



St Edmund's School

Child Protection

and

Safeguarding Policy

(26-27VI.1)

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Safeguarding Statement and Key Personnel

Governors' Committee Responsible:	Welfare and Education Committee
Governor Lead:	Mrs Jackie Alliss
Nominated Lead Member of Staff:	Dr John P. Carlin
Status & Review Cycle:	Statutory Annual
Next Review Date:	September 2027 (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. Where there are safeguarding concerns, the school will normally seek to work openly with parents or carers and will consider informing them of concerns and proposed referrals. However, parents or carers will not be informed where doing so would place the child at greater risk of harm, would otherwise be contrary to the child's best interests, or could prejudice a police or other safeguarding investigation. The DSL will make and record the decision on a case-by-case basis, seeking advice from children's social care or the police where appropriate.

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

The Deputy DSL(s) is/are:

Mr Steve Barnes (Whole school)

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Mr Hywel Bowen-Perkins (Prep school)

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Mrs Jess Weetman (Senior school)

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Mrs Karen Bailey (EYFS)

kb@saintedmunds.co.uk

Mrs S Richardson (Director of Girls)

s.richardson@saintedmunds.co.uk

Mrs Anne-Marie Burke (SEND)

amb@saintedmunds.co.uk

Mrs Sophie Moxey (Lead Nurse)

s.moxey@saintedmunds.co.uk

Mrs Jules Johnston (Nurse)

j.johnston@saintedmunds.co.uk

The nominated Child Protection Governor is:

Mrs Jackie Alliss

j.alliss@saintedmunds.co.uk

The Headteacher is:

Dr Adam Walliker

head@saintedmunds.co.uk

The Chair of Governors is:

Mrs Jackie Alliss

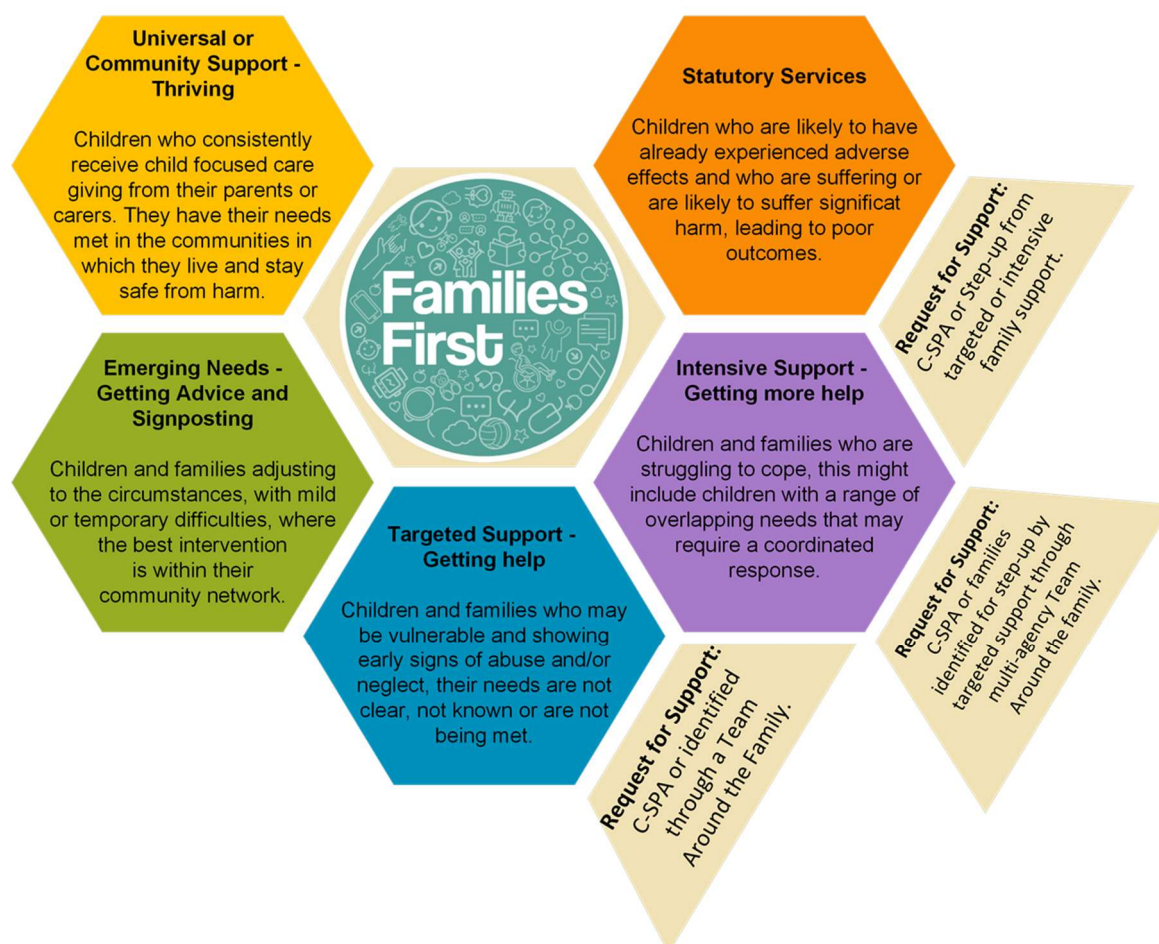
j.alliss@saintedmunds.co.uk

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



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

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

Phone: 01483 517898

Email: edt.ssd@surreycc.gov.uk

The Local Authority Designated Officer (LADO) 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 Headteacher (or Chair of Governors).

Staff can also contact the LADO directly on 0300 123 1650

Email: LADO@surreycc.gov.uk

NSPCC Helpline: 0808 800 5000

Terminology

Safeguarding and promoting the welfare of children is defined as:

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

Child Protection is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm. We recognise that harm also means where a child or young person witnesses harm to another.

Support before statutory intervention refers to support that may be provided to children and families before statutory intervention is required. This includes **universal services and community-based Early Help, and the targeted early help level of Family Help**.

Early Help refers to support available within the community to help children and families as soon as problems emerge. Where needs require more targeted early help, this may be provided through **Family Help**.

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. Overall, this will apply to all the 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.

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

I. Introduction

This policy has been developed in accordance with relevant safeguarding legislation, including the Children Acts 1989 and 2004, the Education Act 2002 and the Education (Independent School Standards) Regulations 2014. It has regard to [Keeping Children Safe in Education 2026 \(KCSIE 2026\)](#), [Working Together to Safeguard Children](#), the statutory Early Years Foundation Stage framework where applicable, and the locally agreed multi-agency safeguarding arrangements and procedures of the Surrey Safeguarding Children Partnership (SSCP). Relevant legislation, statutory guidance and supporting documents are identified below.

The Governing Body takes seriously its responsibilities under section 157 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014 and other relevant safeguarding legislation to safeguard and promote the welfare of children and to work effectively 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 the SSCP 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/
- Part 3 of the schedule to the [Education \(Independent school Standards\) Regulations \(2014\)](#), which requires the proprietor of an independent school to ensure that the school meets the safeguarding and welfare standards set out in that Part
- [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](#), as amended, including by the [Crime and Policing Act 2026](#)
- [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 requires the school to have due regard to the need to eliminate unlawful discrimination, harassment and victimisation, advance equality of opportunity and foster good relations. When significant decisions are made or policies developed, the school will consider the equality implications, including the need to address behaviours such as sexual violence and sexual harassment, misogyny/misandry, racism and faith-based prejudice. The school recognises that some pupils may be disproportionately vulnerable to particular forms of harm or bullying and will integrate this awareness into its safeguarding policies, procedures and practice.
- 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](#)
- [Information sharing to safeguard children and young people](#)

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 notifying 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 and volunteers are subject to the appropriate safer recruitment and suitability checks in accordance with KCSIE 2026 and the school's Recruitment, Selection and Disclosures Policy and Procedure, and that a single central record is maintained as required. In determining whether a volunteer is engaged in regulated activity, the school will apply the definition of regulated activity in force from 1 September 2026, including the removal of the supervision exemption introduced by the [Crime and Policing Act 2026](#).
- The school complies with the statutory requirements and current [Department for Education \(DfE\) guidance concerning disqualification under the Childcare Act 2006](#), as amended.

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
- ensuring 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. The school delivers Relationships, Sex and Health Education (RSHE) in accordance with the current [Department for Education \(DfE\) statutory guidance](#). The school will review its RSHE curriculum regularly to ensure that it remains aligned with the statutory guidance as amended or replaced.

- as part of their preventative education, children will be taught, at an age and developmentally appropriate stage, about online harms, including image sharing, deepfakes, pornography and misogynistic influencers, and when and where to seek help.

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 PSHE, providing 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, online safety, mental wellbeing, road safety, pedestrian and cycle training. In supporting the delivery of safeguarding education, the school will have regard to appropriate evidence-based and quality-assured resources, including PSHE Association accredited lesson plans and resources aligned to the RSHE curriculum, such as those available through the National Crime Agency's CEOP Education Programme. Preventative education will support a whole-school culture of zero tolerance for sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence and harassment, derogatory behaviour or other forms of physical violence and conflict.
- Ensure all staff are aware of the school's requirements concerning mobile phones and other smart technology, including expectations relating to pupil use throughout the school day and guidance governing staff use of mobile technology, and understand the associated safeguarding and online-safety risks.

Mental health

All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. These may include self-harm, signs of an eating disorder, suicidal ideation or risk of suicide. Mental health problems may also 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 diagnose a mental health problem. School staff are, however, well placed to observe children day-to-day and identify those whose behaviour, presentation or engagement suggests that they may be experiencing a mental health problem or be at risk of developing one. Staff should be alert to potential warning signs, including significant changes in behaviour, persistent difficulty sleeping, withdrawal from social situations, loss of interest in activities a child usually enjoys, and signs of self-harm or self-neglect. The presence of one or more indicators does not in itself establish that a child has a mental health condition.

Where children have suffered abuse, neglect or exploitation, or other potentially traumatic adverse childhood experiences, these experiences can have a lasting impact on their mental health, behaviour, attendance, engagement and education.

The school recognises its role in:

- promoting good mental wellbeing and preventing the onset of mental health difficulties;
- observing pupils and identifying early those who may be experiencing mental health problems or be at risk of developing them;
- ensuring appropriate early targeted support is provided; and
- liaising with or referring to specialist services where needed.

Where a member of staff has a concern about a child's mental health, they should act promptly and follow the school's established pastoral and mental health procedures. Where a mental health concern is also a safeguarding concern, staff must follow this Child Protection and Safeguarding Policy and speak to the DSL or a Deputy DSL without delay.

Where a child requires mental health support, understand that the DSL or a Deputy DSL should consider whether parents or carers should be informed to support the child's wellbeing, where doing so would not place the child at additional risk.

Where there is reason to believe that a child is in immediate danger, urgent action must be taken in accordance with the school's safeguarding and emergency procedures.

The school will seek to ensure that children experiencing mental health difficulties receive appropriate support. This may include support through the school's pastoral team, Health Centre and counselling provision; working with parents or carers where appropriate; and referral or signposting to relevant health, mental health or children's services. The school will consider the range of locally available support and liaise with specialist services as appropriate.

The school promotes awareness of mental health and wellbeing through the curriculum, including PSHE, assemblies, Tutor and Form time and the wider pastoral programme. Staff who identify concerns should record and report them through the school's established safeguarding and pastoral systems, including CPOMS where appropriate.

Reference should also be made to:

- St Edmund's Mental Health and Wellbeing Policy
- [DfE Mental Health and Behaviour in schools guidance](#);
- [DfE Promoting and Supporting Mental Health and Wellbeing in schools and Colleges guidance](#);
- Relevant NHS and local mental health support pathways.

Where a child's mental health needs require specialist support, the school will use the appropriate local NHS mental health, children's social care and other specialist referral pathways. Where a mental health concern also raises a safeguarding concern, the school will follow its safeguarding procedures and involve the DSL. The LADO will be contacted where the concern relates to an allegation or concern about an adult working with children.

5. Safe School, Safe Staff

Our school will ensure that:

- All staff receive information about the school's safeguarding arrangements, safeguarding statement, Staff Behaviour Policy (Code of Conduct), Child Protection and Safeguarding Policy, Behaviour Policy, the safeguarding response to children who are absent from education, the role and identity of the DSL and Deputy DSLs, and KCSIE 2026 as part of their induction.
- All staff receive safeguarding and child protection training at induction in line with advice from SSCP 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.
- The school has regard to [DfE's technology planning](#) and [AI guidance](#) on the safe and effective use of generative AI in education, including relevant product safety expectations, when assessing and improving its digital safeguarding arrangements. Relevant staff will be supported to understand the safeguarding, data protection, security and other risks associated with generative AI and how these risks should be mitigated.
- 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, neglect and exploitation and understand that children can be at risk of harm inside and outside of the school, inside and outside of home, and online.

- The Child Protection and Safeguarding 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 about child protection procedures through the publication of the Safeguarding Policy and reference to it in the school's handbook.
- The school works with children, families and partner agencies to facilitate appropriate support before statutory intervention, including universal services and community-based Early Help and, where appropriate, the targeted early help level of Family Help.
- 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 DSL and Deputy DSLs, are clearly advertised in the school with a statement explaining the school's role in referring and monitoring cases of suspected abuse.
- The school has appropriate safeguarding arrangements for visitors and other individuals coming onto the premises. The level of checking or supervision required will be determined according to the nature and purpose of the visit, the individual's role and the opportunity for contact with children, in accordance with KCSIE 2026 and the school's visitor procedures
- All staff are required to read Part one of KCSIE 2026 and the school's Child Protection and Safeguarding Policy in full and mark them as read on Every to confirm that they have read and understood it.
- The school governors will be given a copy of KCSIE 2026 and will sign to say they have read and understood it.

6. Roles and responsibilities

a) All members of the governing body understand and fulfil their responsibilities, namely, to ensure that:

- There is an effective 'Child Protection and Safeguarding Policy' along with a 'Staff Code of Conduct' and a 'Recruitment, Selection and Disclosures Policy And Procedure'.
- Ensure that the school maintains an effective Child Protection and Safeguarding Policy which reflects a whole-school approach to safeguarding, including child-on-child abuse; sets out clear and accessible systems for reporting safeguarding concerns; describes procedures that are consistent with government guidance; reflects locally agreed multi-agency safeguarding arrangements; appropriately addresses safeguarding matters including online safety and the additional needs and vulnerabilities of children with SEND; and is reviewed at least annually, and updated whenever necessary to reflect emerging or evolving safeguarding issues and lessons learnt. The policy will be publicly available on the school website.

- Understand the local criteria for action and the local protocol for assessment, including the arrangements for Family Help and referral to local authority children's social care, and ensure that these are appropriately reflected in the school's safeguarding policies and procedures.
- Ensure that all staff including temporary staff and volunteers are provided with the school's Child Protection and Safeguarding policy and staff behaviour policy.
- ensure that all staff have received appropriate safeguarding training and have read Part one of KCSIE 2026 in full, and that mechanisms are in place to assist staff to understand and discharge their roles and responsibilities as set out in that guidance.
- The school operates robust safer recruitment procedures in accordance with Part Three of KCSIE 2026 and the Education (Independent School Standards) Regulations 2014. All required pre-appointment checks will be undertaken and recorded as appropriate, and those involved in the recruitment and employment of staff to work with children will receive appropriate safer recruitment training. Volunteers undertaking regulated activity will be subject to the appropriate statutory checks, including an enhanced DBS check with children's barred-list information where required, reflecting the changes to regulated activity introduced from 1 September 2026.
- Ensure that the school has appropriate policies and procedures concerning reasonable force and restrictive intervention, which enable staff to make appropriate physical contact where necessary to safeguard and support pupils and which have regard to relevant Department for Education (DfE) guidance.
- The school has procedures for dealing with safeguarding concerns or allegations about staff, including the Headteacher, supply teachers, trainee teachers, volunteers and contractors, and for concerns relating to other children; and that a referral is made to the DBS where the statutory referral criteria are met.
- 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 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).

- Arrangements for PE and sport take appropriate account of safeguarding, safety and fairness, the Equality Act 2010, relevant KCSIE 2026 guidance and, where applicable, guidance from the relevant National Governing Body for the sport.
- The school's arrangements for toilets, changing rooms and showers comply with relevant premises, equality and safeguarding requirements, including the requirements set out in KCSIE 2026.
- Appropriate filtering and monitoring systems are in place to safeguard children online, and that a review of their effectiveness is carried out at least once every academic year. The review will be carried out by the SLT member responsible for filtering and monitoring, with the support of the DSL and IT support. The review will include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record will be kept of these checks. The school will ensure that the leadership team and relevant staff understand the filtering and monitoring arrangements in place, manage them effectively and know how to escalate concerns when identified.
- Ensure that appropriate measures are in place to protect personal information and that the school has appropriate cyber-security and access-management systems. Information security will be considered as part of the school's wider safeguarding responsibilities, with appropriate regard given to the [DfE's Meeting digital and technology standards in schools and colleges](#).
- Ensure that, where the school provides or arranges boarding or residential accommodation for pupils, appropriate safeguarding arrangements are in place which reflect the additional safeguarding considerations associated with children living away from home and are consistent with KCSIE 2026 and other applicable requirements.
- The school complies with DfE and Surrey County Council Children Missing Education requirements.
- Ensure that, where the school arranges alternative provision for a pupil, appropriate safeguarding arrangements are in place and kept under review; that the school maintains appropriate oversight of the pupil's attendance, welfare and safeguarding; and that the school complies with relevant data returns requested by the local authority concerning pupils of statutory school age attending alternative provision and/or on a reduced or modified timetable.
- Ensure that the school has appropriate arrangements governing pupils' use of mobile phones and other smart technology during the school day, consistent with statutory DfE guidance, and that these arrangements are reflected in relevant safeguarding, behaviour and acceptable-use policies.
- 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 and responding to possible mental health problems, including appropriate support arrangements, routes

for escalation, emergency responses where required, and clear referral and accountability systems.

b) 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 (2026) guidance.
- The Child Protection and Safeguarding Policy and procedures are implemented and followed by all staff.
- Ensure that appropriate safeguarding arrangements are implemented in boarding and residential accommodation provided or arranged by the school, and that staff working within such provision understand the school's safeguarding and reporting procedures.
- 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 appropriate opportunities are provided for support before statutory intervention when additional needs are identified, including universal services and community-based Early Help and, where appropriate, the targeted early help level of Family Help.
- Deputy DSLs are trained to the same standard as the DSL and their role is explicit in their job description.
- Robust DSL cover arrangements are in place whenever the DSL is unavailable, including because of illness, leave or other circumstances, and appropriate safeguarding cover arrangements are in place for any school activities taking place out of hours or outside term time. Arrangements will ensure that safeguarding concerns continue to be received, monitored and acted upon without delay, including through a confidential shared safeguarding mailbox or CPOMS.
- 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 DfE, SSCP and Surrey County Council (SCC).
- Statutory requirements are met to make a referral to the Disclosure and Barring Service (DBS) where the referral criteria are met in respect of any member of staff or volunteer who is engaged in regulated activity, and additionally, in the case of teaching staff, to the Teaching Regulation Agency (TRA) where the relevant referral criteria are met.
- That the school has appropriate policies in place that make it clear that sexual harassment, online sexual abuse and sexual violence (including sexualised language) is unacceptable, with appropriate sanctions and support in place.
- That the school's staff have appropriate knowledge of Part 5 the government's KCSIE 2026 guidance.

c) The Designated Safeguarding Lead (DSL)

The DSL will carry out the role and responsibilities set out in Annex B of KCSIE 2026 and will have appropriate status, authority, time, funding, training, resources and support to fulfil these responsibilities effectively. The DSL holds lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place.

The DSL:

- Holds lead responsibility for safeguarding and child protection (including online safety) in the school, this responsibility is not able to be delegated.
- Have an 'it could happen here' approach to safeguarding.
- Liaise with the local authority and work in partnership with other agencies and professionals in line with the Working Together to Safeguard Children (2026) guidance.
- 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 DSL training updated at least every two years, and will refresh their knowledge and skills at regular intervals and at least annually. The DSL will also access appropriate professional support, guidance and resources to support them in carrying out their safeguarding responsibilities effectively, including those identified in KCSIE 2026 and through relevant local safeguarding arrangements.

- 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 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 susceptible to radicalisation or involvement in terrorism through the current [Surrey Prevent referral process](#). The current Prevent referral form and local referral arrangements should be checked before making a referral. If there is an immediate risk of harm, the Police should be contacted on 999.
- 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 25th 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 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 the case holding Social Worker is informed of any child currently with a child protection plan who is absent without explanation.
- Will ensure that all staff have read and understood Part one of KCSIE 2026 in full and have read, understood and agree to work within the school's Child Protection and Safeguarding Policy and Staff Behaviour Policy (Code of Conduct), and that appropriate mechanisms are in place both to confirm this and to support staff in discharging their safeguarding responsibilities.
- 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 DSL and Deputy DSLs, 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 2026 guidance on child-on-child abuse (including harassment and violence) when a concern is raised that a child may have abused, harassed or used violence against another child, whether this has occurred inside or outside school or online.
- Be available during term time (during school hours) for staff in school to discuss safeguarding concerns, whether face-to-face, by telephone or by email. Robust cover arrangements will be maintained whenever the DSL is unavailable, including because of illness, leave or other circumstances, and for any out-of-hours or out-of-term activities. These arrangements will ensure that safeguarding concerns continue to be received, monitored and acted upon without delay, including through a confidential shared safeguarding mailbox or CPOMS.
- 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, including the local criteria for action and local protocol for assessment, and understand the assessment processes and local arrangements for support before statutory intervention, including universal services and community-based Early Help, the targeted early help level of Family Help, and statutory intervention. This includes understanding the local criteria and levels of need for accessing Family Help and for referral to local authority children's social care and recognising that appropriately qualified lead practitioners who are not social workers may lead assessments before statutory intervention and may continue to lead work with families up to and including support under section 17 of the Children Act 1989, where appropriate.
- Have a clear understanding of how to access local support before statutory intervention, including community-based Early Help and Family Help, and support and advise members of staff where such intervention may be appropriate.
- Understand and support the school's delivery of the Prevent duty and provide advice and guidance to staff on protecting children from radicalisation, including the Prevent referral process and Channel. Where a child is receiving support through Channel, ensure that relevant safeguarding information is shared appropriately with the police and other relevant partners to support the assessment and management of risk.
- Liaise with school staff (especially pastoral support, behaviour leads, school health colleagues and the SENDCO) on matters of safety and safeguarding and consult the Surrey Continuum of Support 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. In relation to young carers, recognise that caring responsibilities may impact on a child's attendance, attainment, behaviour and wellbeing, and support early identification so that appropriate help can be provided, including through external partners, local authority or health services where appropriate.
- Ensure that notifications received concerning children placed in temporary accommodation are considered promptly, that any resulting safeguarding or welfare needs are identified, and that appropriate support, information sharing and referral are considered in accordance with this policy.
- Ensure that reports of abuse involving children with SEND are considered in close liaison with the SENDCO, while maintaining appropriate safeguarding confidentiality and information-sharing arrangements.
- 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.
- Support the SLT member responsible for filtering and monitoring in the annual review of the effectiveness of the school's filtering and monitoring systems, including consideration of safeguarding risks and the effectiveness of the arrangements for identifying and escalating concerns.
- Keep detailed, accurate and secure records of safeguarding concerns, decisions and actions, including the rationale for decisions made. Records should include significant information-sharing decisions, including what information was shared or withheld, with whom, and the rationale for that decision, including any relevant assessment of risk.
- 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 or college, the child protection file is transferred separately from the main pupil file, securely and as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. Confirmation of receipt will be obtained.
- When transferring a child protection file, the school will include a clear and structured summary identifying current safeguarding concerns, relevant context and any ongoing support needs. Current safeguarding concerns will be distinguished clearly from historic information so that the receiving setting can readily identify current risk and required support.
- On receiving a child protection file, an appropriately trained member of staff will review the safeguarding information promptly to ensure that key risks, needs and required actions are understood. Where information received is unclear or incomplete, the school will seek clarification from the previous setting where necessary to support effective safeguarding. Safeguarding information will be used to support, and not disadvantage, the child.

- 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.
- Where appropriate, the DSL will consider sharing relevant safeguarding information with a receiving school or college before a pupil transfers where this will enable necessary safeguarding support to be put in place, including where the pupil is receiving support through the Channel programme.
- 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 can 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.
- 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 and Safeguarding Policy is reviewed at least annually and updated whenever necessary to reflect safeguarding issues as they emerge and evolve, including lessons learnt from safeguarding concerns, incidents and practice, with procedures and implementation reviewed regularly.
- Ensure that the Child Protection and Safeguarding 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 DSL and Deputy DSLs, 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 KCSIE 2026.

d) The Deputy Designated Safeguarding Leads (DSLs)

- Is/are trained to the same standard as the DSL and, in the absence of the DSL, carries out those functions necessary to ensure the ongoing safety and protection of pupils as described in KCSIE 2026.
- 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 2026 guidance on child-on-child abuse (including harassment and violence) when a concern is raised that a child may have abused, harassed or used violence against another child, whether this has occurred inside or outside school or online.
- 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.

e) All school staff

All staff should be aware of the indicators of abuse, neglect, exploitation and modern slavery and understand that children can be at risk of harm inside and outside the school, inside and outside the home, and online. Staff should understand that abuse, neglect, exploitation and other safeguarding issues are rarely standalone events and cannot always be covered by one definition or label alone. In most cases, multiple safeguarding issues will overlap.

All staff, but especially the DSL and Deputy DSLs, should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms can take a variety of forms and children can be vulnerable to multiple harms, including sexual abuse, harassment and exploitation; domestic abuse in their own intimate relationships; criminal exploitation, including financial exploitation; serious youth violence; county lines; and radicalisation.

All staff should be aware that safeguarding issues often overlap and can put children at risk of harm. Behaviours and indicators that may be signs of safeguarding risk include drug taking and/or alcohol misuse; unexplainable and/or persistent absences from education; serious violence, including concerns about a child carrying, threatening with or using a weapon; criminal exploitation, including that linked to county lines; radicalisation; and consensual or non-consensual making or sharing of nudes or semi-nudes. Staff should remain alert to the possibility that more than one safeguarding issue may be affecting a child at the same time.

Any concern about a child carrying or using a weapon, or expressing an intention to do so, should be reported to the DSL or a Deputy DSL without delay.

All school staff should understand that online safety risks may relate to content, contact, conduct or commerce, as described in Section 12 (Online Safety/Cybercrime), and remain alert to the ways in which emerging technologies, including generative AI, may create or amplify these risks. Staff should also be alert to indications that a child may be involved in, or at risk of becoming involved in, cyber-dependent crime and should report such concerns to the DSL or a Deputy DSL.

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

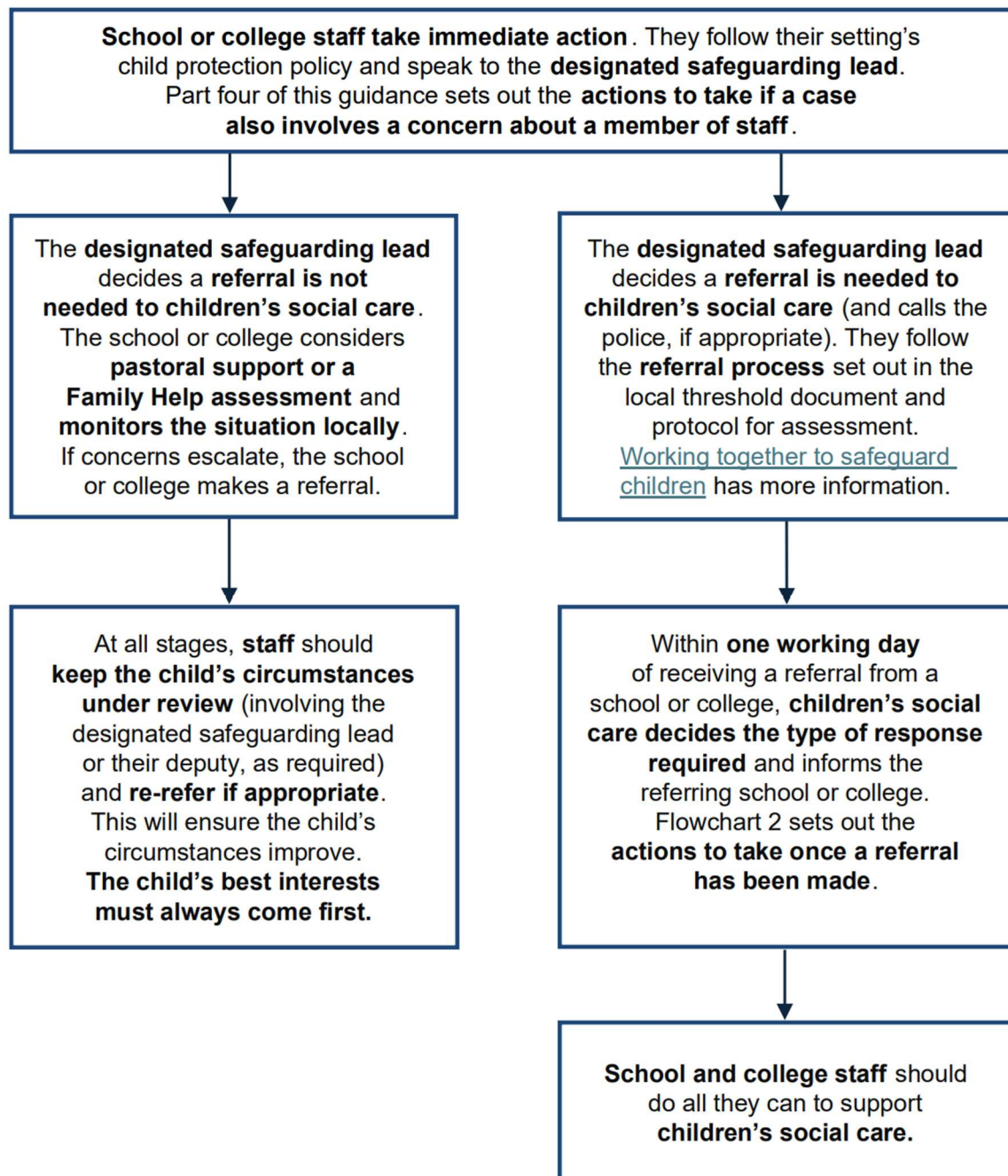
- Provide a safe environment in which children can learn. Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to.
- Ensure children know that there are adults in the school who they can approach if they are worried or have concerns.
- Plan opportunities within the curriculum for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe.
- Understand that the use of generative AI may present safeguarding and online safety risks and follow the school's policies and guidance when using, or supporting pupils to use, generative AI. Staff should report any safeguarding concern arising from the use of generative AI through the school's normal safeguarding procedures.
- Where AI is used to analyse or process school and student data, staff must only use the school-approved Microsoft 365 Copilot service while signed in with their school (@st-eds.co.uk) account and in accordance with the school's data-protection, information-security and acceptable-use arrangements. When used in this approved environment, Microsoft Copilot provides enterprise data protection: prompts, responses and organisational data accessed through Microsoft Graph are not used to train foundation large language models, data is encrypted at rest and in transit, and existing Microsoft 365 permissions and data-protection controls continue to apply. Personal data relating to pupils must nevertheless be limited to what is necessary for the task and, wherever practicable, anonymised or pseudonymised before being processed using Copilot. Safeguarding information, special category personal data or other particularly sensitive information about an identifiable pupil must not be entered into Copilot unless its use for that purpose has been specifically authorised under the school's approved data-protection and information-governance arrangements. Staff remain responsible for checking the accuracy and appropriateness of any AI-generated analysis or content before it is used or shared.
- Attend training 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 (2026), 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 make a safeguarding referral directly to Children's Services through C-SPA, and to the Police where appropriate, if the DSL or a Deputy DSL is not available and the circumstances require immediate safeguarding action.
- Follow the allegations procedures if the disclosure is an allegation against a member of staff.
- Follow the procedures set out by the SSCP and take account of guidance issued by the DfE.
- 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 support before statutory intervention, including community-based Early Help and targeted early help through Family Help, and be prepared to identify and support children who may benefit from such support.
- All staff should understand the school's local arrangements for support before statutory intervention and referral, including the Surrey Continuum of Support and the criteria and levels of need for community-based Early Help, targeted early help through Family Help and referral to local authority Children's Social Care. Staff should understand that statutory support may include services under sections 17, 20, 31 and 47 of the Children Act 1989 and should follow the school's safeguarding procedures whenever they have concerns about abuse, neglect or exploitation, including concerns relating to disabled children. Staff should seek advice from the DSL or a Deputy DSL where they are unsure about the appropriate level of support or referral.
- Recognise that any child may benefit from support before statutory intervention, including from universal services and community-based Early Help, or the targeted early help level of Family Help, as outlined in paragraph 18 of KCSIE 2026. Staff will be particularly alert to children who may need additional support, including young carers, and will liaise with the DSL in the first instance. Options may include managing support for the child internally through the school's pastoral support processes. Where internal support is provided, and where doing so would not place the child at additional risk, the DSL or a Deputy DSL will consider whether parents or carers should be informed to further support the child's wellbeing. Other options may include undertaking or contributing to a Family Help assessment or making a referral to statutory services, as appropriate. Appropriately qualified lead practitioners who are not social workers may lead assessments before statutory intervention and may continue to lead work with families up to and including support

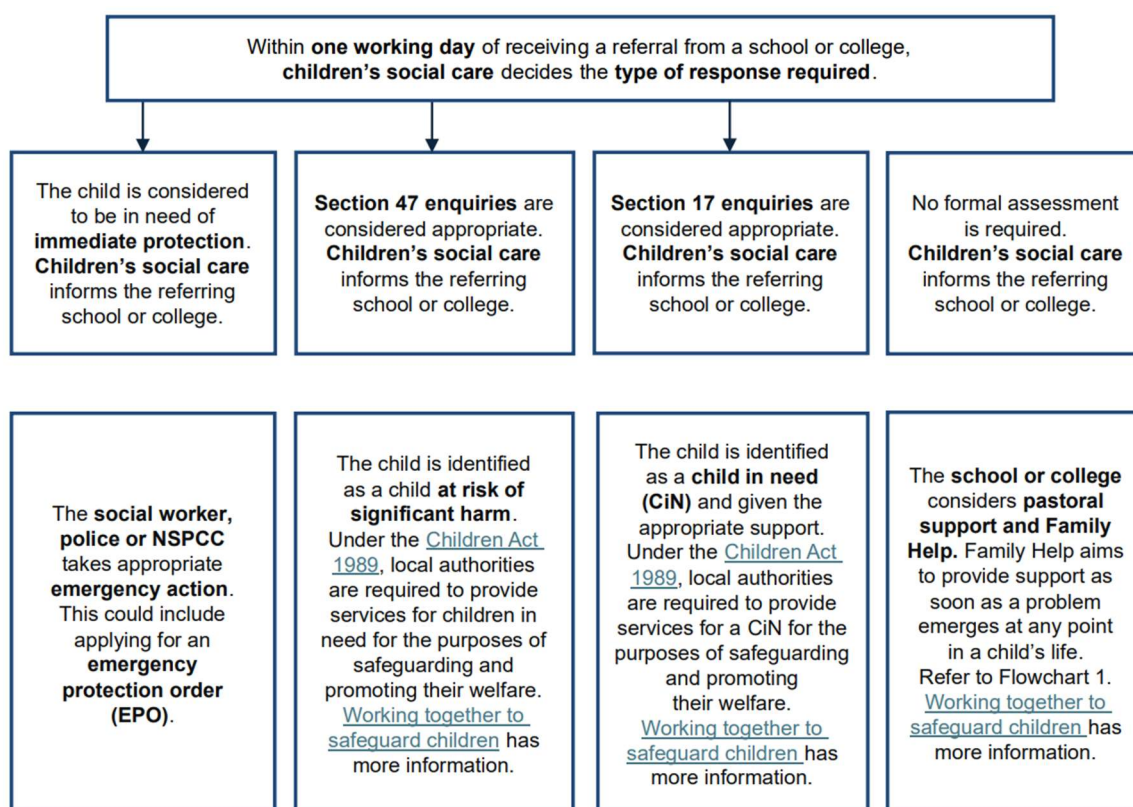
under section 17 of the Children Act 1989, where appropriate. Staff will liaise with other agencies supporting pupils as required.

- 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 and Safeguarding policy, staff 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.
- Recognise that concerns may include self-harm, eating disorders and suicidal ideation, and be alert to changes in a child's behaviour, presentation or engagement that may indicate a mental health difficulty.
- Understand that their role is to notice, record and act on concerns, and that only appropriately trained professionals should attempt to diagnose a mental health problem.
- Understand that abuse, neglect, exploitation and other potentially traumatic adverse childhood experiences may have a lasting impact on a child's mental health, behaviour and education.
- Report mental health concerns through the school's appropriate safeguarding, pastoral and mental health procedures and, where the concern is also a safeguarding concern, take immediate action by speaking to the DSL or a Deputy DSL.
- Where there is reason to believe that a child is in immediate danger, take urgent action through the school's emergency procedures, including contacting the emergency services where appropriate.
- Be prepared to make a safeguarding referral directly to Children's Services through C-SPA, and to the Police where appropriate, if the DSL or a Deputy DSL is not available and the circumstances require immediate safeguarding action.

Actions taken when there are concerns about a child:



Actions taken once a referral has been made to children's social care:



7. Confidentiality, Sharing and Withholding Information

The school recognises that effective information sharing is a core safeguarding responsibility. The school will comply with the statutory Information Sharing Duty under section 16LA of the Children Act 2004, which came into force on 30 September 2026, and will have regard to the current statutory Information Sharing Duty guidance. Where the statutory duty applies, the school will share relevant information where it may help another relevant person to assess need or risk, make a decision, provide support or take action to safeguard and promote the welfare of a child, subject to the statutory limitations. Information will be shared lawfully, appropriately, proportionately, securely and in a timely manner.

St Edmund's School recognises that information sharing is vital in identifying and tackling all forms of abuse, neglect and exploitation, promoting children's welfare and educational outcomes, and effectively meeting children's needs. The school will contribute to inter-agency working in line with Working Together to Safeguard Children (2026) and will share relevant information between professionals and agencies where appropriate.

The school will ensure that appropriate arrangements are in place, and understood by relevant staff, setting out the processes and principles for sharing information within the school and with local authority children's social care, the safeguarding partners and other relevant organisations, agencies and practitioners.

Staff should be proactive in sharing safeguarding information as early as possible to help identify, assess and respond to risks or concerns about a child's safety and welfare, whether concerns are emerging or the child is already known to local authority children's social care. Staff must not assume that another colleague or professional will share information that may be critical to keeping a child safe.

When deciding what information to share, staff should consider whether the information is relevant to the current safeguarding risk, what it is necessary for the recipient to know, and whether the information is clearly presented and appropriately contextualised. Professional judgement should be used to ensure that information shared is focused and proportionate. Information that is unnecessary for safeguarding purposes may be summarised or omitted, but care must be taken not to omit information that may be relevant to understanding or managing safeguarding risk.

When making decisions about sharing or withholding safeguarding information, staff should assess the risks and benefits of sharing or not sharing the information, with the safety and welfare of the child as the primary consideration. This assessment should take account of the nature and seriousness of the safeguarding concern, any risk of harm to the child or others, the child's wishes and feelings where appropriate, and whether sharing information could itself create or increase a risk. Where appropriate, the DSL or a Deputy DSL should be consulted. Significant decisions about information sharing, including the reasons for sharing or not sharing information, should be clearly recorded.

Data protection laws, including the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025, do not prevent the sharing of information for the purposes of keeping children safe. Relevant staff must have due regard to the relevant data protection principles and be confident of the processing conditions that allow them to store and share information for safeguarding purposes, including sensitive information and special category personal data. Staff should understand that 'safeguarding of children and individuals at risk' is a processing condition that allows, where appropriate, practitioners to share special category personal data without the need for consent. Any information sharing must be carried out in accordance with data protection legislation. If staff are unsure, they should seek advice from the DSL, Data Protection Officer or other appropriate information governance lead.

Where the serious harm test under data protection legislation is met, the school must withhold the pupil's personal data from a Subject Access Request (SAR) where required by law. Where there is doubt about whether the test is met, the school will seek independent legal advice.

Fears or uncertainty about sharing information must never be allowed to stand in the way of the need to safeguard and promote the welfare of children. Staff should not assume that someone else will share information that may be critical to keeping a child safe. If staff are unsure whether information should be shared, they should seek advice from the DSL or a Deputy DSL and, where appropriate, the school's Data Protection Officer or information

governance lead. The reasons for significant decisions to share or not share safeguarding information should be recorded.

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
- Information-sharing decisions should be made on a case-by-case basis, taking account of the circumstances of the child and the risks of sharing or not sharing the information. Where a significant decision is made to share, withhold or limit safeguarding information, the decision and the rationale for it should be recorded.
- 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 educational needs, communication difficulties or certain medical or physical health conditions may be more likely to communicate concerns through behaviour rather than words. Staff should remain professionally curious and should not assume that changes in behaviour, mood, presentation or injuries are attributable to a child's disability, SEND or medical condition without further exploration. Staff should also be alert to circumstances in which the management of a child's medical condition, including allergies, may indicate that the child is at increased risk of neglect, abuse or exploitation. Staff will also 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: 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, and any actual words or phrases used by the child.
5. EYFS staff may include a 'Record of existing injury' form if it is relevant, which should also be signed and dated.
6. 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 Surrey Continuum of Support, and having regard to Surrey's local criteria for action and local protocol for assessment, the DSL will consider the child's needs and determine the appropriate level of response and support. Where there are sufficient grounds to suspect that a child is suffering, or is likely to suffer, significant harm, a Request for Support must be made to C-SPA in accordance with the local referral arrangements, and the Police contacted where appropriate.
2. Normally, the school should try to discuss concerns about a child's welfare with the family and, where possible, seek their agreement before making a referral to C-SPA. However, this should only be done where it will not place the child at increased risk or impact a police investigation. The child's views should also be taken into account.
3. If there are grounds to suspect that a child is suffering, or is likely to suffer, significant harm or abuse, the DSL must contact C-SPA by sending a Request for Support Form securely to cspa@surreycc.gov.uk or by telephoning 0300 470 9100. If a child is in immediate danger and urgent protective action is required, the Police must be called on 999. The DSL must also notify C-SPA of the occurrence and the action taken.
4. If the DSL is unsure whether a referral to statutory children's services is required, they may contact C-SPA for advice and consultation.
5. If there is not a risk of significant harm requiring referral to statutory children's services, the DSL will consider the appropriate support before statutory intervention. This may include support through the school's own pastoral processes, universal services or community-based Early Help, undertaking a Family Help assessment where appropriate, or referral to statutory services. Appropriately qualified lead practitioners who are not social workers may lead assessments before statutory intervention and may continue to lead work with families up to and including support under section 17 of the Children Act 1989, where appropriate. Where support is managed internally through the school's pastoral support processes, and where doing so would not place the child at additional risk, the DSL or a Deputy DSL will consider whether parents or carers should be informed to further support the child's wellbeing. The child's circumstances and the effectiveness of support will be kept under review, with consideration given to referral to local authority children's social care if concerns escalate or the child's situation does not improve.
6. 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.

7. When a pupil needs 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.
8. 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.

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 and 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/she touch your private parts?" or "did he/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 must do next and whom you must 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.
- Safeguarding information must be treated confidentially and shared only with those who need it for safeguarding purposes. Staff must never promise a child complete confidentiality and must share relevant information where this is necessary to safeguard the child or another person.
- 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 C-SPA.

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

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

9. Children who are particularly vulnerable

St Edmund's School recognises that some children are more vulnerable to abuse, neglect and exploitation and that additional barriers may exist when recognising abuse, neglect and exploitation for some children. We understand that this increased risk may arise from societal attitudes and assumptions, communication difficulties or safeguarding procedures that fail to recognise children's diverse needs and circumstances.

The school recognises that children with special educational needs and/or disabilities (SEND), or certain medical or physical health conditions, may face additional safeguarding challenges both online and offline. Additional barriers can include assumptions that indicators of possible abuse, such as behaviour, mood or injury, relate to the child's condition without further exploration; greater susceptibility to peer-group isolation or bullying, including prejudice-based bullying; being disproportionately affected by behaviours such as bullying without outwardly showing signs; and communication barriers or difficulties in managing or reporting concerns, including not understanding that what is happening to them is abuse.

Further barriers may arise where a child requires intimate care, is isolated from others or is more dependent on adults for care. Children with SEND may also experience difficulties with cognitive understanding, including being unable to distinguish between fact and fiction in online content, understanding the consequences of repeating such content or behaviours, or recognising associated safeguarding risks.

Staff will take account of these additional vulnerabilities when identifying, assessing and responding to safeguarding concerns. Appropriate pastoral support, communication support and reasonable adjustments will be considered so that children with SEND are able to

understand safeguarding information, communicate concerns and access help. Any report of abuse involving a child with SEND will require close liaison between the DSL or a Deputy DSL and the SENDCO.

To ensure that all our pupils receive equal protection we will give special consideration to children who are/have:

- Are disabled and/or have certain medical or physical health conditions, including allergies, which may give rise to specific additional needs or safeguarding vulnerabilities
- Special educational needs (whether or not they have a statutory Education, Health and Care plan)
- A mental health need
- Are at risk due to either their own or a family member's mental health needs
- Young carers
- Showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- Living away from home, including pupils in boarding or other residential accommodation
- Vulnerable to being bullied or engaged in bullying
- Already viewed as a 'problem'
- Are known to be living in difficult situations, including temporary accommodation, or where there are issues such as substance abuse or domestic abuse. Where the school receives notification that a child has been placed in temporary accommodation, the arrangements set out under "Temporary accommodation notification duty" below will be followed.
- A family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Misusing alcohol and other drugs themselves
- is pregnant and/or is a parent themselves
- has exhibited early signs of abusive, violent and/or harmful behaviours
- A parent or carer in custody, or is affected by parental offending
- Live transient lifestyles
- Are looked after or previously looked after
- A privately fostered child.
- Frequently missing/goes missing from education, home or care
- Whose parent/ carer has expressed an intention to remove them from school for Elective home education (EHE)
- Vulnerable to discrimination, prejudice-based bullying or abuse on grounds including race, ethnicity, religion, disability or sexual orientation, or because they are questioning their gender or are perceived by others to be lesbian, gay, bisexual or gender-questioning
- At risk of being radicalised, drawn into extremism or exploited

- At risk of modern slavery, trafficking, sexual exploitation and/or criminal exploitation, including financial exploitation
- Asylum seekers
- Do not have English as a first language
- At risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- Has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time or reduced timetable, is at risk of permanent exclusion, has been permanently excluded, or is receiving education in alternative provision, including a Pupil Referral Unit

Young carers

The school recognises that young carers may have specific additional needs and that caring responsibilities can have an impact on a child's attendance, attainment, behaviour and wellbeing. Staff will be alert to children who may have caring responsibilities and recognise the importance of early identification so that their individual needs and circumstances can be understood and appropriate support provided.

Where a child is identified as a young carer, the school will consider what support may be appropriate, including support through the school's pastoral arrangements and, where appropriate, support from external partners, local authority or health services. Any safeguarding concerns identified in relation to a young carer will be reported and responded to in accordance with this Child Protection and Safeguarding Policy.

Safeguarding children with medical conditions

The school recognises that an incident relating to the management of a child's medical condition, including allergies, does not in itself necessarily constitute a safeguarding concern or require a safeguarding referral.

However, where an incident indicates that a child may be at increased risk of neglect, abuse or exploitation, either within or outside the family, because of their medical condition, it will be considered as a safeguarding concern and responded to in accordance with this policy.

This may include circumstances where relevant information about a child's medical condition has not been provided to the school, or where a child is repeatedly sent to school without essential medication, thereby placing them at risk.

Staff should report any such safeguarding concern to the DSL or a Deputy DSL without delay. The school will consider the individual circumstances and, where appropriate, take safeguarding action in accordance with its established procedures. Reference should also be made to the school's Administration of Medicines/medical policies and relevant DfE guidance on supporting pupils with medical conditions and allergy safety in schools.

Temporary accommodation notification duty

The school recognises that children living in temporary accommodation may experience additional challenges that affect their welfare, wellbeing, attendance, education and access to support. Where the school receives a notification from a local housing authority that a child has been placed in temporary accommodation, the information will be considered promptly so that any safeguarding, pastoral, attendance, educational or other support needs can be identified and addressed at the earliest opportunity.

The DSL, or an appropriate Deputy DSL, will ensure that relevant information is considered alongside any existing safeguarding or welfare information held by the school and shared appropriately with relevant staff on a need-to-know basis. The school will consider whether the child or family may require additional support and will liaise with parents or carers and relevant agencies where appropriate.

Receipt of a temporary accommodation notification does not replace the school's existing safeguarding responsibilities. Where information received gives rise to a safeguarding concern or indicates that a child has suffered or is at risk of harm, staff will follow the school's normal safeguarding procedures, including referral to Children's Social Care where appropriate.

Further information is available in the government's [Temporary accommodation notification duty](#) guidance.

10. Boarding and residential accommodation

St Edmund's School recognises that children living away from home may be particularly vulnerable to safeguarding concerns and that boarding and residential arrangements require appropriate safeguarding oversight. The school will ensure that arrangements for pupils staying in boarding or other residential accommodation take account of the additional safeguarding risks that can arise when children are living away from home.

The school will maintain appropriate safeguarding arrangements for boarding and residential accommodation and ensure that relevant staff understand their safeguarding responsibilities. Safeguarding concerns arising within boarding or residential accommodation, including concerns involving adults or other children, will be reported and responded to in accordance with this Child Protection and Safeguarding Policy and the procedures set out in KCSIE 2026.

Particular attention will be given to ensuring that pupils living away from home know how to raise a concern, have access to appropriate trusted adults, and are able to report concerns or abuse. Staff responsible for boarding or residential provision will remain alert to the additional vulnerabilities that may arise from children living away from their families and will share safeguarding information with the DSL or a Deputy DSL where appropriate.

Where the school arranges or uses residential accommodation away from the school site, it will satisfy itself that appropriate safeguarding arrangements are in place and that any

safeguarding concerns are reported promptly through the appropriate safeguarding procedures.

11. Anti-Bullying/Cyberbullying

Our school policy on anti-bullying is set out in a separate document and acknowledges that allowing or condoning bullying may lead to consideration under child protection procedures. This includes all forms of bullying, including online, prejudice-based and discriminatory bullying, and bullying related to racism, faith, sexuality or gender. Staff recognise that prejudice-based harm and discriminatory behaviour may have a significant impact on a child's welfare, wellbeing, mental health, sense of safety and willingness to seek help. Staff will be alert to the signs and impact of prejudice-based harm and will ensure that concerns are considered within safeguarding practice where appropriate. 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 or perceived differences may be more susceptible to bullying and 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.

12. Online Safety/Cybercrime

The school recognises information security and access management as part of its wider safeguarding responsibilities. It will take appropriate measures to protect personal information and maintain appropriate cyber-security and access-management systems, having regard to the [DfE's Meeting digital and technology standards in schools and colleges](#). These arrangements are intended to strengthen resilience, reduce the risk of disruption and data breaches, and mitigate associated safeguarding risks.

The school recognises that generative artificial intelligence (AI) is an increasingly important aspect of online safety. Generative AI may provide educational opportunities but may also create or amplify safeguarding risks. The school will therefore have regard to DfE guidance and support materials on the safe and effective use of generative AI in education. AI-related safeguarding concerns will be considered within the school's existing safeguarding and online safety arrangements and reported and responded to in the same way as other online safeguarding concerns.

The school recognises that it is essential to safeguard children from potentially harmful and inappropriate online material. Our whole-school approach to online safety seeks to protect

and educate pupils and staff in their use of technology and provides mechanisms to identify, intervene in and escalate online safety concerns where appropriate.

As part of the school's online safeguarding arrangements, the effectiveness of its filtering and monitoring systems will be reviewed at least once every academic year in accordance with KCSIE 2026. The review arrangements, responsibilities and recording requirements are set out in Section 6, Roles and Responsibilities.

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 TikTok etc. 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 may encounter a wide range of harm through their use of technology, including through harmful content, contact with others and their own or others' online conduct. The harm might range from sending hurtful or abusive texts, emails, or misogynistic or misandrist messages, to grooming or enticing children to engage in harmful behaviour, including sexual behaviour such as webcam photography or face-to-face meetings. Pupils may also be distressed or harmed by accessing inappropriate or harmful online material, including content relating to self-harm, suicide, eating disorders, criminal activity, racism, antisemitism, radicalisation, extremism, extreme violence, misinformation, disinformation and conspiracy theories. Staff will recognise misogynistic and misandrist content and messages as a potential safeguarding concern and respond in accordance with the school's safeguarding procedures.

Online safety risks are broad and continually evolving. In line with KCSIE 2026, the school recognises that these risks can be categorised into four areas:

- **Content:** being exposed to illegal, inappropriate or harmful content, including pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories.
- **Contact:** being subjected to harmful online interaction with other users, or with generative AI applications that simulate such interaction. This may include peer-to-peer pressure, commercial advertising, or adults posing as children or young adults in order to groom or exploit them for sexual, criminal, financial or other purposes.
- **Conduct:** online behaviour that increases the likelihood of, or causes, harm, including making, sending or receiving explicit images, including those generated using AI, and online bullying.
- **Commerce:** risks including online gambling, inappropriate advertising, phishing and financial scams.

In considering these risks, staff should recognise that generative AI can create new content and can alter or imitate existing content. This may include AI-generated or manipulated images and other material used in bullying, harassment, abuse or exploitation. Any

associated safeguarding concern should be reported to the DSL or a Deputy DSL in accordance with the school's established safeguarding procedures.

St Edmund's School tries to keep pupils safe online in school and will respond to online safety incidents by following the flowchart found at Appendix 8 to this policy. Staff are trained to recognise misinformation, disinformation and conspiracy theories as potential safeguarding harms, particularly in online contexts.

Pupils are taught about online safety throughout the curriculum, including, where age and developmentally appropriate, the opportunities and risks associated with generative AI and how to use emerging technologies safely and responsibly. All staff receive regularly updated online safety training and relevant staff are supported to develop their understanding of the safe and effective use of generative AI. The school's Online Safety Coordinator is Mr Jason Batten.

The school recognises the important role that parents and carers play in helping children to stay safe online and will support them by signposting appropriate guidance and resources. This includes [government information on forthcoming guidance for parents and carers on children's screen use](#) and developing healthy and safe habits when using devices and online services.

Children with skills and interests in computing and technology may inadvertently or deliberately become involved in cyber-dependent crime. Cyber-dependent crimes are offences that can only be committed through the use of information and communications technology, where the devices are both the tool for committing the crime and the target of the crime. The [Computer Misuse Act 1990](#) sets out offences including unauthorised access to computer material; unauthorised access with intent to commit or facilitate further offences; unauthorised acts intended to impair, or undertaken recklessly as to impair, the operation of a computer; unauthorised acts causing, or creating a risk of, serious damage; and making, supplying or obtaining articles for use in specified Computer Misuse Act offences.

Such activity can range from gaining unauthorised access to another person's account or computer system to the use of tools or techniques that disrupt services, compromise systems or facilitate more serious offending. Cyber-dependent offending can have consequences beyond the immediate victim and may contribute to wider cyber-security and national risks. Staff should therefore remain alert to children whose online behaviour, technical activity or use of cyber tools gives rise to concerns that they may be involved in, or at risk of becoming involved in, cybercrime.

Where there are concerns about a child in this area, the DSL or a Deputy DSL will consider appropriate safeguarding action and, where appropriate, referral to the [Cyber Choices programme](#). Cyber Choices is a national programme coordinated by the National Crime Agency and delivered by Regional Organised Crime Units and local police cybercrime teams. It aims to help individuals understand the difference between legal and illegal cyber activity, increase awareness of the Computer Misuse Act 1990 and encourage the positive and lawful use of cyber skills.

13. Racism and other prejudice-based behaviour

We recognise that children may experience prejudice-based harm, including racism, faith-based prejudice and other forms of discrimination. Such experiences may have a significant impact on a child's welfare, wellbeing, mental health, sense of safety and willingness to seek help. The school will promote an inclusive, anti-discriminatory culture in which racism and other forms of discriminatory behaviour are recognised, challenged and addressed as part of its safeguarding responsibilities. Staff will be alert to the signs and impact of prejudice-based harm and will ensure that concerns are considered within safeguarding practice where appropriate. Repeated racist or other prejudice-based incidents, or a single serious incident, may lead to consideration under child protection procedures. The school will keep appropriate records of racist and other prejudice-based incidents and respond in accordance with its safeguarding, behaviour and anti-bullying procedures.

14. Radicalisation, Extremism and Terrorism

The Prevent duty under section 26 of the Counter-Terrorism and Security Act 2015, together with the current [Prevent Duty Guidance and DfE guidance](#) places a duty on education and other children's services to have due regard to the need to prevent people from becoming terrorists or supporting terrorism.

Extremism is defined as the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with 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 those susceptible to radicalisation should be viewed as a safeguarding concern and follows governments '[The Prevent duty: safeguarding learners susceptible to radicalisation](#)' guidance.

St Edmund's seeks to protect children and young people against the messages of all violent 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 7.

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 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.

When any member of staff has concerns that a pupil may be susceptible to radicalisation or at risk of involvement in terrorism, they should speak to the DSL and follow the school's normal safeguarding procedures. Where appropriate, the DSL will make a Prevent referral using the appropriate referral process. Where a child is receiving support through the Channel programme, relevant safeguarding information should be shared with the police where appropriate to support the effective assessment and management of risk. If the matter is urgent, the Police must be contacted by dialling 999. In non-urgent cases where police advice is required, staff should follow the current local Prevent and police referral arrangements.

The DfE 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. 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

15. Domestic abuse

Domestic abuse can encompass a wide range of behaviours and may consist of a single incident or a pattern of incidents. Abuse can include, but is not limited to, psychological, physical, sexual, financial or emotional abuse, as well as controlling or coercive behaviour. Under the [Domestic Abuse Act 2021](#), children are recognised as victims of domestic abuse in their own right where they see, hear or experience the effects of abuse and are related to either the person carrying out the abuse or the person experiencing it. Children may also experience domestic abuse in their own intimate relationships, including teenage relationship abuse. Domestic abuse can have a detrimental and long-term impact on a child's health, wellbeing and ability to learn.

Children can be adversely affected by domestic abuse and/or violence at home where it occurs between family members and they see, hear or experience its effects. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Domestic abuse includes intimate partner abuse, abuse between family members, child-to-parent or caregiver abuse, and abuse within intimate personal relationships between children. Teenage relationship abuse may include physical, sexual or emotional abuse, controlling or coercive behaviour, and stalking.

Staff should recognise that domestic abuse can take place inside or outside the home and can affect anyone regardless of gender, age, ethnicity, socioeconomic status, sexuality or background. Children who see, hear or experience the effects of domestic abuse can be victims of domestic abuse in their own right.

Children affected by domestic abuse may experience significant and long-lasting effects on their health, wellbeing, development, behaviour, attendance and ability to learn. Any concern that a child is experiencing, witnessing or otherwise being affected by domestic abuse should be treated as a safeguarding concern and reported in accordance with this policy.

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

St Edmund's School participates in [Operation Encompass](#). Under the statutory Operation Encompass duty, police forces in England and Wales must notify a child's educational establishment where they have reasonable grounds to believe that the child may be a victim of domestic abuse. Notifications include children connected to the household who may be victims of domestic abuse, including children who were not physically present during the incident. The school will use information received through Operation Encompass to consider and provide timely safeguarding and pastoral support in accordance with the child's needs. An Operation Encompass notification does not replace existing safeguarding referral processes.

16. Child Sexual Exploitation (CSE)

Child sexual exploitation (CSE) is a form of child sexual abuse. CSE may involve an individual or group taking advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the child needs or wants, provide a financial advantage or increased status to the perpetrator or facilitator, and/or involve violence or the threat of violence. CSE can be committed by an individual or an organised network or gang, and a victim may identify as being part of this group. Most sexual abuse is committed by individuals previously known to the victim. CSE can affect any child, online and/or offline, and can include children who have been moved or trafficked for the purpose of exploitation. This may constitute modern slavery. Some children may not realise that they are being exploited and may believe that they are in a genuine relationship. Victims are not always recognised as victims and may be criminalised for actions they take while under coercion.

CSE may occur over time or as a one-off occurrence and may take place without the child's immediate knowledge, including where images or videos are shared by others. It can affect any child who has been coerced into sexual activity, including 16- and 17-year-olds who can

legally consent to sex. Staff should recognise that children experiencing CSE may not recognise themselves as victims and may be criminalised for actions undertaken while under coercion.

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.

Where there are concerns that a child may be experiencing or at risk of child sexual exploitation or other extra-familial harm, the DSL will use current SSCP guidance and relevant [multi-agency safeguarding tools](#) to inform assessment and decision-making and will follow the current Surrey referral pathway. Where statutory support may be required, a [Request for Support](#) will be made to C-SPA. If a child is in immediate danger, the Police will be contacted 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. Therefore, 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 DSL (and Deputy DSLs) 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.

17. Child Criminal Exploitation (CCE) & Gangs

Both CSE and CCE are forms of abuse and occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity. This may involve an exchange for something the child needs or wants and/or result in the financial advantage or increased status of the perpetrator or facilitator and/or involve violence or the threat of violence. This can be committed or facilitated by an organised network or gang, and a victim may identify as being part of this group. CCE and CSE can affect any child and can include children who have been moved or trafficked for the purpose of exploitation. This may constitute modern slavery.

Organised network maybe defined as two or more individuals, whether identified or not, who are known to, or associated with, one another and who are involved in or facilitate the sexual exploitation of children. This may include introducing children to others for exploitation, trafficking children for sexual exploitation, taking payment for sexual activities involving a child, or allowing property to be used for such activities.

Children who are criminally exploited should have their vulnerabilities recognised and should be treated as victims. A child cannot consent to being exploited, abused or trafficked and may not recognise that exploitation is happening to them. Staff should also recognise that victims of exploitation may be criminalised for actions they have taken while under coercion and should consider the safeguarding context surrounding the child's behaviour.

There are several 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 violence may have suffered, or may be likely to suffer, significant harm through physical, sexual or emotional abuse, neglect or criminal exploitation. Serious violence may include physical assault and carrying, threatening with or using weapons, and may occur in the context of peer conflict, bullying, gang activity or criminal exploitation.

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.

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

Children may become trapped in criminal exploitation through threats of violence towards themselves or their families, debt entrapment or other forms of coercion. They may be coerced into carrying weapons, including knives, or may begin carrying a weapon because they believe it will protect them from harm. Staff should recognise that the experience and indicators of criminal exploitation may differ between girls and boys and that both girls and boys who are criminally exploited may also be at increased risk of sexual exploitation.

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other forms of “deal line”.

CCE may constitute modern slavery. Further information is available in the [Home Office Modern Slavery: Statutory Guidance for England and Wales](#). In accordance with this guidance, where a child is identified as a potential victim of CCE, CSE, trafficking or modern slavery, an appropriate child protection and modern slavery referral should be completed. The DSL will liaise with Children's Social Care and/or the Police regarding the appropriate safeguarding response and referral to the [National Referral Mechanism \(NRM\)](#).

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

Any concerns that a child is being or is at risk of being criminally exploited will be passed without delay to the DSL. The school is aware there is a clear link between regular non-attendance at school, who can be subsequently found in areas away from their own, and exploitation. Staff will consider a child to be at potential risk in the case of regular non-attendance at school or home. Staff will 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 because 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.

If a student is required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed, the school will use the 'Children and the court system' guidance found on page 161 of KCSIE 2026 to support the students and parents where appropriate and required.

18. Serious violence

Serious violence is a safeguarding concern and may involve physical assault, carrying, threatening with or using weapons, including knives, and may arise in the context of peer conflict or bullying. Serious violence can also be associated with child criminal exploitation. Where concerns involve a child carrying or possessing a knife, staff should also have regard to the [Government's child knife possession offences guidance](#).

All staff should be alert to indicators that a child may be at risk from, or involved in, serious violence. These may include increased absence from school; a change in friendships or relationships with older individuals or groups; a significant decline in educational performance; signs of self-harm or a significant change in wellbeing; signs of assault or unexplained injuries; and unexplained gifts or new possessions. Such indicators may also suggest that a child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Staff should be particularly alert to children whose circumstances may increase their vulnerability to serious violence, including children whose education has been disrupted through suspension, permanent exclusion or attendance at alternative provision, and children with a history of offending. Consideration should also be given to when children may be at increased risk around the school day, including when travelling to and from school and immediately after school.

Any member of staff who has a concern about a child carrying, threatening with or using a weapon, or expressing an intention to do so, should report the concern to the DSL or a Deputy DSL without delay. The DSL will assess the risk both to the individual pupil and to

others in the school, taking account of wider information or concerns, and will take appropriate safeguarding action. Depending on the level of risk, this may include putting in place a safety and support plan, taking action to de-escalate peer conflict, and liaising with Children's Social Care and/or the Police where appropriate. Where there is an immediate risk of harm, the school's emergency safeguarding procedures will be followed. Where the concern relates to possession of a knife, the DSL will also have regard to the [Government's child knife possession offences guidance](#) when considering the appropriate safeguarding response.

The school recognises the importance of early, evidence-based support for children considered to be at risk of serious violence, including at critical points when concerns emerge. Appropriate support will be considered according to the individual child's needs and circumstances and may include access to trusted adults, support to develop social and emotional skills and, where available and appropriate, targeted interventions such as mentoring or therapeutic support.

19. Female Genital Mutilation (FGM)

KCSIE 2026 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.

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 DSL; however, the DSL should be informed.

If a teacher is informed by a girl under 18 that an act of FGM has been carried out on her or a teacher observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth, the teacher must personally report the case to the police in accordance with the current mandatory reporting procedure. The teacher should inform the DSL unless there is good reason not to. Where there is an immediate danger, the emergency services should be contacted without delay.

School staff are trained to be aware of risk indicators of FGM which are set out in Appendix 5. 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.

20. 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](#) (020 7008 0151).

21. 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.

22. 'One chance' rule

All staff must understand the 'one chance' rule in relation to forced marriage, FGM and honour or faith-based abuse. A practitioner may have only one opportunity to speak to a child at risk and provide appropriate help. Staff must therefore act promptly on any concern or disclosure, follow this policy's safeguarding procedures and ensure that appropriate support and referral are considered without delay.

23. 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 is an arrangement in which a child under the age of 16, or under 18 where the child has a disability, is cared for and accommodated by a person who is not the child's parent, a person with parental responsibility or a relative, in that person's own home, for 28 days or more. Staff should be alert to private fostering arrangements in all communities and cultures.

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.

A parent, private foster carer or other person involved in making a private fostering arrangement has duties to notify the local authority. Where the school becomes aware of a possible private fostering arrangement, the DSL will notify Surrey Children's Services/C-SPA promptly so that the local authority can assess the arrangement.

24. Looked After Children

The most common reason for children becoming looked after is because of abuse, neglect and exploitation. 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 support the educational outcomes of looked after children, including discussing how Pupil Premium Plus funding can be best used to support their progress and meet the needs identified in their Personal Education Plan. The school will also work with the Virtual School Head, where appropriate, to support and improve the attendance of children for whom the Virtual School Head has responsibilities, recognising the importance of attendance in improving educational outcomes.

25. Children Who Are Absent From Education/Missing Education

The school follows the statutory guidance '[Working together to improve attendance](#)'.

The school recognises the role of Virtual School Heads in supporting improved attendance and educational outcomes for children within the scope of their responsibilities. Where appropriate, the school will work with the relevant Virtual School Head as part of its wider arrangements for identifying and addressing barriers to attendance, particularly for vulnerable children.

All staff should be aware that children that have unexplainable and/or persistent absences from school, 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, neglect and exploitation such as sexual abuse and/or 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 and schools](#)' and the school's admissions policy.

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

26. Mobile phones/tablets/cameras

The school has separate Pupil and Visitors Mobile Phone and Staff Mobile Phone policies which set out its arrangements for the use of mobile phones and other relevant smart technology. These policies should be read alongside this Child Protection and Safeguarding Policy and reflect the school's safeguarding, behaviour and online-safety arrangements and relevant statutory DfE guidance.

The school's arrangements address pupil possession and use of mobile phones and other smart technology throughout the school day, including lessons, movement between lessons, breaktimes and lunchtimes, with any permitted use or exemptions clearly defined within the relevant policies.

27. Early Years Foundation Stage (EYFS) safeguarding and welfare requirements

The school's EYFS provision will comply with the safeguarding and welfare requirements of the current statutory [DfE's Early Years Foundation Stage framework](#). This includes maintaining appropriate arrangements for safer sleep and safer eating, having regard to current [DfE guidance on screen use in early years settings](#), complying with applicable staff and volunteer suitability requirements, and ensuring that registered childcare is not provided on premises where a prohibited dog breed is kept or present. Detailed operational requirements are set out in the school's relevant EYFS policies, Health and Safety policy, and the Recruitment, Selection and Disclosures Policy And Procedure.

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.

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

Screen use within the EYFS will be appropriate to the age and developmental stage of the child and used purposefully to support learning and development. The school will have regard to current [DfE guidance on screen use in early years settings](#) and will ensure that the use of screens does not unnecessarily displace opportunities for physical activity, play, social interaction, communication and sleep.

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, tablet devices 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 tablet devices 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 OneDrive account. Tablet devices are stored securely overnight in a cupboard or drawer out of sight.

- Photos of children are deleted every 3 months from the tablet devices and the OneDrive account. All tablet devices and computers are password protected.
- Signed permission is sought from each parent at the point of registration with the school regarding the use of photos of their child. Permission is requested for the use of photos on social media and all other media platforms related to the nursery and the school.
- 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 Headteacher. 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 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.

28. Child-on-child harmful sexual behaviour, sexual harassment and sexual violence

The school has regard to Parts One, Two and Five of KCSIE 2026 in preventing, identifying and responding to child-on-child abuse, including harmful sexual behaviour, sexual harassment and sexual violence.

The school recognises that harmful sexual behaviour (HSB) can occur between two or more children of any age and sex, from primary through to secondary age, and may also involve a group of children towards a single child or another group of children. HSB can occur face-to-face or online and may be physical and/or verbal. Sexual behaviour between children exists on a continuum, ranging from developmentally inappropriate or problematic behaviour through to abusive and violent behaviour, and may escalate into sexual harassment or sexual violence.

HSB is a safeguarding issue for all children involved. The school recognises the importance of prevention and early intervention and will identify, challenge and respond appropriately to concerning behaviour at the earliest opportunity. Appropriate, proportionate and evidence-based support will be considered both for children who have experienced harm and for children who have displayed harmful behaviour, with the aim of safeguarding all children and reducing the risk of problematic, abusive or violent behaviour developing or escalating.

All children have the right to attend school and learn in an environment free from abuse, harmful sexual behaviour, sexual harassment and sexual violence. Staff will maintain an attitude of 'it could happen here' when considering child-on-child abuse and will act on signs, reports or concerns without waiting for a direct disclosure.

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 and when staff have any concerns about child-on-child abuse they should speak to their DSL.

Child-on-child abuse can take many forms. It may include bullying, including cyberbullying, prejudice-based and discriminatory bullying; discriminatory behaviour, including racism, faith-targeted abuse and other prejudice-based incidents; abuse in intimate personal relationships between children; physical abuse, including serious physical assault and harm, or the threat of harm with a weapon; sexual violence and sexual harassment; harmful sexual behaviour; the consensual or non-consensual sharing of nudes and semi-nudes; upskirting; and initiation or hazing-type violence and rituals. All incidents involving the making or sharing of nudes and semi-nudes require a safeguarding response, whether the sharing is consensual or non-consensual. All forms of child-on-child abuse are unacceptable and will be taken seriously.

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.

The school will maintain systems for children to report abuse and safeguarding concerns. These systems will be well promoted, easily understood and easily accessible, enabling children to report concerns confidently, knowing that their concerns will be treated seriously and that they will be supported.

We understand that schools and colleges not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying behaviours related to abuse can lead to a culture of unacceptable behaviour, misogyny and an unsafe environment for children 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 that we maintain a positive culture of challenge and reporting within the school.

The school recognises that the absence of reported cases of child-on-child abuse does not mean that such abuse is not occurring. Abuse may be taking place but not being reported. Staff will therefore maintain professional curiosity, remain alert to signs and indicators of child-on-child abuse and act on concerns rather than waiting for a child to make a direct disclosure.

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.

Harmful sexual behaviour, sexual harassment and sexual violence should be understood as part of a continuum of behaviour. HSB may escalate into sexual harassment or sexual violence, and different forms of behaviour may overlap. They can occur online or face-to-face, can be physical or verbal, and are never acceptable.

The school recognises the importance of identifying and addressing behaviour at the earliest appropriate stage. This includes recognising the escalatory nature of misogyny and challenging sexualised, misogynistic or other harmful behaviour before it becomes normalised or develops into more serious harmful sexual behaviour, sexual harassment or sexual violence.

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”.
3. Harmful sexual behaviour, sexual violence and sexual harassment, which may include misogyny/misandry and are covered in more detail below.
4. 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.
5. 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.
6. The different forms Child on Child abuse can take, such as bullying (including cyberbullying).
7. Making or sharing nudes and semi-nudes, whether consensual or non-consensual. All such incidents require a safeguarding response and are covered in more detail in Section 28 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 harmful sexual behaviour, sexual harassment and sexual violence

The school recognises that child-on-child abuse is preventable and that early identification of behaviours and indicators of risk, together with timely and evidence-based support, can help prevent children from going on to commit abuse or violence.

As a school we will:

1. Recognise that harmful sexual behaviour exists on a continuum and that early identification and proportionate, evidence-based intervention and support can help prevent problematic or inappropriate behaviour from developing or escalating into abusive or violent behaviour, including sexual harassment or sexual violence.
2. Provide a developmentally appropriate education syllabus which develops pupils understanding of consent, acceptable behaviour, keeping themselves safe and healthy relationships.
3. Have systems in place for any pupil to raise concerns with staff, knowing that they will be listened to, believed and valued.
4. Deliver targeted work on assertiveness and keeping safe to those children identified as being at risk.
5. Develop robust risk assessments and providing targeted work for pupils identified as being a potential risk to other pupils.
6. Provide clarity on how allegations of child-on-child abuse will be recorded, investigated and dealt with.
7. Have clear processes for supporting all children involved in child-on-child abuse, recognising that it is a safeguarding issue for both the victim and alleged perpetrator, as well as for any other children affected.
8. Provide a clear statement that there is a zero-tolerance approach to abuse and that it should never be tolerated or passed off as “banter”, “just having a laugh”, “part of growing up” or “boys being boys”, as doing so can lead to a culture of unacceptable behaviour, misogyny and an unsafe environment for children.
9. Recognise the gendered nature of some forms of child-on-child abuse, including that girls are more likely to be victims and boys more likely to be perpetrators, while recognising that all forms of child-on-child abuse are unacceptable and that any child may be a victim or perpetrator.
10. Engage with specialist support and interventions.
11. If the report includes an online element staff will be mindful of the governments [‘Searching, screening and confiscation in schools’](#) guidance.

Understanding harmful sexual behaviour (HSB)

Harmful sexual behaviour (HSB) encompasses sexual behaviour by children that is developmentally inappropriate, problematic, abusive or violent. Sexual behaviour between children exists on a continuum and should be considered in the context of the child's age and stage of development, the nature of the behaviour, consent, power imbalance, coercion and its impact on the children involved.

When considering whether sexual behaviour is developmentally typical, problematic or harmful, staff should have regard to the child's age and stage of development. Staff should refer to the NSPCC guidance, '[Sexual development and behaviour in children](#)', which provides advice on understanding sexual development and behaviour in children, recognising behaviour that may be inappropriate or harmful, and responding appropriately. This guidance should be used alongside professional judgement and the school's safeguarding procedures.

The school recognises that HSB may escalate into sexual harassment or sexual violence. Staff should therefore identify, challenge and respond appropriately to concerning sexual behaviour at an early stage rather than waiting for behaviour to become more serious. Responses will be proportionate to the behaviour and circumstances and will consider the safeguarding, welfare and support needs of all children involved, including both children who have experienced harm and children who have displayed, or are alleged to have displayed, harmful behaviour.

HSB may occur face-to-face or online and may involve individual children or groups of children. Staff should not dismiss sexualised behaviour as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'.

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: Sexual violence may include acts of penetration, whether with part of a person's body or an object. This includes assault by penetration where the penetration is sexual and occurs without consent.

Sexual Assault: A person (A) commits an offence of sexual assault if they intentionally touch 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 type of sexual activity but not another and can be withdrawn at any time during sexual activity and each time activity occurs. A person consents only where they agree by choice and have the freedom and capacity to make that choice. Consent must be considered in the context of the child's age and stage of development and any power imbalance, coercion, intimidation or exploitation. Children under the age of 13 can never

legally consent to sexual activity, and sexual activity involving a child under 16 may constitute a criminal offence even where the child appears to have agreed to the activity.

Staff should never assume that apparent compliance, a lack of resistance or the absence of an explicit refusal amounts to consent.

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.
- It may include:
 - Non-consensual sharing of sexual images and videos
 - Sexualised online bullying
 - Unwanted sexual comments and messages, including, on social media
 - 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.

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.

Action - The DSL will consider:

- the wishes and views of the child who has experienced the behaviour;
- the nature and severity of the behaviour and whether a crime may have been committed;
- the ages and developmental stages of the children involved;
- whether there was consent and whether the children involved had the capacity to consent;
- any power imbalance, coercion, intimidation or exploitation;
- whether the behaviour forms part of a pattern or has previously occurred;
- whether there may be other children who have experienced harm;
- whether the behaviour is escalating or there is a risk of further or more serious harm;
- the safeguarding and support needs of the child who has experienced the behaviour and of the child or children alleged to have displayed the behaviour;
- risks to other children;
- any online element;
- the wider safeguarding context; and
- any action required to make locations, activities or arrangements safer.

Options:

- Manage support internally through the school's pastoral support processes.
- Provide or facilitate appropriate support through universal services, community-based Early Help or Family Help, as appropriate.
- Make a Request for Support to C-SPA/statutory children's services, where appropriate.
- Report the matter to the Police, where appropriate.

Referrals to Family Help

Where a report of harmful sexual behaviour, sexual harassment or sexual violence indicates that a child or family would benefit from additional support, but the circumstances do not require an immediate referral to local authority children's social care, the DSL or a Deputy DSL will consider whether support through Family Help is appropriate.

This may include undertaking or contributing to a Family Help assessment and working with relevant services to ensure that appropriate support is provided. The needs of all children

involved should be considered, including the child who has experienced the behaviour, the child or children alleged to have displayed the behaviour, and any other children affected.

Any Family Help support will be kept under review. If concerns escalate, the child's circumstances do not improve, or there is reason to believe that a child is suffering or is likely to suffer harm, the DSL or a Deputy DSL will consider whether a referral to local authority children's social care and/or the Police is required.

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.

29. Making or 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.

The making or sharing nudes and semi-nudes 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.

For safeguarding purposes, this includes relevant imagery that has been digitally altered or wholly generated using AI. Where AI has been used to create or manipulate nude or semi-nude imagery involving a child, staff must treat the matter as a safeguarding concern and follow the procedures set out in this section.

All incidents involving the making or sharing of nudes and semi-nudes must be treated as a safeguarding concern and require an appropriate safeguarding response, whether the making or sharing is consensual or non-consensual. Incidents should be managed in accordance with the UKCIS guidance [‘Sharing nudes and semi-nudes: advice for education settings working with children and young people’](#) and the school’s child protection procedures.

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 circumstances apply, the incident will nevertheless continue to be treated as a safeguarding concern. The DSL will use their professional judgement to assess the risk to the children involved and may decide, with input from the Headteacher, that the appropriate safeguarding response is to manage the incident within the school 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 the making or sharing nudes and semi-nudes 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.

30. Allegations against staff, including supply teachers, trainee teachers, volunteers and contractors

All school staff, including supply teachers and trainee teachers, and all volunteers and contractors 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 Headteacher.

Where an allegation may meet the harm threshold, the case manager will make any necessary basic enquiries in accordance with local safeguarding procedures and will discuss the allegation with the LADO without delay. Basic enquiries must not jeopardise any subsequent police or safeguarding investigation. The school will follow the advice and direction of the LADO and other relevant agencies.

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

Where a safeguarding concern or allegation relates to an individual who is not directly employed by the school, including a supply teacher, trainee teacher or contracted member of staff provided by an employment agency or business, the school will follow Part Four of KCSIE 2026. The school recognises that it shares safeguarding responsibilities with the relevant employment agency, business or teacher-training provider. The school will remain responsible for gathering the facts and managing the safeguarding process, working closely with the relevant third-party organisation, which will usually lead on any disciplinary action. The school will ensure that the relevant organisation is appropriately involved in the process and that relevant information is shared in accordance with safeguarding and information-sharing requirements. Where a concern or allegation relates to a trainee teacher placed within the school, the same expectations will apply, and the teacher-training provider will be expected to follow the same procedures as those applying to supply agencies.

The school will not cease to use the services of a supply teacher because of a safeguarding concern or allegation without first establishing the facts and liaising with the LADO to determine an appropriate outcome. Where appropriate, the school will discuss with the supply agency whether suspension or redeployment should be considered while an investigation is undertaken.

The school will follow the Surrey procedures for managing allegations against staff, procedures set out in KCSIE 2026 Part Four.

Suspension of the member of staff, excluding the Headteacher, against whom an allegation has been made, needs careful consideration, and the Headteacher will seek the advice of the LADO and an HR Consultant in making this decision. In the event of an allegation against the Headteacher, 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 2026.

The term 'low-level concern' means any concern, no matter how small, that an adult working in or on behalf of the school, including a member of staff, supply teacher, trainee teacher, volunteer or contractor, may have acted in a way that:

- is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside work; and
- does not meet the harm threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not restricted to:

- Having favourites
- Taking photographs of children on their mobile phone, contrary to school policy
- Using inappropriate sexualised, intimidating or offensive language
- Engaging with a child on a one-to-one basis in a secluded area
- Being overly friendly with children
- 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 Headteacher via CPOMS StaffSafe or in person. Where the concerns relate to the Headteacher 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 Headteacher, or deputised staff will collect evidence where necessary by speaking to the individual involved and any witnesses

The Headteacher, 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 Headteacher 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 in accordance with applicable data protection laws, including the Data Protection Act 2018, UK GDPR and the Data (Use and Access) Act 2025.
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 KCSIE 2026, we will refer it to the LADO in accordance with local safeguarding procedures
3. Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher, trainee teacher or contractor, the school will notify the relevant employer, employment agency or teacher training provider, as appropriate, so that any potential patterns of inappropriate behaviour can be identified and the concern can be managed in accordance with the relevant safeguarding procedures.

References

We will only include substantiated safeguarding concerns or allegations (including a group of low-level concerns about the same individual) that meet the harm threshold in references. Low-level concerns will not be included in references unless they relate to matters that would normally be included in a reference, for example misconduct or poor performance. A low-level concern relating exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in a reference.

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31. 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

Whistle-blowing for cases involving the Headteacher 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.

32. Reasonable force and restrictive intervention

There are limited circumstances in which it may be appropriate for staff to use reasonable force to safeguard children. Reasonable force covers a broad range of actions involving a degree of physical contact to control or restrain a child. This may range from guiding a child to safety by the arm to more significant intervention, such as breaking up a fight or restraining a child to prevent violence or injury. Any force used must be reasonable in the circumstances, using no more force than is necessary for the least amount of time.

The school does not operate a 'no contact' policy. Staff may make appropriate physical contact where this is necessary to support or protect a pupil. Any decision to use reasonable force to control or restrain a child will be based on the professional judgement of the staff concerned, within the context of the law, the school's policies and the individual circumstances. Staff should have regard to the '[DfE's Restrictive interventions, including use of reasonable force in schools guidance](#)'.

When considering or using reasonable force in relation to a child with SEND, a mental health problem or a medical condition, staff will carefully consider the additional

vulnerabilities of the child and the school's duties under the Equality Act 2010, including the duty to make reasonable adjustments where applicable. Positive and proactive behaviour support should be used wherever appropriate to reduce the likelihood that restrictive intervention will be required. This may include individual behaviour or support plans for pupils with additional vulnerabilities, developed in consultation with parents or carers where appropriate.

Any use of reasonable force or restrictive intervention will be considered within the school's safeguarding arrangements. The school will maintain procedures for recording incidents in accordance with section 93A of the Education and Inspections Act 2006, the Education (Independent School Standards) Regulations 2014 and relevant DfE guidance. Each use-of-force incident that is required to be recorded under section 93A will be recorded in accordance with those requirements.

The school will also record any incident in which a member of staff secludes, restrains or immobilises a pupil otherwise than as a disciplinary penalty. For these purposes, seclusion includes situations in which a pupil is detained apart from other people, except relevant staff, and is prevented from leaving, or reasonably believes that leaving would result in punishment. Restraint or immobilisation includes restricting a pupil's movement, including by holding or binding the pupil's body or part of it, securing the pupil to a fixed or heavy object, or depriving the pupil of an auxiliary aid that they normally use to assist movement. Where such an incident is not already recorded as a use-of-force incident, a written record will be made as soon as practicable after the incident.

Information about a recorded use-of-force, seclusion or restraint incident will be provided to each parent of the pupil as soon as practicable after the incident, except where doing so would be likely to result in significant harm to the pupil. Where it appears that there is no parent to whom the information can safely be provided without being likely to result in significant harm to the pupil, the information will instead be provided to the local authority in whose area the pupil is ordinarily resident.

Records will include sufficient information to establish the circumstances of the incident, the restrictive intervention used, the reasons for its use, its duration where relevant, any injury or distress arising, the steps taken following the incident and the information provided to parents or, where applicable, the local authority. Incidents will be reviewed as appropriate, including consideration of whether preventative or de-escalation measures, reasonable adjustments or individual support arrangements need to be amended. Any safeguarding concern arising from the use of a restrictive intervention will be reported and managed in accordance with this Child Protection and Safeguarding Policy and the school's procedures for concerns or allegations about adults.

33. Children who are lesbian, gay or bisexual and children who are questioning their gender

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

Risks can be compounded where lesbian, gay or bisexual children lack a trusted adult with whom they can be open. Staff should therefore endeavour to reduce any additional barriers faced by these children and provide a safe space in which they can speak openly or share concerns.

The school recognises that children who are questioning their gender may require sensitive and thoughtful support.

Where a child requests support for social transition, the school will take a very careful approach. Social transition is an active intervention which may have significant effects on a child's psychological functioning and longer-term outcomes, and there is a lack of good evidence on its long-term impact on young people. The school will consider the best interests and welfare of the child and other children, relevant safeguarding considerations, and any relevant clinical evidence or advice and other professional advice, where appropriate.

A child questioning their gender is not, in itself, a safeguarding concern. However, staff should remain alert to wider concerns about the child's welfare and follow the school's usual safeguarding procedures where such concerns arise.

Where a child simply confides in a member of staff about their feelings regarding their gender but does not request any change to how they are treated at school, there will generally be no reason to breach that confidence unless the conversation gives rise to a safeguarding concern. Where there is a safeguarding concern, staff must follow the school's usual safeguarding procedures.

Where a child or their parent or carer makes a request for the school to support any degree of social transition, the request will be considered carefully on an individual basis. Staff must not initiate social transition and individual members of staff must not make changes relating to social transition before a school-level decision has been made. The DSL will be involved in considering the request and its safeguarding implications.

Where a child who is questioning their gender asks the school for support with social transition, the school will engage the child's parents or carers as a matter of priority. Their views will carry great weight and will be properly considered. Where involving parents or carers would constitute a greater risk to the child than not involving them, the DSL will determine what safeguarding action is required before the parents or carers are contacted or decisions are taken.

The school will also comply with its duties under the Equality Act 2010 and Human Rights Act 1998. In relation to policies other than those where KCSIE specifies that no exception can be made, where a policy may place a gender-questioning child at a disadvantage, the school will consider whether the policy has a legitimate aim and whether it is a proportionate means of achieving that aim, including whether there is another way of achieving the same aim and the impact of the policy, or of making or not making an exception, on the child and others affected.

Any decision about a request for social transition will be made cautiously and, on a case-by-case basis, taking account of the child's individual circumstances, their best interests and any relevant safeguarding considerations. Where necessary, the school will seek appropriate clinical or other professional advice. Particular caution will be exercised in relation to primary-aged children.

Any decision made in response to a request for support with social transition will be documented clearly, including the relevant safeguarding, welfare, equality and other considerations, the views of the child and parents or carers where appropriate, any professional advice considered, and the reasons for the decision. Arrangements will be reviewed where circumstances or the child's needs change.

The school will ensure that a child's biological sex is recorded accurately wherever the school is legally required to record it and that relevant staff have access to accurate information where this is necessary to fulfil the school's safeguarding responsibilities. Particular safeguarding consideration will be given where a child has socially transitioned and is 'living in stealth', meaning that some pupils or staff may be unaware of the child's biological sex. The DSL will be involved in such cases.

Where a child wishes fully or partially to reverse a previously agreed social transition, the school will provide appropriate support and will work with the child, parents or carers and relevant professionals as appropriate, having regard to the child's welfare and safeguarding needs.

The school's Relationships and Sex Education curriculum supports age-appropriate teaching about LGBT+ matters in accordance with [statutory guidance](#), and we recognise there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse.

The school will ensure that its arrangements for toilets comply with relevant safeguarding and premises requirements. Pupils will not be permitted to use toilets designated for the opposite biological sex, including where the school is responding to a request to support any degree of social transition for a child who is questioning their gender. Where a gender-questioning child does not wish to use the toilet designated for their biological sex, the school will consider whether an appropriate alternative facility can be provided, such as a self-contained individual toilet, without compromising the provision of single-sex facilities. Any alternative arrangements will seek to protect the safety, comfort, privacy and dignity of the child and of other children.

The school will provide suitable changing accommodation and showers for pupils aged 11 or over at the start of the school year, having regard to their ages, numbers and sex and any special requirements they may have. A child aged 11 or older at the start of the school year will not be permitted to undress in front of a child of the opposite biological sex, and pupils will not be permitted to use changing rooms designated for the opposite biological sex.

Where a child who is questioning their gender does not wish to use the changing rooms or showers designated for their biological sex, the school will consider whether appropriate alternative changing or washing arrangements can be provided without compromising single-sex facilities. This may include a fully enclosed room intended for use by one child at a time that can be secured from the inside, or access to facilities at an alternative time. Any alternative arrangements will seek to protect the safety, comfort, privacy and dignity of the child and of other children.

Where individual arrangements are made, the school will keep a clear record of those arrangements, ensure that they are communicated appropriately and review them regularly.

Where mixed-sex toilet facilities are provided in addition to single-sex facilities, the school will assess and record the associated safeguarding risks and plan accordingly.

The school will ensure that arrangements for residential visits, boarding and overnight accommodation take appropriate account of sex, privacy and safeguarding requirements. A child will not be permitted to share sleeping accommodation with a child of the opposite biological sex. Where a child who is questioning their gender does not wish to share sleeping accommodation with children of their biological sex, the school will consider whether appropriate alternative arrangements can be made, taking account of the child's safety, comfort, privacy and dignity and those of other children.

The school recognises that, as children get older, some sports may be taught and played in single-sex groups. In accordance with the Equality Act 2010, children may be separated according to biological sex for participation in a sport, game or competitive activity where the physical strength, stamina or physique of the average girl would put her at a disadvantage in competition with the average boy, or vice versa.

Where the school determines that a sport needs to be played in single-sex groups for safety reasons, there will be no exceptions. The school may also provide single-sex sport where this is necessary or appropriate to ensure fairness. In determining arrangements for individual sports, the school will have regard to relevant guidance from National Governing Bodies on their safe and fair operation.

Where there are no safety concerns and a child who is questioning their gender makes a request concerning how they participate in sport or PE, the school will consider that request individually and in accordance with relevant safeguarding and equality requirements, including KCSIE 2026. Consideration will include the best interests of the child, the impact on other children and the need to maintain a safe and fair environment for participation in PE and sport.

34. Linked policies

This policy also links to our policies on:

- Staff Code of Conduct
- Behaviour
- Missing Child Policy
- Recruitment, Selection and Disclosures Policy And Procedure
- EYFS Staff Qualifications, Training & Recruitment
- EYFS Staff Supervision Policy
- EYFS Operational Procedures
- EYFS Dietary Policy and Practice
- EYFS Infection Control, Safety and Hygiene procedures
- Health And Safety
- Whistleblowing
- Anti-bullying
- Curriculum
- Relationships and Sex Education (RSE)
- Teaching and Learning
- Academic Support, Special Educational Needs and Disability (SEND)
- Mental Health and Wellbeing
- First Aid and Medical Provision
- Drugs
- Risk Assessment
- E-Safety / Acceptable Use of Devices
- Pupil and Visitors Mobile Phone Policy
- Staff Mobile Phone Policy

35. 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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

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 verbal abuse, such as persistent criticism, belittling, or name-calling, as well as not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child 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, causing or inciting a child to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, such as acts of penetration, whether that is with part of a person's body or an object (e.g. rape or assault by penetration), and non-penetrative acts such as masturbation, kissing, rubbing, and touching over clothing. Sexual abuse 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 as well as offline, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Children can be sexually abused within the family, an institution or a community setting, and are more likely to know their abuser than not. The

sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of the school's policy and procedures for dealing with it. There are specific offences for children under 13, who can never provide valid consent to sexual activity, and there are specific offences which make clear that sexual activity with a child under 16 is an offence, regardless of whether they agreed to that activity.

Neglect: 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, because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

36. Appendix 2 - Recognising signs of child abuse

Please refer to [Working Together to Safeguard Children \(2026\)](#). To support the local context, all staff have access to the [Surrey Safeguarding Children Partnership's Continuum of Support](#) for children and families in Surrey, which provides guidance for practitioners in identifying need and accessing appropriate support for children and families.

Staff should remember that abuse, neglect, exploitation and other safeguarding issues are rarely standalone events and cannot always be covered by one definition or label alone. Multiple safeguarding concerns may overlap, and the presence or apparent absence of one type of abuse should not prevent consideration of other safeguarding risks affecting the child.

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 (CSE)

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

Bruising in the following locations or circumstances may raise particular safeguarding concerns and should be considered alongside the child’s age, developmental stage, mobility, medical circumstances, explanation and wider context. Staff should not attempt to determine whether an injury is non-accidental; concerns should be recorded and referred in accordance with the school’s safeguarding procedures.

- 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, handprints or a hairbrush
- 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.

Emotional abuse may include verbal abuse, such as persistent criticism, belittling or name-calling. The following may also 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

37. Appendix 3 - Child-on-child sexual harassment and sexual violence

Harmful sexual behaviour (HSB), sexual harassment and sexual violence can occur between two or more children of any age and sex and may also involve a group of children towards a single child or another group of children. Such behaviour can occur online or face-to-face and may be physical or verbal.

Sexual behaviour between children exists on a continuum. HSB may escalate into sexual harassment or sexual violence, and different forms of behaviour may overlap. The school will therefore seek to identify and respond to concerning behaviour at an early stage and will not wait for behaviour to escalate before considering whether safeguarding intervention is required.

When considering sexual behaviour between children, staff should take account of the age and developmental stage of the children, the nature and frequency of the behaviour, consent, equality and power imbalance, coercion, intimidation or exploitation, the impact on the children involved, whether the behaviour is escalating or forms part of a wider pattern, and whether there are risks to other children.

In assessing whether sexual behaviour is developmentally typical, problematic or harmful, staff should have regard to the child's age and stage of development and the context in which the behaviour occurs. Staff should refer to the NSPCC guidance, '[Sexual development and behaviour in children](#)', for advice on understanding sexual development and behaviour in children, recognising behaviour that may be inappropriate or harmful, and responding appropriately.

Sexual harassment and sexual violence are never acceptable. The school takes a zero-tolerance approach and will not dismiss or tolerate harmful sexual behaviour, sexual harassment or sexual violence as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'.

Responses will be proportionate and child-centred and will consider the safeguarding, welfare and support needs of all children involved, including children who have experienced harm and children who have displayed, or are alleged to have displayed, harmful behaviour. Appropriate support and early intervention will be considered to reduce the risk of harmful behaviour continuing, developing or escalating.

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. Some sexual behaviours may be developmentally expected, but staff must consider the child's age and developmental stage, the context, consent, equality and power, coercion, intimidation, exploitation, impact on those involved and whether the behaviour is escalating or part of a wider pattern. 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** – consent means agreeing by choice and having the freedom and capacity to make that choice. Consent must be considered in the context of the child's age and stage of development and any imbalance of power, coercion, intimidation or exploitation. Consent may be given to one type of sexual activity but not another and can be withdrawn at any time. Children under the age of 13 can never legally consent to sexual activity, and sexual activity involving a child under 16 may constitute a criminal offence even where the child appears to have agreed. Apparent compliance, lack of resistance or the absence of an explicit refusal should not be assumed to mean consent.
- **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 and Safeguarding policy and in line with KCSIE 2026.

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 person’s 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 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

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 support internally through the school's pastoral support processes.
- Provide or facilitate appropriate support through universal services, community-based Early Help or Family Help, as appropriate.
- Make a Request for Support to C-SPA/statutory children's services, where appropriate.
- Report the matter to the Police, where appropriate.

Where Family Help may be appropriate following a report of harmful sexual behaviour, sexual harassment or sexual violence, the DSL or a Deputy DSL will follow the arrangements set out in Section 27 of this policy, including keeping the child's circumstances and the effectiveness of support under review and considering referral to local authority children's social care where concerns escalate.

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.

38. 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
- sexual behaviour that is inappropriate for the child's age or developmental stage, or that involves coercion, exploitation, abuse, significant power imbalance or criminal conduct
- 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 the making or sharing of nudes and semi-nudes 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.

39. 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 DSL; however, the DSL should be informed.

If a teacher is informed by a girl under 18 that an act of FGM has been carried out on her or a teacher observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth, the teacher should personally make a report to the police force in which the girl resides by calling 101. The teacher should personally make the report to the police in accordance with the statutory mandatory reporting procedure and should inform the DSL unless there is a good reason not to do so.

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. There are 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? The belief is 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
- A child may be at risk of FGM regardless of their ethnicity, nationality, religion, community or family background. Staff should consider the individual circumstances and known risk factors, including concerns about travel abroad, a child talking about being 'cut', preparation for a special ceremony, family or community pressure, or knowledge that another child or family member has experienced FGM.
- 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 changes 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.

Staff must not attempt to mediate, confront alleged perpetrators or otherwise intervene in a way that could increase the child's risk. Concerns should be reported immediately through safeguarding procedures and, where appropriate, to the police, local authority children's social care and/or the Forced Marriage Unit.

Contact should be made with the C-SPA and/or the Forced Marriage Unit Tel: 020 7008 0151 or email: fm@fcdo.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 should be aware that, in cases involving forced marriage or honour-based abuse, there may be only one opportunity to speak to a child privately and safely. Staff should therefore

act promptly, avoid actions that could increase risk, and follow the school's safeguarding procedures and relevant specialist guidance.

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.

40. Appendix 6 - Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. It can include psychological, physical, sexual, financial or emotional abuse, as well as controlling or coercive behaviour. Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and may also experience domestic abuse in their own intimate relationships, including teenage relationship abuse. Domestic abuse can have a detrimental and long-term impact on children's health, wellbeing and ability to learn.

St Edmund's School participates in Operation Encompass. The statutory Operation Encompass information-sharing duty requires police forces in England and Wales to notify a child's educational establishment when they have attended a domestic abuse incident at the child's home. This includes all children connected to the household, whether or not they were present at the incident. Information received through Operation Encompass enables the school to consider and provide timely safeguarding and pastoral support for children affected by domestic abuse. Notifications will be managed by the DSL or an appropriately trained Deputy DSL in accordance with the school's safeguarding and information-sharing procedures.

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 Domestic Abuse Service - Covering Guildford and Waverley - 01483 898884

41. Appendix 7 - Indicators Of Vulnerability to Radicalisation

Radicalisation is the process through which a person comes to support terrorism or becomes involved in terrorism. The Prevent duty requires specified authorities, including schools, to have due regard to the need to prevent people from becoming terrorists or supporting terrorism.

Staff should remain alert to children who may be susceptible to radicalisation and should consider the child's individual circumstances rather than relying on a fixed profile or checklist. Concerns may arise from behaviour, associations, online activity, expressed views or other contextual information. A clearly identifiable ideology is not required before a Prevent concern may be considered or referred.

The school will have regard to the current Prevent Duty Guidance and relevant DfE safeguarding guidance concerning children and young people who may be susceptible to radicalisation. Concerns will be reported to the DSL and managed through the current Prevent referral arrangements.

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.

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 can recognise those vulnerabilities.

Guidance for identifying radicalisation can be found from the 2023 DfE [‘Managing risk of radicalisation in your education setting’](#) guidance. 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.

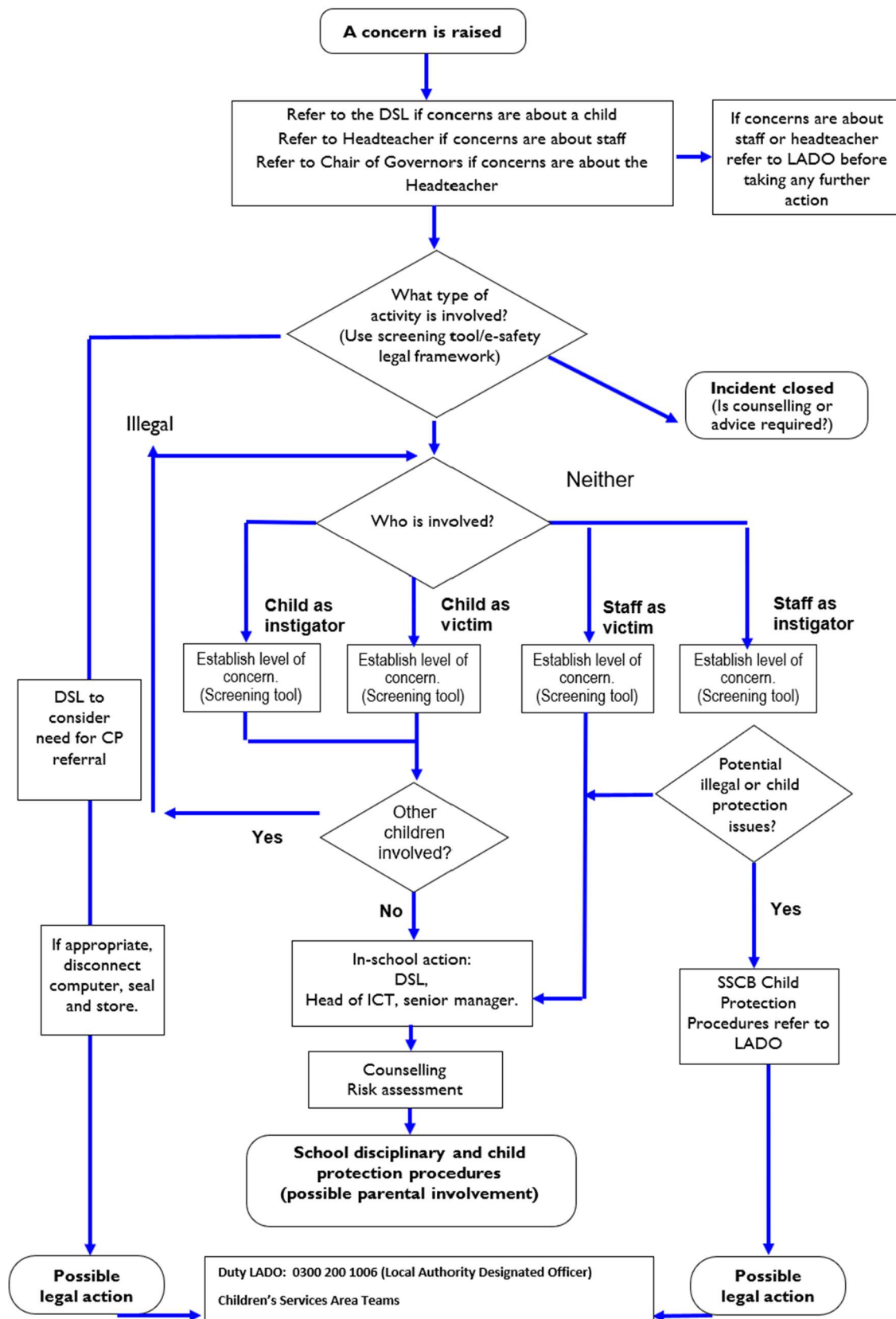
However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

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.
- 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 DfE guidance [The Prevent Duty](#) can be accessed via this link.

42. Appendix 8 - What to do if you have an online safety concern



43. 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 is an arrangement in which a child under the age of 16, or under 18 where the child has a disability, is cared for and accommodated by a person who is not the child's parent, a person with parental responsibility or a relative, in that person's own home, for 28 days or more. Staff should be alert to private fostering arrangements in all communities and cultures.

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.

A parent, private foster carer or other person involved in making a private fostering arrangement has duties to notify the local authority. Where the school becomes aware of a possible private fostering arrangement, the DSL will notify Surrey Children's Services/C-SPA promptly so that the local authority can assess the arrangement.

Children Looked After

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

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.

44. Appendix 10 - 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 that have unexplainable and/or persistent absences from 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 school Attendance (Pupil Registration) (England) Regulations 2024.

When removing a child's name, the school will notify the Local Authority of:

- the full name of the child,
- the full name and address of any parent with whom the child normally resides,
- at least one telephone number of the parent,
- the child's future address and destination school, if applicable, and
- the school will make all required returns to the Local Authority when a pupil's name is added to or deleted from the admission register, in accordance with the school Attendance (Pupil Registration) (England) Regulations 2024 and current DfE guidance.

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.
- The school will make the required new-pupil return to the local authority within the timescale prescribed by the School Attendance (Pupil Registration) (England) Regulations 2024, including within five days where the regulations require a new-pupil return. The school will comply with any additional local-authority request for returns. 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 \(EHE\)](#) 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 may require an alternative education offer or a reduced or modified timetable to support their education or a return to full-time provision. The school recognises that pupils accessing alternative provision, including off-site provision, may have additional vulnerabilities and that safeguarding must be a central consideration when arranging and reviewing any such placement.

Where St Edmund's places a pupil with an alternative provision provider, the school remains responsible for safeguarding that pupil. Before the placement begins, the school will satisfy itself that the placement meets the pupil's needs and obtain written confirmation that appropriate safeguarding checks have been carried out on individuals working at the provision. The school will also obtain written confirmation that the provider will notify the school of any subsequent arrangements or changes, including relevant staff changes, that may place the pupil at risk, so that the school can assure itself that appropriate safeguarding checks continue to be in place.

The school will ensure that there are effective arrangements for monitoring a pupil's attendance at alternative provision and for following up absences promptly. Appropriate arrangements will be established with the provider so that the school knows whether the pupil is attending the provision as expected and safeguarding concerns, unexplained absences or other significant concerns are communicated without delay.

The school will ensure that parents and carers, and the local authority where relevant, including where a pupil has an Education, Health and Care Plan, are provided with clear information about alternative provision placements and reduced or modified timetables, including why the provision is being used, where and when it will take place, its intended outcomes, and how and when it will be reviewed.

Alternative provision placements will be kept under regular review to ensure that the provision continues to meet the pupil's educational and safeguarding needs and that the pupil is benefiting from the placement. Reviews will take account of attendance, progress, wellbeing, safeguarding information and whether the placement remains suitable. Parents or carers and the pupil will be involved as appropriate, together with the provider and relevant professionals.

The school will comply with relevant data returns requested by the Local Authority concerning pupils of statutory school age attending alternative provision and/or on a reduced or modified timetable. The school leadership will report to Governors on the use and effectiveness of alternative provision and modified timetables, including any formal direction of a pupil to alternative provision where applicable.

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, neglect and exploitation. 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.

45. Appendix I I – Safeguarding and remote learning

Where the school provides remote education for any reason, its safeguarding and child protection responsibilities continue to apply. Remote education will be planned and delivered in accordance with this policy, the Staff Code of Conduct, the school's acceptable-use arrangements, online-safety procedures and any current DfE guidance applicable to remote education.

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.

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.

Behaviour

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

Personal data

Lessons: The conference service may require the sharing of personal data, e.g. usernames to invite in. Staff must use school-approved systems and accounts when communicating with pupils or parents and when processing personal information. Data protection laws continue to apply, including the Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025. Staff must follow the school's data-protection, information-security and acceptable-use procedures.

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.

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 DSLs.

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

46. Appendix 12 - Further Advice Links

DSLs should ensure that they have access to appropriate professional support, advice, guidance and resources to enable them to fulfil their safeguarding responsibilities effectively. This may include support available through the local safeguarding partners, local authority safeguarding services and relevant national safeguarding organisations. DSLs should also refer to the examples of support and resources identified in KCSIE 2026.

- Further advice on child protection is available from:
- NSPCC:
 - General: <https://www.nspcc.org.uk/>
 - SEND students: <https://learning.nspcc.org.uk/safeguarding-child-protection-schools/safeguarding-children-with-special-educational-needs-and-disabilities-send>
 - Deaf and/or disabled students): [Safeguarding d/Deaf and disabled children and young people | NSPCC Learning](#)
 - Understanding sexualised behaviour in children: <https://learning.nspcc.org.uk/child-health-development/sexual-behaviour>
- Childline: <https://www.childline.org.uk/>
- Anti-Bullying Alliance: <https://anti-bullyingalliance.org.uk/>
- Childnet International: <https://www.childnet.com/>
- Contextual Safeguarding Network: <https://www.contextualsafeguarding.org.uk/>
- Surrey Safeguarding Children: [Partnership webpages](#)
- Lucy Faithfull: [Foundation webpages](#)
- Shore Space: <https://shorespace.org.uk/>
- CSA Centre: <https://www.csacentre.org.uk/research-resources/practice-resources/helping-education-settings-identify-and-respond-to-concerns/>

- The Children's Society: <https://www.childrenssociety.org.uk/what-we-do/our-work/preventing-child-sexual-exploitation>
- Safer Internet Centre <https://www.saferinternet.org.uk/>
- National Crime Agency's CEOP Education team: <https://www.ceopeducation.co.uk/>
- Using AI in education settings: support materials: [Using AI in education settings: support materials - GOV.UK](#)
- Safe use of generative AI in education: module 3: [Safe use of generative AI in education: module 3 - GOV.UK](#)
- Current DfE guidance and information concerning children's screen use, online safety and the use of technology: [New guidance on screen use for children aged 5–16 - GOV.UK](#)
- Government guidance on child knife possession offences: [Child knife possession offences - GOV.UK](#)