarding Lead (DDSL)	**Rev Phil Jackson** Chaplain	pmj@reigategrammar.org
Deputy Designated Safeguarding Lead (DDSL)	**Nick Lobb** Online Safety Coordinator Designated Teacher for CLA	njl@reigategrammar.org
Deputy Designated Safeguarding Lead (DDSL)	**Vicky Papadopoulou** Pastoral Support Worker/ELSA	vxp@reigategrammar.org
Deputy Designated Safeguarding Lead (DDSL)	**Brendan Stones** Deputy Head	bps@reigategrammar.org
Deputy Designated Safeguarding Lead (DDSL)	**Elizabeth Taylor** Director of Sixth Form	eet@reigategrammar.org

Chinthurst School Key Staff (Tel:)

Headteacher **Deputy Designated Safeguarding Lead (DDSL)**	**Cathy Trundle**	ctrundle@chinthurstschool.co.uk
Designated Safeguarding Lead (DSL)	**Lia Winchester** **Deputy Headteacher**	Lwinchester@chinthurstschool.co.uk
Deputy Designated Safeguarding Lead (DDSL)	**William Beadle** 11plus Lead	wbeadle@chinthurstschool.co.uk
Early Years Designated Safeguarding Lead (EYDSL)	**Lara Bland** Early Years SEND lead	lbland@chinthurstschool.co.uk

Micklefield School: Key Staff (Tel: 01737 224212)

Headmaster	**Mr R Ardé**	office@micklefieldschool.co.uk
Designated Safeguarding Lead (DSL)	**Mr G Baguley**	baguleyg@micklefieldschool.co.uk
Deputy DSL	**Mr R Ardé**	office@micklefieldschool.co.uk
Deputy DSL	**Mrs F Yarde**	yardef@micklefieldschool.co.uk
Deputy DSL	**Mrs C Barker**	barkerc@micklefieldschool.co.uk
EYFS Safeguarding Lead	**Miss Z Rule**	rulez@micklefieldschool.co.uk
EYFS Deputy Safeguarding Lead	**Miss J Jelley**	jelleyj@micklefieldschool.co.uk
EYFS Deputy Safeguarding Lead	**Miss K Estall**	estallk@micklefieldschool.co.uk
Online Safety Coordinator	**Mr G Baguley**	baguleyg@micklefieldschool.co.uk
Nominated Child Protection Governor	**Mrs Becky Sturt**	BES@reigategrammar.org Tel: 01737 222231
Chair of Governors	**Mr M Elsey**	c/o bursar@reigategrammar.org Tel: 01737 222231

St Christopher's Key Staff (Tel: 01372 721807)

Headteacher	**Bronia Grehan**	B.Grehan@st-christophers.surrey.sch.uk
Designated Safeguarding Lead (DSL)	**Bronia Grehan**	B.Grehan@st-christophers.surrey.sch.uk
Deputy Designated Safeguarding Lead (DDSL)	**Laura Fisher**	lfisher@stchristophers.surrey.sch.uk
Deputy Designated Safeguarding Lead (DDSL)	**Nicky Gunn**	ngunn@stchristophers.surrey.sch.uk

RGS Surrey Hills School Key Staff (Tel: 01372 373382)

Headmistress	**Hayley Robinson**	hayley.robinson@rgs-surreyhills.org
Designated Safeguarding Lead (DSL)	**Kate Cobb** Deputy Head	kate.cobb@rgs-surreyhills.org
Deputy Designated Safeguarding Lead (DDSL)	**Claire Ellis** Assistant Head	claire.ellis@rgs-surreyhills.org
Deputy Designated Safeguarding Lead (DDSL)	**Rachael Evans** Lead Nurse	rachael.evans@rgs-surreyhills.org
Deputy Designated Safeguarding Lead (DDSL)	**Heather Buchanan** EA to Headmistress	heather.buchanan@rgs-surreyhills.org
Deputy Designated Safeguarding Lead (DDSL)	**George Cook** House Parent	george.cook@rgs-surreyhills.org
Deputy Designated Safeguarding Lead (DDSL)	**Chris Patrick** Assistant House Parent	chris.patrick@rgs-surreyhills.org
Deputy Designated Safeguarding Lead (DDSL)	**Tracy Bushby** Head of Year 7	tracy.bushby@rgs-surreyhills.org
Deputy Designated Safeguarding Lead (DDSL)	**Hayley Irwin** Head of Year 8	hayley.irwin@rgs-surrehills.org
Deputy Designated Safeguarding Lead (DDSL)	**Amanda Ayling** Head of Year 9	amanda.ayling@rgs-surreyhills.org
Deputy Designated Safeguarding Lead (DDSL)	**Jane Fuller** Head of Year 10	jane.fuller@rgs-surreyhills.org
Deputy Designated Safeguarding Lead (DDSL)	**John Souici** Head of Year 11	john.souici@rgs-surreyhills.org
Deputy Designated Safeguarding Lead (DDSL)	**Hannah Taylor** Head of Year 12	hannah.taylor@rgs-surreyhills.org
Deputy Designated Safeguarding Lead (DDSL)	**Katie Palmer** Head of Year 13	katie.palmer@rgs-surreyhills.org

Governor Responsibilities for Child Protection and Safeguarding for the Reigate Grammar School Group (Tel: 01737 222231)

Chair of Governors	**Mr Mark Elsey**	chairman@reigategrammar.org
Lead Governor for Safeguarding and Online Safety at RGS, RSM, Chinthurst	**Mrs Lisa Page**	lcp@reigategrammar.org
Lead Governor for Safeguarding and Online Safety at Micklefield, St Christopher's	**Mrs Becky Sturt**	bes@reigategrammar.org
Lead Governor for Safeguarding and Online Safety at Surrey Hills	TBC	TBC

Contents

Safeguarding Statement: It is everyone's responsibility and it could happen here 7

Terminology 7

Introduction 8

Equalities Statement 9

1. Policy Principles and Values 10
2. Policy Aims 10
3. Supporting Children 11
4. Prevention/Protection 11
5. Professional expectations, roles and responsibilities 12
6. Roles and Responsibilities 14
7. Confidentiality, Sharing and Withholding Information 19
8. What to do if you have concerns about a child's welfare: Reporting and responding to Safeguarding Concerns 19
9. If Staff are Concerned about a Child's Welfare 19
10. Early Help 23
11. Safeguarding concerns and allegations (including non-recent) against adults who work with children, including Low-level Concerns – referral process 24
12. What is child abuse? 26
13. What is abuse and neglect? 26
14. Sexual violence and sexual harassment between children in schools and child-on-child abuse: We have a zero-tolerance approach 26
15. Online Safety 29
17. Racist Incidents 33
18. Concerns about Radicalisation, Extremism and Terrorism 33
19. Whistleblowing 36
20. Specialist Setting 37

Appendix 1: Types of abuse and specific safeguarding concerns 39

Appendix 2: Specific Safeguarding Concerns 45

Appendix 3: Continuum of Support for families living in Surrey 57

Appendix 4: Where there are concerns about a child 58

Appendix 5: Sexual violence 59

Safeguarding Policy Declaration 61

Safeguarding Statement: It is everyone's responsibility and it could happen here

This is a joint policy across The Reigate Grammar School Group of schools including the Early Years Foundation Stage. This policy therefore covers the welfare of children aged from 2-18 years. In addition, staff need to be alert to the extra vulnerabilities of children living away from their parents in a boarding setting. We recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils – ***it is everyone's responsibility.***

Senior Schools	**Pre-Prep and Prep Schools (all with EYFS provision)**
Reigate Grammar School (day) RGS Surrey Hills (day and boarding)	Chinthurst School and Nursery (day) Micklefield School and Nursery (day Reigate St Mary's School and Nursery (day) St Christopher's School and Nursery (day)

Children are at the centre of everything we do. We are committed to providing children with a sense of belonging and an environment in which children and adults feel safe, secure, valued and respected, and feel confident to talk if they are worried, believing they will be effectively listened to.

Adults know that keeping children safe is everybody's responsibility and that all children, regardless of age, gender, culture, language, race, ability, sexual identity, faith or none have equal rights to protection and opportunities.

We are alert to the signs of abuse, neglect (including affluent neglect) and exploitation and follow procedures to ensure that children receive effective support, protection and justice. Child protection forms part of our safeguarding responsibilities.

We are committed to safeguarding every child by recognising and addressing racism, unconscious bias, and intersectional vulnerabilities, ensuring all pupils feel safe, valued, and respected.

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

Terminology

KCSIE defines Safeguarding as the process for protecting children from harm and abuse, whether that is within or outside the home, as well as online. This includes:

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

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

"staff" refers to all those working for or on behalf of our schools, full or part time, temporary or permanent, in either a paid or voluntary capacity.

"Child(ren)" includes everyone under the age of 18. On the whole, this will apply to pupils of our schools. However, the policy will extend to visiting children and students from other establishments.

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

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

MAP refers to the Surrey Multi-Agency Partnership. The local safeguarding partnership has three partners:

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

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

C-SPA refers to the Children's *Single Point of Access*

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

Child looked after (CLA) used internally in Surrey County Council rather than looked after child (used in statutory guidance).

Statutory means what has been decided or is controlled by the law.

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development; or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

Children suffering or likely to suffer significant harm. The safeguarding partnership, with the help of other organisations as appropriate, have a duty to make enquires under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse, neglect and exploitation, female genital mutilation or other so-called honour-based violence, and threats like radicalisation and sexual exploitation.

Introduction

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

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

- Working Together to Safeguard Children 2023 which sets out the multi-agency working arrangements to safeguard and promote the welfare of children and young people and protect them from harm; in addition, it sets out the statutory roles and responsibilities of settings.
- "What to do if you are Worried a Child is Being Abused" 2015 - Advice for Practitioners
- Keeping Children Safe in Education (KCSIE, 2025) https://assets.publishing.service.gov.uk/media/6650a1967b792ffff71a83e8/Keeping_children_safe_in_education_2024.pdf is statutory guidance issued by the Department for Education (DfE) which all schools and colleges must have regard to when carrying out their duties to safeguard and promote the welfare of children.
- Early Years Foundation Stage Statutory Framework is statutory guidance which sets standards that school and childcare providers must meet for the learning, development, and care of children from birth to 5 years in Ofsted registered settings – see RSM
- Local Guidance from the Local Safeguarding Partnership: Surrey Safeguarding Children Partnership (SSCP) including SSCP Procedures. **We work closely with Surrey Safeguarding Partnership** (and other safeguarding partnerships in different counties as appropriate). **We operate safeguarding procedures in line with locally agreed multi-agency safeguarding arrangements put in place by the safeguarding partners.**

- National Minimum Standards for boarding schools contains arrangements to safeguard and promote the welfare of children for whom accommodation is provided by boarding schools.

This policy applies to all members of staff and governors/proprietors in the setting. We publish this policy on our websites and hard copies are available on request from the School Office.

Guidance and documents referred to in this policy:

- Surrey Safeguarding Children Partnership protocols, guidance and procedures
- Working Together to Safeguard Children 2023
- Keeping Children Safe in Education (KCSIE, 2025)
- Disqualification under the Childcare Act 2006 (updated 2019)
- FGM Act 2003 Mandatory Reporting Guidance 2015 (updated January 2020)
- "What to do if you are worried a child is being abused" 2015
- Teachers" standards
- Information sharing: advice for practitioners providing safeguarding services
- The Equality Act 2010
- Early years foundation stage (EYFS) statutory framework
- Surrey County Council Safeguarding Children Missing Education (CME) and Educated Other Than at School (EOTaS)
- Surrey County Council Touch and The Use Of Physical Intervention When Working With Children And Young People

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

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

Equalities Statement

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

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

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

> As part of the safeguarding responsibilities, we recognise that racism; whether overt, covert, structural, or rooted in unconscious bias, can cause significant harm to children and young people. We are committed to creating an environment where every pupil feels safe, valued, and respected. We acknowledge the importance of intersectionality, recognising that children may face multiple and overlapping forms of discrimination which can heighten their vulnerability. Staff identify, challenge, and record incidents of racism, and to reflect on their own practice with awareness of unconscious bias. We will listen to the lived experiences of pupils and take proactive steps to ensure that racist behaviours or attitudes are addressed swiftly, in line with safeguarding procedures. We will also be mindful to avoid framing families as "hard to reach". Instead, acknowledge the systemic barriers they may face in engaging with safeguarding services, such as with language barriers and cultural misunderstandings.

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

1. Policy Principles and Values

The welfare of the child is paramount and we understand our duty to consider at all times the **best interests of the child**, **to create a culture of safety, equality and protection** and to **take action to enable all children to have the best outcomes**.

- We maintain an attitude of "**It is everyone's responsibility and it could happen here."**
- We maintain a **zero-tolerance** approach to sexual violence and sexual harassment

1.1. Children have a right to feel safe and secure: they cannot learn effectively unless they do so.

1.2. All children have a right to be protected from harm and abuse, this means that all children regardless of age, gender, culture, language, race, ability, sexual identity or religion have equal rights to protection, safeguarding and opportunities.

1.3. Our staff are well trained to recognise the signs of abuse, neglect and exploitation, such that they understand what their responsibilities are and how they should respond when they identify a concern.

1.4. We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working to protect and safeguard children.

1.5. Whilst we 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.

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

2. Policy Aims

- To provide staff with the framework to promote and safeguard the wellbeing of children and in doing so ensure they meet their statutory responsibilities.
- To ensure consistent good practice across we and ensure that safeguarding follows a whole school approach.
- Clarify safeguarding expectations for members of the community, staff, governing body, children, and their families.
- Contribute to the establishment of a safe, resilient, and robust safeguarding culture built on shared values; that children are treated with respect and dignity, taught to treat each other and staff with respect, feel safe, have a voice and are listened to.
- Support contextual safeguarding practice recognising that our site can be a location where harm can occur.
- Set expectations for developing knowledge and skills within the community (staff, children, parents/carers) to the signs and indicators of safeguarding issues and how to respond to them.
- Early identification of need for vulnerable learners and provision of proportionate interventions to promote their welfare and safety.
- Work in partnership with children, parents/carers, and other agencies in the Surrey Safeguarding Children's Partnership, or other safeguarding partnerships where appropriate.
- Ensure that the specific needs of boarders are met and that we adhere to the National Minimum Standards for Boarding Schools.

3. Supporting Children

We will support all children by:

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

3.2. We will support all children by:

- Encouraging self-esteem and self-assertiveness, through the curriculum and through positive relationships within the community, whilst not aggression or bullying.
- Promoting a caring, safe and positive environment within the schools.
- Ensuring children are taught to understand and manage risk through Personal, Social, Health and Economic Education (PSHEE) and Relationship and Sex Education (RSE) and Health Education through all aspects of setting life, including staying safe online.
- Responding sympathetically to any requests for time out to deal with distress and anxiety
- Offering details of pastoral support and **opportunities for children to be listened to** within schools.
- Liaising and working together with all other support services and those agencies involved in the safeguarding of children, for example Early Help at school or beyond.
- Notifying the C-SPA without delay if there is an immediate risk of significant harm.
- We will provide continuing support to children about whom there have been concerns who leave us by ensuring that information is shared confidentially with the child's new setting. We will ensure the records are forwarded as a matter of priority and within statutory timescales.

3.3. As part of a broad and balanced curriculum, children are taught about safeguarding, including online, through various teaching and learning opportunities. Children are taught to recognise when they are at risk and how to get help when they need it.

3.4. The DSL will consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

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

4. Prevention/Protection

4.1. We recognise that we play a significant part in the prevention of harm to children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection.

4.2. We will therefore:

- Work to establish and maintain an ethos where children feel secure, are encouraged to talk and are always listened to;
- Include regular consultation with children e.g. through questionnaires, student councils and forums, participation in anti-bullying week, asking children to report whether they feel safe within the setting or have had happy/sad lunchtimes/playtimes etc.
- Ensure that all children know there is an adult they can approach if they are worried or in difficulty, including staff with specialist training;
- Include safeguarding across the curriculum, including PSHEE opportunities which equip children with the skills they need to keep themselves and other safe, including online and to

know to whom they should turn to for help. It is also recognised that effective education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special education needs or disabilities. In particular, this will include anti-bullying work and online-safety. Also, focussed work in Year 6 to prepare for transition to secondary school and more personal safety/independent travel;

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

5. Professional expectations, roles and responsibilities

We will ensure that:

5.1. **we operate safer recruitment procedures in line with KCSIE 2025 and this includes statutory checks on staff suitability to work with children and disqualification regulations.**

5.2. details of the DSL and DDSL are available on the website, noticeboards around school and at reception.

5.3. all staff receive and read, understand and adhere to:

- Part 1 of the statutory guidance KCSIE 2025 and Annex B. This applies to the Governing Body in relation to Part 2 of the same guidance.
- Our *Safeguarding and Child Protection* Policy (which includes the safeguarding response to children missing in education and the names and role of the DSL and DDSLs)
- *The Staff Code of Conduct*

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

- The *Behaviour Policy*
- The Anti-Bullying Policy
- The Acceptable Use Policy
- Online Policy
- Whistleblowing
- Behaviour
- Anti-Bullying
- Attendance
- Touch and the use of restrictive physical intervention (Preps)
- Intimate Care (Preps)
- Missing Child Policy (Preps)
- Statement of Boarding Principles and Practice (RGS SH)
- Supervision of Boarders Policy (RGSSH)
- Privacy & Possessions Policy (including searching/confiscation) (RGSSH)
- Staff Boarding Handbook (RGSSH)

5.4. all staff receive safeguarding and child protection training at induction, **including Prevent and Online Safety** (which amongst other things incudes an understanding of expectations, applicable roles and responsibilities in relation to filtering and monitoring) **and Behaviour Policy** in line with advice from in line with advice from SSCP and **receive safeguarding and child protection updates, as required, but at least annually**. **As part of the induction, staff must read *KCSIE* Part 1 and Annex B and also the Safeguarding Policy, which includes Children Absent from Education and child-on-child abuse.** The Induction meeting proves an opportunity for the new member of staff to discuss the main elements with the DSL. During the induction when staff meet with one of the DSLs and the role of the DSL and deputies is explained to them. They are asked to read **the Staff Code of Conduct** and key features are explained during induction e.g. **whistleblowing, acceptable use of ICT, staff/pupil relationships and guidance on appropriate use of social media and other forms of communications to**

help ensure professional roles are clearly understood. In addition, guidance is given on 1:1 teaching situations such as music tuition. Please see Code of Conduct. In summary, we will follow *KCSIE* guidance as set out below:

Staff Induction – these are not intended to be exhaustive	
Explain and discuss (*KCSIE*)	**Provide** (*KCSIE* Part One and Annex B)
Safeguarding policy (including response to children absent/missing from education and child-on-child Abuse)	Safeguarding Policy (including children absent/missing from education and child-on-child Abuse)
Role of DSL – including identity of DSL and deputies – contained in Safeguarding Policy	Role of DSL and DDSLs
Explain Staff Code of Conduct	Staff Code of Conduct (including whistleblowing, acceptable use of IT, staff/pupil relationships, low-level concerns, comms including use of social media)
Explain Pupil Behaviour Policy	Pupil Behaviour Policy (including measures to prevent bullying, including cyber bullying, prejudice-based and discriminatory bullying)
Online Safety Policy (which amongst other things incudes an understanding of expectations, applicable roles and responsibilities in relation to filtering and monitoring)	Online Safety Policy
Part One of *KCSIE and Annex B*	Part One of *KCSIE and Annex B*

5.5. all members of staff are trained in and receive updates in online safety and reporting concerns.

5.6. all staff and governors have regular child protection awareness training, in line with advice from Surrey Safeguarding Partnership updated by the DSL as appropriate, to maintain their understanding of the **signs and indicators of abuse and to include Prevent and Online Safety.**

All members of staff maintain a zero-tolerance approach to sexual violence and sexual harassment.

5.7. we provide a coordinated offer of Early Help when additional needs of children are identified and contributes to Early Help arrangements and inter-agency working and plans.

5.8. our lettings policy will seek to ensure the suitability of adults working with children on school sites at any time and ensure that any groups who use our premises have Safeguarding and Child Protection policies and procedures in place.

5.9. community users organising activities for children are aware of our *Safeguarding and Child Protection Policy*, guidelines and procedures.

5.10. the name of the designated members of staff for child protection, the Designated Safeguarding Lead (DSL) and Deputies, are clearly advertised in the schools.

5.11. **all staff will be given the latest copy of *Keeping Children Safe in Education Part 1 (KCSIE)* and *Annex B* and will record to say they have read and understood it.** This applies to the Governing Body in relation to Part 2 of the same guidance.

5.12. staff are given a summary of key contact details e.g. C-SPA phone number and also the steps to respond in case of an allegation against a member of staff e.g. LADO contact details.

6. Roles and Responsibilities

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

6.1. Maintain an attitude of ***"It could happen here"*** and is "everyone's responsibility".

6.2. Maintain a zero-tolerance approach to sexual violence and sexual harassment.

6.3. Read and understand Part 1 of statutory guidance KCSIE 2025. Those working directly with children will also read Annex B. Those who do not work directly with children may be given the option to read Annex A instead.

6.4. Provide a safe environment in which children can learn

6.5. Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to.

6.6. Ensure children know that there are adults whom they can approach if they are worried or have concerns.

6.7. Be aware of indicators of abuse, neglect and exploitation understanding that children can be at risk of harm inside and outside of the setting, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse, neglect and exploitation so that staff are able to identify cases of children who may be in need of help or protection.

6.8. Be able to identify vulnerable learners and take action to keep them safe. Information or concerns about learners will be shared with the DSL where it includes those:

- who may need a social worker and may be experiencing abuse, neglect (including affluent neglect) or exploitation.
- requiring mental health support
- may benefit from early help.
- where there is a radicalisation concern
- where a crime may have been committed

6.9. **All staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect (including affluent neglect) or exploitation.**

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

6.11. Staff should raise concerns about the mental health of a child with the pastoral team and use the reporting and recording system as established in their school escalating to relevant agencies, avenues of support as appropriate. Mental Health and Behaviour in Schools Guidance can be found here: https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2.

Useful links:

- Mindworks Surrey
- Surrey Young Suicide Prevention Toolkit
- The Surrey Self-Harm Protocol
- Install - R;pple Suicide Prevention

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

6.13. Know who the DSL and Deputy DSLs, Chair of Governors and Governor responsible for safeguarding are and know how to contact them.

6.14. **If staff have a mental health concern about a child that is also a safeguarding concern, immediate action will be taken**, following the policy and procedures and speaking to the DSL or a deputy and reporting it through their school system.

6.15. Plan opportunities within the curriculum for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe.

6.16. Attend training in order to be aware of and alert to the signs of abuse, neglect and exploitation.

6.17. Know how to respond to a pupil who discloses harm or abuse following training of *Working together to Safeguard Children 2023* and *What to do if you are worried a child is being Abused, 2015*.

6.18. Record their concerns if they are worried that a child is being abused and report these to the DSL immediately that day. If the DSL is not contactable immediately a DDSL should be informed.

6.19. Be prepared to refer directly to the Single Point of Access (C-SPA), and the police if appropriate, if there is a risk of significant harm and the DSL or DDSLs are not available.

6.20. Report low-level concerns (as defined in KCSIE 2025) about any member of staff/supply staff or contractor to the DSL/Headteacher, or if it is a low-level concern about the Headteacher, it should be reported to the Chair of Governors.

6.21. Follow the allegations procedures, as set out in this policy and KCSIE 2025, if the disclosure is an allegation against a member of staff, supply staff, volunteer or contractor.

6.22. Provide support for children subject to Early Help, Child in Need or Child Protection and be involved where appropriate, in the implementation of individual plans to further safeguard vulnerable learners and understand their academic progress and attainment and maintain a culture of high aspirations for this cohort.

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

6.24. Notify the DSL or their Deputy of any child on a child protection plan or child in need plan who has unexplained absence.

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

6.26. Will identify children who may benefit from early help, liaising with the DSL in the first instance. Options may include managing support for the child internally via our pastoral support and/or liaise with other agencies that support children and provide early help. In some circumstances it may be appropriate for a member of school staff to act as the lead professional in early help cases.

6.27. Be mindful that the Teacher Standards states that teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

6.28. **The Headteachers will ensure that:**

6.28.1. the Child Protection and *Safeguarding Policy* and procedures are implemented and followed by all staff (including temporary staff and volunteers) and all staff are aware of the role of the DSL, including the identity of the DSL and any deputies and to make sure that this is shared at staff induction

6.28.2. Parents and carers are aware of this policy and where they can access a copy

6.28.3. Visitors are appropriately supervised as necessary

6.28.4. we have 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.

6.28.5. our staff have appropriate knowledge of part 5 of *Keeping Children Safe In Education* guidance (child on child sexual violence and sexual harassment)

6.28.6. 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

6.28.7. where there is a safeguarding concern that the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Child-centred systems and processes are in place for children to express views and give feedback.

6.28.8. we fully contribute to inter-agency working in line with *Working Together to Safeguard Children 2023 guidance*.

6.28.9. sufficient time, training, support, resources, including cover arrangements where necessary, is allocated to the DSL and deputy(ies) DSL(s) to carry out their roles effectively, including the provision of advice and support to school staff on safeguarding and child protection matters, to take part in strategy discussions/meetings and other inter-agency meetings and/or support other staff to do so; and to contribute to the assessment of children.

6.28.10. Deputy DSLs are trained to the same standard as the DSL and the role is explicit in their job description.

6.28.11. adequate and appropriate DSL cover arrangements are in place for any out of hours/out of term activities.

6.28.12. systems are in place for children to express their views and give feedback which operate with the best interest of the child at heart.

6.28.13. 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.

6.28.14. that pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.

6.28.15. ensure that allegations or concerns against staff and other adults are dealt with in accordance with the guidance from the Department of Education (DfE), Surrey Safeguarding Children Partnership (SSCP) and Surrey County Council (SCC). This means they liaise with the Local Authority Designated Officer (LADO), before taking any action and on an ongoing basis, where an allegation is made against a member of staff or volunteer.

6.28.16. statutory requirements are met to **make a referral to the Disclosure and Barring Service and additionally in the case of teaching staff to the Teacher Regulation Agency** where they think an individual has engaged in conduct that harmed (or is likely to harm) a child; or if the person otherwise poses a risk of harm to a child.

6.28.17. 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.

6.28.18. Where relevant, ensure that there are enough staff per child (staff ratios) and where there is an Early Years Foundation Stage, to ensure that every child is assigned a key person.

6.29. The Designated Safeguarding Lead (DSL)

In each of the schools within the RGS Group, there is a DSL appointed and who is a member of our Senior Leadership Team. Each school manages their own safeguarding caseload with the DSL working with their Headteacher.

Details of the DSL and DDSLs are available on the website, pamphlets at reception and on posters at each school.

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

- Read and follow KCSIE
- Always be available during term time (during school hours) for staff to discuss any safeguarding concerns. Appropriate and adequate cover arrangements will be arranged by the DSL and leadership team for any out of hours/out of term activities.
- Work together with all staff to understand the whole picture when there are safeguarding concerns, providing them with advice, support and expertise.
- Contribute 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.
- Work together with and support parents/carers and families who may be facing challenging circumstances and, when there are safeguarding concerns, making parents/carers aware of our role in making referrals about suspected abuse, neglect and exploitation.
- Understand the importance of sharing information, including making appropriate referrals to relevant agencies (for example, Children's Services, the police, the Channel Programme and/or the Disclosure and Barring Service (DBS)) and supporting staff who make referrals directly.
- Understand and follow Surrey Safeguarding Children Partnership (SSCP) safeguarding procedures or those of other partnerships where a child does not live in Surrey.
- Have a secure working knowledge of SSCP procedures and understand the assessment process for providing early help and statutory intervention, in line with Surrey's Continuum of Need Indicators or the relevant procedures with another local authority.
- Keep the headteacher up to date with safeguarding issues.
- Have the lead responsibility for online safety, including oversight and checking the effectiveness of our filtering and monitoring systems and their reports.
- Be aware of the requirement for children to have an Appropriate Adult, as described in PACE Code C 2019.
- Make sure child protection files are up to date and kept as per record keeping section.
- Make sure that all staff have access to this policy (and the wider safeguarding procedures), the policy is available publicly and reviewed annually.
- Make sure that all adults who work for us have adequate and appropriate safeguarding induction, regularly updated safeguarding training and annually sign to say they have read the relevant part of KCSIE.
- Work alongside the governing board and headteacher to review and update procedures and how they are being implemented, including jointly completing and submitting the biennial (s157 s175) Statutory Audit for Safeguarding Arrangements and Termly Safeguarding Data Collections via PHEW to Surrey County Council.
- Promote the educational outcomes of children who have or had a social worker, by sharing appropriate child protection information with the teacher and leaders.
- Encourage a culture of listening to children, taking into account their wishes and feelings when any plans are put in place to protect them.

The Deputy Designated Safeguarding Lead(s):

- Will be trained to the same standard as the DSL and the role is explicit in their job description.
- Will take on the DSL's responsibilities if they are unavailable. If the DSL is long-term absent, a deputy will temporarily take over as the DSL.

Further responsibilities of the DSL are listed elsewhere in this policy. For a detailed explanation of the DSL's responsibilities, see Annex C of KCSIE.

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

6.30.1. there is a whole school approach to safeguarding, involving everyone in the setting and ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development and online safety is a theme throughout.
6.30.2. a nominated governor for safeguarding is identified.
6.30.3. our policies, procedures and training follow the local safeguarding partnership arrangements and the law, including our duties under the Human Rights Act 1998, Data Protection Act 2018 and Equality Act 2010.
6.30.4. our leadership team is held to account for our safeguarding arrangements.
6.30.5. safeguarding is a standing item on the agenda for Governing Body meetings.
6.30.6. the appointed (DSL) is given the additional time, funding, training, resources and support needed to carry out the role effectively.
6.30.7. an experienced governor takes leadership responsibility for our safeguarding arrangements.
6.30.8. there is an appointed designated teacher for looked after children who is appropriately trained.
6.30.9. the governing body takes 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 educational needs and disabilities (SEND).
6.30.10. safeguarding and child protection files are maintained as set out in Annex C of KCSIE.
6.30.11. we add to multi-agency working and shares information appropriately and in a timely manner.
6.30.12. all staff receive regular safeguarding information, updates and in-depth training.
6.30.13. staff sign to say they have read the appropriate part of KCSIE. Governors sign to say they have read and understood KCSIE and this policy.
6.30.14. children are taught about keeping safe, including when online.
6.30.15. the governing body does all that they reasonably can to limit children's exposure to online risks from our online IT systems and assign a member of the senior leadership team and a governor to ensure standards are met.
6.30.16. appropriate safer recruitment processes and procedures are in place.
6.30.17. procedures are in place to identify and address children absent from education, including persistent absence, and when safeguarding concerns coincide.
6.30.18. there are procedures for reporting and managing safeguarding concerns about adults who work for the schools. The Chair of Governors will manage any allegations against the headteacher.
6.30.19. there are effective safeguarding arrangements for when the site is being hired/let.
6.30.20. all members of the governing board receive safeguarding training at induction, which is regularly updated.
6.30.21. 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 Safeguarding Link Governor

The Link Safeguarding Governor provides strategic oversight of safeguarding across the schools. They work in close partnership with the DSL to monitor the effectiveness of policies and procedures, ensure compliance with statutory guidance, and support the development of a strong safeguarding culture. The Link Governor holds leaders to account on safeguarding matters and provides regular assurance to the governing body. The Link Governor:

- meets with the DSL and visit us regularly asking questions that allow them to monitor how our safeguarding policies and procedures are being put into practice.
- is the governing board's safeguarding specialist, feeding back their findings following school visits and meetings with the DSL.

- attends appropriate training that guides them in how to monitor and progress any areas of weakness in our safeguarding arrangements.
- keeps up to date with the SSCP's safeguarding arrangements and guidance.

7. Confidentiality, Sharing and Withholding Information

We take responsibility to protect and look after the data (information) about children and families seriously. The Data Protection Act (DPA) 2018 and General Data Protection Regulation (GDPR) guide us in how to do so. Under the DPA 2018, we will share information without consent if "the safeguarding of children and individuals at risk" is the reason for doing so, and

- it is not possible to gain consent
- it cannot be reasonably expected that a practitioner (for example, teacher) gains consent, or
- to gain consent would place a child at risk

The government's information sharing advice for safeguarding practitioners supports staff who have to make decisions about sharing information. Staff are aware that they can speak to a member of the safeguarding team if they are unsure about sharing information. Government guidance emphasises that: "The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children."

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 2023 guidance. We respect that safeguarding matters are personal to families, so the DSL, deputy and headteacher will only share information about a child to members of staff and professionals on a need-to-know basis.

All staff should be aware that they cannot make a promise to a child to keep secrets that might impact on the child's safety or wellbeing. Instead, staff should tell the child that they may need to pass information on to others who can help and protect them.

8. What to do if you have concerns about a child's welfare: Reporting and responding to Safeguarding Concerns

8.1. The following procedures apply to all staff working in the schools and will be covered by training to enable staff to understand their role and responsibility.

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

8.3. 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.

8.4. There are also a number of specific safeguarding concerns that we recognise pupils may experience, such as domestic abuse and these are covered further on in the policy for more detail.

9. If Staff are Concerned about a Child's Welfare

If a member of staff suspects abuse, spots signs or indicators of abuse, or they have a disclosure of abuse made to them, or are concerned about a child/children being drawn into terrorism they must:

a. 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 is likely to suffer significant harm. If there is not a risk of

immediate harm, please follow the process below. Make an initial record of the information related to the concern, this can be done in person or via ***our reporting and recording system***

b. Report it to the DSL immediately.

c. The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available.

d. Make an accurate record (which may be used in any subsequent court proceedings) as soon as possible and within 24 hours of the occurrence, of all that has happened, including details of:

- Date and time
- Place
- Who was present
- Context
- Details of disclosure/concern (using the child's words)
- Demeanour/non-verbal behaviours of the child
- Child's voice
- Any injuries using a body map to record these
- Rationale for decision making and action taken
- Action/s taken

e. The records must also be added to our reporting and recording system. **Anyone can make a referral.** In the absence of the DSL or their deputies, all staff must be prepared to and know how to refer directly to C-SPA (and the police if appropriate) if there is the potential for immediate significant harm or contact the consultation line at the C-SPA for support and advice.

Disclosures

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 all right 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. It is understood how important it is that a child's first experience of talking to a trusted adult about a worry is a positive one.

Handling a disclosure

- Listen to them 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.
- 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.
- 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

- Record the date, time, place and persons present.
- Use the child's own words, verbatim where possible, and stick to the facts. 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– signed and dated – and pass them to the DSL
- Do not ask children to make written statements themselves or sign records.

Concerns about a child who is not in immediate danger, or is suffering or likely to suffer significant harm

First, speak to the DSL or a deputy. If in exceptional circumstances, the DSL or a deputy are not available, this will not delay you from taking appropriate action. Instead, you will speak to a member of the senior leadership team or take advice from Children's Services, if necessary.

How children can report concerns

It is essential that children can tell us how they are feeling and know that we will take it seriously. We aim to create an environment full of "reachable moments" which encourages children to feel safe enough to open up about their concerns. Children can confidently report any worries they have about their lives, both in and out of school by:

- Speaking to an adult they trust.
- Making a written or an anonymous disclosure – this may be on paper or through an online system such as Whisper

Children are made aware of how they can report concerns through assemblies, tutor times, posters etc.

We know children try to get their voice heard not just through what they say but how they behave, as pointed out in the NSPCC's voice of the child briefing. When there are behavioural issues or changes in a child's behaviour we take a safeguarding first approach, including considering if the child is communicating an unmet need and/or abuse. For children who are pre-verbal or non-verbal, observing behaviour and presentation is even more important for understanding the child's lived experience.

Referral to Children's Services

Concerns about a child or a disclosure should be discussed with the DSL who will help decide whether a referral to Children's Services is appropriate. The DSL and deputy 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 has not 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.

We 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 call 999 for an ambulance or if necessary may need to 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 you have 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.

If a child has experienced or is at risk of female genital mutilation

Female genital mutilation (FGM) is illegal in England. 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".

Teachers

For this section only, "teachers" means qualified teachers or persons who are employed or engaged to carry out teaching work in schools and other institutions. All staff should speak to the DSL (or a deputy) when a concern about female genital mutilation (FGM) arises. If a teacher suspects that FGM has been carried out on a child or believes that the child is at risk of FGM, they will follow their internal safeguarding procedures.

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 will 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.

Other members of staff

Other members of staff who establish that an act of FGM appears to have been carried out on a child or suspect a child is at risk of FGM, will follow the same procedures as with any other concern, i.e. will speak to the DSL or a deputy and follow local safeguarding procedures.

Useful links:

Mandatory reporting of female genital mutilation: procedural information

Supporting Staff

We recognise that staff who have become involved with a child who has suffered harm or appears to be likely to suffer harm may find the situation stressful and upsetting.

We will support such staff by providing an opportunity to talk through their anxieties through internal supervision with the DSLs and/or to seek further support as appropriate, for example from our Independent School Counsellor or an external source via HR.

Notifying Parents

Working alongside and supporting families is a key priority. This involves being open and transparent with parents and carers when we have concerns about their child's welfare, and/or we need to request support from other services to make sure the child's situation improves. If we believe that notifying parents or carers could increase the risk to the child or cause further harm, we will seek advice from Children's Services about how and when parents or carers should be updated. It is legitimate to share concerns without a parent's or carer's consent when there is good reason to do so and that sharing the information would improve the safeguarding of the child in a timely manner.

Record Keeping

Safeguarding concerns and referrals are stored electronically and in individual secure files. The DSL lead is responsible for keeping written records of all concerns, discussions and decisions, including the rationale for those decisions. Safeguarding files will be stored securely, and access will be limited to those who need it.

When a child leaves, the DSL will make sure that their safeguarding file is transferred to the new education school or college within five (5) days of an in-year transfer or within five (5) days of the start of a new term. This will be securely transferred separately from their main file and a confirmation of receipt will be requested and kept. Where appropriate, the DSL will share information in advance of the child transferring so support can be put in place ready for when the child starts. We will ensure that when a child starts at one of the schools we will ensure that key staff are aware of the safeguarding file as soon as possible.

If this is the last school that the child attends, their safeguarding file will be securely stored by us until their 25th birthday is reached.

10. 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. 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. We are also able to offer a range of Early Help within the Group's settings, such as counselling.

The DSL and/or deputy may 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 does not appear to be improving. The DSL is aware of the local escalation policy and procedures.

We are aware any child may benefit from early help. Staff who work directly with children will be particularly alert to the potential need for early help for children listed under Part 1, paragraph 18 of KCSIE:

- is frequently missing/goes missing **from education, home or care;**
- has **experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit**;
- **has a parent or carer in custody** or is affected by parental offending;
- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory education, health and care plan);
- is a young carer;

- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is misusing drugs or alcohol themselves;
- is at risk of modern slavery, trafficking or exploitation;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- has returned home to their family from care;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited;
- is a privately fostered child.

11. Safeguarding concerns and allegations (including non-recent) against adults who work with children, including Low-level Concerns – referral process

Procedure around allegations

Surrey's LADO procedure will be followed where it is alleged that anyone working in the setting that provides education for children under 18 years of age, including supply staff, volunteers and contractors or another adult who works with children has:

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

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

- Report any concerns about the conduct of any member of staff or volunteer to the relevant Headteacher immediately. If the Headteacher is absent then staff should refer to the Chair of Governors or to the LADO.
- Where the allegation relates to a member of supply staff provided by an agency the agency should be fully involved.
- If an allegation is made against the Headteacher, the concerns need to be raised with the Chair of Governors as soon as possible. If the Chair of Governors is not available, then the LADO (Local Authority Designated Office) should be contacted directly. Where the allegation is against the Headteacher, the Headteacher must not be informed of the allegation prior to contact with the chair and the LADO.
- Where there is a conflict of interest in reporting to the Headteacher, contact the LADO directly.
- If the concern is about the Chair of Governors, contact the LADO.
- There may be situations when the Headteacher or Chair of Governors will want to involve the police immediately if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.
- **Once an allegation has been received by the Headteacher or Chair of Governors they will contact the LADO (as part of their mandatory duty)** on **0300 123 1650** option **3 LADO** Email: LADO@surreycc.gov.uk **immediately and before taking any action or investigation**.
- Following consultation with the LADO inform the parents of the allegation unless there is a good reason not to.

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

If the matter is to be investigated internally, the LADO will advise us to seek guidance from local authority colleagues in following procedures set out in part 4 of KCSIE(2025) and the SSCP procedures.

Low-Level Concerns (see separate Low-Level Concerns Policy for further detail)

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

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

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

The purpose of considering low-level concerns is to embed a culture of openness, trust and transparency in which our values and expected behaviours are consistently lived, monitored and reinforced by all staff.

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

If the concern has been raised via a third party, the Headmaster/DSL should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

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

Staff should be encouraged and feel confident to self-refer where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Low-level concerns can be reported to the Headteacher or the DSL. If it is about the Headteacher, it should be referred to the Chair of Governors, or directly to the LADO. The Headteacher should not be informed of any allegations prior to contact with the Chair or the LADO.

Low-level concerns should be recorded in writing, including:

- name* of individual sharing their concerns
- details of the concern
- context in which the concern arose
- action taken

(* if the individual wishes to remain anonymous then that should be respected as far as reasonably possible)

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO. If we have any doubt as to whether a low-level concern in fact meets the harm threshold, the Headteacher(or DSL in consultation with the Headteacher) will consult with the LADO and take a collaborative decision-making approach.

The records review might identify that there are wider cultural issues within the Schools that enabled the behaviour to occur. This might mean that policies or processes could be revised or extra training delivered to minimise the risk of it happening again.

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

We will be asked, as part of a routine ISI Inspection to confirm that they have disclosed to inspectors all instances of safeguarding concerns.

Non-recent allegations

If an adult makes an allegation that they were abused as a child, the individual should be advised to report the allegation to the police. Non recent allegations made by a child, should be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children's social care and the police. Abuse can be reported no matter how long ago it happened.

12. What is child abuse?

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

13. What is abuse and neglect?

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another child or children. There are four categories of abuse:

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

See Appendix 1 for further details.

The Neglect Risk Assessment Tool is available to provide more detailed information regarding neglect.

14. Sexual violence and sexual harassment between children in schools and child-on-child abuse: We have a zero-tolerance approach

Child-on child Abuse, including sexual violence and sexual harassment

Context

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

We understand that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported.

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

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

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying) abuse in intimate personal relationships between children (sometimes known as "teenage relationship abuse")
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)

- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery) UKCIS guidance: Sharing nudes and semi-nudes advice for education settings
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

See **Appendix 5** for further details around consent and definition of rape.

We recognise that children are capable of abusing other children and their peers and this will be dealt with under the Safeguarding policy and in line with KCSIE (2025).

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

It is important that all victims are taken seriously and offered appropriate support and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and no victim should ever be made to feel ashamed for making a report.

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

Responding to allegations of child-on-child abuse

- Follow the "handling a disclosure" procedure set out above. You must make a record of the allegation and inform the DSL or a deputy.
- If the DSL and a deputy are not available due to emergency circumstances, the staff member will speak to a member of the senior leadership team and/or contact the relevant Children's Services.

The DSL or a deputy will make a decision from the following options depending on the level of risk or harm:

1. Manage the concern internally providing pastoral support to all those involved.
2. Complete an early help assessment.
3. Make a referral to Children's Services and/or, where necessary, the police. The DSL may choose to consult Children's Services to assist them with making a decision.
4. The police will still be informed of any criminal offences. If the child is aged under the criminal age of responsibility, the police will take a welfare approach.

The DSL or a deputy will contact the parents or carers of the children involved at the earliest opportunity and where appropriate. Records will be kept of all concerns, discussions had, decisions made and any outcomes reached. If a criminal offence has been committed or is being investigated, the DSL will work closely with the police to avoid impacting the criminal process while protecting children or following disciplinary procedures.

Where the DSL, Children's Services or the police decide the concern should be handled by us internally, we will thoroughly investigate the concern using the behaviour policy and processes. A risk assessment and prevention plan will be completed when a safeguarding risk has been identified. The plan will be monitored and a date set for a follow-up evaluation with everyone concerned. We will support all children involved in the incident, including the child/ren who displayed the behaviour and the children who experienced it.

Responding to allegations of sexual harassment and sexual violence

Using the DSL's or a deputy's professional judgement, we will make decisions about and address the incident. We will request the support of other agencies, such as Children's Services and the police, if necessary.

We follow the local safeguarding arrangements below when an allegation of sexual violence and/or sexual harassment has been made.

1. Manage internally using the behaviour policy and pastoral support.
2. Early help response used for non-violent harmful sexual behaviour to prevent escalation.
3. Refer to Children's Services when a child has been harmed, is at risk of harm or in immediate danger.
4. Report to the police if a crime has been committed, such as rape, assault by penetration or sexual assault, following the When to call the police guidance.

The management of children with sexually harmful behaviour is complex. We will work with other relevant agencies to maintain the safety of the whole school community. Where appropriate, immediate measures will be put in place to support and protect the person impacted by the behaviours, any witnesses and the alleged instigator of the behaviours. A written record will be made and next steps discussed, taking into account the views of those impacted by the behaviour.

A risk and needs assessment will be completed for all reports of sexual violence and on a case-by-case basis for reports of sexual harassment. The assessment, which will be kept under review, will consider:

- whether there may have been other people impacted by the behaviour;
- the person known to be impacted by the behaviour, especially their protection and support;
- the alleged instigator of the behaviour;
- all children (and, if appropriate, staff) at the Schools, especially any actions that are appropriate to protect them from the alleged instigator or future harm; and
- the time and location of the incident and any action that can make the Schools safer.

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 the behaviour policy.

If a child who has experienced sexual violence or sexual harassment asks us not to make a referral

If the child does not give consent to share information, the DSL or a deputy will balance the victim's wishes against their duty to protect them and other children on a case-by-case basis. If a child is at risk of harm, is in immediate danger or has been harmed, a referral should be made to Children's Services, and as rape, assault by penetration or sexual assault are crimes, reports should be referred to the police. As stated above, a police referral will still be made for children under the age of criminal responsibility.

We will do all we reasonably can to protect the anonymity of any children involved in any report, including weighing up what staff need to know and any support that will be put in place. Further, we will take into account the potential impact of social media in facilitating the spreading of rumours and exposing the child's identity.

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, the DSL and a deputy will be aware of anonymity, witness support, and the criminal process in general so that they can offer support and act appropriately. They will be guided by the CPS: Safeguarding Children as Victims and Witnesses advice.

Physical Abuse

While a clear focus of child-on-child abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from pupils to pupils can also be abusive.

These are equally not tolerated and if it is believed that a crime has been committed, will be reported to the police.

The principles from the *Anti-Bullying Policy* will be applied in these cases, with recognition that any police investigation will need to take priority.

15. Online Safety

We have an *Online Safety Policy* which explains how it tries to keep pupils safe in school and how it responds to online safety incidents. The aim is to empower us to protect and educate pupils, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. We also have procedures on the use of mobile and smart technology.

Children increasingly use electronic equipment on a daily basis to access the internet, share and view content and images via social media sites such as Facebook, Xr, Instagram, Snapchat and for online gaming.

Some adults and other children use these technologies to harm children. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing children to engage in extremist or sexual behaviour such as webcam photography or face-to-face meetings. **Abuse can take place wholly online or technology may be used to facilitate offline abuse.**

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

Children are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated. Each school has an online safety co-ordinator.

Our aims are to:

- have in place online safety processes that protect children and staff including how it identifies, intervenes in and escalates online concerns, where appropriate.
- make sure technology is used responsibly and safely through education.
- set clear expectations for the use of mobile phones and smart technology.

We fulfil our aims by:

- ensuring appropriate filtering and monitoring systems are in place on our network and devices.
- educating children to learn how to keep themselves safe when online, what to do if they are harmed or spot a risk and what the consequences are if they break our rules about online safety.
- engaging with parents and carers about what online safety looks like.
- training staff on online safeguarding risks and how to be online safely.
- making sure children, staff, parents/carers, **governors** and volunteers sign an understandable acceptable use agreement that covers how they should use our IT systems and their mobile and smart technology.
- making parents, carers, children and staff aware that staff can search an electronic device they have confiscated. See Searching, Screening and Confiscation.

Due to the constant changes to online technology and the related harms, we have an ongoing approach to review and risk assess our online safety policies, procedures and systems.

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.

The 4Cs

Being online can be a great source of fun, entertainment, communication and education. Some people's online behaviour places others at risk. The number of issues covered under online safety is large and constantly growing. They are categorised into these four areas of risk:

Content: being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism misinformation, disinformation (including fake news) and conspiracy theories.

Contact: being subjected to harmful online interaction with other users, for example peer to peer pressure, commercial advertising, and adults posing as children or young adults with the intention to groom or exploit children for sexual, criminal, financial or other purposes.

Conduct: online behaviour that increases the likelihood of, or causes, harm, for example making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying).

Commerce: risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If children or members of staff report any issues, we will report it to the Anti-Phishing Working Group (https://apwg.org/).

Mobile phones and smart technology (including smart watches) – see each school's individual online safety and acceptable use policies.

Many children have unlimited and unrestricted access to the internet via mobile phone networks; therefore, children could be harmed or harm others online when at school. This may include sexually harassing, bullying and sharing indecent images (often via large chat groups).

Staff are aware that they must never use their personal mobile telephone or other electronic device to take photographs or videos of pupils. Only school devices may be used, please see separate policies/procedures for Reigate Grammar School, Reigate St Mary's, Micklefield, St Christopher's and RGS Surrey Hills for further details, However, please note that in the Early Years settings, personal mobile phones, tablets, cameras or other electronic devices must be kept in a locked cupboard and switched off.

Media recordings, audio, image and video (including digital files)

When we make media recordings of children, such as taking videos or photos, we will get the child's and their parents"/carers" consent, make sure the child is appropriately dressed and encourage the child to tell us if they are worried about any media that has been taken of them. See the staff code of conduct and online safety policy, which cover our expectations for staff making media recordings.

Filtering and monitoring

To limit children's exposure to online risks from our IT systems, it has strong and effective filtering and monitoring systems, following the government's Meeting digital and technology standards in schools and colleges guidance. We will make sure that:

- Specific staff have assigned roles and responsibilities to manage systems.
- Staff know about the systems in place and how to escalate concerns.
- There are annual reviews of the systems, or more frequently if there is a significant change or issue.
- Our **governing body** reviews the systems with the DSL, (and IT staff and service providers where applicable), to find out what more can be done to keep children safe.
- The systems are effective for the age range of children and consider children potentially at greater risk of harm.

- When we block online content, it does not impact teaching and learning.
- Filtering works across all devices including mobile devices and smart technology

Remote education

When children are being taught remotely e.g. at home, we will be in regular contact with parents and carers. We will make sure parents and carers are aware of:

- What their child/ren are being asked to do online, including the sites they will be accessing and who from the Schools will interact with their child/ren.
- The importance of children being safe online and offering advice on how to do so.
- What systems we use to filter and monitor online use.

Information security and access systems

We have procedures in place to protect IT systems and staff and learners from cybercrime, i.e. when criminals seek to exploit human or security vulnerabilities online to steal passwords, data or money directly. We will follow the government's Cyber security standards for schools and colleges guidance which were developed to help us improve resilience against cyber-attacks. Procedures and systems are reviewed regularly to keep up with the constant changes to cyber-crime technologies.

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

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. 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.

Useful links:

- Childnet International
- Safer Internet Centre webpages
- Generative AI: product safety expectations

16. Concerns about Nudes and Semi-Nudes

Responding to any incident that comes to your attention:

- **Report** it to your DSL or equivalent immediately, using our 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 provider, 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 involve 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 may 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 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 IWF) 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 we have 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 section of this policy.

17. Racist Incidents

We acknowledge that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of racist incidents.

18. Concerns about Radicalisation, Extremism and Terrorism

Prevent duty guidance: England and Wales (2023) under section 26 of the *Counter-Terrorism and Security Act 2015* places a duty on education and other Children's Services to have due regard to the need to prevent people from becoming terrorists or supporting terrorism.

Extremism is defined as "as "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs".

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

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes with an electronic system. The use or threat **must** be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

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

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

It is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection.

If you have a concern that a child may be at risk of radicalisation or involvement in terrorism and they are in **immediate danger,** contact the police on 999. If the child is not in immediate danger, speak with the DSL or a deputy as a first point of call.

The DSL may decide to discuss their concerns with Children's Services and will make referrals to the police Prevent team and/or the Channel programme, where necessary. The DSL will need to seek the individual's consent when referring to the Channel programme.

Prevent referral form to refer cases by e-mail to preventreferrals@surrey.pnn.police.uk .
(email address solely for prevent referrals and not general enquires).

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.

Prevent leads

- Claire McDonald, Prevent Supervisor, Surrey Police:

  claire.mcdonald@surrey.police.uk – 07795 043842

- Lara Bowden, Project Officer, Surrey County Council:

  lara.bowden@surreycc.gov.uk

- Helene Morris – DfE Regional Prevent Co-ordinator for Southeast – Counter Extremism. Department for Education Prevent Coordinator for South-East

  Prevent.SouthEast@service.education.gov.uk

  National Prevent referral form (healthysurrey.org.uk)

Staff and governors can also raise concerns by emailing counter.extremism@education.gsi.gov.uk, but this is not to be used in emergency situations. If you believe you have information relating to terrorism, you can call the anti-terrorist hotline on 0800 789 321. To report extremism in education, including allegations against staff and institutions, use this link

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

The governors, the Headmaster and the DSL will assess the level of risk within the Schools and put actions in place to reduce that risk. Risk assessment may include, due diligence checks for external speakers and private hire of facilities, anti-bullying policy and other issues specific to our 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.

Children potentially at greater risk of 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 below highlights some of the groups of children this applies to:

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.

Children's Services share with us which children have a social worker. Once we are aware of this information, we will use it to make decisions in the child's best interest, i.e. their safety, welfare and educational outcomes. When a child has a social worker, safeguarding is at the heart of every decision we make, such as how we react to unauthorised absence or children missing education, which themselves carry additional risks. When necessary, we offer extra in-school support to children who have a social worker.

The Virtual School is a statutory service that exists to provide advice and support for children who have a social worker, children placed in care and previously looked after, such that they have the opportunity to meet their full educational potential. Where needed, we work with the Virtual School to support these children.

Children looked after and previously looked after

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 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 we have 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

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, i.e. the ways we teach children to keep themselves and others safe, is adapted to meet the needs of children with SEND.

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.
- 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

In addition, we would be particularly mindful of children who are:

- Young carers
- Affected by parental substance misuse, domestic abuse or parental mental health needs
- Adverse childhood experiences (ACEs)
- Asylum seekers
- Living away from home
- Vulnerable to being bullied or engaged in bullying
- Already viewed as a "problem"

- Living in temporary accommodation
- Live transient lifestyles
- Living in chaotic and unsupportive home situations
- Vulnerable to discrimination on the grounds of race, ethnicity, religion, disability or sexuality
- At risk of sexual exploitation
- Do not have English as a first language
- At risk of female genital mutilation
- At risk of forced marriage
- At risk of being drawn into extremism

Extended school and off-site arrangements

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

When children attend an alternative provision provider, we continue to be responsible for their safety and wellbeing. We will satisfy itself 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 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. 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.

19. Whistleblowing

A whistleblower is a worker who reports certain types of wrongdoing. All staff have a duty to do so. We aim to create an environment where staff feel able to raise concerns about poor or unsafe practice and potential failures in how it manages safeguarding. Any concerns should be raised with the senior leadership team and will be taken seriously. Please see separate Whistleblowing Policy.

Whistleblowing regarding the Headteacher should be made to the Chair of governors.

If it becomes necessary to consult outside us, they should speak in the first instance, to the Area Schools Officer or LADO in accordance with the Whistleblowing Policy.

Staff are encouraged to use an external, independent and confidential service provided by Navex Global, who can be contacted on their freephone helpline number 0800 069 8180 and through the Navex Global web pages

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

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

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

Identified areas of risk

We are aware that each individual settings within the RGS Group of Schools will have its own identified areas of risk and will have their own risk assessments to help mitigate this.

We will also be mindful of any emerging local risks, for example based on community partnership intelligence from Partner services | Surrey Police or via the Youth Engagement Officers and we will also ensure neighbourhood police aware of any information of concern received about the local area.

There is a wide range of issues that each school may consider as part of this risk assessment, for example:

- Areas on site where children feel unsafe
- Areas where gangs or anti-social behaviour is prevalent.
- School is situated on a busy road or near a level crossing.
- Accessing sports off site.
- Sharing our site with other agencies.
- Building work.

Useful links:

- Youth and school engagement | Surrey Police
- Safer Communities Programme | Healthy Surrey
- Surrey Healthy Schools | Healthy Surrey
- Partner services | Surrey Police

20. Specialist Setting

a. **Choristers are accompanied usually by the** Head of Choral Music, or other appropriate staff during offsite services and performances (applicable at RSM)

b. **EYFS**: we will inform Ofsted of allegations against people living or working on the premises, or of any other abuse alleged to have taken place on the premises as soon as practicable and within 14 days at the latest.

Further advice on Safeguarding and Child Protection is available from the following websites:

- Surrey County Council Education Safeguarding Team webpages
- NSPCC webpages
- Childline webpages
- CEOP ThinkUKnow webpages
- Anti-Bullying Alliance webpages
- Childnet International
- Safer Internet Centre webpages
- Contextual Safeguarding Network webpages
- Surrey Safeguarding Children Partnership webpages
- Lucy Faithfull Foundation webpages
- Surrey Self-Harm Protocols

Early Years Provision Safeguarding Arrangements

We adhere to the requirements set out in the EYFS Statutory Framework including the requirements regarding paediatric first aid training, safer eating and children's privacy in relation to toileting and nappy changes.

Disqualification from working in childcare

Where staff work in, or are involved in the management of, our early years or provision of care of pupils under the age of eight, we will take steps to check whether those staff are disqualified under the Childcare Act 2006. These checks will be undertaken pre-appointment, and from time to time during employment. This forms part of the safer recruitment practices, further details of which can be found in the Recruitment Policy.

We record all checks on staff employed to work in or manage relevant childcare on the Single Central Register. This includes the date disqualification checks were completed.

Where a member of staff is found to be disqualified or if there is doubt over that issue then, pending resolution, we will remove them from the work from which they are or may be disqualified. Suspension or dismissal will not be an automatic response; we will consider if there is scope in principle to redeploy them with other age groups or in other work from which they are not disqualified, subject to assessing the risks and taking advice from the LADO when appropriate.

Use of mobile phones and cameras

Our policy on the use of mobile phones and cameras in the setting can be found in our Online Behaviours Policy OR in the preparatory schools and pre-preparatory school our policy on the use of mobile phones and cameras in school. For example, staff are not permitted to use their personal mobile devices or cameras in school. Staff who wish to use take photographs or video of pupils (whether on a personal or school device) must first speak with the Headteacher to obtain their approval before taking any image of a pupil. Staff who wish to use their personal mobile devices or cameras in school for any other reason must first speak with the Headteacher. Staff who act in breach of this may be subject to disciplinary action. Parents are not permitted to use their mobile phones or camera in or around the EYFS setting without prior approval from the Headteacher.

This policy also links to policies on:

- Administration of medicines
- Alcohol, Drugs and Tobacco
- Anti-Bullying
- Attendance
- Behaviour
- Code of Conduct
- Complaints Policy
- Curriculum
- Equality Policy
- E-Safety Policy
- Health & Safety
- Intimate Care (Preps)
- Mental Health and Wellbeing Policy (RGS)
- Online Behaviours – Pupils (including use of mobile devices)
- Online Behaviours Policy – Staff (including use of mobile devices)
- Pastoral Care Policy
- Physical intervention
- PSHEE
- Relationships and Sex Education
- Risk Assessment
- Safer Recruitment
- SEND Policy
- Teaching and Learning
- The Use of Mobile Technology in School Policy (RSM only)
- Whistleblowing

Appendix 1: Types of abuse and specific safeguarding concerns

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

Forms of abuse and neglect

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

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

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

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

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

For further information on indicators of abuse can be accessed via NSPCC.

Indicators of Abuse

Neglect

Neglect is a lack of care, but poverty and lack of information or adequate services can be contributory factors.

Far more children are registered to the category of neglect on Child in Need and Child Protection plans than to the other categories. As with abuse, the number of children experiencing neglect is likely to be much higher than the numbers on the plans.

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

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

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

Neglect can include parents or carers failing to:

- provide adequate food, clothing and shelter
- protect a child from physical and emotional harm or danger
- ensure adequate supervision or stimulation
- ensure access to appropriate medical care or treatment

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

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

The following is a summary of some of the indicators that may suggest a child is being abused or is at risk of harm.

It is important to recognise that indicators alone cannot confirm whether a child is being abused. Each child should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Do not keep it to yourself. The Neglect Risk Assessment Tool provides staff with a resource to identify and act on concerns regarding neglect.

Physical indicators of neglect:

- Constant hunger and stealing food
- Poor personal hygiene - unkempt, dirty or smelly
- Underweight
- Dress unsuitable for weather
- Poor state of clothing
- Illness or injury untreated

Behavioural indicators of neglect:

- Constant tiredness
- Frequent absence from school or lateness
- Missing medical appointments
- Isolated among peers
- Frequently unsupervised
- Stealing or scavenging, especially food
- Destructive tendencies

Affluent neglect

Affluent neglect refers to the neglect experienced by children in wealthy families. This can be more difficult to spot, as the kind of neglect experienced by children and young people in these circumstances is often emotional.

There are a few risks that children from all walks of life face; being a child in an affluent family is often perceived to protect those children from some of these dangers. Children from wealthier, more 'stable" families are not as sheltered from neglect as is often assumed.

Emotional Neglect

In wealthy families, it can be the case that parents work long hours, leaving children in the care of paid nannies or au pairs. This can create a disconnect emotionally and leave children feeling lonely, with their emotional needs unfulfilled by their parents.

Affluent parents may also put a high amount of pressure on their children to succeed at school, which can sometimes lead to psychological and emotional problems for children.

Parental Alcohol and Substance Abuse, Domestic Violence, and Parental Mental Illness

These factors were frequently considered as problems that only occur in families from poorer socioeconomic backgrounds, however in reality, they can be found in any family regardless of background and have lasting effects on the children in the home.

Drug Use and Sexual Activity

It can be the case that, due to a lack of parental supervision and guidance, wealthier parents may have a more relaxed attitude to the risks their children take, or in many cases are not sufficiently present or available to know about what their children are doing. This often leads to increased risks for their children, who often have the financial access to facilitate drug abuse and the independence to engage in harmful sexual activity.

Why is Affluent Neglect often overlooked?

There are several barriers that may prevent more affluent children, who are experiencing these types of neglect, from accessing the support they need. Firstly, their symptoms may be harder to spot. The nature of emotional neglect can make it much harder to identify than other types of neglect. For example, due to the family having hired help to care for the children they may present as clean, well-dressed, and properly fed when they are, in reality, experiencing emotional neglect.

Wealthy families are often not "on the radar" of protective services. There may also be increased hostility towards agencies, such as social services, from more affluent families, making it more difficult to improve outcomes for children in these circumstances.

The role of unconscious bias also needs to be considered when working with children from wealthier families. Schools and school staff may miss important pieces of the puzzle when they assume that children from wealthy families are less at risk than those from poorer backgrounds. These children may be coming in with new clothes bearing expensive brand labels. It is easy to make presumptions from these indicators that a child is being well looked-after.

Children attending boarding school are even more difficult to identify as neglected. Their parents may often live out of the area or even out of the country. This adds another layer of complexity and can prove challenging, not only for identifying issues in their home life, but also for corresponding with parents to improve child outcomes.

What is the impact?

The emotional neglect, exposure to the toxic trio, and lack of supervision sometimes faced by children from affluent families are adverse childhood experiences (ACEs). ACEs can affect brain development and change how a person's body responds to stress. They have a lasting impact on an individual and the consequences of these adverse experiences can lead to long-term mental and physical health problems, as well as substance misuse and addiction in adulthood.

Emotional Abuse

It is sometimes possible to spot emotionally abusive behaviour from parents and carers to their children, by the way that the adults are speaking to, or behaving towards children. An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later

- Emotional abuse is difficult to define, identify/recognise and/or prove.
- Emotional abuse is chronic and cumulative and has a long-term impact.
- All kinds of abuse and neglect have emotional effects although emotional abuse can occur by itself.
- Children can be harmed by witnessing someone harming another person – as in domestic abuse.
- Most harm is produced in low warmth, high criticism homes, not from single incidents.

Indicators of Emotional Abuse

Developmental issues:

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

Behaviour issues:

- Acceptance of punishment which appears excessive
- Over-reaction to mistakes
- Continual self-deprecation ("I'm stupid… ugly… worthless" etc.)
- Compulsive 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
- Arriving early at school, leaving late

Social issues:

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

Emotional responses:

- Extreme fear of new situations
- Inappropriate emotional responses to painful situations ("I deserve this")
- Fear of parents being contacted
- Self-disgust

- Low self-esteem
- Unusually fearful with adults
- Lack of concentration, restlessness, aimlessness
- Extremes of passivity or aggression

Physical Abuse

Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. 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.

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 our Schools, it is normal to ask about a noticeable injury. Concerns should be increased when:

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

You should be concerned if a child:

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

Sexual Abuse

Sexual abuse is often perpetrated by people who are known and trusted by the child e.g. relatives, family friends, neighbours, babysitters, and people working with the child in school, faith settings, clubs or activities. Children can also be subject to child sexual exploitation.

Sexual exploitation is seen as a separate category of sexual abuse. The SSCP professional guidance provides school staff with information regarding indicators of CSE. Characteristics of child sexual abuse:

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

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

Indicators of Sexual Abuse

Physical observations:

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

Behavioural observations:

- Sexual knowledge inappropriate for age
- Sexualised behaviour or affection inappropriate for age
- Sexually inappropriate behaviour
- Hinting at sexual activity
- Inexplicable decline in educational progress
- Depression or other sudden apparent changes in personality as becoming insecure
- Lack of concentration, restlessness, aimlessness
- Socially isolated or withdrawn
- Overly compliant behaviour
- Acting out, aggressive behaviour
- Poor trust or fear concerning significant adults
- Regressive behaviour
- Onset of wetting, by day or night
- Nightmares
- Arriving early at school, leaving late, running away from home
- Suicide attempts, self-mutilation
- Suddenly drawing sexually explicit pictures
- Eating disorders or sudden loss of appetite or compulsive eating
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Become worried about clothing being removed
- Trying to be "ultra-good" or perfect; overreacting to criticism.

Appendix 2: Specific Safeguarding Concerns

This section is based on Annex B of KCSIE. Annex B includes further information about other safeguarding issues to be aware of. **All concerns under this section should be addressed in line with the What to do if you have concerns about a child's welfare section of this document, unless stated otherwise.**

Children absent from education

All staff will be aware that children missing from education or persistently absent, without explanation and/or for prolonged periods can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. Further, it may also indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so called "honour"-based abuse or risk of forced marriage. We are also aware that absence can increase any existing safeguarding risks.

Attendance is closely monitored to support us in identifying abuse and acting early. Staff will be aware of our 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 our procedure for addressing children missing or absent from education, we make sure it has 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 us without a new school being named.

Our attendance policy and procedures are set out in a separate document. We follow 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

Anti-Bullying

Please see separate Anti-Bullying Policy for further details.

All staff are aware that children with SEND and/or children who identify as Lesbian, Gay, Bisexual, Transgender, Queer or Questioning (LGBTQ+), 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.

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 create a culture where they can speak out or share their concerns with members of staff.

Useful links:

- Surrey Safeguarding Children Partnership Procedures Manual Bullying
- Behaviour in schools (advice for schools, including advice for appropriate behaviour between pupils)
- Relationships Education, Relationships and Sex Education and Health Education guidance
- Preventing bullying - GOV.UK
- Guidance for schools on colleges on gender questioning children (currently in draft, to be finalised

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 another person. Such events should be fully recorded and signed by a witness.

Staff who are likely to need to use physical intervention will be appropriately trained.

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 sometimes touch is appropriate in the context or 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 setting will consider the risks, given the additional vulnerabilities of these children.

Contextual safeguarding

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 record concerns about contextual safeguarding in accordance with our safeguarding procedures. We understand the importance of information sharing, therefore if any contextual safeguarding concerns about the local area are identified, it will share this information with relevant partners. If there is a specific concern about a child, we will consult with Children's Services.

Useful links:

- Tackling Child Exploitation multi-agency Practice Principles
- Contextual Safeguarding Network webpages

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

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Both can occur online. Children can be exploited by adult males or females, as individuals or in groups. 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)

CSE is a form of child sexual abuse which can affect any child. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse, including via the internet.

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. Some children may not realise they are being exploited, for example believing they are in a genuine romantic relationship.

CSE can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development
- become pregnant

See the Sharing nudes and semi-nudes section below for details about 'sextortion".

Child criminal exploitation (CCE)

We recognise children involved in CCE are victims, despite their engagement in crime. A child may have been criminally exploited even if the activity appears to be consensual. Staff will be aware that girls are at risk of criminal exploitation too, and that both boys and girls who are being criminally exploited may be at higher risk of sexual exploitation.

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. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. CCE can include children being forced and/or manipulated:

- to work in cannabis factories.
- into moving drugs or money across the country (county lines).
- to shoplift or pickpocket.
- to threaten serious violence to others.
- into committing vehicle crime.

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

Serious violence

Staff will be aware of the indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include:

- increased absence from school.
- a change in friendships or relationships with older individuals or groups.
- a significant decline in performance.
- signs of self-harm or a significant change in wellbeing.
- 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).

All staff are aware of the range of risk factors increasing the likelihood of involvement in serious violence, such as:

- being male.
- having been frequently absent or permanently excluded from school.
- having experienced child maltreatment.
- having been involved in offending, such as theft or robbery.

Being the victim of, carrying out or allegedly carrying out serious violence (e.g. knife crime) may indicate that a child is involved in county lines.

Useful links:

- Homepage - Surrey Safeguarding Children Partnership
- Crime - Surrey Safeguarding Children Partnership
- Preventing youth violence and gang involvement government guidance
- Criminal exploitation of children and vulnerable adults: county lines government guidance
- Child exploitation | Catch22
- Keeping kids safe - Children's Commissioner for England | Children's Commissioner for England

Children who run away or go missing from education, home or care

We recognise that children who run away, go missing or are absent from education and their normal residence are potentially vulnerable to abuse, exploitation, offending and placing themselves in situations where they may suffer physical harm. The statutory guidance Children Who Run Away or go Missing from Home or Care requires that every child or young person who runs away or goes missing must be offered a return home interview (RHI) within 72 hours of their return.

Useful links:

- Multi agency risk assessment conferences | Healthy Surrey

Mental health

With mental health problems, a child might find the ways they are frequently thinking, feeling or reacting becoming difficult, or even impossible, to cope with. Mental health problems affect around 1 in 6 children. We recognise that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be trained to recognise the signs of a child who may be experiencing a mental health problem. We aim to promote positive mental health for all staff and children. To do so, we take into account the government's Mental health and behaviour in schools guidance.

Useful Links:

- Mind
- NSPCC: Child mental health
- Homepage - Surrey Safeguarding Children Partnership
- Mental health and behaviour in schools - GOV.UK
- Promoting Children and Young People's Emotional Health and Wellbeing GOV.UK
- Better Health Every Mind Matters | Campaigns | Campaign Resource Centre

Domestic Abuse

Domestic abuse can include a wide range of behaviours and may be a single or pattern of incidents. This form of 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 and outside the home. The Domestic Abuse Act

2021 states that 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).

These experiences can have a serious and long-term impact on a child's health, well-being, development and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. The Act states that domestic abuse occurs between at least two people over the age of 16. Therefore, legally, some older children can also commit domestic abuse either in their own intimate relationships or against their parents/carers.

We are signed up to the police initiative Operation Encompass, a scheme between Surrey Police, Surrey Domestic Abuse Service and Surrey schools. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the DSL before the child or children arrive the following day. This ensures that we have 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)

Homelessness

We recognise that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL is 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, including new poverty induced by the pandemic; rent arrears; domestic abuse and antisocial behaviour; and/or the family being asked to leave a property. If a child has been harmed or is at risk of harm, a referral to children's social care will be made.

Useful links:

- Homelessness Reduction Act Factsheets - GOV.UK

Child-on-child abuse

We recognise that children can abuse other children, often referred to as child-on-child abuse. It can happen inside and outside school and online. We also recognise that boarding students may be more vulnerable to sexual harassment and sexual abuse, and staff are mindful of this when they perform their daily duties in school.

This can include, but is not limited to:

- bullying (including online bullying, prejudice-based and discriminatory bullying).
- abuse between children in an intimate relationship.
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (including when a child encourages or threatens physical abuse online).
- sexual violence, such as rape and sexual assault (including when a child encourages or threatens this online).
- sexual harassment, such as sexual comments, jokes and online sexual harassment.
- consensual and non-consensual sharing of nude and semi-nude images and/or videos.

- 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.
- upskirting and initiation/hazing type violence and rituals.

Older children may use any type of child-on-child abuse to "recruit" younger children into gangs, especially in areas where gangs are prevalent. Young people experiencing child sexual exploitation first hand may be forced to "recruit" other young people using types of child-on-child abuse. We are aware that boys are more likely to carry out child-on-child abuse and girls are more likely to impacted by it, but all child-on-child abuse is unacceptable and will be taken seriously.

We do not tolerate child-on-child abuse. We know that even when there are no reported cases, it could still be happening but yet to be reported. We do not downplay child-on-child abuse, especially sexual violence and sexual harassment, as "banter", "just having a laugh", "part of growing up" or "boys being boys". For children to feel safe we make sure children know that child-on-child abuse is not acceptable behaviour and how to report it to a trusted adult if they are experiencing or witnessing it.

It is our duty to minimise the risk of child-on-child abuse. We do this in the following ways:

- Staff read this policy.
- Staff are trained to spot the signs that a child is, or may be experiencing, child-on-child abuse and how to report it. They maintain an attitude that "it could happen here".
- Staff challenge any inappropriate behaviour between children, including the use of derogatory language.
- The behaviour policy, which includes the whole school response to abuse, makes sure everyone knows how to behave and how to respond consistently when children show unacceptable or abusive behaviour.
- In all areas of school life, such as lessons, assemblies and in the playground, we teach children how to act and to treat other people, including when they are online.
- We have effective systems in place for children to report child-on-child incidents.

Child-on-child sexual violence and sexual harassment

Our schools are aware of Ofsted's Review of sexual abuse in schools and colleges. The review was carried out as a result of the large number of testimonies shared on the Everyone's Invited website, which highlighted the prevalence of sexual harassment and sexual violence.

We know that sexual violence and sexual harassment can happen between two children of any age or sex, from a group of children to a single child or group of children, online and face to face. It is more likely that girls will be impacted by sexual violence and more likely that sexual harassment will be instigated by boys. Sexual violence and sexual harassment exist on a continuum and may overlap. They are never acceptable, and we will not tolerate them. National and local research has made us aware of the prevalence and normalisation of harassment and abuse in school-aged children. "No reports" does not mean it is not happening here.

Alongside girls, these groups are at higher risk of sexual violence and sexual harassment:

- children with SEND.
- children who are LGBT+ or who are perceived to be LGBT+ by their peers.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, negatively affect their educational attainment and be worsened if the alleged perpetrator(s) attends the same school. If a child reports an incident, they will be reassured that they have done the right thing by telling a trusted adult, will be taken seriously, supported and kept safe. We will further reassure those affected that the law is there to protect them, not criminalise them.

We are aware that when a child reports sexual violence or harassment, this may only be the start of a larger disclosure that could transpire over time. When there are reports, we will always consider the effectiveness of our policies and procedures and whether any changes are necessary to reduce the risk of it happening again. This will be in line with maintaining a culture of safeguarding. We follow Part 5 of KCSIE when considering our response to sexual violence and sexual harassment. These are mainly captured in the child-on-child abuse section of this policy.

Harmful Sexual Behaviour (HSB)

Children's sexual behaviours exist on a continuum. HSB refers to problematic, abusive and violent sexual behaviours that are developmentally inappropriate and may cause developmental damage. HSB can occur online or face-to-face. We will always consider HSB in a child protection context. We recognise that children displaying harmful sexual behaviours have often experienced their own abuse and trauma and they will be offered appropriate support.

When considering HSB, we will take into account the ages and the stages of development of the children. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years" difference in age, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

Our DSL and deputy 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.

Our curriculum addresses these issues via the following topics according to the age and stage of development of the children:

- healthy and respectful relationships
- what respectful behaviour looks like
- gender roles, stereotyping, equality
- body confidence and self-esteem
- consent

Useful links:

- Surrey Safeguarding Children Partnership Procedures Manual- Harmful Sexual Behaviour
- NSPCC Harmful Sexual Behaviours
- Stop it Now
- Shore Space

Upskirting

We will ensure that all staff and children are aware that "upskirting" is a criminal offence and will not be tolerated. The Criminal Prosecution Service (CPS) defines "upskirting" as: "a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission".

We will decide each incident on a case-by-case basis, with the DSL or a deputy taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police, as required.

Sharing nudes and semi-nudes

This is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18 (UKCIS, 2024). It is a form of child sexual abuse. All incidents will be dealt with as safeguarding concerns. The primary concern at all times will be the welfare and protection of the children involved. While sharing nudes and semi-nudes of themselves or their peers breaks the law, we know it is important to avoid criminalising young people unnecessarily.

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 do not do what is asked. It can happen to anybody, but a large number 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 and 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.

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

So-called "honour"-based abuse (HBA) means incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage and practices such as breast ironing. We are aware this abuse often involves a wider network of family or community pressure and can include multiple perpetrators. Therefore, we will consult with Children's Services before taking any form of action to reduce the dynamic and additional risk factors that might be present as a result.

Female genital mutilation (FGM)

Female genital mutilation (FGM) means all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. The DSL will make sure that staff have appropriate training to prepare them for spotting signs that a child has been affected by FGM or is at risk 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.
- 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).

Useful links:

- Female Genital Mutilation Statutory Guidance
- Surrey Safeguarding Children Partnership Procedures Manual Female Genital Mutilation

Forced marriage

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.

Useful links:

- Freedom charity
- Handling cases of forced marriage guidance
- National FGM Centre
- Forced marriage
- Karma Nirvana

One Chance Rule

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

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

Modern slavery

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 may occur include:

- 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

Private Fostering

Definition: A privately fostered child is a child under 16 (or 18 if disabled) who is cared for by an adult who is not a parent, grandparent, aunt, uncle, stepparent (including civil partnerships), sister or brother where the child is to be cared for in that person's home for 28 days or more.

A child who is looked after or placed in any residential home, hospital or school (where they are receiving full-time education) is excluded from the definition. In a private fostering arrangement, the parent retains parental responsibility.

However, Children under 16 who spend more than two (2) weeks in residence during holiday time in a school, become privately fostered children for the purposes of the legislation during that holiday period. See also Schedule 8 (para 9) Children Act 1989.

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, (as per section 66(1)(a) and (b) of the Children Act 1989) 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.

Looked After Children by the local authority or those who are placed in residential settings, 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. We recognise 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.

We are aware that, by law, a parent or other persons involved in making a private fostering arrangement must notify Children's Services as soon as possible. We have a duty to inform Children's Services of this arrangement if they have not been notified, but we will encourage parents and private foster carers to do so in the first instance. Where a member of staff becomes aware that a child may be in a private fostering arrangement, they will raise this with the DSL and the DSL will notify the C-SPA immediately.

Useful links:

- Surrey Children's Services Procedure Manual Private Fostering
- A5-Private-Fostering-leaflet.pdf

Preventing radicalisation and extremism

While some children are more susceptible, any child can be radicalised into terrorism. We take our statutory duty to prevent children from becoming terrorists or supporting terrorism seriously.

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.

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

To prevent children from being radicalised into terrorism, we make sure:

- 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 Educate against hate government website lists signs that could indicate that a child is being radicalised:

- becoming increasingly argumentative
- refusing to listen to different points of view
- unwilling to engage with children who are different
- becoming abusive to children who are different

- embracing conspiracy theories
- feeling persecuted
- changing friends and appearance
- distancing themselves from old friends
- no longer doing things they used to enjoy
- converting to a new religion
- being secretive and reluctant to discuss their whereabouts
- changing online identity
- having more than one online identity
- spending a lot of time online or on the phone
- accessing extremist online content
- joining or trying to join an extremist organisation

If you have concerns that a child may be at risk of radicalisation or involvement in terrorism, go to Concerns about extremism and radicalisation section of this policy.

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

Child abuse linked to faith or belief

This type of abuse can happen anywhere across any community and/or religion. There are a variety of definitions associated with abuse linked to faith or belief. It can include, but is not limited to, the concept of belief in:

- Witchcraft and spirit possession, demons or the devil acting through children or leading them astray (traditionally seen in some Christian beliefs).
- The evil eye or djinns (traditionally known in some Islamic faith contexts) and dakini (in the Hindu context).
- Ritual or multi-murders where the killing of children is believed to bring supernatural benefits or the use of their body parts is believed to produce potent magical remedies.
- use of belief in magic or witchcraft to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation.

If you suspect a case of child abuse linked to faith or belief, follow the safeguarding procedures in this policy. In addition, the Metropolitan Police's Project Violet team can be contacted on the non-emergency, 24/7 number: 101.

Useful links:

- Child abuse linked to faith or belief | Surrey Police
- Short YouTube introduction video

Fabricated or induced illnesses

Staff 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. The supporting children with medical needs policy details the procedure for ensuring reported medical needs are evidenced by medical professionals.

Useful link:

- The Royal College of Paediatrics and Child Health (RCPCH) guidance

Children and the Court System

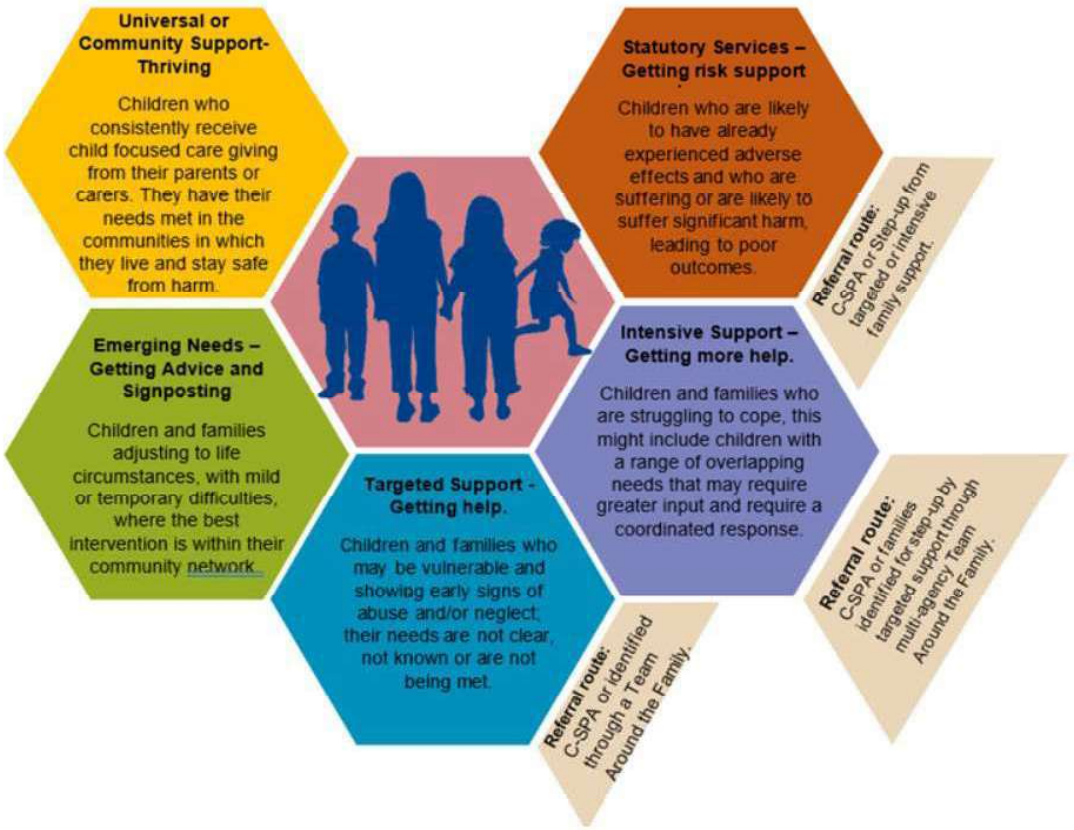
Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children 5-11-year-olds and 12-17-year-olds.

- https://www.gov.uk/government/publications/young-witness-booklet-for-5-to-11-year-olds
- https://www.gov.uk/government/publications/young-witness-booklet-for-12-to-17-year-olds

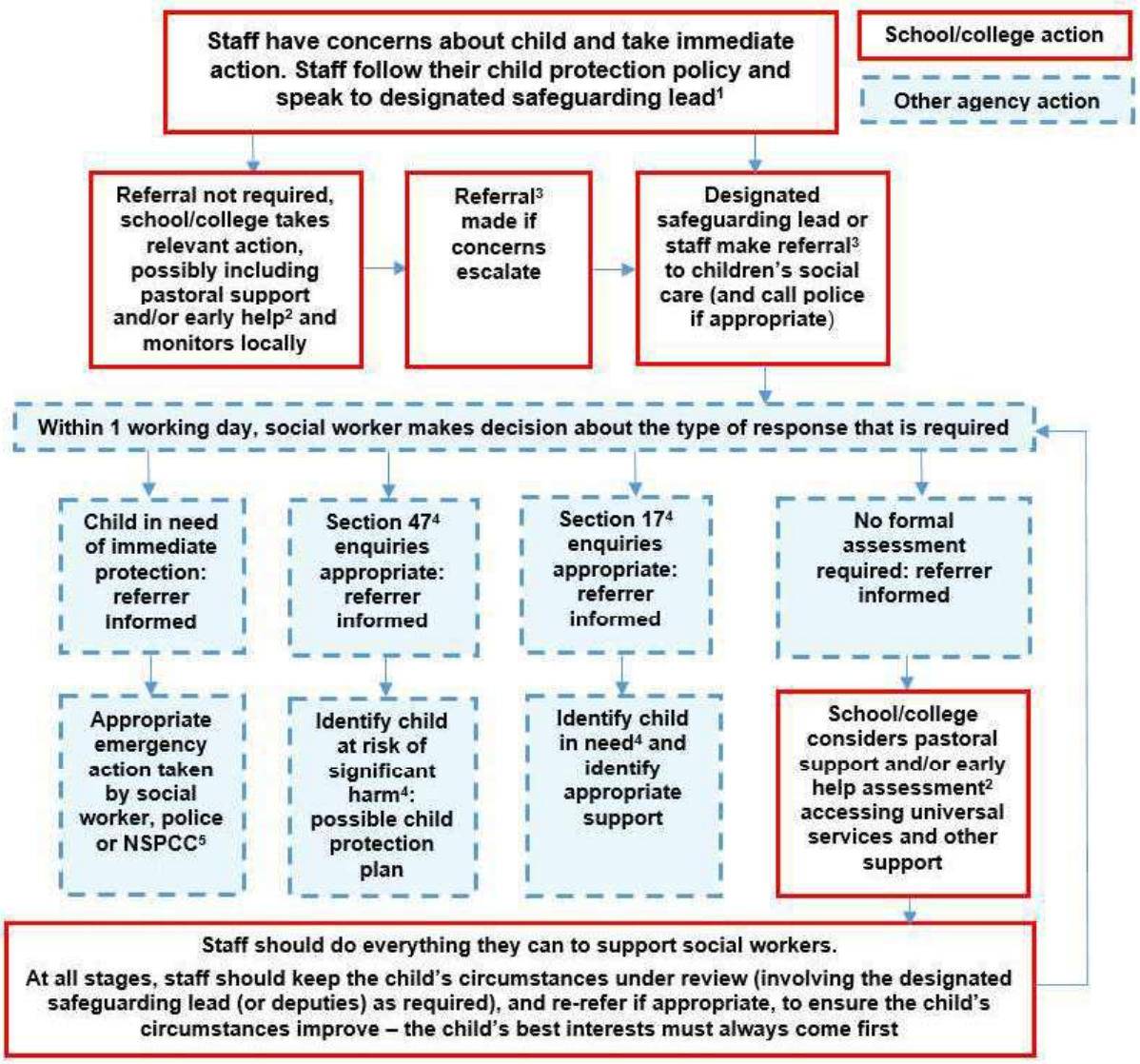
Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. For further information, please see The National Information Centre on Children of Offenders, NICCO which provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Appendix 3: Continuum of Support for families living in Surrey



Appendix 4: Where there are concerns about a child



1. In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.
2. Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of Working Together to Safeguard Children provides detailed guidance on the early help process.
3. Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of Working Together to Safeguard Children.
4. Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of Working Together to Safeguard Children.
5. This could include applying for an Emergency Protection Order (EPO).

Appendix 5: Sexual violence

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

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

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

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

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

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

What is consent?

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

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

Further information about consent can be found here: Rape Crisis England & Wales - Sexual consent.

Sexual harassment

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

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

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

- consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of U18s is a criminal offence. Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK (www.gov.uk)
- 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 are not comfortable with online.

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

Safeguarding Policy Declaration

I, the undersigned, confirm that I have received a copy of the Safeguarding Policy.

I also confirm that I have read, understood and agree to adhere to the terms laid out in these procedures.

Signed: .....

Print Name: .....

Date: .....

(Please remove this sheet and return the signed copy to HR)