MORE HOUSE SCHOOL

SAFEGUARDING AND CHILD PROTECTION POLICY

Policy review

As a school, we review this policy at least annually in line with DfE, SSCP and SCC requirements and other statutory guidance.

Key Personnel
The Designated Safeguarding Lead (DSL) is:
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Designated Teacher for Looked after and Previously Looked after Children (LAC/PLAC) is:
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Nominated safeguarding governor is:
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The Headmaster is:
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01252 792303

The Chair of Governors is:
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The Local Authority designated officer (LADO) is:
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MORE HOUSE SCHOOL

SAFEGUARDING AND CHILD PROTECTION POLICY

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Important Disclaimer:

As a Surrey school, More House's Safeguarding and Child Protection Policy will refer to Surrey County Council and Surrey Safeguarding Children's Partnership services and procedures. School staff will be expected to follow procedures as set out by Surrey Safeguarding Children Partnership (SSCP) and contact with other counties will occur via the Safeguarding Team.

MORE HOUSE SCHOOL

SAFEGUARDING AND CHILD PROTECTION POLICY

Rationale and Policy Statement:

More House School is a charitable company for the benefit of educating boys with Developmental Language Disorder and Specific Learning Difficulties. Its core aim is the operation of an environment in which all pupils are educated so that they realise success in public examinations and develop self-confidence and social skills to enable them to participate fully in society and keep themselves safe. The safety and wellbeing of all our pupils is of paramount importance to us, at More House School.

At More House School we are committed to safeguarding children and young people and we expect everyone who works in our school to share this commitment. Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. We will always act in the best interest of the child.

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children.

We make every effort to provide an environment in which children and adults feel safe, secure, valued, and respected, and feel confident to talk if they are worried, believing they will be effectively listened to.

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 in our school. The policy also informs parents and carers how we will safeguard their children whilst they are in our care.

Definitions

Safeguarding and promoting the welfare of children is defined as:

- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- 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.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 2 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 2 defines neglect in more detail.

Sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos, or live streams.

Early Help means providing support as soon as any needs emerge or are identified at any point in a child's life.

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

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

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

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

MAP refers to the Surrey Multi-Agency Partnership.

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

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education 2023 (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- A clinical commissioning group for an area within the LA
- The chief officer of police for a police area in the LA area

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

Policy Principles and Values

- The welfare of the child is paramount.
- Maintain an attitude of "It could happen here".
- Maintain a "zero tolerance" approach to sexual violence and sexual harassment.
- Children have a right to feel safe and secure, they cannot learn effectively unless they do so.
- All children have a right to be protected from harm and abuse.

- All staff have a role in the prevention of harm and abuse and an equal responsibility to act immediately on any suspicion or disclosure that may indicate a child is at risk of harm, either in the school or in the community, considering contextual safeguarding, in accordance with statutory guidance.
- We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working to protect and safeguard children.
- Whilst the school will work openly with parents as far as possible, there will be instances which require engagement with external agencies including the police. The school will take a 'safeguarding first' approach to this, however it will also be guided by the principles found here: When-to-call-police-guidance-for-schools-and-colleges.pdf (governmentevents.co.uk).
- There are occasions when the police and/or children's services will be informed of an incident and this does not require, nor does it necessitate a request for permission from the pupil or his parents. The school reserves the right to contact the relevant Local Authority Children's Social Care or the Police, without notifying parents if this is believed to be in the child's best interests and/or to minimise the continuing risk of harm to the child.
- The school will only do this in cases where it is essential and will take guidance from the police and/or children's services regarding contacting parents or speaking to the pupils involved.
- We will always act in the best interests of the child and ensure that our decisions around safeguarding take a child-centred and coordinated approach.

Equality statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after
- Are missing from education
- Whose parent/carer has expressed an intention to remove them from school to be home educated

Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education 2023 (KCSIE 2023) and Working Together to Safeguard Children (2023), the Governance Handbook and Surrey Safeguarding Children Partnership (SSCP) Procedures. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Human Rights Act 1998, which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights (ECHR)
- The Equality Act 2010, which makes it unlawful to discriminate against people regarding particular protected characteristics.
- The Public Sector Equality Duty (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- The Education and Training (Welfare of Children) Act 2021 – covers 16-19 academies and further education apprenticeships and technical education.

Other guidance and documents referred to in this policy

- The Education Act 2002
- Disqualification under the Childcare Act 2006 (updated 2019)
- What to do if you are worried a child is being abused 2015
- Teacher Standards 2011
- Information Sharing: Advice for Practitioners guidance 2018
- Education (Independent School Standards) Regulations 2014
- Revised Safeguarding Statutory Guidance Framework for the Assessment of Children in Need and their Families 2000

Supporting Children - Roles and Responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour for Learning policy
- Pastoral support system
- Planned programme of Relationship and Sex Education (RSE), which is inclusive and delivered regularly, tackling issues such as:

- Healthy and respectful relationships
- Boundaries and consent
- Stereotyping, prejudice and equality
- Body confidence and self-esteem
- How to recognise an abusive relationship (including coercive and controlling behaviour)
- The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support
- What constitutes sexual harassment and sexual violence and why they're always unacceptable

Supporting Children

Our school may provide a safe place and stability in the lives of children who have been abused or who are at risk of harm. We recognise that a child who is abused or witnesses abuse and/or violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth. 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.

More House School will support all children:

- Promote a caring, safe, and positive environment within the school.
- Encourage self-esteem and self-assertiveness, through the curriculum and through positive relationships within the school community.
- Ensure children are taught to understand and manage risk through personal, social, health and economic (PSHEE) education and Relationship and Sex Education (RSE) and through all aspects of school life, including staying safe online.
- Respond sympathetically to any requests for time out to deal with distress and/or anxiety.
- Offer details of helplines, counselling, or other avenues of external support.
- Liaise and work in partnership with other support services and agencies involved in the safeguarding of children.
- Notify Children's services without delay if there is an immediate risk of significant harm.
- Provide continuing support to children about whom there have been concerns who leave the school by ensuring that information is shared confidentially with the child's new setting. We will ensure the school records are forwarded as a matter of priority and within statutory timescales.
- The school recognises it plays a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection.

The school will:

- Establish and maintain an ethos where children feel safe and secure, are encouraged to talk, and are always listened to.
- Include regular consultations with children e.g., through questionnaires, participation in anti-bullying activity, asking children to report whether they feel safe in the school.
- Ensure children know that there are adults in the school who they can approach if they are worried or have concerns.
- Include safeguarding across the curriculum, including PSHEE, opportunities which equip children with the skills they need to assess and manage risk appropriately, stay safe from harm and to know to whom they should turn 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.
- 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.

Role of the school

The school will ensure that:

- The school operates safer recruitment procedures in line with KCSIE 2023 which includes statutory checks on the suitability of staff to work with children.
- All staff receive information about the school's safeguarding arrangements, the staff code of conduct, Safeguarding and Child Protection policy, the role and names of the Designated Safeguarding Lead (DSL) and their deputy Designated Safeguarding Lead (DDSL), and Keeping Children Safe in Education 2023 part 1 and annex B. All staff will sign to say they have read and understood it. This applies to the Governing body in relation to part 2 of the same guidance.
- All staff receive safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction in line with advice from SSCP. Training is regularly updated as required, and at least annually to continue to provide them with relevant skills and knowledge to safeguard children effectively.
- All members of staff are trained in and receive regular updates in online safety and reporting concerns.
- All members of staff maintain a zero-tolerance approach to sexual violence and sexual harassment.
- All staff and governors have regular safeguarding and child protection awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse.
- The Safeguarding and Child Protection Policy is made available via the school's website and a paper copy is available upon request for parents/carers.
- All parents/carers are made aware of the responsibilities of staff members with regard to safeguarding and child protection procedures.
- It provides a coordinated offer of early help when additional needs of children are identified and contribute to early help arrangements and inter-agency working and plans.
- The school's lettings policy will seek to ensure the suitability of adults working with children on the school site at any time and ensure that any groups who use the school's premises have Safeguarding and Child Protection policies and procedures in place.
- Community users organising activities for children are aware of the school's Safeguarding and Child Protection Policy, guidelines and procedures.
- The name of the designated members of staff for safeguarding and child protection, the DSL and DDSL(s), are clearly advertised in the school.

All Staff:

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

- Maintain an attitude of "It could happen here" with regards to safeguarding.
- Understand that safeguarding is "everyone's responsibility".
- Maintain a zero-tolerance approach to sexual violence and sexual harassment.
- Read and understand Part 1 and Annex B of KCSIE 2023.
- In addition to this all staff will be aware of the systems in place which support safeguarding including reading this Safeguarding and Child Protection Policy; the Behaviour for Learning Policy; the Staff Code of Conduct); safeguarding response to children who are absent from education, particularly on repeat occasions and/or for prolonged periods; and the role of the DSL.
- Know who and how to contact the DSL and DDSL, the Chair of Governors, and the Governor responsible for safeguarding.
- Be aware of indicators of abuse and neglect understanding that children can be at understanding that children can be at risk of harm inside and outside of the school, inside and outside of home and online. Exercising professional

curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

- Be able to identify vulnerable learners and take action to keep them safe. Information or concerns about learners will be shared with the DSL where it includes those:
    - who may need a social worker and may be experiencing abuse or neglect
    - requiring mental health support
    - may benefit from early help
    - where there is a radicalisation concern
    - where a crime may have been committed
- Provide a safe environment in which children can learn.
- Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to.
- Ensure children know that there are adults in the school who they can approach if they are worried or have concerns.
- Be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- 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.
- Take immediate action if they have a mental health concern about a child that is also a safeguarding concern, following our Safeguarding and Child Protection Policy and procedures.
- Plan opportunities within the curriculum for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe.
- Attend training in order to be aware of and alert to the signs of abuse and neglect.
- Know how to respond to a child 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).
- Report their concerns if they are worried that a child is being abused to the DSL immediately that day. If the DSL is not contactable immediately a Deputy DSL must be informed. The concern must be recorded on CPOMS as soon as possible the same day.
- Be prepared to refer directly to the Children's Single Point of Access (C-SPA), and the Police if appropriate, if there is a risk of significant harm and the DSL or their DDSL is not available.
- Follow the allegations procedures, as set out in this policy and KCSIE 2023, if the disclosure is an allegation against a member of staff, supply staff, volunteer, contactor or individual or organisation using school premises for running activities for children.
- Report low-level concerns (as defined in KCSIE 2023) about any member of staff/supply staff or contractor to the Headmaster or through the Neutral Notifications form. Where a low-level concern is raised about the Headmaster it will be shared with the Chair of Governors.
- Provide support for children subject to Early Help, Child in Need or Child Protection and be involved where appropriate, in the implementation of individual plans to further safeguard vulnerable learners and understand their academic progress and attainment and maintain a culture of high aspirations for this cohort.
- A member of staff who is approached by a child should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they need to pass information to other professionals to help keep the child and/or other children safe. The degree of confidentiality should always be governed by the need to protect the child.
- Notify the DSL or their Deputies of any child on a child protection plan or child in need plan who has unexplained absence.
- Understand early help and be prepared to identify and support children who may benefit from early help. Liaise with other agencies that support children and provide early help.
- Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)

- Be mindful that the Teachers' Standards that states teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties
- Know what to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- Understand that children who are (or who are perceived to be) lesbian, gay, bisexual or transgender (LGBT) can be targeted by other children.
- Know to look for to identify children who need help or protection.

The Headmaster:

In addition to the role and responsibilities of all staff the Headmaster is responsible for the implementation of this policy and will ensure that:

- The school fully contributes to inter-agency working in line with Working Together to Safeguard Children 2023 guidance.
- The Safeguarding and Child Protection Policy and procedures are implemented and followed by all staff (including temporary staff).
- The school has appropriate policies in place that make it clear that sexual harassment, online sexual abuse, and sexual violence (including sexualised language) is unacceptable, with appropriate sanctions and support in place.
- That the school's staff have appropriate knowledge of part 5, of KCSIE 2023.
- That all children are supported to report concerns about harmful sexual behaviour freely. That concerns are taken seriously and dealt with swiftly and appropriately, and children are confident that this is the case, and that comprehensive records of all allegations are kept.
- All staff undertake appropriate safeguarding and child protection training and that they are aware of the role of the DSL, including their identity of the DSL and the deputies.
- Sufficient time, training, support, funding, resources, including cover arrangements where necessary, are allocated to the DSL to carry out their role effectively, including the provision of advice and support to school staff on child welfare and child protection matters, to take part in strategy discussions/meetings and other inter-agency meetings and/or support other staff to do so; and to contribute to the assessment of children.
- Opportunities are provided for a co-ordinated offer of early help when additional needs of children are identified.
- Deputy DSLs are trained to the same standard as the DSL and the role is explicit in their job description.
- Adequate and appropriate DSL cover arrangements are in place for any out of hours/out of term activities.
- Where there is a safeguarding concern that the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Child-centred systems and processes are in place for children to express their views and give feedback.
- All staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle-blowing procedures.
- Children are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.
- Allegations or concerns against staff and other adults are dealt with in accordance with guidance from the Department for Education (DfE), Surrey Safeguarding Children Partnership (SSCP) and Surrey County Council (SCC).
- Statutory requirements are met to make a referral to the Disclosure and Barring Service and additionally, in the case of teaching staff, the Teacher Regulation Agency, where they think an individual has engaged in conduct that harmed (or is likely to harm) a child; or if the person otherwise poses a risk of harm to a child.
- Keep records of "low level concerns" in cases which concern a member of staff/supply staff/contractor or a volunteer. The records should include details of the concern, the context in which the concern arose, decisions 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.

- In the event of an allegation of abuse is made against another member of staff or volunteer, they will act as the 'case manager' where appropriate.

The Designated Safeguarding Lead

The DSL is a member of the senior leadership team. Our DSL is Amy Lee, Head of Safeguarding. The DSL takes lead responsibility for child protection and wider safeguarding in the school.
When the DSL is absent, the deputy – Alexandra Rositano, Deputy Head (Head of Residential) – will act as cover.

The full responsibilities of the DSL and the deputy are set out in their job descriptions.

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

- Hold the lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place) in the school, this responsibility is not able to be delegated.
- Liaise with the Surrey Country Council and work in partnership with other agencies in line with Working Together to Safeguard Children (2023).
- Where necessary contact Surrey's Child Protection Consultation Line for advice and support.
- Manage and submit a Request for Support Form for a child if there are concerns about suspected harm or abuse, to the C-SPA, and act as a point of contact and support for school staff. Requests for support should be made securely by email to cspa@surreycc.gov.uk using the Request for Support Form; urgent referrals should be made by telephone 0300 470 9100 (and ask for the priority line).
- Report concerns that a child may be at risk of radicalisation or involvement in terrorism, use the Prevent referral form to refer cases by e-mail to preventreferrals@surrey.pnn.police.uk . If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101 or 01483 632982 and ask to speak to the Prevent Supervisor for Surrey. The Department for Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).
- Refer cases where a crime may have been committed, to the Police as required.
- Liaise with the "case manager" and Local Authority Designated Officer (LADO) for child protection concerns in cases which concern a member of staff/supply staff/contractor or a volunteer; and refer cases where a person is dismissed or left service due to risk/harm to a child to the Disclosure and Barring Service and Teaching Regulation Agency, as required.
- Follow DfE and KCSIE 2023 guidance on 'Child-on-child Abuse' when a concern is raised that there is an allegation of a child abusing another child within the school.
- When there has been a report of sexual violence, make an immediate risk and needs assessment. Additionally, where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis and will be put in place as required.
- Be available during term time (during school hours) for staff in school to discuss any safeguarding concerns. Appropriate and adequate cover arrangements will be arranged by the DSL and the school leadership for any out of hours/term activities.
- Act as a source of support and expertise in carrying out safeguarding duties for the whole school community.
- Ensure that the names of the DSL and DDSL, are clearly advertised, with a statement explaining the school's role in referring and monitoring cases of suspected abuse.
- Encourage and promote a culture of listening to children and taking account of their wishes and feelings, amongst all staff.
- Access training and support to ensure they have the knowledge and skills required to carry out the role.
- 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 Support.

- Have a clear understanding of access and referral to the local Early Help offer and will support and advise members of staff where early help intervention is appropriate
- Have a working knowledge of how Surrey Country Council conducts an initial child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Understand the lasting impact that adversity and trauma can have, including on the children's behaviour, mental health, attendance, progress and wellbeing, and what is needed in responding to this in promoting educational outcomes.
- Understand and support the school delivery with regards to the requirements of the Prevent duty and provide advice and guidance to staff on protecting children from radicalisation.
- Liaise with school staff (especially pastoral support, behaviour leads, school health colleagues and the SENDCO) on matters of safety and safeguarding and consult the SSCP's Continuum of Support indicators document to inform decision making and liaison with relevant agencies.
- Be alert to the specific needs of children in need, those with Special Educational Needs and Disabilities (SEND) and young carers.
- Understand the risks associated with online activity and be confident that they have the up-to-date knowledge and capability to keep children safe whilst they are online at school; in particular understand the additional risks that children with SEND face online and the associated and appropriate support they require.
- The DSL will undertake child protection and safeguarding training at least every 2 years.
- In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).
- They will also undertake Prevent awareness training.
- Work with the Headmaster and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at the school.
- Keep detailed, accurate records (either written or using appropriate secure online software), that include all concerns about a child, even if there is no need to make an immediate referral and record the rationale for decisions made and action taken.
- Ensure that an indication of the existence of the additional safeguarding/child protection file is marked on the child's main file record.
- Ensure that when a child transfers school (including in-year), their child protection file is passed to the new school/college within 5 days or within 5 days of the start of a new term (separately from the main child's file and ensuring secure transit) and that confirmation of receipt is received.
- Ensure that where a child transfers school and is on a child protection plan or is a child looked after, their information is passed to the new school/college immediately and that the child's social worker is informed.
- If the transit method requires that a copy of the Child Protection file is retained until such a time that the new school/college acknowledges receipt of the original file, the copy should be securely destroyed on confirmation of receipt.
- In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.
- Report to the Headmaster any significant issues, for example, use of the Surrey's FaST Resolution Process enquiries under section 47 of the Children Act 1989 and Police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.
- Ensure that the case holding Social Worker is informed of any child currently with a child protection plan who is absent without explanation.

- Organise child protection and safeguarding induction, regularly updated training, and a minimum of annual updates (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) for all school staff, keep a record of attendance and address any absences.
- Ensure each member of staff has access to, and understands, the school's Safeguarding and Child Protection policy procedures, especially new and part-time staff.
- Ensure that in collaboration with the school leadership and governors, the Safeguarding and Child Protection policy is reviewed annually, and the procedures and implementation are updated and reviewed regularly.
- Ensure that the *Safeguarding and Child Protection policy* is available publicly and that parents are aware that referrals about suspected harm and abuse will be made and the role of the school in this.
- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and leadership staff.
- Establish and maintain links with the Local Authority safeguarding partners to make sure staff are aware of training opportunities and the latest policies on local safeguarding arrangements.
- Contribute to and provide, with the Headmaster and Chair of Governors, the "Audit of Statutory Duties and Associated Responsibilities" to be submitted annually to the Surrey County Council, Education Safeguarding Team.
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
- Contribute to the assessment of children.
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies.
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support.
- Have a good understanding of harmful sexual behaviour.
- Ensure that all staff electronically sign to say they have read, understood and agree to work within the School's Safeguarding and child protection policy, Staff Code of Conduct and KCSIE 2023 Part 1 and annex B and ensure that the policies are used effectively.
- Meet all other responsibilities as set out for DSLs in KCSIE 2023.

The Deputy Designated Safeguarding Leads

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

- Be trained to the same standard as the DSL and the role is explicit in their job description.
- Provide support and capacity to the DSL in carrying out delegated activities of the DSL; however, the lead responsibility of the DSL cannot be delegated.
- In the absence of the DSL, carry out the activities necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the DSL the DDSL will assume all of the functions of the DSL.
- Undertake child protection and safeguarding training at least every 2 years.
- Undertake Prevent awareness training.

The Governing Body

All members of the governing body understand and fulfil their responsibilities to ensure that:

- There is a whole school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- A nominated governor for safeguarding is identified.

- Governing bodies should ensure that all members receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the school are effective and support the delivery of a robust whole school approach to safeguarding. Training should be regularly updated.
- The child's wishes and feelings are considered when determining what action to take and what services to provide.
- The school has effective safeguarding policies and procedures, including a Safeguarding and Child Protection policy, a Staff Code of Conduct, a Behaviour for Learning policy and a response to children who are absent from education, particularly on repeat occasions and/or for prolonged periods.
- Policies are consistent with SSCP and statutory requirements, are reviewed annually (as a minimum) and updated if needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt and that the Safeguarding and Child Protection policy is available on the school's website.
- The SSCP is informed in line with local requirements about the discharge of duties via the Biennial (s 157 s 175) Statutory Audit for Safeguarding Arrangements and Termly Safeguarding Data Collections.
- Ensure recruitment, selection and induction follow safer recruitment practice including all appropriate checks.
- The school operates a safer recruitment procedure that includes statutory checks on staff suitability to work with children and disqualification by association regulations, and by ensuring that there is at least one person on every recruitment panel who has completed safer recruitment training, if there is not a panel conducting interviews then the individual will have completed the safer recruitment training.
- At least one member of the governing body has completed safer recruitment training.
- Staff have been trained appropriately and this is updated in line with guidance and all staff have read KCSIE 2023 part 1 and Annex B and that mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance.
- Ensure that, the requirement for staff to undergo regular updated safeguarding training, including online safety and the requirement to ensure children are taught about safeguarding, are integrated, aligned, and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning.
- Considering the above training requirements, Governing bodies should have regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all children.
- All staff including temporary staff are provided with the school's Safeguarding and Child Protection policy and if applicable the staff code of conduct.
- Take a proportionate risk-based approach to the level of information that is provided to temporary staff, volunteers and contractors.
- The school has procedures for dealing with allegations of abuse against staff (including the Headmaster), volunteers and against other children and that a referral is made to the DBS and/or the Teaching Regulation Agency (as applicable) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have had they not resigned.
- As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Headmaster, they will receive training in managing allegations for this purpose.
- Policies and processes are in place to deal with concerns (including allegations) which do not meet the harm threshold or "low level concerns" as defined in KCSIE 2023.
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors).
- A member of the senior leadership team has been appointed by the governing body as the DSL who will take lead responsibility for safeguarding and child protection and that the role is explicit in the role holder's job description.
- That on appointment, the DSL and DDSL undertake interagency training (SSCP Foundation Modules 1 and 2) and also initially undertake DSL 'New to Role' with 'Refresher' training at least every two years as well as attending DSL network events, to refresh knowledge and skills.

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support.
- Children are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through personal, social, health and economic education (PSHEE) and relationships and sex education (RSE).
- Alongside the school, governors will regularly review the effectiveness of filtering and monitoring systems in place to safeguard children online.
- Ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies.
- The school will comply with DfE and the Surrey County Council Policy Guidance for Safeguarding Children Missing Education and Education other than at school.
- Clear systems and processes are in place for identifying possible mental health concerns, including routes to escalate and clear referral and accountability systems.
- Ensure that safeguarding and child protection files are maintained as set out in KCSIE 2023 Annex C.
- Enhanced DBS checks (without barred list checks unless the governor is also a volunteer at the school) are in place for all governors.
- Ensure section 128 checks are undertaken as defined in KCSIE 2023.
- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
    - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place and inspect them if needed.
    - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate.
    - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.
- They are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements.
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised.
- The school will comply with regular data returns requested by the Local Authority, regarding all children of statutory school age, attending alternative provision and/or on a reduced or modified timetable.
- Any weaknesses in safeguarding are remedied immediately.
- All governors will read KCSIE 2023 in its entirety.

Virtual School heads

Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

They should also identify and engage with key professionals, e.g. DSLs, SENCOs, social workers, mental health leads and others.

Training

- All staff receive safeguarding and child protection training at induction which is in line with advice from SSCP including; whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities and can identify signs of possible abuse or neglect. The training is regularly updated and all staff receive safeguarding and child protection updates as required, but at least annually.

- This training will be regularly updated and will:
    - Be integrated, aligned, and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
    - Be in line with advice from the 3 safeguarding partners
    - Have regard to the Teachers' Standards to support the expectation that all teachers:
        - Manage behaviour effectively to ensure a good and safe environment
        - Have a clear understanding of the needs of all pupils
- All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children may be susceptible to being drawn into terrorism and to challenge extremist ideas.
- Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins, and staff meetings).
- Contractors will also receive safeguarding training.
- Volunteers will receive appropriate training, if applicable.

Confidentiality, Sharing and Withholding Information

All matters relating to child protection will be treated as confidential and only shared as per the 'Information Sharing Advice for Practitioners' (DfE 2018) guidance. The school will refer to the guidance in the Data protection: toolkit for schools to support schools with data protection activity, including compliance with General Data Protection Regulation (GDPR).

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

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act 1998 and GDPR are not a barrier to sharing information where a failure to do so would place a child at risk of harm. There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.

If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

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. If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy).

All staff are aware that they cannot promise a child to keep a disclosure confidential.

All staff will keep a record of their decision and the reason for sharing the information, with whom and for what purpose.

All staff must be aware that timely information sharing is essential to effective safeguarding.

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

- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
    - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
    - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
    - The DSL should consider that:
        - Parents or carers should normally be informed (unless this would put the victim at greater risk)
        - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
        - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- Regarding anonymity, all staff will:
    - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
    - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
    - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome

Concerns and referrals will be kept in a separate child protection file for each child on CPOMS.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.
Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.
The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

Reporting and responding to safeguarding concerns

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

The aim of our procedures is to provide a robust framework which enables staff to take appropriate action when they are concerned that a child is being harmed or abused or is at risk of harm or abuse.

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

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

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

- Listen to and believe the child. Allow the child time to talk freely and do not ask leading questions.
- Stay calm and do not show that you are shocked or upset.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it.
- Report it to the DSL immediately (typically via CPOMS).
- Make an accurate record (which may be used in any subsequent court proceedings) as soon as possible on CPOMS and within 24 hours of the occurrence, of all that has happened, including details of:

  - Dates and times of their observations.
  - Dates and times of any discussions in which they were involved.
  - Place
  - Who was present
  - Context
  - Details of disclosures/concern (using the child's voice)
  - Demeanour/non verbal behaviours of the child
  - Any injuries.
  - Rationale for decision making and action taken.
  - Actions taken
- The records must be signed and dated by the author or /equivalent on electronic based records.
- The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention must not be delayed if the DSL is not immediately available.
- If in exceptional circumstances the DSL or their Deputies are not available, staff must be prepared to refer directly to C-SPA (and the Police if appropriate) if there is the potential for immediate significant harm.
- Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

All staff should be aware that children may:
- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected.
- Not recognise their experiences as harmful.
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

Following a report of concerns the DSL must:

- Using the SSCP Continuum of support indicators and/or Surrey's professional's consultation line decide whether or not there are sufficient grounds for suspecting harm, in which case a request for support must be made to the C-SPA and the Police if it is appropriate.
- The school should try to discuss any concerns about a child's welfare with the parent/carer and where possible obtain their agreement before making a referral to the C-SPA. However, this should only be done when it will not place the child at increased risk or could impede a Police investigation. Where there are doubts or reservations about involving the child's family, the DSL should clarify with the C-SPA or the Police whether the parents/carers should be told about the referral and, if so, when and by whom. This is important in cases where the Police may need to conduct a criminal investigation. The child's views should also be considered.
- If there are grounds to suspect a child is suffering, or is likely to suffer, harm or abuse the DSL must contact the C-SPA. If a child is in immediate danger and urgent protective action is required, the Police (dial 999) must be called. If the DSL feels unsure about whether a referral is necessary, they can phone the C-SPA to discuss concerns.
- If there is not a risk of significant harm, the DSL will either actively monitor the situation or consider offering early help.
- When a child needs urgent medical attention and there is suspicion of abuse the DSL or their Deputies should take the child to the accident and emergency unit at the nearest hospital, having first notified the C-SPA. The DSL should seek advice about what action the C-SPA will take and about informing the parents, remembering that parents should normally be informed that a child requires urgent hospital attention.
- The exception to this process will be in those cases of known FGM where there is a mandatory requirement for the teacher to report directly to the Police. The DSL must also be made aware.

Dealing with safeguarding concerns

All staff:

A member of staff who is approached by a child should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they 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.

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

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

Guiding principles

- Receive
- Reassure
- Respond
- Report
- Record
- Remember
- Review (by the DSL)

What happens next?

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

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

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

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

Early Help Assessment

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting 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 will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review and the school will consider a referral to the relevant local authority children's social care if the child's situation does not appear to be improving or is getting worse. Timelines of interventions will be monitored and reviewed.

Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.
We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.
To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
  - Pupils can report any concern they may have with any member of staff.
  - Pupils are able to report any concerns via the 'Worry Button' form which they are able to access from the school computers or through teams from home.
  - Pupils are made aware of the ways they can report by their form tutor and also during PSHE lessons.

Safeguarding concerns and allegations made against adults who work with children

At More House School we recognise the possibility that adults working in the school may harm children, including governors, volunteers, supply teachers, agency staff and individuals or organisations who use the school premises for running activities for children.

Concerns may come from various sources, for example, a suspicion; complaint; or disclosure made by a child, parent, or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

The Headmaster has to decide whether the concern is an allegation or low-level concern. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO).

Procedure for Allegations that meet the harm threshold

Surrey's LADO procedure will be followed where it is alleged that anyone working in the school 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;**
- **possibly committed a criminal offence against or related to a child;**
- **behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or**
- **behaved or been involved in an incident outside of the school which did not involve children but could impact on their suitability to work with children.**

The last bullet point above includes behaviour that may have happened outside of the school, that might make an individual unsuitable to work with children, this is known as transferable risk.

If we're in any doubt as to whether a concern meets the harm threshold, we will consult the LADO.

When considering allegations of suitability, (the fourth criteria above) the LADOs would consider the following situations:

- Parents of children who are placed on a CP plan, CIN plan or are receiving Early Help
- Arrests for offences against adults
- Presentation to other professionals around mental health, domestic abuse and/or substance misuse
- Extreme political or religious viewpoints which could be considered Hate Crime
- Concerns about behaviour in their private lives which may impact on children

In any of these situations the LADO criteria for intervention will be assessed against the likelihood and impact of transferable risk to children.

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

- Report any concerns to the Headmaster immediately.
- If an allegation is made against the Headmaster, 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 should be contacted directly.
- There may be situations when the Headmaster 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 Headmaster or Chair of Governors, they will contact the LADO (as part of their mandatory duty) on 0300 123 1650 option 3 LADO or Email: LADO@surreycc.gov.uk immediately and before taking any action or investigation.
- Following consultation with the LADO Inform the parents of the allegation unless there is a good reason not to.
- In liaison with the LADO, the school will determine how to proceed and if necessary, the LADO will refer the matter to the relevant Local Authority Children's Social Care and/or the Police.
- If the matter is investigated internally, the LADO will advise the school to seek guidance from local authority colleagues in following procedures set out in part 4 of KSCIE 2023 and the SSCP procedures.

Full details on the school's procedure for dealing with allegations and low-level concerns about a staff member, is in the *Managing Allegations of Abuse made against a member of staff policy*.

Low-Level Concerns - concerns that do not meet the harm threshold

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' – that an adult working in or behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority.

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

- Breaches of the code of conduct
- Failure to follow policy, procedure, or guidance
- Any breach of data protection or confidentially
- Poor behaviour management
- Inappropriate use of social media
- Misadministration of medication
- Inappropriate use of language, shouting or swearing

- Discussing personal or sexual relationships, with or in the presence of pupils
- Making (or encouraging others to make) unprofessional comments which scapegoat, demean or humiliate children, or might be interpreted as such
- Being overly friendly with children
- Having favourites (generous marking of work, overuse of praise, a particular child given 'special' tasks, extra support that is not necessary)
- Taking photographs of children on their mobile device, contrary to school policy
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door, outside of prescribed school protocols or guidance

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

If the concern has been raised via a third party, the Headmaster 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.

The purpose of reporting low-level concerns is to create a culture of openness, trust and transparency in which the school's values and expected behaviour set out in the staff code of conduct are lived, monitored and reinforced constantly by staff. Staff are encouraged to 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.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

Reports should be made in a timely manner, staff can report any low level concern either by emailing the headmaster directly or completing a neutral notification form. All low-level concerns reports should include the following information:

- name* of individual sharing their concerns
- name of the person the concern is regarding

- 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 will be kept confidential, held securely, and comply with the Data Protection Act 2018.

Records will 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.

The records' review might identify that there are wider cultural issues within the school 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.

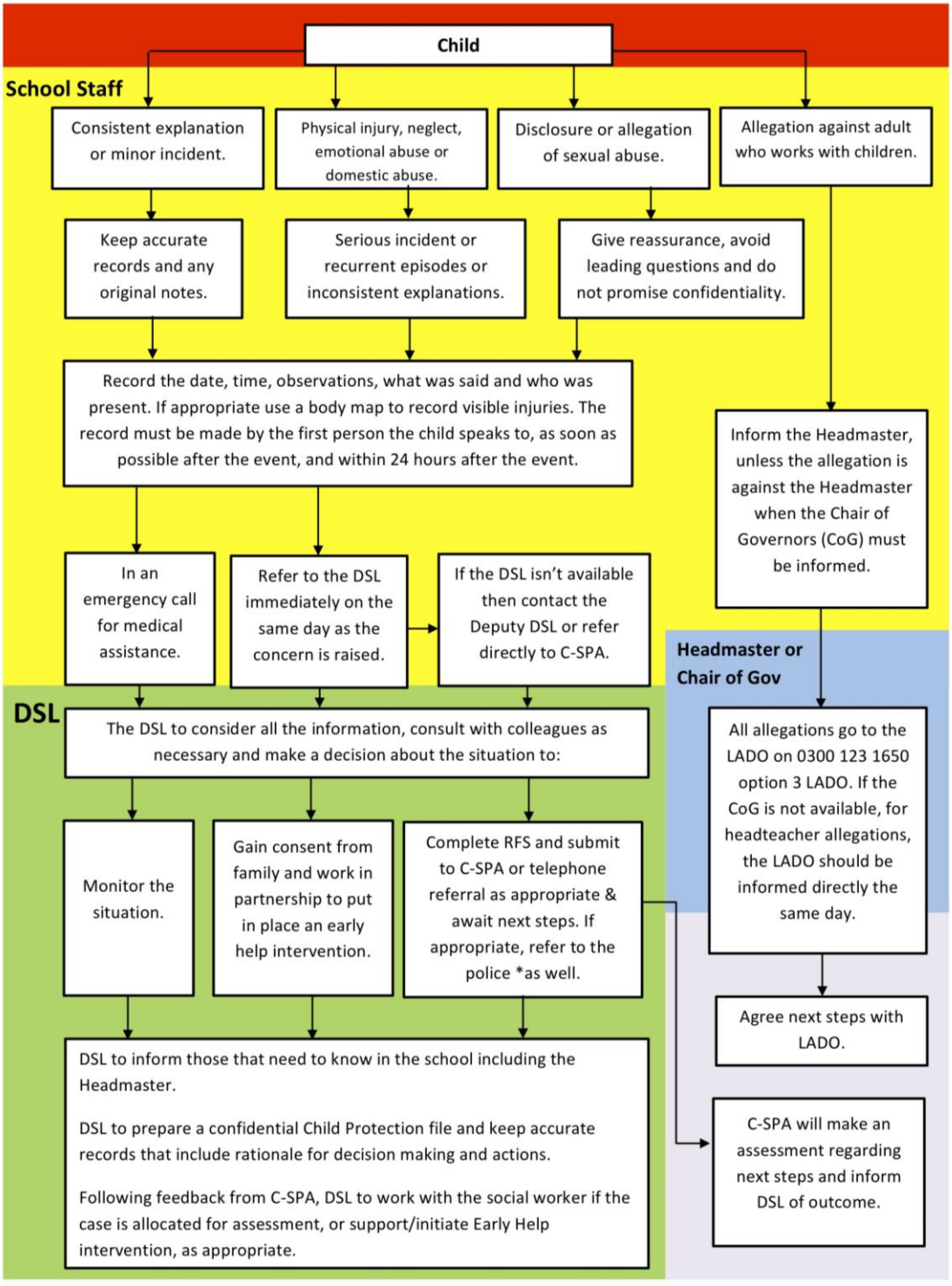
Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Links to other school policies:

This policy links to the following School policies and procedures:

Anti-bullying policy
Attendance and Absence policy
Behaviour for Learning policy
Complaints Procedure
Conducting a Search policy
Curriculum policy
Equal Opportunities policy
Exclusion policy
Health and Safety policy
Managing Allegations of Abuse and Low-Level Concerns Made Against Staff policy
Missing Children policy
Preventing Radicalisation and extremism policy and Risk Assessment
Restraint policy
Safe use of Technology policy
Safer Recruitment Policy
Sex and Relationships Education policy
Staff Code of Conduct
Visiting speaker policy
Whistleblowing

APPENDIX 1: Child Protection Procedures Flowchart



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

APPENDIX 2: What is child abuse?

The following definitions are taken from Working Together to Safeguard Children; HM Government (2023). In addition to these definitions, it should be understood that children can also be abused by being sexually exploited, honour-based abuse, forced marriage or female genital mutilation. To support the local context, all staff have access to the Surrey Safeguarding Children Partnership Continuum of Support indicators in the staff Sharepoint.

What is abuse and neglect?

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experience its effects . Children may be abused in a family or in an institutional or extra-familial contexts, 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. Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another, therefore staff should always be vigilant and always raise any concerns with the DSL (or deputy).

Physical abuse

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

Emotional abuse

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Sexual abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.
Sexual abuse can take place online, and technology can be used to facilitate offline abuse.
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.
- 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 is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect

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

The school uses the Graded Care Profile 2 tool to support better identification and intervention in cases of neglect. The Neglect Risk Assessment Tool is used to support with the initial identification of neglect.

APPENDIX 3: Indicators of abuse

Neglect

The nature of 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.

Once a child is born, neglect may involve a parent or carer failing to:
- Provide adequate food, clothing, and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate caregivers)
- Ensure access to appropriate medical care or treatment
- Provide suitable education

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

NSPCC research has highlighted the following examples of the neglect of children:
- frequently going hungry
- frequently having to go to school in dirty clothes
- regularly having to look after themselves because of parents being away or having problems such as drug or alcohol misuse
- being abandoned or deserted
- living at home in dangerous physical conditions
- not being taken to the doctor when ill

- not receiving dental care

Physical indicators of neglect:

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

Behavioural indicators of neglect:

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

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 school staff have should be discussed with the DSL.

Emotional abuse

The nature of 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 effect 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

Developmental indicators of emotional abuse:

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

Behavioural indicators of emotional abuse:

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

Social indicators of emotional abuse:
- Withdrawal from physical contact
- Withdrawal from social interaction
- Over-compliant behaviour
- Insecure, clinging behaviour
- Poor social relationships

Emotional indicators of emotional abuse:
- 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

The nature of physical abuse:
Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. But accidental injuries normally occur on the bony prominences – e.g., knees, shins.

Injuries on the soft areas of the body are more likely to be inflicted intentionally and should therefore make us more alert to other concerning factors that may be present.
A body map can assist in the clear recording and reporting of physical abuse. The body map should only be used to record observed injuries and no child should be asked to remove clothing by a member of staff of the school.

Indicators of physical abuse / factors that should increase concern:
- Multiple bruising or bruises and scratches (especially on the head and face)
- Clusters of bruises – e.g., fingertip bruising (caused by being grasped)
- Bruises around the neck and behind the ears – the most common abusive injuries are to the head

- Bruises on the back, chest, buttocks, or on the inside of the thighs
- Marks indicating injury by an instrument – e.g., linear bruising (stick), parallel bruising (belt), marks of a buckle
- Bite marks
- Deliberate burning may also be indicated by the pattern of an instrument or object – e.g., electric fire, cooker, cigarette
- Scalds with upward splash marks or *tide marks*
- Untreated injuries
- Recurrent injuries or burns
- Bald patches

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

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

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

The nature of sexual abuse:

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

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

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 women and other children can commit sexual abuse too.

Physical indicators of sexual abuse:

- 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 indicators of sexual abuse:

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

APPENDIX 4: Child-on-child Abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is 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 nudes and semi nudes images and/or videos (also known as sexting or youth produced sexual imagery)
- 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
- 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)

Where children abuse other children online, this can take the form of, for example, abusive, harassing, misogynistic and misandrist messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma and will offer them appropriate support.

Physical Child-on-child Abuse

While a clear focus of child-on-child abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from children to children 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. When-to-call-police-guidance-for-schools-and-colleges.

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

Anti-Bullying/Cyberbullying

Our school policy on anti-bullying is set out in a separate *(Anti-Bullying policy)* document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures.

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

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

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

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

PSHEE education regularly provides opportunities for children to understand bullying is wrong, its impact and how to deal with it.
LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will find the experience stressful and distressing. This will, in all likelihood, adversely affect their education attainment as well as their emotional well-being; this will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim 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, adults, and school staff are supported and protected as appropriate.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Policy

We believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults and other children in school.

We recognise that children are capable of abusing other children. Most cases of pupils hurting other pupils will be dealt with under our school's **Behaviour for Learning policy**, but within this Safeguarding and Child Protection Policy the recommendations from KCSIE 2023 will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence.
- Could put pupils in the school at risk.
- Is violent.
- Involves pupils being forced to use drugs or alcohol.
- Involves sexual exploitation, sexual abuse, or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes).

We are clear that sexual violence and sexual harassment is not acceptable.

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

- Making clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up" or "boys being boys". We believe failure to so can lead to a culture of unacceptable behaviours and an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.
- Recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported.
- Challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. As we believe that dismissing or tolerating such behaviours risks normalising them. Whilst More House School is a boys-only school, pupils come into contact with female and other gender identifying young people, and thus such policy statement remains highly relevant.

Prevention

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Take a whole school approach to safeguarding & child protection.
- Provide a clear set of values and standards, underpinned by the school's *Behaviour for Learning policy* and pastoral support; and by a planned programme of evidence-based content delivered through the curriculum.
- Engage with specialist support and interventions.
- Responding robustly to reports of sexual violence and sexual harassment.
- Challenge any form of derogatory or sexualised language or inappropriate behaviour between children, including requesting or sending sexual images.
- Make clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- Ensure pupils are able to easily and confidently report abuse using our reporting systems.
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners.
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed.

- Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.
- Ensure staff are trained to understand:
    - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports.
    - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here".
    - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
        - Children can show signs or act in ways they hope adults will notice and react to.
        - A friend may make a report.
        - A member of staff may overhear a conversation.
        - A child's behaviour might indicate that something is wrong.
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation.
- That a pupil harming a child could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it.
- That they should speak to the DSL if they have any concerns.
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side.

Responding to reports of sexual violence and sexual harassment

Children making any report of sexual violence or sexual harassment including "upskirting" (The Voyeurism Offences Act 2019) will be taken seriously, kept safe and be well supported.

If the report includes an online element, staff will be mindful of the Searching, Screening and Confiscation: advice for schools guidance. The key consideration is for staff not to view or forward illegal images of a child. The guidance provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection

Staff taking the report will inform the DSL or the Deputy DSL immediately.

Staff taking a report will never promise confidentiality.

Risk Assessment

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

The risk assessment will consider:

- The victim, especially their protection and support
- The alleged perpetrator, their support needs, and any sanction needed
- All other children at the school
- The victim and the alleged perpetrator sharing classes and space at school
- The risk assessment will be recorded and kept under review

Where there has been other professional intervention and/or other specialist risk assessments, these professional assessments will be used to inform the school's approach to supporting and protecting children.

Action

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

The DSL will take the lead role in any sanctioning of the alleged perpetrator(s). We will provide support at the same time as implementing any disciplinary sanction.

Disciplinary sanctions can be implemented while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this.
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing.

The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.

The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s).

The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or implementing any disciplinary sanctions against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Parents or carers should usually be informed (unless this would put the child at greater risk or advised otherwise to by Children's social care or the police).

If a child is at risk of harm, is in immediate danger, or has been harmed, a Request for Support will be made to the C-SPA by secure email: cspa@surreycc.gov.uk or telephone 0300 470 9100, as appropriate.

The DSL will consider:

- The wishes of the victim
- The nature of the incident including whether a crime has been committed and the harm caused
- Ages of the children involved
- Developmental stages of the children
- Any power imbalance between the children
- Any previous incidents

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

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

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

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

Options:
- Manage internally
- Early Help intervention
- Request for support to the C-SPA
- Report to the Police (generally in parallel with a request for support to the C-SPA)

All concerns, discussions, decisions and reasons for decision will be recorded electronically on CPOMS.

Ongoing Response:

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

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, the school will be mindful of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately.

Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim.

The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart on school premises and on transport where appropriate.

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the school will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of school rules and may lead to the view that allowing the perpetrator to remain in the same school would seriously harm the education or welfare of the victim (and potentially themselves and other children).

Where a criminal investigation into sexual assault leads to a conviction or caution, the school will, if it has not already, consider any suitable sanctions in light of the *Behaviour for Learning policy*, which may include consideration of permanent exclusion. Where the perpetrator is going to remain at the school, the Headmaster should continue keeping the victim and perpetrator in separate classes where possible, and continue to consider the most appropriate way to manage potential contact on school premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

The victim, alleged perpetrator and any other children and adults affected will receive appropriate support and safeguards on a case-by-case basis.

The school will implement any disciplinary sanction against the alleged perpetrator in accordance with the school's *Behaviour for Learning policy*.

The school recognises that implementing disciplinary sanction and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.

The school will consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

The school recognises that children who have experienced sexual violence display a wide range of responses to their experiences including clear sings of trauma, physical and emotional responses, or no overt signs at all.

Harmful Sexual Behaviour (HSB)

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

The school' response to HSB:

The Brook Traffic Light Tool uses a traffic light system to categorise the sexual behaviours of children it can be used to help professionals:

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

The school will also consult with ACT or SWGfL's Harmful Sexual Behaviour Support Service for schools.

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

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

APPENDIX 5: Sharing nudes and semi nudes incidents

All incidents of this nature will be treated as a safeguarding concern and in line with the UK Council for Child Internet Safety (UKCCIS) guidance Sharing nudes and semi-nudes.

The term 'sharing nudes and semi-nudes' means sending or posting of nude or semi-nude images, videos, or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline.

'Nudes and semi-nudes' may also be referred to as:

- youth produced sexual imagery or 'youth involved' sexual imagery
- indecent imagery; this is the legal term used to define nude or semi-nude images and videos of children and young people under the age of 18
- 'sexting'; many adults may use this term, however some young people interpret sexting as 'writing and sharing explicit messages with people they know' rather than sharing images
- image-based sexual abuse; this term may be used when referring to the non-consensual sharing of nudes and semi-nudes

Incidents included in this approach:

- a person under the age of 18 creates and shares nudes and semi-nudes of themselves with a peer under the age of 18
- a person under the age of 18 shares nudes and semi-nudes created by another person under the age of 18 with a peer under the age of 18
- a person under the age of 18 is in possession of nudes and semi-nudes created by another person under the age of 18

Incidents not included in this approach:

- the sharing of nudes and semi-nudes of under 18s by adults (18 and over) as this constitutes child sexual abuse and a referral will be made to C-SPA and the police.
- children and young people under the age of 18 sharing adult pornography or exchanging sexual texts which do not contain images

The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

The law - Indecent images of children

Responding to incidents of sharing nudes and semi-nudes is complex because of its legal status. Making, possessing, and distributing any imagery of someone under 18 which is 'indecent' is illegal. This includes imagery of yourself if you are under 18.

The relevant legislation is contained in the Protection of Children Act 1978 (England and Wales) as amended in the Sexual Offences Act 2003 (England and Wales).

Specifically:

- it is an offence to possess, distribute, show, and make indecent images of children
- the Sexual Offences Act 2003 (England and Wales) defines a child, for the purposes of indecent images, as anyone under the age of 18

'Indecent' is not defined in legislation. When cases are prosecuted, the question of whether any photograph of a child is indecent is for a jury, magistrate, or district judge to decide based on what is the recognised standard of propriety.

Indecent imagery does not always mean nudity; however, images are likely to be defined as such if they meet one or more of the following criteria:

- nude or semi-nude sexual posing e.g., displaying genitals and/or breasts or overtly sexual images of young people in their underwear
- someone nude or semi-nude touching themselves in a sexual way
- any sexual activity involving a child
- someone hurting someone else sexually
- sexual activity that includes animals

Understanding motivations and behaviours

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online
- images created or shared are used to abuse peers e.g., by selling images online or obtaining images to share more widely without consent to publicly shame

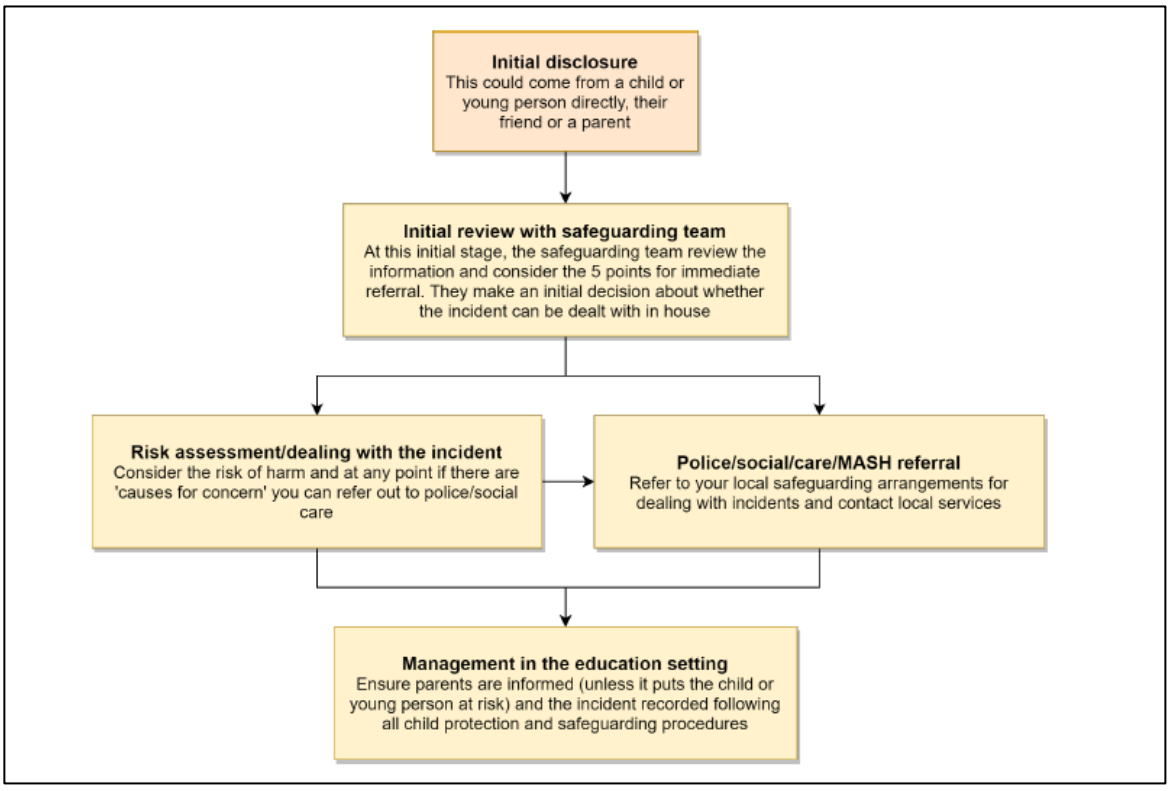
Responding to incidents

When an incident involving nudes and semi-nudes comes to the attention of any member of staff, they must report it to the DSL or Deputy DSL immediately.

- Staff should never view, copy, print, share, store or save the imagery themselves or ask a child to share or download – this is illegal
- If the staff member has already viewed the imagery by accident (e.g., if a young person has showed it to them before they could ask them not to), report this to the DSL (or Deputy) and seek support
- Staff must not delete the imagery or ask the young person to delete it
- Staff must 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 Deputy)
- Staff must 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
- Staff must not say or do anything to blame or shame any young people involved
- Staff must explain to them that they need to report it and reassure them that they will receive support and help from the DSL (or Deputy)
- The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off
- The DSL (or Deputy) should hold an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding team
- There should be subsequent interviews with the children or young people involved (if appropriate)
- Parents and carers should be informed at an early stage and involved in the process in order to best support the child or young person unless there is good reason to believe that involving them would put the child or young person at risk of harm or advised otherwise to by Children's social care or the police

- A referral should be made to C-SPA and/or the police immediately if there is a concern that a child or young person has been harmed or is at risk of immediate harm at any point in the process

Outline of response -



An immediate referral to police and/or C-SPA or equivalent will be made 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 is known about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The images involve sexual acts and any pupil in the images or videos is under 13
- There is 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, they are presenting as suicidal or self-harming

If none of the above apply, the DSL (or Deputy) may decide to respond to the incident without involving the police or the Local Authority Children's Social Care. They can still choose to escalate the incident at any time if further information/concerns are disclosed at a later date.

The circumstances of incidents can vary widely. If at the initial review stage, a decision has been made not to refer to police and/or C-SPA, the DSL (or Deputy) should conduct a further review (including an interview with any child or young person involved) to establish the facts and assess the risks, referring back to any relevant assessment tools.

Assessing the risks

When assessing the risks and determining whether a referral is needed, the following will also be considered:

- why was the nude or semi-nude shared? Was it consensual or was the child or young person put under pressure or coerced?
- has the nude or semi-nude been shared beyond its intended recipient? Was it shared without the consent of the child or young person who produced the image?
- has the nude or semi-nude been shared on social media or anywhere else online? If so, what steps have been taken to contain the spread?
- how old are any of the children or young people involved?
- did the child or young person send the nude or semi-nude to more than one person?
- do you have any concerns about the child or young person's vulnerability?
- are there additional concerns if the parents or carers are informed?

Once the DSL (or Deputy) has assessed a child or young person as not at immediate risk, it may be necessary to have a conversation with them and decide the best course of action. If possible, the DSL (or Deputy) should carry out this conversation.

Supporting the pupil/s

However, if the child or young person feels more comfortable talking to a different member of staff, this should be facilitated where possible. It is important that the child or young person is given a sense of control over the reporting process. The DSL (or Deputy) should support the member of staff to make sure the conversation is handled appropriately, and they feel confident in discussing the incident.

The purpose of the conversation is to:

- identify, without viewing wherever possible, what the image contains and whether anyone else has been involved
- find out whether the image has been shared between two people or shared further. This may be speculative information as images or videos may have been shared more widely than the child or young person is aware of
- discuss what actions and support might be needed, including preventing further distribution. This discussion should take into account the views of the child or young person as well as balancing what are considered to be appropriate actions for responding to the incident

Pupils who have had their nudes or semi-nudes shared publicly will be:

- reassured that they have done the right thing by speaking to an adult and that More House School and other adults are there to help
- advised:
- to delete images or videos from social media accounts (including from cloud photo backups) if they have uploaded them themselves
- to use the IWF and Childline's Report Remove tool at www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/sexting/report-nude-image-online/. Report Remove helps children and young people to report an image shared online, to see if it is possible to get the image removed. This must be done as soon as possible in order to minimise the number of people that have seen the picture
- on how to report sexual images or videos on individual sites to get them taken down. If the image has been shared via a mobile, they should be informed that they can contact the mobile phone operator to have a mobile number changed as this may stop others from contacting them
- to speak to the school if they are concerned about any bullying behaviour

Pupils who have been sent a nude or semi-nude will be:

- reassured that they have done the right thing by speaking out and that the school, and other adults are there to help

- asked whether it was sent by an adult or another child or young person and if they requested the photo or if it was sent unsolicited
- advised:
  - on the importance of reporting it online if it has been shared
  - to delete it from their devices and accounts
  - on the importance of not sharing the image further
  - if they asked to receive the photos, explain that they should not put pressure onto others to do things that they are uncomfortable with

Pupils who have shared another child's or young person's nudes or semi-nudes will be:
Asked:

- whether they asked for the photo or were initially sent it without requesting
- who the image has been sent to and where it has been shared? Agree next steps for taking the image down, including deleting the image from their phone or any social media accounts and reporting it to service providers
- about their motivations for sharing the image and discuss what they could have done differently. If they have reacted to an upsetting incident, such as the break-up of a relationship, by sending the image onwards, talk about how they could have managed their feelings in a healthier and more positive way. Emphasise that whatever the reason, it is always wrong to share nudes and semi-nudes of another child or young person. This can be used as an opportunity to discuss the importance of consent and not putting pressure on others to take or share nudes and semi-nudes
- advised on the law on the sharing of nudes and semi-nudes (see section on The law – Indecent images of Children

APPENDIX 6: Specific safeguarding issues

Contextual Safeguarding

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside school and/or can occur between children outside of school. All staff, but especially the DSL and deputies should consider whether children are at risk of abuse or exploitation in situations outside their families.

Risk and harm outside of the family can take a variety of different forms and children can be vulnerable to sexual exploitation, criminal exploitation, and serious youth violence in addition to other risks.

As a school, we will consider the various factors that can impact the life of any pupil about whom we have concerns. We will consider the level of influence that these factors have on their ability to be protected and remain free from harm, particularly around child exploitation or criminal activity.

What life is like for a child outside the school gates, within the home, within the family and within the community are key considerations when the DSL is looking at any concerns.

Online Safety/Cybercrime

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our Safe use of Technology policy, which is on the staff SharePoint.

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, More House School aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers, and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate, or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending, and receiving explicit images (e.g., consensual, and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above we will:

Educate pupils about online safety as part of our curriculum. For example:

- The safe use of social media, the internet and technology

- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
    - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
    - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers, and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's IT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- The school 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 (or a deputy), will consider a referral into the Cyber Choices programme. This programme aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems
- We carry out regular reviews of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

As a residential special school we recognise that we have additional factors to consider with regard to online safety, below outlines our approach to these additional factors:

- The school's approach to harmful online content:
    - Education of pupils through PSHEE and computing curriculum
    - Smoothwall monitoring software, alerts safeguarding team if a pupil tries to access harmful content while on a school device
    - Sonicwall firewall filtering, blocks pupils from accessing harmful online content while on a school device
    - Staff are trained
    - Sanctions are outlined in the Behaviour for Learning policy
    - AUP for pupils

- How children's devices are managed when they bring them into school:
    - Boarders in years 6-10 have limited access to their own devices and are not allowed overnight, Years 11+ are allowed to have their own devices overnight subject to parental permissions
    - School's mobile phone policy restricts use of pupil's device during school hours

Harmful content that may already be downloaded on to a child's device:

- We expect parents to talk to their sons and to have checked their device has no harmful content downloaded
- If content is found school has right to confiscate and contact police if necessary
- We acknowledge the risk and share responsibility with parents.
- Sanctions are outlined in the Behaviour for Learning policy

- The opportunity to download harmful content via 3, 4 and 5G that will bypass the school's filtering and monitoring systems:
  - The school will support pupils to report to staff if they become aware other boys doing this
  - Sanctions are outlined in the Behaviour for Learning policy
  - Assemblies and follow up with form tutor and housemaster of consequences

Racist Incidents

Whilst incidents of racism are predominantly dealt with using the Behaviour for Learning system, we recognise that this cannot be the only action taken following an incident of this nature.

Pupils will be provided with an educational process surrounding racism, in accordance with the European Commission against Racism and Intolerance, with specific, selected resources to develop their understanding.

There is equally a recognition and acknowledgement that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of all incidents surrounding racism or xenophobia on our Management Information System.

Radicalisation, Extremism and Terrorism

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

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

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

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious violence to a person/people; causes serious damage to property; or seriously interferes with 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.

Some children may be susceptible to being radicalised; adopting beliefs and engaging in activities which are harmful, criminal, or dangerous. This can happen both online and offline.

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

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

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff receive training to help identify early signs of radicalisation and extremism.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police forces.

We will ensure that suitable internet filtering is in place and equip our pupils to stay safe online at school and at home. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website Educate Against Hate and charity NSPCC say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Opportunities are provided in the curriculum to enable children to discuss issues of religion, ethnicity and culture and the school follows the DfE advice Promoting Fundamental British Values as part of SMSC (spiritual, moral, social and cultural education) in Schools (2014).

The school governors, the Headmaster and the DSL will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessment may include due diligence checks for external speakers and private hire of facilities, *Anti-Bullying policy* and other issues specific to the More House School's profile, community, and philosophy.

When any member of staff has concerns that a child may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL in the first instance, who should then follow the safeguarding procedures and refer cases

by e-mail to preventreferrals@surrey.pnn.police.uk following the Prevent Referral process and use the Prevent referral form. In cases where further advice from the Police is sought dial 101 or 01483 632982 and ask to speak to the Prevent Supervisor for Surrey.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals are assessed and may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual will be required to provide their consent before any support delivered through the programme is provided.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. This is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

Indicators of vulnerability to radicalisation and extremism

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

Extremism is defined by the Crown Prosecution Service as:

The demonstration of unacceptable behaviour by using any means or medium to express views which:

- Encourage, justify, or glorify terrorist violence in furtherance of particular beliefs
- Seek to provoke others to terrorist acts
- Encourage other serious criminal activity or seek to provoke others to serious criminal acts
- Foster hatred which might lead to inter-community violence in the UK

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

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

Children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

Other indicators of vulnerability include:

- **Identity Crisis** – the child is distanced from their cultural / religious heritage and experiences discomfort about their place in society.
- **Personal Crisis** – the child may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.

- **Personal Circumstances** – migration; local community tensions; and events affecting the child's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- **Unmet Aspirations** – the child may have perceptions of injustice or a feeling of failure.
- **Experiences of Criminality** – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration.
- **Special Educational Needs and Disability (SEND)** – children may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism. The Department of Education guidance The Prevent Duty should be referred to.

More House School recognises there will be new extremist groups that may not be represented within the Prevent Duty, such as extreme misogynist movements like INCEL. If any member of staff has a concern that a child may be at risk from such groups, they should follow the same process for other concerns around radicalisation, extremism or terrorism.

Domestic Abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, 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.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

The DSL will provide support according to the child's needs and update records about their circumstances.

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

Parental Mental Health

The term 'mental ill health' is used to cover a wide range of conditions, from eating disorders, mild depression and anxiety to psychotic illnesses such as schizophrenia or bipolar disorder. Parental mental illness does not necessarily have an adverse impact on a child's developmental needs, but it is essential to always assess its implications for each child in the family. It is essential that the diagnosis of a parent's/carer's mental health is not seen as defining the level of risk. Similarly, the absence of a diagnosis does not equate to there being little or no risk.

For children, the impact of poor parental mental health can include:

- The parent's/carer's needs or illnesses taking precedence over the child's needs
- The child's physical and emotional needs being neglected
- The child acting as a young carer for a parent or a sibling
- The child having restricted social and recreational activities
- The child finding it difficult to concentrate, potentially having an impact on educational achievement
- The child missing school regularly as (s)he is being kept home as a companion for a parent/carer
- The child adopting paranoid or suspicious behaviour as they believe their parent's delusions
- Witnessing self-harming behaviour and suicide attempts (including attempts that involve the child)
- Obsessional compulsive behaviours involving the child.

If staff become aware of any of the above indicators, or others that suggest a child is suffering due to parental mental health, the information will be shared with the DSL.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

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

Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of child sexual abuse.

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

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

Other indicators of CSE can include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation

- Gang-association and/or isolation from peers/social networks
- Exclusion or unexplained absences from school, college, or work
- Leaving home/care without explanation and persistently going missing or returning late
- Excessive receipt of texts/phone calls
- Returning home under the influence of drugs/alcohol
- Inappropriate sexualised behaviour for age
- Evidence of/suspicions of physical or sexual assault
- Relationships with controlling or significantly older individuals or groups
- Multiple callers (unknown adults or peers)
- Frequenting areas known for sex work
- Concerning use of internet or other social media
- Increasing secretiveness around behaviours
- Self-harm or significant changes in emotional well-being
- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

Any concerns that a child is being or is at risk of being sexually exploited should be passed immediately to the DSL. Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse
- Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example)
- Recent bereavement or loss
- Social isolation or social difficulties
- Absence of a safe environment to explore sexuality
- Economic vulnerability
- Homelessness or insecure accommodation status
- Connections with other children and young people who are being sexually exploited
- Family members or other connections involved in adult sex work
- Having a physical or learning disability
- Being in care (particularly those in residential care and those with interrupted care histories)
- Sexual identity

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

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

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

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

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

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

Child Criminal Exploitation (CCE)

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

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Having unexplained amounts of money,
- New high cost items and multiple mobile phones
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

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

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

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

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move (and store) drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

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

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

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

A request for support to the C-SPA will be made when any concern of harm to a child as a consequence of gang activity including child criminal exploitation becomes known. The DSL will contact the C-SPA and police if appropriate. If there is concern about a child's immediate safety, the Police will be contacted on 999.

Serious Youth Violence

Indicators that children may be at risk from or involved in 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

These could indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

Risk factors which increase the likelihood of involvement in serious violence include:

- 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

All staff should be aware of the associated risks and understand the measures in place to manage these.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and deputies will be aware of contact details and referral routes into the local housing authority so they can raise progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to the relevant Local Authority Children's Social Care.

Modern Slavery

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act (2003). It is a form of child abuse and violence against women. A mandatory reporting duty requires teachers to report 'known' cases of FGM in under 18s, which are identified in the course of their professional work, to the Police.

The duty applies to all persons in school who are employed or engaged to carry out 'teaching work' in the school, whether or not they have qualified teacher status.

The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the DSL; however, the DSL should be informed.

If a teacher is informed by a girl under 18 that an act of FGM has been carried out on her or a teacher observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth, the teacher should personally make a report to the Police force in which the girl resides by calling 101. The report should be made immediately.

Although More House School is a boys-only school, staff may identify information leading to concern for a non More House School child, e.g., a sibling of a pupil, or other female family member or friend.

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

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

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

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

Forced Marriage

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

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

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

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

So-called 'honour-based' abuse

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

So-called 'honour-based' abuse might be committed against people who:

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

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

Private Fostering Arrangements

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

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

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

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

By law, a parent, private foster carer, or other persons involved in making a private fostering arrangement must notify the relevant Local Authority Children's Social Care immediately. However, 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.

Children at greater risk of harm

Whilst all children should be protected, it is important that governing bodies and proprietors recognise (and reflect in their policies and procedures) that some groups of children, are potentially at greater risk of harm than others (both online and offline). The list below, is not exhaustive, but highlights some of those groups.

Pupils with a social worker (Child in Need and Child Protection plans)

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that when a child has a social worker, it is an indicator that child is more at risk than most pupils. A child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour, social integration and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare, and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or absent from education where there are known safeguarding risks
- The provision of pastoral and/or academic support

Looked After Children and Previously Looked After Children

The most common reason for children becoming looked after is because of abuse and neglect.

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

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

The designated teacher and governor for looked after children will have the appropriate level of training to equip them with the knowledge and skills to undertake their role.

The designated teacher for looked after children and the DSL have details of the child's social worker and the name and contact details of SCC's Head of Virtual School.

We have appointed a designated teacher, **Mrs Adele Williams, Director of Pupil Progress** who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

Pupils with special educational needs or disabilities (SEND) or certain health conditions

We recognise that pupils with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges both online and offline. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEND or certain medical conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- 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 colleges or the consequences of doing so

Mental Health

All staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, attendance and progress at school. School staff are not expected or trained to diagnose 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.

All staff will take immediate action if they have a mental health concern about a child that is also a safeguarding concern, following our *Safeguarding and Child Protection Policy* and procedures.

Children who are lesbian, gay, bisexual or transgender (LBGT+)

The fact that a child or a young person may be LGBT+ is not in itself an inherent risk factor for harm. However, children who are LGBT+ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT+ (whether they are or not) can be just as vulnerable as children who identify as LGBT+.
Risks can be compounded where children who are LGBT+ lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.

Children Who Are Absent From Education

All children are entitled to an efficient, full time education which is suitable to their age, ability, aptitude, and any SEND they may have.

The school recognises that a child absent from education, particularly repeatedly and/or prolonged periods, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage. They are also at significant risk of underachieving, being victims of abuse and harm, exploitation, radicalisation, and not being in education, employment, or training (NEET) later in life.

There are many circumstances where a child may be absent from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions and/or prolonged periods, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of being absent in future. This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

We monitor attendance carefully and address poor or irregular attendance without delay.

We will always follow up with parents/carers when pupils are not at school. This means we need to have at least two up to date contacts numbers for parents/carers. Parents should remember to update the school as soon as possible if the numbers change.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Where possible the school will hold more than one emergency contact number for each child.

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

When removing a child's name, the school will notify the Local Authority of: (a) the full name of the child, (b) the full name and address of any parent with whom the child normally resides, (c) at least one telephone number of the

parent, (d) the child's future address and destination school, if applicable, and (e) the ground in regulation 8 under which the child's name is to be removed from the school register.
The school will make reasonable enquiries to establish the whereabouts of a child jointly with the Local Authority, before deleting the child's name from the school register if the deletion is under regulation 8(1), sub-paragraphs (f) (iii) and (h) (iii)of The Education (Pupil Registration) (England) 2006 (amended 2016).
The school will:

- Enter children on the admissions register on the first day on which the school has agreed, or has been notified, that the child will attend the school.
- Notify the Local Authority within five days of adding a child's name to the admission register. The notification must include all the details contained in the admission register for the new child.
- Monitor each child's attendance through their daily register.
- Remove a child's name from the admissions register on the date that the child leaves the school.
- The school will notify the Local Authority when they are about to remove a child's name from the school register under any of the fifteen grounds listed in the regulations, no later than the date that the child's name is due to be removed.
- Where parents notify the school, in writing, of their intention to Electively Home Educate (EHE) the school will forward a copy of the letter to the Local Authority Education Inclusion Team.
- Where parents orally indicate that they intend to withdraw their child to EHE and no letter has been received, the school will not remove the child from roll and will notify the Education Inclusion Team at the earliest opportunity.

Pupils Missing Out on Education (PMOOE)

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

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

The school will ensure that parents (and the Local Authority where the child has an Education Health Care Plan (EHCP)) are given clear information about alternative provision placements and reduced/modified timetables: why, when, where, and how they will be reviewed.

The school will keep the placement and timetable under review and involve parents in the review. Reviews will be frequent enough to provide assurance that the off-site education and/or modified timetable is achieving its objectives and that the child is benefitting from it.

The school will monitor and track children attending alternative provision to ensure that the provision meets the needs of the child. The school continues to be responsible for the safeguarding of that pupil. The school will obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment.

The school will comply with regular data returns requested by the Local Authority, regarding all children, of statutory school age, attending alternative provision and/or on a reduced/modified timetable.

The school leadership will report to governors any formal direction of a child to alternative provision to improve behaviour.

The school leadership will report to governors information regarding the use and effectiveness of alternative provision and modified/reduced timetables.

School Attendance and Behaviour

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

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

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

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff.

Reception staff will always check visitors' credentials along with the reason for their visit before allowing them to sign in and enter the setting. Visitors should therefore always be prepared to produce photographic identification.

All visitors must register using the online system in front reception, take a copy of the school's Safeguarding leaflet and wear their photographic visitor's badge at all times whilst on site.

Pre-arranged professional visitors to the school such as extra-curricular and peripatetic teachers, educational psychologists and school improvement officers, will be asked to show their organisation's photo ID. As long as their company, LA or educational psychology service, has provided prior written confirmation that an appropriate level of DBS check has been carried out, these visitors will not be required to provide a copy of their DBS and will be able to move around the school unaccompanied. If not, they will be required to show their certificate to office staff before being allowed independent access to the site. If they unable to produce this for any reason, they will be an accompanied visitor until they can.

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school anyone who is known to disseminate extremist views, and we will carry out appropriate checks to ensure that any individual or organisation wishing to use our school facilities is neither seeking to disseminate extremist views nor radicalise pupils or staff.

Full details of these checks can be found in our Visiting Speaker Policy.

Physical Intervention (use of reasonable force)

We have a separate policy outlining how we will use physical intervention. This can be found on the staff SharePoint.

Whistleblowing

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

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

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. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday, and Email: help@nspcc.org.uk.

Whistleblowing regarding the Headmaster should be made to the Chair of the Governing Body: Call 1010 from a school phone or request his email address from the school office.

APPENDIX 7: Safer Recruitment and DBS checks – policy and procedures

Recruitment and selection process

The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education. Amend or add to this as applicable to reflect your own approach.
To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.
We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders
- Require the applicant to complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
    - If they have a criminal history

  - Whether they are included on the barred list
  - Whether they are prohibited from teaching
  - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
  - Any relevant overseas information
- Sign a declaration confirming the information they have provided is true

Shortlisting

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online.

Seeking references and checking employment history

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current and past employers and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the Headteacher or HR Department as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

Pre-appointment vetting checks

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate but will keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Overseas checks are carried if the individual has been overseas within the last 5 years, unless their previous job was working in a school which ended not more than three months before the persons appointment.
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in relevant conduct; or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.
We will not keep copies of such checks for longer than 6 months.
Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.
We will check the identity of all contractors and their staff on arrival at the school.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out. Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

Governors

All governors will have an enhanced DBS check without barred list information.
All governors will also have the following checks:

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008).
- Identity
- Right to work in the UK

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.
We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

APPENDIX 8: Useful contacts

Useful Contacts	Email	Telephone No.
Surrey C-SPA	cspa@surreycc.gov.uk	0300 470 9100
Surrey out of hours Children's Services		01483 517 898
Surrey Safeguarding Children Partnership Support Team		01372 833 330
Hampshire Children's Services	Childrens.services@hants.gov.uk	0300 555 1384
Hampshire out of hours Children's Services		0300 555 1373
West Sussex Children's Services	mash@westsussex.gov.uk	01403 229 900
West Sussex out of hours Children's Services		0330 222 6664 07711 769 657
Police		101 or in emergencies 999
Forced Marriage Unit	fmu@fco.gov.uk	0207 008 0151
NSPCC Child Protection Line		0800 800 500
Childline		0800 1111
Prevent	preventreferrals@surrey.pnn.police.uk	01483 632 982 or 0207 340 7264

Further advice on child protection and safeguarding is available from:
Surrey County Council Education Safeguarding Team

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

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

Thinkuknow: https://www.thinkuknow.co.uk/

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

Beat Bullying: http://www.beatbullying.org/

Childnet: http://www.childnet.com/

Thinkuknow (includes resources for professionals and parents): https://www.thinkuknow.co.uk/

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

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

Mind: https://www.mind.org.uk or call 0300 123 3393

The Samaritans: https://www.samaritans.org or TEXT 116 123