



**St Edmund's School**

**Child Protection**

**and**

**Safeguarding Policy**

**(23-24VI.3)**

## Contents

Safeguarding Statement and Key Personnel.....	3
Key External Agencies.....	4
Terminology.....	5
1. Introduction.....	6
2. Policy Principles.....	7
3. Policy Aims.....	8
4. Values.....	8
5. Safe School, Safe Staff.....	11
6. Roles and Responsibilities.....	12
7. Confidentiality, Sharing and Withholding Information.....	21
8. Child Protection Procedures.....	22
9. Children who are particularly vulnerable.....	25
10. Anti-Bullying / Cyberbullying.....	26
11. Online Safety/Cybercrime.....	27
12. Racist Incidents.....	27
13. Radicalisation, Extremism and Terrorism.....	28
14. Domestic Abuse.....	29
15. Child Sexual Exploitation (CSE).....	30
16. Child Criminal Exploitation (CCE) & Gangs.....	31
17. Female Genital Mutilation (FGM).....	32
18. Forced Marriage.....	33
19. Honour-based Abuse and Breast Ironing.....	33
20. One Chance Rule.....	34
21. Private Fostering Arrangements.....	34
22. Looked After Children.....	35
23. Children Who Are Absent From Education/Missing Education.....	35
24. Mobile Phones / Tablets / Cameras.....	35
25. Sexual Violence and Harassment.....	37
26. Youth produced sexual imagery (sharing nudes and semi-nudes).....	43
27. Allegations against staff, including supply staff and volunteers.....	45
28. Whistle-blowing.....	48
29. Physical Intervention.....	48
30. Children who are Lesbian, Gay, Bi or Trans (LGBTQ+).....	48
31. Linked Policies.....	49
Appendix 1 - Definitions of main forms of abuse.....	50
Appendix 2 - Recognising signs of child abuse.....	51
Appendix 3 - Sexual violence and sexual harassment between children in schools.....	56
Appendix 4 - Child Sexual Exploitation.....	60
Appendix 5 - Female Genital Mutilation (FGM).....	62
Appendix 6 - Domestic Abuse.....	65
Appendix 7 - Indicators Of Vulnerability To Radicalisation.....	66
Appendix 8 -What to do if you have an online safety concern:.....	68
Appendix 9 - Private Fostering Arrangements.....	69
Appendix 10 – Further Advice Links.....	72
Appendix 11 - Safeguarding and Remote Learning.....	73

## Safeguarding Statement and Key Personnel

<b>Governors' Committee Responsible:</b> .....	Welfare and Education Committee
<b>Governor Lead:</b> .....	Mrs Jackie Alliss
<b>Nominated Lead Member of Staff:</b> .....	Dr John P Carlin
<b>Status &amp; Review Cycle:</b> .....	Statutory Annual
<b>Next Review Date:</b> .....	September 2024 (or earlier if required)

### Safeguarding Statement

St Edmund's School is committed to safeguarding and promoting the welfare of children and requires all staff and volunteers to share this commitment.

We have a number of policies and procedures in place that contribute to our safeguarding commitment which can be viewed in the '[School information and policies](#)' section of our website.

Our school works in partnership with other agencies when there are concerns about a child's welfare. We will ensure that our concerns about our pupils are discussed with his/her parents/carers first unless we have reason to believe that such action would be contrary to the child's welfare.

We actively support the government's '[Prevent](#)' agenda to counter radicalism and extremism.

**Key School Personnel - can be contacted by telephone via 01428 604 808.**  
**This is the main school line. In an emergency, out of school hours or during school holidays, Dr John P. Carlin, Lead DSL can be contacted on 07547 633 804.**

**The Designated Safeguarding Lead (DSL) is:** Dr John P Carlin [jc@saintedmunds.co.uk](mailto:jc@saintedmunds.co.uk)  
**The Deputy DSL(s) is/are:** Mr Steve Barnes (Whole School) [s.barnes@saintedmunds.co.uk](mailto:s.barnes@saintedmunds.co.uk)  
Mr Hywel Bowen-Perkins (Prep School) [hbp@saintedmunds.co.uk](mailto:hbp@saintedmunds.co.uk)  
Mrs Jess Weetman (Senior School) [j.weetman@saintedmunds.co.uk](mailto:j.weetman@saintedmunds.co.uk)  
Mrs Karen Bailey (EYFS) [kb@saintedmunds.co.uk](mailto:kb@saintedmunds.co.uk)  
Mrs S Richardson (Director of Girls) [s.richardson@saintedmunds.co.uk](mailto:s.richardson@saintedmunds.co.uk)  
Mrs Anne-Marie Burke (SEND) [amb@saintedmunds.co.uk](mailto:amb@saintedmunds.co.uk)

**The nominated child protection governor is:** Mrs Jackie Alliss

**The Headmaster is:** Dr Adam Walliker  
[head@saintedmunds.co.uk](mailto:head@saintedmunds.co.uk)

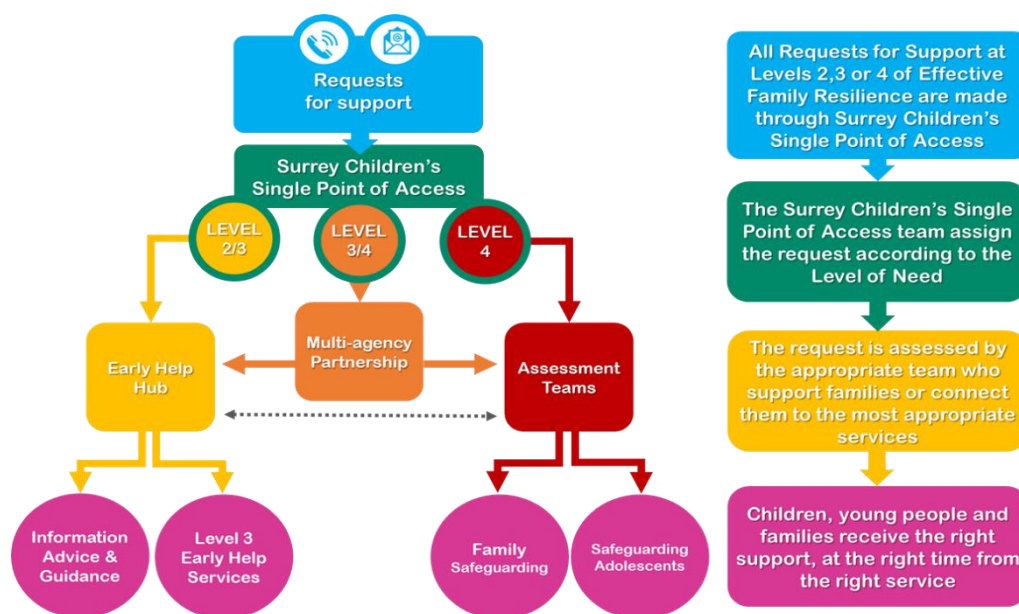
**The Chair of Governors is:** Mrs Jackie Alliss

## Key External Agencies

**Children's Single Point of Access (C-SPA)**, a front door to Surrey County Council services for children, provides residents and people who work with children in Surrey with direct information, advice and guidance about where and how to find the appropriate support for children and families. C-SPA is available **9am-5pm, Monday – Friday**

**Phone: 0300 470 9100**

**Email: [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk)**



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

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

**Phone: 01483 517898**

**Email: [edt.ssd@surreycc.gov.uk](mailto:edt.ssd@surreycc.gov.uk)**

The LADO Service manages allegations against individuals who work or volunteer with children in Surrey. If you have a concern regarding someone who works with children, you should inform the Headmaster (or Chair of Governors).

Staff can also contact the LADO directly on 0300 123 1650

Email: [LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk)

NSPCC Helpline: 0808 800 5000

## **Terminology**

**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; and
- taking action to enable all children to have the best outcomes.

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

We recognise that harm also means where a child or young person witnesses harm to another.

**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, including Governors.

**Child** 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 children of other establishments.

**Parents** refers to birth parents and other adults who are in a parenting role, for example stepparents, foster carers, persons with nominated parental responsibility, those with guardianship and adoptive parents.

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

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

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

## I. Introduction

Our school has developed this policy in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002, and in line with statutory guidance: 'Working Together to Safeguard Children' 2018, Revised Safeguarding Statutory Guidance 'Framework for the Assessment of Children in Need and their Families' 2000, 'What to do if You are Worried a Child is Being Abused' 2015. The guidance also reflects, both statutory guidance 'Keeping Children Safe in Education' 2023 (KCSIE), and the Surrey Safeguarding Children Partnership (SSCP) Procedures.

The Governing body takes seriously its responsibility under section 175/157 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within our school to identify, assess, and support those children who are suffering harm or at risk of suffering harm.

This policy applies to all members of staff and governors in the school.

### **Guidance and documents referred to in this policy**

This policy is also based on the following legislation:

- This policy also takes into account the procedures and practice of Surrey Safeguarding Children Partnership and the published safeguarding arrangements set out by the Surrey safeguarding partners <http://www.surreyscp.org.uk> whose procedures are available at [www.surreyscp.org.uk/professionals/sscp-procedures/](http://www.surreyscp.org.uk/professionals/sscp-procedures/)
- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- [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 (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- [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 [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children
- This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)
- ['What to do if you are worried a child is being abused'](#)
- [Teacher Standards 2011](#)
- [Information Sharing Advice for Practitioners' guidance 2018](#)

## 2. Policy Principles

The welfare of the children in our care is paramount. All children regardless of age, gender, culture, language, race, ability, sexual identity or religion have equal rights to protection, safeguarding and opportunities. We maintain an attitude of "it could happen here".

Our school recognises that all adults, including temporary staff, volunteers and governors, have a full and active part to play in protecting our pupils from harm and have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm; All staff believe that our school should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child.

Pupils and staff involved in child protection issues will receive appropriate support. Whilst the school will work openly with parents as far as possible it reserves the right to contact external agencies without notify parents if this is deemed to be in the child's best interests.

### **3. Policy Aims**

- To demonstrate the school's commitment with regards to safeguarding and child protection to pupils, parents and other partners
- To support the child's development in ways that will foster security, confidence and independence
- To provide an environment in which children and young people feel safe, secure, valued and respected, and feel confident to, and know how to approach adults if they are in difficulties, believing they will be effectively listened to
- To raise the awareness of all teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse
- To provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we, the school, contribute to assessments of need and support packages for those children
- To emphasise the need for good levels of communication between all members of staff
- To develop a structured procedure within the school which will be followed by all members of the school community in cases of suspected abuse
- To develop and promote effective working relationships with other agencies, in particular Early Help providers, the Police and Social Care
- To ensure that all staff working within our school who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory DBS check (as per KCSIE 2023 guidance), and a single central record is kept for audit
- We comply with the Disqualification under the Childcare Act 2006 guidance issues in August 2018.

### **4. Values**

#### **Supporting Children**

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

We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.



St Edmund's school will support all children by:

- Encouraging self-esteem and self-assertiveness, through the curriculum as well as our relationships, whilst not condoning aggression or bullying
- Promoting a caring, safe and positive environment within the school
- Responding sympathetically to any requests for time out to deal with distress and anxiety
- Offering details of helplines, counselling or other avenues of external support
- Liaising and working together with all other support services and those agencies involved in the safeguarding of children
- Notifying Social Care as soon as there is a significant concern
- Providing continuing support to a child about whom there have been concerns who leaves the school by ensuring that appropriate information is copied under confidential cover to the child's new setting and ensuring the school medical records are forwarded as a matter of priority
- Children are taught to understand and manage risk through our person, social, health and economic (PHSE) education and Relationships, Sex and Health Education (RSHE) and through all aspects of school life. This includes online safety.

### **Prevention / Protection**

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

The school community will therefore:

- Work to establish and maintain an ethos where children feel secure, are encouraged to talk and are always listened to
- Include regular consultation with children e.g. through safety questionnaires, asking children to report whether they have had happy/sad lunchtimes/playtimes, eating with Children at lunchtimes and the School council
- Ensure that all children know there is an adult in the school whom they can approach if they are worried or in difficulty
- Include safeguarding across the curriculum, including PSE, opportunities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help. In particular this will include anti-bullying work, online-safety, mental wellbeing, road safety, pedestrian and cycle training
- 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

## Mental Health

All staff should also be aware that poor mental health can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a concern about a child's mental health that is also a safeguarding concern, immediate action should be taken, following their child protection policy, mental health and wellbeing policy and speaking to the designated safeguarding lead or a deputy.

Reference should be made to:

The St Edmund's Mental Health and Wellbeing Policy

[Mental Health and Behaviour in schools DfE guidance \(November 2018\);](#)

DfE guidance '[promoting and supporting mental health and wellbeing in schools](#)', which details numerous resources available to schools; and

Public Health England/DfE: [Promoting children and young people's emotional health and wellbeing a whole school and college approach](#)

The School, through assemblies, Form Time and PSHE focuses on Mental Health and its impact on all year groups. Staff who might identify that a student is suffering from poor mental health will contact the pastoral/DSL team and Health Centre through verbal and written communication on ENGAGE/CPOMS, depending on the scale of the perceived issue. The school employs a counsellor to whom students are referred if they express interest in seeing her. Parents are expressly encouraged to visit their GP with their son/daughter if there is a perceived problem. The school may also signpost to counsellors should a family require the information.

Routes to external agencies through CAMHS, Children's Services and the LADO, depending on the borough, are contacted if there is a mental health issue which cannot be resolved through the above methods.

## 5. Safe School, Safe Staff

Our School will ensure that:

- All staff receive information about the school's safeguarding arrangements, the school's safeguarding statement, staff behaviour policy (code of conduct), child protection policy, behaviour policy, the safeguarding response to children who are
- absent from education, the role and names of the Designated Safeguarding Lead and their deputy(ies), and Keeping Children Safe in Education part 1 and Annex A on induction;
- all staff receive safeguarding and child protection training at induction in line with advice from Surrey Safeguarding Children's Partnership which is regularly updated and receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually;
- all members of staff are trained in and receive regular updates in online safety, the roles and responsibilities of school's filtering and monitoring systems and how to report concerns;
- all staff and governors have regular child protection awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse;
- the child protection policy is made available via the school website or other means and that parents/carers are made aware of this policy and their entitlement to have a copy via the school handbook/newsletter/website. All parents/carers are made aware of the responsibilities of staff members with regard to child protection procedures through the publication of the Safeguarding Policy and reference to it in the school's handbook.
- the school provides a coordinated offer of Early Help when additional needs of children are identified and contributes to early help arrangements and inter-agency working and plans;
- Community users organising activities for children are aware of the school's Child Protection Policy, guidelines and procedures;
- the name of the designated members of staff for child protection, the Designated Safeguarding Lead and deputy(ies), are clearly advertised in the school with a statement explaining the school's role in referring and monitoring cases of suspected abuse;
- Visitors and lettings are either DBS checked or supervised when on site.
- The name of the designated members of staff for child protection, the Designated Safeguarding Lead and deputy(ies), are clearly advertised in the school with a statement explaining the school's role in referring and monitoring cases of suspected abuse;
- All staff will be given a copy of Part 1 and Annex A of Keeping Children Safe in Education 2023 and 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.

## **6. Roles and Responsibilities**

### **6.1. All members of The Governing Body understand and fulfil their responsibilities, namely to ensure that:**

- there is an effective Child Protection and Safeguarding policy together with a staff behaviour policy (code of conduct);
- child protection, safeguarding, recruitment and managing allegations policies and procedures, including the staff behaviour policy (code of conduct), are consistent with Surrey Safeguarding Children's Board and statutory requirements, are reviewed annually and that the Child Protection policy is publically available on the school website or available in hard copy from the School's designated safeguarding lead.;
- ensures that all staff including temporary staff and volunteers are provided with the school's child protection policy and staff behaviour policy;
- Policies are consistent with SSCP and statutory requirements, are reviewed annually and that the Child Protection policy is available on the school website
- all staff have been trained appropriately and read Keeping Children Safe in Education (2023) part I and Annex A and that mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance.
- 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 safer recruitment training.
- the school has procedures for dealing with allegations of abuse against staff (including the Headteacher), volunteers and against other children and that a referral is made to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have had they not resigned.
- The Chair of Governors is nominated to liaise with the local authority on Child Protection issues and in the event of an allegation of abuse made against the Headteacher
- a member of the senior leadership team has been appointed as the Designated Safeguarding Lead (DSL) by the Governing Body who will take lead responsibility for safeguarding and child protection and that role is explicit in the role holder's job description.
- on appointment, the DSL and deputy(ies) should undertake interagency training (SSCP Foundation and Modules 1&2) as soon as possible and also undertake DSL 'New to Role' and 'Update' training every two years;
- all other staff have safeguarding training updated as appropriate;
- at least one member of the governing body has completed safer recruitment training to be repeated every five years.
- 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 (PSHE) as well as relationships and sex education (RSE).
- that application filters and monitoring systems are in place to safeguard children online.

- the school complies with DFE and Surrey County Council Children Missing Education requirements.
- the school complies with regular data returns requested by the local authority, regarding all pupils or statutory school age, attending alternative provision and/or on a reduced or modified timetable.
- appropriate online filtering and monitoring systems are in place;
- enhanced DBS checks (without barred list checks, unless the governor is also a volunteer at the school) are in place for all Governors;
- any weaknesses in Child Protection are remedied immediately;
- they have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

**6.2. The Headteacher will ensure that (in addition to the role and responsibilities of all staff):**

- the school fully contributes to inter-agency working in line with Working Together to Safeguard Children guidance;
- the Child Protection and Safeguarding Policy and procedures are implemented and followed by all staff;
- sufficient time, training, support, resources, including cover arrangements where necessary, is allocated to the DSL and deputy(ies) DSL(s) to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions, support school staff on child welfare and other necessary meetings;
- that 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 their 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;
- systems are in place for children to express their views and give feedback which operate with the best interest of the child at heart;
- 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;
- that pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online;
- record "low level concerns" in cases which concern a member of staff/supply staff/contractor, volunteer, an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). Using CPOMS Staff Safe, the record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be

noted, if the individual wishes to remain anonymous then that will be respected as far as reasonably possible.

- that allegations or concerns against staff 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 the individual has engaged in conduct that harmed (or likely to harm) a child; or if the person otherwise poses a risk of harm to a child.
- that the school/college 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/college's staff have appropriate knowledge of part 5 the government's 'Keeping children safe in education' guidance.

### **6.3. The Designated Safeguarding Lead:**

- holds lead responsibility for safeguarding and child protection (including online safety) in the school, this responsibility is not able to be delegated;
- has a 'it could happen here' approach to safeguarding;
- Liaise with the local authority and work in partnership with other agencies in line with Working Together to Safeguard Children.
- acts as a source of support and expertise in carrying out safeguarding duties for the whole school community;
- encourages a culture of listening to children and taking account of their wishes and feelings;
- is appropriately trained with updates every two years and will refresh their knowledge and skills at regular intervals but at least annually;
- manage and submit a Request for Support form for a child if there are concerns about suspected harm or abuse, to the Children's Single Point of Access (C-SPA). Requests for support should be made securely by email to [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk) using the Request for Support form – urgent referrals should be made by telephone 0300 470 9100 (and ask for the priority line);
- report concerns that a pupil may be at risk of radicalisation or involvement in terrorism, following the Prevent referral process and use the Prevent referral form to refer cases by e-mail to [preventreferrals@surrey.pnn.police.uk](mailto:preventreferrals@surrey.pnn.police.uk) . If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101 or 01483 632982 and ask to speak to the Prevent Supervisor for Surrey. The Department of Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264);
- refer cases to the police where a crime has been committed;
- will keep detailed, accurate records, either written or using appropriate online software, of all concerns about a child even if there is no need to make an immediate referral;

- will ensure that all such records are kept confidential, stored securely and are separate from pupil records, until the child's 25<sup>th</sup> birthday;
- will ensure that an indication of the existence of the additional file (as outlined above) is marked on the pupil records;
- will ensure that when a pupil leaves the school, their child protection file is passed to the new school (separately from the main pupil file and ensuring secure transit) and that confirmation of receipt is obtained;
- will ensure that a copy of the CP file is retained until such a time that the new school acknowledges receipt of the original file. The copy should then be shredded;
- will liaise with the Local Authority and work with other agencies and professionals in line with Working Together to Safeguard Children;
- was a working knowledge of SSCB procedures;
- will ensure that either they, or an appropriate staff member, attend case conferences, core groups, or other multi-agency planning meetings, contribute to assessments, and provide a report where required which has been shared with the parents;
- will ensure that all staff sign to say they have read, understood and agree to work within the School's child protection policy, staff behaviour policy (code of conduct) and Keeping Children Safe in Education 2023 Part 1 and annex A and ensure that the policies are used appropriately;
- will organise child protection and safeguarding induction, regularly updated training and a minimum of annual updates (including online safety) for all school staff, keep a record of attendance and address any absences;
- will ensure that the name of the designated members of staff for Child Protection, the Designated Safeguarding Lead and deputies, are clearly advertised in the school, with a statement explaining the school's role in referring and monitoring cases of suspected abuse;
- liaise with the 'case manager' and Local Authority Designated Officer for child protection concerns in cases which concern a member of staff or a volunteer; and refer cases where a person is dismissed or left service due to risk/harm to a child to the DBS and TRA, as required;
- Follow DfE and KCSIE guidance on 'Child on Child Abuse' when a concern is raised that there is an allegation of a pupil abusing another pupil within the school.
- Be available during term time (during school hours) for staff in school to discuss any safeguarding concerns. Appropriate and adequate cover arrangements will be arranged by the DSL and the school leadership for any out of hours/term activities.
- Act as a source of support and expertise in carrying out safeguarding duties for the whole school community.
- Encourage and promote a culture of listening to children and taking account of their wishes and feelings, amongst all staff. Access training and support to ensure they have the knowledge and skills required to carry out the role. DSL training should be updated at least every two years and their knowledge and skills refreshed at regular intervals but at least annually.

- Have a secure working knowledge of SSCP procedures and understand the assessment process for providing early help and statutory intervention, including the local authority levels of need criteria and referral arrangements.
- 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.
- 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 Levels of Need document to inform decision making and liaison with relevant agencies.
- Be alert to the specific needs of children in need, those with SEND and young carers.
- Understand the risks associated with online activity and be confident that they have the up to date knowledge and capability to keep children safe whilst they are online at school; in particular understand the additional risks that children with SEND face online and the associated and appropriate support they require.
- 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 child protection file is marked on the pupil school file record.
- Ensure that when a pupil transfers school (including in year), their child protection file is passed to the new school as soon as possible, and within statutory timescales (separately from the main pupil file and ensuring secure transit) and that confirmation of receipt is received.
- Ensure that where a pupil transfers school and is on a child protection plan or is a child looked after, their information is passed to the new school immediately and that the child's social worker is informed. In addition, consideration should be given to a multi-agency schools transition meeting if the case is complex or on-going.
- If the transit method requires that a copy of the Child Protection file is retained until such a time that the new school acknowledges receipt of the original file, the copy should be securely destroyed on confirmation of receipt.
- Ensure that all appropriate staff members have a working knowledge and understanding of their role in case conferences, core groups and other multi-agency planning meetings, to ensure that they attend and are able to effectively contribute when required to do so; where a report is required, this should be shared with the parents prior to the meeting.
- Report to the Headteacher any significant issues for example, use of the SSCP multiagency escalation procedures, enquiries under section 47 of the Children Act 1989 and Police investigations.
- Ensure that the case holding Social Worker is informed of any child currently with a child protection plan who is absent without explanation.



- Ensure that all staff sign to say they have read, understood and agree to work within the School's child protection policy, staff behaviour policy (code of conduct) and Keeping Children Safe in Education (KCSIE) Part 1 and annex A and ensure that the policies are used effectively.
- Organise child protection and safeguarding induction, regularly updated training and a minimum of annual updates (including online safety) for all school staff, keep a record of attendance and address any absences.
- Ensure that in collaboration with the school leadership and governors, the child protection policy is reviewed annually and the procedures and implementation are updated and reviewed regularly.
- Ensure that the Child Protection Policy is available publicly and that parents are aware that referrals about suspected harm and abuse will be made and the role of the school in this.
- 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 Headteacher and Chair of Governors, the "Audit of Statutory Duties and Associated Responsibilities" to be submitted annually to the Surrey County Council, Education Safeguarding Team.
- Ensure that the names of the Designated Safeguarding and Child Protection Lead and deputies, are clearly advertised, with a statement explaining the school's role in referring and monitoring cases of suspected abuse.
- Meet all other responsibilities as set out for DSLs in Keeping Children Safe in Education 2023.

#### **6.4. The Deputy Designated Safeguarding Lead(s)**

- Is/are trained to the same standard as the Designated Safeguarding Lead and, in the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of pupils as described in 'Keeping Children Safe in Education 2023';
- In the event of the long-term absence of the DSL the deputy will assume all of the functions above;
- 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.
- Follow DfE and KCSIE guidance on 'Child on Child Abuse' when a concern is raised that there is an allegation of a pupil abusing another pupil within the school.
- Be confident as to 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 when required.
- 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.

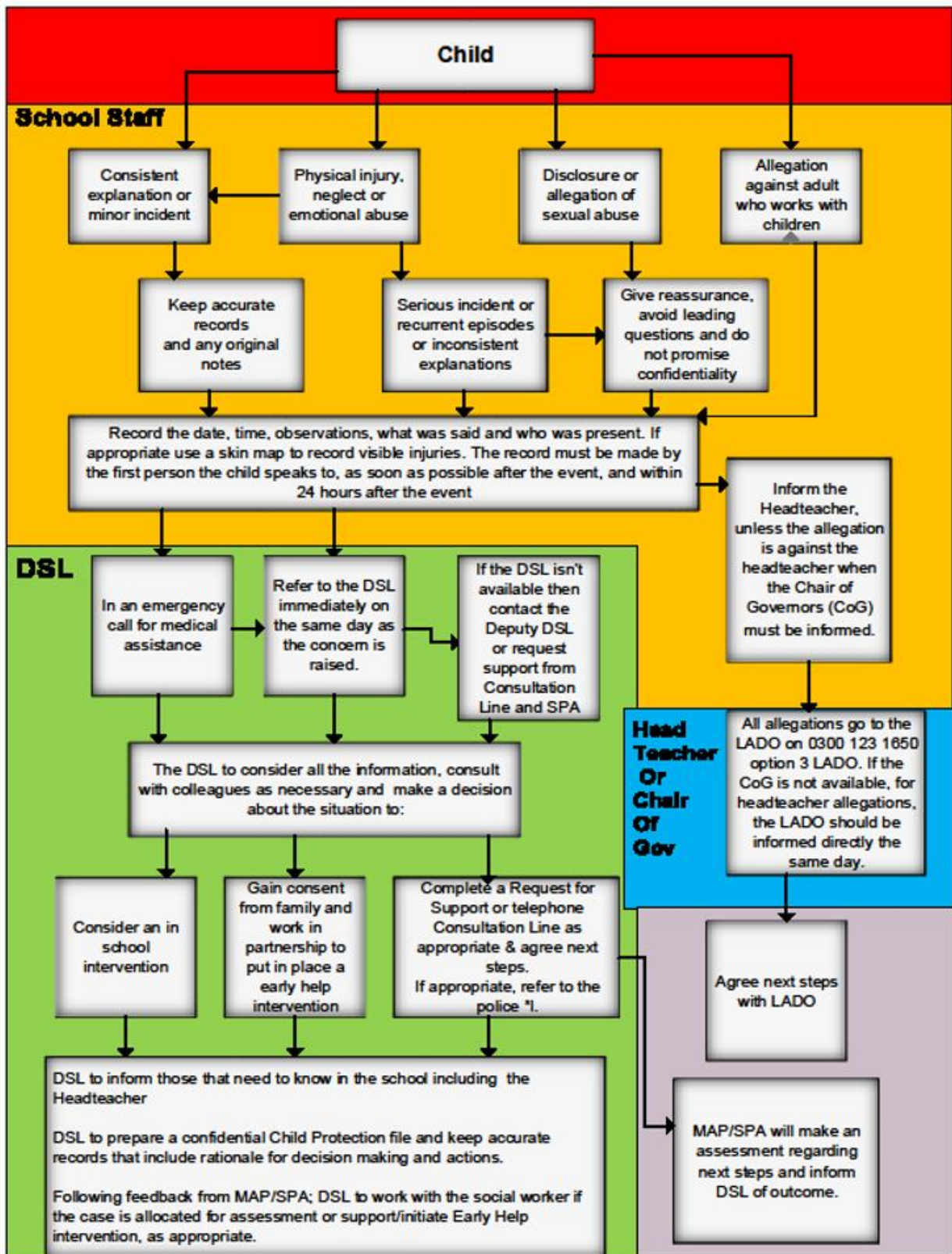
## **6.5. All School Staff**

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

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

- 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.
- 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.
- Maintain an attitude of “it could happen here” with regards to safeguarding.
- Know how to respond to a pupil who discloses harm or abuse following training of ‘Working together to Safeguard Children’, and ‘What to do if you are worried a child is being Abused’ (2015).
- Record their concerns if they are worried that a child is being abused and report these to the DSL immediately that day. If the DSL is not contactable immediately a Deputy DSL should be informed.
- Be prepared to refer directly to the Multi Agency Partnership (MAP), and the police if appropriate, if there is a risk of significant harm and the DSL or their Deputy is not available.
- Follow the allegations procedures if the disclosure is an allegation against a member of staff.
- Follow the procedures set out by the Surrey Safeguarding Children Partnership and take account of guidance issued by the Department for Education.
- Provide support for children subject to Early Help, Child in Need or Child Protection that is in keeping with their plan.
- Treat information with confidentiality but never promising to “keep a secret”. Notify the DSL or their Deputy of any child on a child protection plan or child in need plan who has unexplained absence.
- Have an understanding of early help, and be prepared to identify and support children who may benefit from early help.
- Will identify children who may benefit from early help, liaising with the DSL in the first instance. (Options may include managing support for the child internally via the school’s pastoral support process or an early help assessment). In some circumstances it may be appropriate for a member of school staff to act as the lead professional in early help cases. Liaise with other agencies that support pupils and provide early help.
- Know who the DSL and Deputy DSL are and know how to contact them.

- Have an awareness of the role of the DSL, the school's Child Protection Policy, Behaviour Policy and Staff Code of Conduct, and procedures relating to the safeguarding response for children who go missing from education.
- Be mindful that the Teacher Standards states that teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- Assist the Governing Body and Headteacher in fulfilling their safeguarding responsibilities set out in legislation and statutory guidance.
- 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.
- Understand that only trained professionals will attempt to make a diagnosis of a mental health problem
- Be well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one
- Understand that where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff are aware of how these children's experiences, can impact on their mental health, behaviour and education
- Recognise and understand that if they have a mental health concern about a child that is a safeguarding concern, immediate action will be taken, following our child protection policy and procedure and speaking to the designated safeguarding lead or a deputy.
- Be prepared to refer directly to the Multi Agency Partnership (MAP), and the police if appropriate, if there is a risk of significant harm and the DSL or their Deputies are not available.



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

## 7. Confidentiality, Sharing and Withholding Information

- St Edmund's School recognises that in order to effectively meet a child's needs, safeguard their welfare and protect them from harm, the school must contribute to inter-agency working in line with [Working Together to Safeguard Children \(2018\)](#) and share information between professionals and agencies where there are concerns.
- All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children. The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- 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](#)
- Information will be shared with staff within the school who 'need to know.'
- Relevant staff have due regard to Data Protection principles which allow them to share (and withhold) information
- All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing.
- 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

- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)
- Our School also recognises that all matters relating to child protection are personal to children and families. Therefore, in this respect they are confidential and the Headteacher or DSLs will only disclose information about a child to other members of staff on a need to know basis.
- We will always undertake to share our intention to refer a child to Children Social Care with their parents /carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation. If in doubt, we will consult with C-SPA on this point.

## 8. Child Protection Procedures

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

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

1. Make an initial record of the information related to the concern.
2. Report it to the DSL immediately.
3. The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available.
4. Make an accurate record (which may be used in any subsequent court proceedings) as soon as possible and within 24 hours of the occurrence, of all that has happened, including details of:
5. Dates and times of their observations, dates and times of any discussions in which they were involved. Any injuries Explanations given by the child / adult Rationale for decision making and action taken Any actual words or phrases used by the child
6. EYFS staff may include a 'Record of existing injury' form if it is relevant, which should also be signed and dated
7. The records must be signed and dated by the author or / equivalent on electronic based records

In the absence of the DSL or their Deputy, staff must be prepared to refer directly to C-SPA (and the police if appropriate) if there is the potential for immediate significant harm

## Following a report of concerns the DSL must:

1. Using the SSCP Levels of Need detailed in 'Effective family resilience in Surrey', decide whether or not there are sufficient grounds for suspecting significant harm, in which case a request for support must be made to the SAP and the police if it is appropriate.
2. Normally the school should try to discuss any concerns about a child's welfare with the family and where possible to seek their agreement before making a referral to the C-SPA. However, this should only be done when it will not place the child at increased risk or could impact a police investigation. The child's views should also be taken into account.
3. If there are grounds to suspect a child is suffering, or is likely to suffer, significant harm or abuse the DSL must contact the C-SPA. By sending a Request for Support Form by secure email to: [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk) or contact the C-SPA consultation line on 0300 470 9100 to discuss the concerns. If a child is in immediate danger and urgent protective action is required, the Police (dial 999) must be called. The DSL must also notify the C-SPA of the occurrence and what action has been taken
4. 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.
5. Where there are doubts or reservations about involving the child's family, the DSL should clarify with the C-SPA or the police whether the parents should be told about the referral and, if so, when and by whom. This is important in cases where the police may need to conduct a criminal investigation.
6. When a pupil is in need of urgent medical attention and there is suspicion of abuse the DSL or their Deputy should take the child to the accident and emergency unit at the nearest hospital, having first notified the C-SPA. The DSL should seek advice about what action the C-SPA will take and about informing the parents, remembering that parents should normally be informed that a child requires urgent hospital attention.
7. **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 should also be made aware.**

### 8.1 Dealing with disclosures

- A member of staff who is approached by a child should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they may need to pass information to other professionals to help keep the child or other children safe. The degree of confidentiality should always be governed by the need to protect the child.
- Additional consideration needs to be given to children with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.
- All staff should know who the DSL is and who to approach if the DSL is unavailable. 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, the seven R's**

### **Receive**

- Listen to what is being said, without displaying shock or disbelief;
- Accept what is said and take it seriously;
- Make a note of what has been said as soon as practicable;

### **Reassure**

- Reassure the pupil, but only so far as is honest and reliable;
- Don't make promises you may not be able to keep e.g. 'I'll stay with you' or 'everything will be alright now' or 'I'll keep this confidential';
- Do reassure, for example, you could say: 'I believe you', 'I am glad you came to me', 'I am sorry this has happened', 'We are going to do something together to get help';

### **Respond**

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

### **Report**

- Share concerns with the DSL immediately;
- If you are not able to contact your DSL or the Deputy DSL, and the child is at risk of immediate harm, contact the C-SPA or Police, as appropriate directly;
- If you are dissatisfied with the level of response you receive following your concerns, you should press for re-consideration;

### **Record**

- If possible make some very brief notes at the time, and write them up as soon as possible
- Keep your original notes on file
- Record the date, time, place, person/s present and noticeable nonverbal behaviour, and the words used by the child. If the child uses sexual 'pet' words, record the actual words used, rather than translating them into 'proper' words
- If appropriate, complete a body map to indicate the position of any noticeable bruising
- Record facts and observable things, rather than your 'interpretations' or 'assumptions'



## **Remember**

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

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

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

## **What happens next?**

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

If they have concerns that the disclosure has not been acted upon appropriately they might inform the Headteacher or Safeguarding Governor of the school and/or may contact the CSPA.

Receiving a disclosure can be upsetting for the member of staff and schools should have a procedure for supporting them after the disclosure. This might include reassurance that

- they have followed procedure correctly and that their swift actions will enable the allegations to be handled appropriately.
  - In some cases additional counselling might be needed and staff should be encouraged to recognise that disclosures can have an impact on their own emotions.

## **9. Children who are particularly vulnerable**

- St Edmund's School recognises that some children are more vulnerable to abuse and neglect and that additional barriers exist when recognising abuse for some children. We understand that this increase in risk is due more to societal attitudes and assumptions or child protection procedures which fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment or circumstances.
- In some cases possible indicators of abuse such as a child's mood, behaviour or injury might be assumed to relate to the child's impairment or disability rather than giving a cause for concern. Or a focus may be on the child's disability, special educational needs, gender or situation without consideration of the full picture. In other cases, such as bullying, the child may be disproportionately impacted by the behaviour without outwardly showing any signs that they are experiencing it.

- Some children may also find it harder to disclose abuse due to communication barriers, lack of access to a trusted adult or not being aware that what they are experiencing is abuse.
- To ensure that all of our pupils receive equal protection we will give special consideration to children who are:
  - Disabled or have special educational needs (SEN)
  - Young carers
  - Asylum seekers
  - Living away from home
  - Vulnerable to being bullied or engaged in bullying
  - Already viewed as a 'problem'
  - Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic abuse
  - Live transient lifestyles
  - Are looked after or previously looked after
  - Are missing from education
  - Whose parent/ carer has expressed an intention to remove them from school and be home educated
  - Living in chaotic and unsupportive home situations
  - Vulnerable to discrimination on the grounds of race, ethnicity, religion, disability or sexuality
  - At risk of sexual exploitation
  - Do not have English as a first language
  - At risk of female genital mutilation
  - At risk of forced marriage
  - At risk of being drawn into extremism.
  - Are at risk due to either their own or a family member's mental health needs

## **10. Anti-Bullying / Cyberbullying**

Our school policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. This includes all forms e.g. online, racist, homophobic and gender related bullying. We keep a record of known bullying incidents which is shared with and analysed by the governing body. All staff are aware that children with SEND and / or differences/perceived differences are more susceptible to being bullied / victims of child abuse.

When there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm' a bullying incident should be addressed as a child protection concern.

If the bullying is particularly serious, or the anti-bullying procedures are seen to be ineffective, the Headteacher and the DSL will consider implementing child protection procedures.

The subject of bullying is addressed at regular intervals in PHSE education.

## **11. Online Safety/Cybercrime**

Our pupils increasingly use electronic equipment on a daily basis to access the internet and share content and images via social media sites such as Facebook, twitter, Instagram, snapchat and oovoo. St. Edmunds has an online safety (E-Safety) policy which explains how we try to keep children safe in St. Edmunds and how we respond to online safety incidents.

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

Unfortunately, some adults and other children use these technologies to harm children. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing children to engage in sexual behaviour such as webcam photography or face-to-face meetings. Pupils may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders

St Edmund's School tries to keep pupils safe online in school and how will respond to online safety incidents by following the flowchart found at Appendix 7 to this policy.

Pupils are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated. The school online safety co-ordinator is Mr Jason Batten. Children are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated.

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.

## **12. Racist Incidents**

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

### 13. Radicalisation, Extremism and Terrorism

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

Extremism is defined as 'as 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs'. 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 **must** be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

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

St Edmund's 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<sup>1</sup>.

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

School staff receive training to help identify early signs of radicalisation, extremism and terrorism. Indicators of vulnerability to radicalisation are in detailed in Appendix 6.

Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and the school encourages Fundamental British Values as part of SMSC (spiritual, moral, social and cultural education) and regular Chapel services.

The school governors, the Headteacher and the Designated Safeguarding Lead (DSL) will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessments may include, the use of school premises by external agencies, anti-bullying policy and other issues specific to the school's profile, community and philosophy.

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<sup>1</sup> <https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty>

When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL. They should then follow normal safeguarding procedures and refer cases by email to [preventreferral@surrey.pnn.police.uk](mailto:preventreferral@surrey.pnn.police.uk) following the prevent referral form. If the matter is urgent then Surrey Police must be contacted by dialling 999. In non-urgent cases where police advice is sought then dial 101. In cases where further advice from the police is required then dial 101 or 01483 632982 and ask to speak to the prevent supervisor for Surrey.

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](mailto:counter.extremism@education.gov.uk). Note that 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

#### **14. Domestic Abuse**

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

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. 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. (See Appendix 5).

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.

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.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This is the procedure where police forces are part of Operation Encompass – if your local force is not, check your local procedures and adapt if necessary.

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

The school/college is enrolled onto the Operation Encompass scheme, a joint project between Surrey Police, Surrey Domestic Abuse Service and Surrey school/colleges; where every school/college 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/college (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.

## **15. Child Sexual Exploitation (CSE)**

Child sexual exploitation is a form of sexual abuse where children are sexually exploited for money, power or status. More information and the indicators of CSE are set out in appendix 3. CSE can happen online and offline and all staff should be aware of the link between online safety and vulnerability to CSE.

Any concerns that a child is being or is at risk of being sexually exploited should be passed without delay to the DSL. St Edmund's School is aware there is a clear link between regular school absence/truancy and CSE. Staff should consider a child to be at potential CSE risk in the case of regular school absence/truancy and make reasonable enquiries with the child and parents to assess this risk.

The DSL will use the Surrey Safeguarding Children's Board CSE Screening Tool (<http://www.surreyscb.org.uk/wp-content/uploads/2016/06/SSCB-CSE-Screening-Tool-May-16.pdf>) on all occasions 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 tool identified any level of concern (green, amber or red) the DSL should contact their local Referral, Intervention and Assessment team and email the completed CSE Screening

Tool along with a [Request for Support form](#), If a child is in immediate danger the police should be called on 999.

St Edmund's School is aware that a child often is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. As a consequence the child may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse.

St Edmund's School includes the risks of sexual exploitation in the PHSE curriculum. Pupils will be informed of the grooming process and how to protect themselves from people who may potentially be intent on causing harm. They will be supported in terms of recognising and assessing risk in relation to CSE, including online, and knowing how and where to get help.

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

## **16. Child Criminal Exploitation (CCE) & Gangs**

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity.

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.

Criminal exploitation of children is a typical feature of county lines criminal activity. Key identifying features of involvement in county lines are when children are missing, when the victim may have been trafficked for transporting drugs, a referral to the National Referral Mechanism should be considered with Social Care and Police colleagues.

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

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

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

## **17. Female Genital Mutilation (FGM)**

Keeping Children Safe in Education explains that FGM comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs”.

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as ‘female genital cutting’, ‘circumcision’ or ‘initiation’.

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<sup>2</sup>.

The duty applies to all persons in St Edmund's 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 Designated Safeguarding Lead, however the DSL should be informed.

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

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<sup>2</sup> <https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>



School staff are trained to be aware of risk indicators of FGM which are set out in Appendix 4. Staff should be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer vacation period. There should also be consideration of potential risk to other girls in the family and practicing community.

Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including dialling 999 if appropriate.

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

## **18. 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 an appalling and indefensible practice and 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.

A forced marriage is not the same as an arranged marriage which is common in several 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**

## **19. Honour-based Abuse and Breast Ironing**

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.

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.

HBA is a violation of human rights and may be a form of domestic and/or sexual abuse. There is no, and cannot be, honour or justification for abusing the human rights of others.

## **20. One Chance Rule**

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

St Edmund's School are aware that if the victim is not offered support following disclosure that the 'One Chance' opportunity may be lost. That is, they may only have one chance to speak to a potential victim and thus they may only have one chance to save a life. This means that all practitioners working within statutory agencies need to be aware of their responsibilities and obligations when they come across these cases. If the victim is allowed to walk out of the door without support being offered, that one chance might be wasted. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBA cases.

## **21. Private Fostering Arrangements**

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or 18 if the child is disabled. Children looked after by the local authority or who are placed in residential schools, children's homes or hospitals are not considered to be privately fostered.

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

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

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

## **22. Looked After Children**

The most common reason for children becoming looked after is as a result of abuse and neglect. St Edmund's school ensures that staff have the necessary skills and understanding to keep looked after children safe. 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.

The DSL (who is also the designated teacher for looked after children) will have details of the child's social worker and the name and contact details of the Surrey County Council's virtual school head for children in care.

The DSL (who is also the designated teacher for looked after children) works with the virtual school head to discuss how Pupil Premium Plus funding can be best used to support the progress of looked after children in the school and meet the needs in the child's personal education plan.

## **23. Children Who Are Absent From Education/Missing Education**

All staff should be aware that children being absent from school or college, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities.

Attendance, absence and exclusions are closely monitored. A child going missing from education is a potential indicator of abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so called 'honour'-based abuse or risk of forced marriage.

The DSL will monitor unauthorised absences and take appropriate action including notifying the local authority particularly where children go missing on repeat occasions and/or are missing for periods during the school day in conjunction with 'Children Missing Education: Statutory Guidance for Local Authorities'<sup>3</sup>.

Staff must be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage. See Appendix.5

## **24. Mobile Phones / Tablets / Cameras**

### **Use of technology within the EYFS setting.**

The EYFS computers are password protected. All records stored on the school software are password protected and only accessed by appropriate staff.

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<sup>3</sup> <https://www.gov.uk/government/publications/children-missing-education>

Children do not have internet access unless supervised with an adult.

The computers have regularly updated virus protection.

EYFS tablets will be kept out of sight in a cupboard or drawer in rooms when not in use and are password protected.

Any EYFS reports or documents completed outside of nursery do not contain images of children and are used via the secure online software, Tapestry, which is password access only.

### **Use of mobile phones, tablets, cameras and computers within the EYFS**

- All staff, students, volunteers, parents and visitors are made aware of our procedures around use of mobile phones, Tablets and computers.
- Personal Mobile phones are not permitted when with the children or during working hours, except for contact use when out around the school site.
- Staff may use only the nursery Tablets for taking photos of children within the EYFS to record events/development and use in displays. These are downloaded on to the EYFS computers via a password protected I cloud or Onedrive and are not stored directly on the tablets. Tablets are stored securely overnight in a locked cupboard or drawer.
- Photos of children are deleted every 3 months from the tablets, I cloud and Onedrive. All Tablets and computers are password protected.
- Signed permission is sought from each parent regarding the uses of photos of their child. Separate permission is sought for the use of photos on social media. Only the Nursery and school Facebook page is used for this.
- Children's photos may be sent via e mail to parents using a secure link to an online album which expires after 1 month. Parents are reminded not to share photos of the children on any social media platforms.
- Permission is also sought from parents for the sharing of photos with other parents. This includes photos taken within the online software, Tapestry.
- All records and photos stored on the Tapestry software programme are password protected and only accessed by EYFS staff.
- Children do not have internet access unless supervised by an adult.
- Staff may use the internet on the EYFS computers for any appropriate nursery or school related business. There must be no use of offensive or indecent material from any website. Staff must also have regard for copyright restrictions that may apply.
- Any member of staff found to be accessing inappropriate sites or misusing the computer will be subject to disciplinary action.
- Staff will not use photos or be involved in any discussion regarding children or the nursery on any social networking site or site in the public domain such as Facebook, Twitter, Instagram etc.

## **In The Years Beyond the EYFS**

Staff are aware of the dangers of taking photographs of children and mobile phones are to be locked by a password. All staff have a clear understanding of what constitutes the misuse of mobile phones and know how to minimise the risk.

Staff will not use mobile phones for private use in the classrooms or when performing a duty, unless with the prior permission of the Headmaster. Staff must not use their personal mobiles to contact parents unless in an emergency. Staff must be vigilant and alert to any potential warning signs of the misuse of mobile phones and are informed that they are responsible for their own behaviour regarding the use of mobile phones and should avoid putting themselves into compromising situations, which could be misinterpreted and lead to potential allegations.

Staff should be aware of the need for professional boundaries and they are given clear guidance regarding the acceptable use of mobile phones.

Many educational activities can involve recording images. These may be undertaken for displays, publicity, to celebrate achievement and to provide records of evidence of the activity. Personal mobile phones must not be used to take photos of pupils except in exceptional circumstances when permission from a DSL (designated safeguarding lead) must be sought and granted in advance and the image erased as soon as possible in the presence of a work colleague.

***Staff are informed that all mobile phone use is open to scrutiny and the management can withdraw or restrict authorisation at any time.***

## **25. Sexual Violence and Harassment.**

We are familiar with the guidance and information contained with part 5 KCSiE 2023 guidance [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/999239/SVSH\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/999239/SVSH_2021.pdf) which has been produced to assist schools and colleges to manage cases of sexual violence and harassment between pupils.

At our school 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 in the school and other pupils.

We recognise that some pupils will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's behaviour policy or anti-bullying policy in the first instance.

However, we recognise that some allegations may be of such a serious nature that they may raise safeguarding concerns.

**All staff** should recognise that children are capable of abusing their peers. All our staff should be clear about our school policy and procedures with regard to child-on-child abuse.

We recognise the importance of an ambitious broad and balanced curriculum which develops students understanding of consent, acceptable behaviour, keeping themselves safe and healthy relationships.

We will ensure that, in our school or college, our policy will include procedures to minimise the risk of child-on-child abuse.

We recognise and will ensure that systems should be in place (and they should be well promoted, easily understood and easily accessible) for children to confidently report abuse, knowing their concerns will be treated seriously.

We understand that schools and colleges not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying some behaviours related to abuse can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. We will ensure we have a positive cultural of challenge and reporting in our school.

We recognise that children may not find it easy to tell staff about their abuse verbally. We understand children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of school or college staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. As per this policy, if staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told.

As always when concerned about the welfare of a child, all our staff should act in the best interests of the child. In all cases, we acknowledge that we should follow general safeguarding principles as set out throughout this policy. Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted).

The starting point regarding any report should always be that there is a zero-tolerance approach to sexual violence and sexual harassment, and it is never acceptable, and it will not be tolerated. It is especially important not to pass off any sexual violence or sexual harassment as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

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

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable.

It is important that **all** victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Our staff will recognise the importance of:

1. Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
2. not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
3. Challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.
4. Recognition of the gendered nature of child-on-child abuse (i.e., that it is more likely that girls will be victims and boys’ perpetrators), but that all child-on-child abuse is unacceptable and will be taken seriously.
5. The different forms Child on Child abuse can take, such as: bullying (including cyberbullying).
6. Sexual violence and sexual harassment. (Which is covered in much more detail below).
7. Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery) Also covered below.
8. 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
9. Upskirting, which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
10. Initiation/hazing type violence and rituals.

### **Preventing Child on Child Abuse:**

As a school we will:

1. Provide a developmentally appropriate education syllabus which develops pupils understanding of consent, acceptable behaviour, keeping themselves safe and healthy relationships.

2. Have systems in place for any pupil to raise concerns with staff, knowing that they will be listened to, believed and valued.
3. Deliver targeted work on assertiveness and keeping safe to those children identified as being at risk.
4. Develop robust risk assessments and providing targeted work for pupils identified as being a potential risk to other pupils.
5. Provide clarity on how allegations of child-on-child abuse will be recorded, investigated and dealt with.
6. Have clear processes as to how victims, perpetrators and any other child affected by child-on-child abuse will be supported.
7. Provide a clear statement that abuse is abuse and should never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”.
8. Recognise the gendered nature of child-on-child abuse (i.e., that it is more likely that girls will be victims and boys’ perpetrators), but that all child-on-child abuse is unacceptable and will be taken seriously
9. Engage with specialist support and interventions.
10. If the report includes an online element staff will be mindful of the Searching, Screening and Confiscation: advice for schools 2022 guidance.

### **Sexual violence – rape & sexual assault, including by penetration.**

We recognise it is important that our staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act.

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

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



**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

## **What is consent?**

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

## **Sexual harassment**

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

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

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- Sexual “jokes” or taunting;
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence<sup>4</sup>. It may include:
- Non-consensual sharing of sexual images and videos; Sexualised online bullying; Unwanted sexual comments and messages, including, on social media; and Sexual exploitation; coercion and threats

## **Risk Assessment**

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

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<sup>4</sup> Project DESHAME provides useful research advice and resources regarding online sexual harassment – found [here](#)

The risk assessment will consider:

- The victim, especially their protection and support.
- The alleged perpetrator, their support needs and any discipline action.
- All other children at the St. Edmunds.
- The victim and the alleged perpetrator sharing classes and space at St. Edmunds.
- 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 St. Edmunds's approach to supporting and protecting children.

Support regarding risk assessments can be accessed from the Education Safeguarding Team [education.safeguarding@surreycc.gov.uk](mailto:education.safeguarding@surreycc.gov.uk)

Action: The DSL will consider:

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

### **Ongoing Response:**

- The DSL will manage each case individually and will ensure the risk assessment is reviewed regularly with relevant partner agencies, for example the Police and Children's Social Care.
- Where 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 St. Edmunds premises and on transport where appropriate.
- Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the St. Edmunds will take suitable action. In all but the most

exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and may lead to the view that allowing the perpetrator to remain in the same St. Edmunds 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 St. Edmunds will, if it has not already, consider any suitable sanctions in light of their behaviour policy, which may include consideration of permanent exclusion. Where the perpetrator is going to remain at the St. Edmunds, the Headteacher/Principal should continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on St. Edmunds 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.

## **26. Youth produced sexual imagery (sharing nudes and semi-nudes)**

The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal.

Youth produced sexual imagery refers to both images and videos where:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18.
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

All incidents of this nature should be treated as a safeguarding concern and in line with the UKCCIS guidance 'Sharing nudes and semi-nudes: advice in education settings working with children and young people.'

Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child is child sexual abuse and should be responded to accordingly. If a member of staff becomes aware of an incident involving making or sharing nudes or semi-nudes they should follow the child protection procedures and refer to the DSL as soon as possible. The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not view, copy or print the images.

The DSL should hold an initial review meeting with appropriate school staff and subsequent interviews with the children involved (if appropriate). Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the child at risk of harm. At any point in the process if there is concern a young person has been harmed or is at risk of harm a referral should be made to C-SPA or the Police as appropriate.

Immediate referral at the initial review stage should be made to C-SPA/LADO/Police if:

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

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

In applying judgement the DSL will consider if:

- there is a significant age difference between the sender/receiver.
- there is any coercion or encouragement beyond the sender/receiver.
- the imagery was shared and received with the knowledge of the child in the imagery.
- the child is more vulnerable than usual i.e. at risk for example child in need, child protection or early help plans, looked after, SEND.
- there is a significant impact on the children involved.
- the image is of a severe or extreme nature.
- the child involved understands consent.
- the situation is isolated or if the image been more widely distributed.
- there other circumstances relating to either the sender or recipient that may add cause for concern i.e. difficult home circumstances.
- the children have been involved in incidents relating to youth produced sexual imagery before.

If any of these circumstances are present the situation will be escalated according to our child protection procedures, including reporting to the police or C-SPA. Otherwise, the situation will be managed within the school.

The DSL will record all incidents of making sharing and sending nudes and semi-nudes, including both the actions taken, actions not taken, reasons for doing so and the resolution in line with safeguarding recording procedures.

## **27. Allegations against staff, including supply staff and volunteers.**

All school staff including any supply staff or volunteers should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.

Guidance about conduct and safe practice, including safe use of mobile phones by staff will be given at induction.

We understand that a pupil may make an allegation against a member of staff or staff may have concerns about another staff member. If such an allegation is made, or information is received which suggests that a person may be unsuitable to work with children, the member of staff receiving the allegation or aware of the information, will immediately inform the Headmaster.

The Headmaster on all such occasions will discuss the content of the allegation with the Duty Local Authority Designated Officer (LADO) at the earliest opportunity and before taking any further action. The Duty LADO can be contacted 0300 123 1650 option 3 LADO. Email [LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk) immediately and before taking any action or investigation.

If the allegation made to a member of staff concerns the Headmaster, the person receiving the allegation will immediately inform the Chair of Governors who will consult the LADO (as above) without notifying the Headmaster first.

The school will follow the Surrey procedures for managing allegations against staff, procedures set out in Keeping Children Safe in Education (2023) part 4.

Suspension of the member of staff, excluding the Headmaster, against whom an allegation has been made, needs careful consideration, and the Headmaster will seek the advice of the LADO and an HR Consultant in making this decision. In the event of an allegation against the Headmaster, the decision to suspend will be made by the Chair of Governors.

Staff, parents and governors are reminded that publication of material that may lead to the identification of a member of school staff who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing including content placed on social media sites.

### **Low Level Concerns**

Concerns may arise in several different ways, for example:

- Pre-employment vetting checks
- Complaint
- Disclosure made by a child, parent or other adult within or outside the School
- Suspicion

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

## **Definition of low-level concern**

A low-level concern is a concern that does not meet the threshold for harm as outlined in KCSIE 2023.

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the College may have acted in a way that:

- Is not consistent or conform with the staff code of conduct inside or outside of work
- Is 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 restricted to:

- a) Having favourites
- b) Taking photographs of children on their mobile phone, contrary to school policy
- c) Using inappropriate sexualised, intimidating or offensive language
- d) Engaging with a child on a one-to-one basis in a secluded area
- e) Being overly friendly with children
- f) Humiliating pupils

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.

## **Sharing low-level concerns**

Any staff member who has a low-level concern should report those concerns to the Headmaster via CPOMS StaffSafe or in person. Where the concerns relate to the Headmaster the concerns should be reported to the Chair of Governors.

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share any concerns so that they can be addressed appropriately. We will create this culture by:

- Empowering staff to share any low-level concerns
  - 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
  - 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
  - Helping to identify any weakness in the School's safeguarding system
- If there is any doubt, the School will consult with the LADO.

## **Responding to low-level concerns**

All staff have access to CPOMS StaffSafe implemented as of January 2023 to log concerns.

The Headmaster, or deputised staff will collect evidence where necessary by speaking:

- To the individual involved and any witnesses

The Headmaster, or deputised staff will use the information collected to determine any further action, in line with the School's staff Code of Conduct.

If the Headmaster is not initially involved in evidence gathering, then they will be kept up to date with any developments by relevant staff.

## **Recording of information**

All low-level concerns will be recorded. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

1. Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
2. Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in Keeping Children Safe In Education, we will refer it to the designated officer at the local authority
3. Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

## **References**

We will not include low-level concerns in references unless:

- The concern (s) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated
- The concern (s) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

A low-level concern relating exclusively to safeguarding should not be referred to in a reference.

## **28. Whistleblowing**

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

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

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – the line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

Whistleblowing for cases involving the Headmaster should be made to the Chair of the Governing Body, whose contact details are readily available to staff from the Clerk to the Governors (Bursar) or they can contact the LADO directly.

## **29. Physical Intervention**

We acknowledge that staff must only ever use physical intervention as a last resort, when a child is endangering him/herself or others, and that at all times it must be the minimal force necessary to prevent injury to another person. Such events should be recorded and signed by a witness. We understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection or disciplinary procedures.

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

## **30. Children who are Lesbian, Gay, Bi or Trans (LGBTQ+)**

- a. The School recognises the fact that a child or 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.
- b. 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.
- c. LGBT inclusion is part of the <https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education> curriculum and we recognise there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse.



### **31. Linked Policies**

This policy also links to our policies on:

**Behaviour**

**Staff Code of Conduct**

**Whistleblowing**

**Anti-bullying**

**Health & Safety**

**Curriculum**

**PSHE**

**Teaching and Learning**

**Administration of medicines**

**Drugs**

**Risk Assessment**

**Relationships and Sex Education**

**Recruitment and Selection**

**Child Sexual Exploitation**

## **Appendix I - Definitions of main forms of abuse**

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

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

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

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

## **Appendix 2 - Recognising signs of child abuse**

Please refer to Working Together to Safeguard Children HM Government (2018). To support the local context, all staff have access to the [Surrey Safeguarding Children Partnership Levels of Need Threshold Document](#).

### **Categories of Abuse:**

- Physical Abuse
- Emotional Abuse (including Domestic Abuse)
- Sexual Abuse (including child sexual exploitation)
- Neglect

### **Signs of Abuse in Children:**

The following non-specific signs may indicate something is wrong:

- Significant change in behaviour
- Extreme anger or sadness
- Aggressive and attention-seeking behaviour
- Suspicious bruises with unsatisfactory explanations
- Lack of self-esteem
- Self-injury
- Depression
- Age inappropriate sexual behaviour
- Child Sexual Exploitation.

### **Risk Indicators**

The factors described in this section are frequently found in cases of child abuse. Their presence is not proof that abuse has occurred, but:

- Must be regarded as indicators of the possibility of significant harm
- Justifies the need for careful assessment and discussion with designated / named / lead person, manager, (or in the absence of all those individuals, an experienced colleague)
- May require consultation with and / or referral to Children's Services

The absence of such indicators does not mean that abuse or neglect has not occurred.

In an abusive relationship the child may:

- Appear frightened of the parent/s
- Act in a way that is inappropriate to her/his age and development (though full account needs to be taken of different patterns of development and different ethnic groups)

The parent or carer may:

- Persistently avoid child health promotion services and treatment of the child's episodic illnesses
- Have unrealistic expectations of the child
- Frequently complain about/to the child and may fail to provide attention or praise (high criticism/low warmth environment)
- Be absent or misusing substances
- Persistently refuse to allow access on home visits
- Be involved in domestic abuse

Staff should be aware of the potential risk to children when individuals, previously known or suspected to have abused children, move into the household.

### **Recognising Physical Abuse**

The following are often regarded as indicators of concern:

- An explanation which is inconsistent with an injury
- Several different explanations provided for an injury
- Unexplained delay in seeking treatment
- The parents/carers are uninterested or undisturbed by an accident or injury
- Parents are absent without good reason when their child is presented for treatment
- Repeated presentation of minor injuries (which may represent a "cry for help" and if ignored could lead to a more serious injury)
- Family use of different doctors and A&E departments
- Reluctance to give information or mention previous injuries

### **Bruising**

Children can have accidental bruising, but the following must be considered as non-accidental unless there is evidence or an adequate explanation provided:

- Any bruising to a pre-crawling or pre-walking baby
- Bruising in or around the mouth, particularly in small babies which may indicate force feeding
- Two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental, though a single bruised eye can be accidental or abusive)
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally
- Variation in colour possibly indicating injuries caused at different times
- The outline of an object used e.g. belt marks, hand prints or a hair brush
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- Bruising around the face
- Grasp marks on small children
- Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse

## **Bite Marks**

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3 cm in diameter are more likely to have been caused by an adult or older child.

A medical opinion should be sought where there is any doubt over the origin of the bite.

## **Burns and Scalds**

It can be difficult to distinguish between accidental and non-accidental burns and scalds, and will always require experienced medical opinion. Any burn with a clear outline may be suspicious e.g.:

- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- Linear burns from hot metal rods or electrical fire elements
- Burns of uniform depth over a large area
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water is his/her own accord will struggle to get out and cause splash marks)
- Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation

Scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

## **Fractures**

Fractures may cause pain, swelling and discolouration over a bone or joint.

Non-mobile children rarely sustain fractures.

There are grounds for concern if:

- The history provided is vague, non-existent or inconsistent with the fracture type
- There are associated old fractures
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement
- There is an unexplained fracture in the first year of life

## **Scars**

A large number of scars or scars of different sizes or ages, or on different parts of the body, may suggest abuse.

## **Recognising Emotional Abuse**

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse.

The indicators of emotional abuse are often also associated with other forms of abuse.

The following may be indicators of emotional abuse:

- Developmental delay
- Abnormal attachment between a child and parent/carer e.g. anxious, indiscriminate or not attachment
- Indiscriminate attachment or failure to attach
- Aggressive behaviour towards others
- Scape-goated within the family
- Frozen watchfulness, particularly in pre-school children
- Low self-esteem and lack of confidence
- Withdrawn or seen as a “loner” – difficulty relating to others

## **Recognising Signs of Sexual Abuse**

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child to talk about and full account should be taken of the cultural sensitivities of any individual child/family.

Recognition can be difficult, unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional/behavioural.

Some behavioural indicators associated with this form of abuse are:

- Inappropriate sexualised conduct
- Sexually explicit behaviour, play or conversation, inappropriate to the child’s age
- Continual and inappropriate or excessive masturbation
- Self-harm (including eating disorder), self-mutilation and suicide attempts
- Involvement in prostitution or indiscriminate choice of sexual partners
- An anxious unwillingness to remove clothes e.g. for sports events (but this may be related to cultural norms or physical difficulties)

Some physical indicators associated with this form of abuse are:

- Pain or itching of genital area
- Blood on underclothes
- Pregnancy in a younger girl where the identity of the father is not disclosed
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing

## **Recognising Neglect**

Evidence of neglect is built up over a period of time and can cover different aspects of parenting. Indicators include:

- Failure by parents or carers to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene and medical care
- A child seen to be listless, apathetic and irresponsive with no apparent medical cause. Failure of child to grow within normal expected pattern, with accompanying weight loss
- Child thrives away from home environment
- Child frequently absent from school
- Child left with adults who are intoxicated or violent
- Child abandoned or left alone for excessive periods

### Appendix 3 - Sexual violence and sexual harassment between children in schools

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

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

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

**Developmental Sexual Activity** encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

**Inappropriate Sexual Behaviour** can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is “acting out” which may derive from other sexual situations to which the child or young person has been exposed. If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

Abusive sexual activity included any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base. In order to more fully determine the nature of the incident the following factors should be given consideration. The presence of exploitation in terms of:

- **Equality** – consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies
- **Consent** – agreement including all the following:
  - Understanding that is proposed based on age, maturity, development level, functioning and experience
  - Knowledge of society’s standards for what is being proposed
  - Awareness of potential consequences and alternatives
  - Assumption that agreements or disagreements will be respected equally



- Voluntary decision
- Mental competence
- **Coercion** – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance.

In evaluating sexual behaviour of children and young people, the above information should be used only as a guide.

We recognise that children are capable of abusing their peers and this will be dealt with under our child protection policy and in line with KCSiE (2023).

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

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. ‘Upskirting’ is where someone takes a picture under a persons clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with, or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

Children making a report of sexual violence or sexual harassment 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 (DfE 2022) guidance.

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

Staff taking a report will never promise confidentiality.

Parents or carers should usually be informed (unless this would put the child at greater risk).

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

### **Risk Assessment**

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

The risk assessment will consider:

- The victim, especially their protection and support.
- The alleged perpetrator, their support needs and any discipline action.

- All other children at the school.
- The victim and the alleged perpetrator sharing classes and space at school.
- The risk assessment will be recorded and kept under review.

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

Support regarding risk assessments can be accessed from the Surrey Education Safeguarding Team who can be contacted either via C-SPA or email on [education.safeguarding@surreycc.gov.uk](mailto:education.safeguarding@surreycc.gov.uk)

## **Action**

The DSL will consider:

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

## **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)

## **Ongoing Response**

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

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

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

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the school will take suitable action.

In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and may lead to the view that allowing the perpetrator to remain in the same school would seriously harm the education or welfare of the victim (and potentially themselves and other pupils).

Where a criminal investigation into sexual assault leads to a conviction or caution, the school will, if it has not already, consider any suitable sanctions in light of their behaviour policy, which may include consideration of permanent exclusion.

Where the perpetrator is going to remain at the school or college, the Headteacher should continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on school and college 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 & adults affected will receive appropriate support and safeguards on a case-by-case basis.

The school will take any disciplinary action against the alleged perpetrator in accordance with the school behaviour policy.

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

## **Physical Abuse**

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

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

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

References:

[DfE Keeping Children Safe in Education 2023](#)

## Appendix 4 - Child Sexual Exploitation

The following list of indicators is not exhaustive or definitive but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation.

Signs include:

- going missing from home or school
- regular school absence/truancy
- underage sexual activity
- inappropriate sexual or sexualised behaviour
- sexually risky behaviour, 'swapping' sex
- repeat sexually transmitted infections
- in girls, repeat pregnancy, abortions, miscarriage
- receiving unexplained gifts or gifts from unknown sources
- having multiple mobile phones and worrying about losing contact via mobile
- online safety concerns such as youth produced sexual imagery or being coerced into sharing explicit images.
- having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- changes in the way they dress
- going to hotels or other unusual locations to meet friends
- seen at known places of concern
- moving around the country, appearing in new towns or cities, not knowing where they are
- getting in/out of different cars driven by unknown adults
- having older boyfriends or girlfriends
- contact with known perpetrators
- involved in abusive relationships, intimidated and fearful of certain people or situations
- hanging out with groups of older people, or anti-social groups, or with other vulnerable peers
- associating with other young people involved in sexual exploitation
- recruiting other young people to exploitative situations
- truancy, exclusion, disengagement with school, opting out of education altogether
- unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- mood swings, volatile behaviour, emotional distress
- self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
- drug or alcohol misuse
- getting involved in crime
- police involvement, police records
- involved in gangs, gang fights, gang membership
- injuries from physical assault, physical restraint, sexual assault.

## **Harmful Sexual Behaviour**

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

- 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
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- By categorising sexual behaviours, the school can work with other agencies to the same standardised criteria when making decisions and can protect children and young people with a multi-agency approach

When there has been a report of sexual violence, the Lead DSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis.

The risk and needs assessment for a report of sexual violence will consider:

- the victim, especially their protection and support
- whether there may have been other victims
- the alleged perpetrator(s)
- all the other children, (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms, and
- The time and location of the incident, and any action required to make the location safer.

## Appendix 5 - 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 Designated Safeguarding Lead, however the DSL should be informed.

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

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

### What is FGM?

It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

#### 4 types of procedure:

- Type 1 Clitoridectomy – partial/total removal of clitoris
- Type 2 Excision – partial/total removal of clitoris and labia minora
- Type 3 Infibulation entrance to vagina is narrowed by repositioning the inner/outer labia
- Type 4 all other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

Why is it carried out?

Belief that:

- FGM brings status/respect to the girl – social acceptance for marriage
- Preserves a girl's virginity
- Part of being a woman / rite of passage
- Upholds family honour
- Cleanses and purifies the girl
- Gives a sense of belonging to the community

- Fulfils a religious requirement
- Perpetuates a custom/tradition
- Helps girls be clean / hygienic
- Is cosmetically desirable
- Mistakenly believed to make childbirth easier

### **Is FGM legal?**

FGM is internationally recognised as a violation of human rights of girls and women. It is **illegal** in most countries including the UK.

### **Circumstances and occurrences that may point to FGM happening are:**

- Child talking about getting ready for a special ceremony
- Family taking a long trip abroad
- Child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan)
- Knowledge that the child's sibling has undergone FGM
- Child talks about going abroad to be 'cut' or to prepare for marriage

Signs that may indicate a child has undergone FGM:

- Prolonged absence from school and other activities
- Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued
- Bladder or menstrual problems
- Finding it difficult to sit still and looking uncomfortable
- Complaining about pain between the legs
- Mentioning something somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group
- Reluctance to take part in physical activity
- Repeated urinal tract infection
- Disclosure

### **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.

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 Tel: 020 7008 0151 or email: [fmu@fco.gov.uk](mailto:fmu@fco.gov.uk)

## **Honour-based Violence**

Honour based violence (HBV) 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.

Honour based violence 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; 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.

## **One Chance Rule**

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

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



## **Appendix 6 - Domestic Abuse**

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

### **How does it affect children?**

Children can be traumatised by seeing and hearing violence and abuse. They may also be directly targeted by the abuser or take on a protective role and get caught in the middle. In the long term this can lead to mental health issues such as depression, self harm and anxiety.

### **What are the signs to look out for?**

Children affected by domestic abuse reflect their distress in a variety of ways. They may change their usual behaviour and become withdrawn, tired, start to wet the bed and have behavioural difficulties. They may not want to leave their house or may become reluctant to return. Others will excel, using their time in your care as a way to escape from their home life. None of these signs are exclusive to domestic abuse so when you are considering changes in behaviours and concerns about a child, think about whether domestic abuse may be a factor.

### **What should I do if I suspect a family is affected by domestic abuse?**

To talk through your concerns call the Surrey Domestic Abuse Helpline on 01483 776822 or talk to your local outreach service.

East Surrey Domestic Abuse Services - Covering Reigate & Banstead, Mole Valley and Tandridge - 01737 771350

National Domestic Abuse helpline – 0808 2000 247

Your Sanctuary Outreach Service Covering Woking, Runnymede and Surrey Heath - 01483 776822

North Surrey Outreach Service - Covering Epsom & Ewell, Elmbridge and Spelthorne - 01932 260690

South West Surrey Outreach Service - Covering Guildford and Waverley - 01483 577392

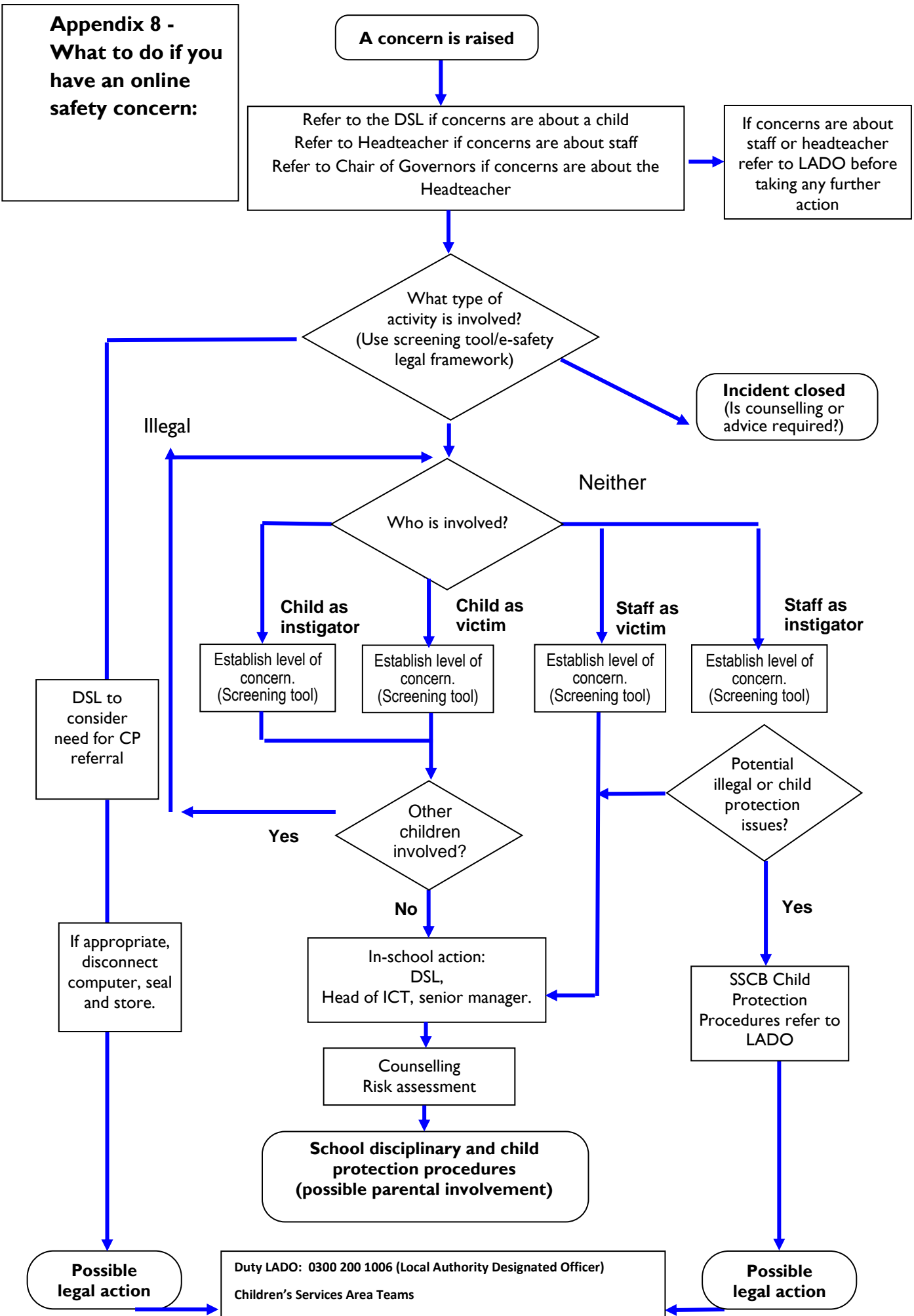
## Appendix 7 - Indicators Of Vulnerability To Radicalisation

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
2. Extremism is defined by the Government in the Prevent Strategy 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.
3. 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; or
  - Foster hatred which might lead to inter-community violence in the UK.
4. 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.

5. Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.
6. Indicators of vulnerability include:
  - Identity Crisis – the student / pupil is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
  - Personal Crisis – the student / pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
  - Personal Circumstances – migration; local community tensions; and events affecting the student / pupil’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
  - Unmet Aspirations – the student / pupil may have perceptions of injustice; a feeling of failure; rejection of civic life;
  - Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration;
  - Special Educational Need – students / pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.
7. 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.
8. More critical risk factors could include:
  - Being in contact with extremist recruiters;
  - Accessing violent extremist websites, especially those with a social networking element;
  - Possessing or accessing violent extremist literature;
  - Using extremist narratives and a global ideology to explain personal disadvantage;
  - Justifying the use of violence to solve societal issues;
  - Joining or seeking to join extremist organisations; and
  - Significant changes to appearance and / or behaviour;
  - Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

The Department of Education guidance [The Prevent Duty](#) can be accessed via this link.

**Appendix 8 -  
What to do if you  
have an online  
safety concern:**



## **Appendix 9 - Private Fostering Arrangements**

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

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

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

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

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

### **Children Looked After**

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

The school ensures that staff have the necessary skills and understanding to keep looked after children safe. 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.

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

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

## Children Missing Education

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

The school recognises that children missing education are at significant risk of underachieving, being victims of abuse and harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.

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

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

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.

The school will:

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

## **Pupils Missing Out on Education**

The vast majority of children engage positively with school and attend regularly. However, in order to flourish, some children require an alternative education offer or may require a modified timetable to support a return to full time education provision. It is recognised that children accessing alternative provision or a reduced or modified timetable may have additional vulnerabilities.

The school will ensure that the parents (and the local authority where the pupil has an EHCP) are given clear information about alternative provision placements and reduced or modified timetables: why, when, where, and how they will be reviewed;

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

The school will monitor and track children attending alternative provision to ensure that the provision meets the needs of the child

The school will comply with regular data returns requested by the Local Authority, regarding all pupils, of statutory school age, attending alternative provision and/or on a reduced or modified timetable. The school leadership will report to governors of any formal direction of a pupil to alternative provision to improve behaviour.

The school leadership will report to governors information regarding the use and effectiveness of the use of alternative provision and modified 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 abuse and neglect, including the exploitation of children. The DSL will regularly liaise with members of school staff with responsibility for behaviour and attendance to ensure risk is identified and appropriate intervention is in place to protect children from harm.

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

## Appendix 10 – Further Advice Links

Further advice on child protection is available from:

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

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

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

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

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

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

Surrey Safeguarding Children [Partnership webpages](#)

Lucy Faithfull [Foundation webpages](#)



## Appendix 11 - Safeguarding and Remote Learning

Although coronavirus (COVID-19) restrictions have changed and all children should now be in face-to-face learning, there may be situations that arise that entail remote teaching for children. Just like with face-to-face teaching, St Edmund's acknowledges that safeguarding and child protection is vital when teaching remotely.

### i. Policy

Staff should ensure they are familiar with the following policies/documents:

- Child Protection and Safeguarding Policy
- Acceptable Use Policy
- Staff Code of Conduct

Pupils must be reminded of the School's expectations for them to follow the:

- Acceptable Use Policy
- Behaviour and Discipline Policy

Parents should be informed of provisions for remote learning and must also ensure that they are responsible for their child/ren accessing this learning at the required times (See section iv)

### ii. Education

Where practicable, during normal school working hours when remote learning is taking place staff will be available via the portal to pupils and email to parents. Each group within the school community will have specific roles to play and these are outlined below:

- **The Role of Staff** – Staff should ensure that they provide lesson content, ensuring that there is enough material for the children to complete in line with their allocated contact time. Staff will ensure they regularly monitor the engage portal and their school email, during working hours to respond to any incoming queries. If for circumstances beyond their control a staff member is unable to set work they should inform their line manager.
- **The Role of the Pupil** – Pupils should endeavour to complete work set, ensuring they are checking their emails (senior pupils) and checking for work set on engage.
- **The Role of the Parent** – We would ask parents to support their child(ren) by encouraging them to complete work set by their teachers in a timely fashion.

Given that the reason for remote learning will likely be due to exceptional circumstances it is important that staff take into consideration any reasonable difficulties pupils may face when setting work. This may mean staff will have to either plan for a lower volume of work from students or allow for extended timescales, provide for reasonable deadlines and set marking

expectations and standards, which may be different from normal. However, it is imperative that staff provide remote education which has continuity.

It is important for staff to plan screen-based and non-screen based activities to achieve a healthy screen time balance. It is also vital that pupils and staff are also given the opportunity for reasonable breaks, activities and relaxation.

**iii. Behaviour**

Staff and students should follow the St Edmund's code of conduct when involved in remote learning.

**iv. Personal Data**

Lessons: The conference service may require the sharing of personal data, e.g. usernames to invite in. You must use school-provided email addresses as GDPR still applies.

Parental communication: Unless a member of staff has a school device for making telephone calls, they should only communicate with parents via email during remote education periods.

**v. Safeguarding**

If live video and audio is being used, there should be careful consideration of the location that everyone uses. It is possible that pupils may be in their bedrooms and this may not be appropriate. Microsoft teams and Zoom are services that enables the teacher to disable users' microphone and video cameras.

During live video sessions with classes, both staff and pupils are expected to dress appropriately. They do not have to wear uniform or business attire but should be dressed respectfully. As would be the case during a normal school day, staff have the right to ask a pupil to adjust their attire if they deem it unacceptable. As a rule of thumb, staff and pupils should consider what would be acceptable attire for a mufti day.

Online or offline, effective Safeguarding requires a whole-school approach. The planning for online or distance learning activities should include the school's safeguarding team as part of the planning process.

Ensure online lessons are in-line with the School's Safeguarding Policy and the Staff Code of Conduct.

Staff must maintain their safeguarding obligations. Record and report any safeguarding incidents or potential concerns to one of the school DSL's.

During periods of remote education, pupils should be reminded of who they can contact within the school for help or support.