'Doing our best to achieve our best'

Clarendon Primary School and Nursery Child Protection and Safeguarding Policy

September 2026

Policy Reviewed: September 2026

Next Review Date: September 2027

Content	Page	Content	Page
Safeguarding statement	3	Children with special educational needs and disabilities	32
Key policy principles	3	Children with medical conditions	33
Policy aims	3	Children who are lesbian, gay or bisexual	33
Supporting Children	4	Children who are questioning their gender	33
Terminology	5	Children Missing Education	34
Key personnel and contact details for children's services and the LADO	6	Children Missing Out on Education (PMOOE)	34
Legislation and guidance followed in school	7	Children absent from education	35
Roles & Responsibilities- All school staff	8	Fabricated or induced illnesses	36
Roles & Responsibilities – Headteacher	9	Modern slavery	36
Roles & Responsibilities- DSL & Deputy DSL	10	Identified areas of risk for our school	36
Roles & Responsibilities – Governing Body	11	Confidentiality, Sharing and Withholding Information	37
Roles & Responsibilities – Safeguarding link governor	12	Record Keeping	37
What to do if you've concerns about a child's welfare	13	Use of physical intervention	38
Disclosures and managing disclosures	13	Concerns or allegations made about adults in our school, including low-level concerns	39
How children can report concerns	14	Whistleblowing	40
Early Help	15	Online safety and the use of smart devices	41
Referrals to children's services	15	Mobile phones and smart technology (including smart watches and glasses)	42
What is Child Abuse and Forms of child abuse (physical, emotional, sexual and neglect.)	16	Media recordings, audio, image and video (including digital files)	43
General indicators of abuse	17	Filtering and monitoring	43
Contextualised safeguarding	17	Remote education	43
Female genital mutilation	18	Information security and access systems	44
Concerns about nudes and semi nudes	18	Lettings and off-site arrangements	44
Child-on-child abuse – harassment & violence & (including sexual)	20	Extended school and off-site arrangements	45
Responding to allegations of sexual harassment and sexual violence	22	Staff Training – DSL, governors, staff	45
Harmful sexual behaviour	24	The designated teacher for children who are looked after (CLA)	47
Brook Traffic Light Tool – a guide to identifying sexual behaviours	26	Teaching and learning	47
Concerns about mental health	27	Linked policies	48
Domestic Abuse	28	**Appendix 1** – additional information about Neglect	49
Homelessness	28	**Appendix 2** – additional information about Emotional Abuse	50
Concerns about extremism and radicalisation	29	**Appendix 3** – additional information about Physical Abuse	51
Racist Incidents	30	**Appendix 4** – additional information about Sexual Abuse	53
Bullying	30	**Appendix 5** – additional information about Sexual Violence, Consent and Sexual Harassment	54
Children potentially at greater risk of harm Children who have social worker	30 30	**Appendix 6** – additional information about Radicalisation and Extremism	56
Children who are looked after and previously looked after	31	**Appendix 7** – information relating to serious violence and specific types of exploitation.	58
Young carers	31	**Appendix 8** – Further information about Female Genital Mutilation (FGM)	61
Private Fostering Arrangements	31	**Appendix 9** – information relating to other forms of control / illegal practice in this country	62
Children who run away or go missing from home or care	32		

“Safeguarding is Everyone’s Business” as “it could happen here”

Clarendon Primary School and Nursery has a duty to keep children safe. This includes how we protect children from experiencing harm and how we should respond when we suspect or confirm that a child is being harmed.

Children are at the centre of everything we do. We are committed to providing our children with a sense of belonging and an environment that is welcoming, safe, valuable and respectful. We aim to ensure all children are confident to talk if they are worried; believing they will be effectively listened to.

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

We believe that everyone has the right to succeed and on a journey to excellence we are committed to supporting children to ‘Doing their best to achieve their best.’ Alongside everyday practice, this is actively promoted through our whole school values of:

- Perseverance
- Teamwork
- Respect
- Curiosity
- Honesty
- Kindness

Key Policy Principles

The Key principles and values within this policy are:

- The welfare of the child is paramount.
- Maintain an attitude of “It could happen here” and “Safeguarding is Everyone’s Business” as well as one that identifies the fact that children have a right to always feel safe and secure as they cannot learn effectively unless they do.
- Maintain a **“zero-tolerance”** approach to sexual violence and sexual harassment.
- An understanding that all children have a right to be protected from harm and abuse.
- An understanding that all staff have a role to play in the prevention of harm and abuse and an equal responsibility to act immediately on any suspicion or disclosure that may indicate a child is at risk of harm, either in our organisation or in the community; taking into account contextual safeguarding, in accordance with statutory guidance.
- Acknowledging that working in partnership with other agencies protects children and reduces risk. As a result, our organisation will actively engage in partnership working to protect and safeguard children.

Whilst our organisation will work openly with parents / carers (as far as possible), it reserves the right to contact social care or the police, without notifying parents / carers, if this is believed to be in the child’s best interests. We will always act in the best interests of the child and ensure that our decisions around safeguarding take a child-centred and co-ordinated approach.

Policy Aims

The aims of these procedures are:

- To demonstrate the school’s commitment to safeguarding and child protection.
- To provide staff with the framework to promote and safeguard the wellbeing of children and in doing so ensuring they meet their statutory responsibilities.

- To ensure consistent good practice across the school and nursery and ensure that safeguarding follows a 'whole organisation approach'.
- To keep track of children known or thought to be at risk of harm.
- To clarify safeguarding expectations for members of our school community as well as for staff, the Governing body, children and their families.
- To contribute to the establishment of a safe, resilient, and robust safeguarding culture which is built on shared values and where children are treated with respect and dignity, taught to treat each other and staff with respect, where they feel safe, and where they feel they have a voice and are listened to.
- To support contextual safeguarding practice, recognising that the school site can be a location where harm can occur.
- To set expectations for developing knowledge and skills within our organisation's community (i.e. staff, governors, children and parents/carers) regarding the signs and indicators of safeguarding issues and how to respond to them.
- To ensure the early identification of need for vulnerable learners and subsequent provision of proportionate interventions to promote their welfare and safety.
- To work in partnership with children, parents/carers, and other agencies within the Surrey Safeguarding Children's Partnership.

Supporting Children

We recognise that school may provide a safe place and the only stability in the lives of children who have been abused or who are at risk of harm.

We recognise that a child who is abused or witnesses abuse and / or violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth. Research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

Our school will support all children by:

- Promoting a caring, safe and positive environment within the school.
- Encouraging self-esteem and self-assertiveness, through the curriculum and through positive relationships within the school community.
- Ensuring all children know there is and they can access an adult in school whom they can approach if they are worried or in difficulty.
- Ensuring children are taught to understand and manage risk through personal, social, health and economic (PSHE) education and Relationship and Sex Education (RSE) and through all aspects of school life. This includes online safety and how to stay safe when working or playing online.
- 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 in partnership with other support services and agencies involved in Early Help and the safeguarding of children.
- Notifying Social Care without delay if there is an immediate risk of significant harm.
- Providing continuing support to a child about whom there have been concerns who leaves the school by ensuring that information is shared under confidential cover to the child's new school and ensure our school records are forwarded as a matter of priority and within statutory timescales.
- Provide preventative education by creating a culture of '**zero tolerance'** towards sexism, misogyny/Misandry, homophobia, biphobia and sexual violence and sexual harassment.

Terminology

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

- Providing help and support to meet the needs of children as soon as problems emerge.
- Protecting children from maltreatment, whether that is within or outside the home, including online.
- Preventing impairment of children's mental and physical health or development;
- Making sure that children grow up in circumstances consistent with the provision of safe and effective care.
- 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.

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

Child(ren) includes everyone under the age of 18.

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

The local safeguarding partnership. This is made up of three partners:

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

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

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

Staff refers to all those working for or on behalf of the school, full or part-time, temporary or permanent, in either a paid or voluntary capacity. This includes, but is not limited to, employed staff, contractors, volunteers, governors/trustees, supply staff and self-employed staff.

MAP refers to the Surrey Multi-Agency Partnership.

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

DSL refers to the school's Designated Safeguarding Lead.

DDSL refers to the school's Deputy Designated Safeguarding Lead.

SSCP refers to Surrey Safeguarding Children Partnership.

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

Clarendon Primary School *will publish our safeguarding and child protection policy on our website and hard copies will be available on request from the school office.*

Key Personnel

School:

The Designated Safeguarding Lead and Headteacher is (DSL) is: William Neale
Contact details: email:DSL@clarendon.surrey.sch.uk Telephone: 01784 253379

The deputy DSL(s): Louise Stondzik
Contact details: email: deputy@clarendon.surrey.sch.uk Telephone: 01784 253379

The deputy DSL(s): Sarah Evans
Contact details: email: sevans@clarendon.surrey.sch.uk Telephone: 01784 253379

Special educational needs and disabilities coordinator (SENDCo): Sarah Robinson
Contact details: email: SENCOadmin@clarendon.surrey.sch.uk Telephone: 01784 253379

Designated teacher for young carers: Louise Stondzik
Contact details: email: deputy@clarendon.surrey.sch.uk Telephone: 01784 253379

Governor:

The nominated child protection governor and Chair of Governors is: Karen Handley
Contact details: email: ChairofGov@Clarendon.surrey.sch.uk Telephone: 01784 253379

Children's Services

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

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

Surrey's Child Protection Consultation Line for advice and support can be contacted on: 0300 470 9100 option 3.

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

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

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

If you need to contact another local authority, the following government website link will help you identify which local council to report child abuse to and provide appropriate contact details: Report child abuse to a local council - GOV.UK.

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

EDT is available 5pm-9am, Monday – Friday, Weekends 24 hours a day.
Phone: 01483 517898
Email: edt.ssd@surreycc.gov.uk

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

The LADO can be contacted in the following ways:

- **Email:** LADO@surreycc.gov.uk
- **Telephone:** 0300123 1650 option 3
- **Online**: LADO Referral Form

The Law (legislation and statutory guidance)

In addition to Surrey Safeguarding Children Partnership's (SSCP) arrangements, Clarendon Primary School also follows the laws and statutory guidance below:

- Working Together to Safeguard Children 2026 which sets out the multi-agency working arrangements to safeguard and promote the welfare of children and young people and protect them from harm; in addition, it sets out the statutory roles and responsibilities of schools.
- 'What to do if you are Worried a Child is Being Abused' 2015 - Advice for Practitioners
- Keeping Children Safe in Education (KCSIE, 2026) which is statutory guidance issued by the Department for Education (DfE) which all schools and colleges must have regard to when carrying out their duties to safeguard and promote the welfare of children.
- Early years foundation stage (EYFS) statutory framework which is statutory guidance which sets standards that school and childcare providers must meet for the learning, development, and care of children from birth to 5 years in Ofsted registered settings. This should be read alongside KCSIE.
- Relationships and sex education (RSE) and health education - GOV.UK which is statutory 2002 and section 403 of the Education Act 1996
- Education Act 2002,which places a duty on maintained and independent schools as well as non-maintained special schools, academies and local authorities to keep children safe and promote their welfare.
- The Children Act 1989, which is the main source of child safety law for England and Wales. The Act gives the basis for most of children's services' duties and responsibilities towards children and their families. It also provides the legal framework for the child protection system. The 2004 amendment is used alongside the Act.

- The Children Act 1989 Care Planning, Placement and Case Review which sets out what responsibilities education settings have for children looked after by the local authority.

- The Human Rights Act 1998 which sets out the core rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on

Human Rights (the Convention) that apply in the UK. (Experiencing harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of these rights.)

- The Equality Act 2010 which states that schools and colleges must not unlawfully discriminate against children because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (called protected characteristics). As a result, the school takes positive action to deal with disadvantages affecting our children with protected characteristics to make sure their needs are met. (The Equality Act 2010: advice for schools advises us further on this.)
  N.B – With regards to Sport – As children get older, some sports are typically taught and played in single-sex groups. The Equality Act 2010 contains an exception in relation to single-sex sport whereby we can separate children according to their biological sex without discriminating lawfully against them where physical strength, stamina or physique of the average girl would put her at a disadvantage in competition with the average boy (or vice versa) or to ensure safety. Where there are no safety concerns and a child makes a request relating to how they participate, we will consider the request in light of the advice on *"considering requests for support with social transition"* (See page 65 in KCSIE for further details).
- The Public Sector Equality Duty (PSED) states that we have to be mindful of the need to eliminate unlawful discrimination, harassment and victimisation. Some children may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic or transphobic bullying, or racial discrimination. As a school we believe it is important to make sure we foster good relations between those who share a protected characteristic and those who do not, and work to make sure children have equal opportunities. We give specific attention to this duty when we write our policies or make any decisions about how our school is run.
- Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 and the Childcare Act 2006 which sets out who is disqualified from working with children.

Regulations and safeguarding requirements relating to school premises relating to the use of toilets

We provide mixed-sex toilets in addition to single-sex toilets. Where they are mixed-sex toilets are used in the lower part of the school, individual toilet cubicles are provided to ensure privacy.

More legislation is covered throughout this policy in their relevant sections. Whilst some government guidance is not statutory, it supports the school in the decisions made when keeping children safe. Where possible, links to non-statutory guidance have been included in the relevant sections.

Roles and responsibilities

Whilst some members of our school have specific safeguarding responsibilities, everybody in our school has a responsibility for safeguarding.

All School Staff will:

- Maintain an attitude of "It could happen here" with regards to safeguarding.
- Understand that safeguarding is "everyone's responsibility".
- Maintain a "**zero-tolerance**" approach to sexual violence and sexual harassment.
- Attend safeguarding training appropriate to their role and ensure they are familiar with key policies, including this policy and the staff behaviour policy (i.e. staff and governor code of conduct).
- Sign to say they have read and understood:
  - Part 1 of statutory guidance KCSIE (2026).
  - The school's safeguarding arrangements and safeguarding statement.

- The school's Staff behaviour policy (code of conduct).
- The school's Safeguarding and Child Protection policy.
- Information about the role and names of the Designated Safeguarding Lead (DSL) and their deputy Designated Safeguarding Lead (DDSL).

- Ensure they know who and how to contact the DSL, DDSL and the Chair of Governors responsible for safeguarding.
- Have a responsibility to provide a safe environment in which children can learn.
- Have a responsibility to establish and maintain an environment where children feel secure, are encouraged to talk and are listened to.
- Plan opportunities within the curriculum for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe.
- Follow the school's procedures for identifying and reporting any concerns and issues about the school's online filtering and monitoring systems.
- Follow the school's safeguarding and child protection processes and procedures, sharing information quickly when they have a concern about a child's safety and wellbeing, even when they are unsure.
- Whenever necessary, refer safeguarding or child protection concerns to external agencies, such as the police, children's services and the LADO.
- Create a culture where children who identify as lesbian, gay, bisexual, or are questioning their gender feel safe, can speak out and share concerns.
- Be aware of indicators of abuse, neglect, exploitation and modern slavery, understand that children can be at risk of harm inside and outside of the school, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse, neglect and exploitation so that staff are able to identify cases of children who may be in need of help or protection.
- Understand 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.

The Headteacher will ensure:

- This policy and other safeguarding related policies and procedures (such as the staff behaviour policy, whistle blowing procedures and health and safety policy) are shared at induction, understood by all staff and are being followed at all times.
- All staff are aware of the role of the designated safeguarding lead (DSL), including the identity of the DSL and any deputies.
- Ensure Deputy DSLs are trained to the same standard as the DSL and the role is explicit in their job description.
- 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.
- Staff receive safeguarding training that is updated regularly.
- Parents and carers are aware of this policy and where they can access a copy.
- The DSL (if not the headteacher) is given the additional time, funding, training, resources, and support needed to carry out the role effectively and there is cover by an equivalently trained deputy if the DSL is absent.
- Visitors are appropriately supervised or escorted, where necessary.
- That all children are supported to report concerns freely, that concerns are taken seriously and dealt with swiftly and appropriately, and comprehensive records of all allegations are kept.
- 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 are used to inform the whole school approach to safeguarding.

- They become the ‘case manager’ when an allegation is raised about a member of staff and make the final decision regarding all low-level concerns.
- Record low-level concerns in cases which concern a member of staff / supply staff / contractor or a volunteer. The record will 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.
- Within Early Years ensure:
  - There are enough staff per child (staff ratios), where relevant and applicable.
  - Each child in the Early Years Foundation Stage is assigned a key person.
  - Appropriate arrangements are put in place for the supervision of staff who have contact with children and families.
- All staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the school’s whistle-blowing procedures.

The Designated Safeguarding Lead:
William Neale (DSL), has the lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place. The DSL is a senior member of staff from our school’s leadership team.

The school also have 2 deputy DSLs to support the DSL in their role. While the DSL may hand over some activities to a deputy, the DSL will always have the ultimate responsibility for keeping children safe.

The full responsibilities of the DSL and the deputy DSL(s) are listed in their job descriptions. (This is based on the duties outlined in KCSIE 2025, Annex C). The DSL’s responsibilities include, but are not limited to:
- Having an “it could happen here” approach to safeguarding.
- Holding the lead responsibility for safeguarding and child protection.
- Having the lead responsibility for online safety, including oversight and checking the effectiveness of the school’s filtering and monitoring systems and their reports.
- Always being available during term time (during school hours) for staff in the school to discuss any safeguarding concerns.
- Organising appropriate and adequate cover arrangements for any out of hours / out of term activities.
- Ensuring there are cover arrangements in place when the DSL is unavailable due to illness, leave or other circumstances. This will include any Deputy DSL’s accessing the DSL email account to ensure that safeguarding concerns are received, monitored and acted upon without delay.
- Reading, understanding and following KCSIE.
- Acting as a source of support and expertise in carrying out safeguarding duties for the whole school community.
- Working together with all staff to understand the whole picture when there are safeguarding concerns; providing them with advice, support and expertise.
- Contributing to the assessment of children, including taking part and/or supporting staff to take part in strategy discussions, child protection conferences and meetings between multiple agencies.
- Working together with and supporting parents / carers and families who may be facing challenging circumstances and, when there are safeguarding concerns, making parents / carers aware of the school’s role in making referrals about suspected abuse, neglect and exploitation.
- Understanding the importance of sharing information, including making appropriate referrals to relevant agencies (for example, children’s services, the police, the Channel Programme

and / or the Disclosure and Barring Service (DBS)) and supporting staff who make referrals directly themselves.
- Understanding and following Surrey Safeguarding Children Partnership (SSCP) safeguarding procedures.
- Having a secure working knowledge of SSCP procedures and understand the assessment process for providing early help and statutory intervention, in line with Surrey's Continuum of Need Indicators.
- Keeping the headteacher (if they are not the DSL), up to date with safeguarding issues.
- Being aware of the requirement for children to have an Appropriate Adult, as described in PACE Code C 2019.
- Keeping detailed, accurate, secure written records (either written or using appropriate secure online software), of all concerns, discussions and decisions about a child made including the rationale for those decisions and actions taken. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc. (See record keeping section below.
- Making sure that all staff have access to this policy (and the wider safeguarding procedures), making sure the policy is available publicly and is reviewed annually.
- Making sure that all adults (who work in or for the school), have an adequate and appropriate safeguarding induction (which is regularly updated), and sign annually to say they have read the relevant part of KCSIE.
- Working alongside the governing body and headteacher (if not the DSL) to review and update procedures and how they are being implemented, including jointly completing and submitting the biennial (s157 s175) Statutory Audit for Safeguarding Arrangements and Termly Safeguarding Data Collections via PHEW to Surrey County Council.
- Promoting the educational outcomes of children who have or had a social worker, by sharing appropriate child protection information with the teacher and leaders.
- Encouraging a culture of listening to children, taking into account their wishes and feelings when any plans are put in place to protect them.
- Ensuring that when a child transfers setting (including in-year), their safeguarding / child protection file is passed to the new setting 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.
- Using Surrey's FaST Resolution Process to raise concerns about disagreements with regards to the decision making of process other professionals.

The Deputy Designated Safeguarding Lead(s):
Deputy Designated Safeguarding Leads will:
- Be trained to the same standard as the DSL and the role is explicit in their job description.
- Provide support and capacity to the DSL in carrying out delegated activities.
- Take on the designated safeguarding lead's responsibilities if they are unavailable. If the designated safeguarding lead is long-term absent, a deputy will temporarily take over as the designated safeguarding lead.

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

The Governing Body
The non-statutory Maintained schools governance guide sets out the roles, responsibilities and legal duties of the governing body.

All members of The Governing Body will understand and fulfil their responsibilities to ensure that:
- Safeguarding, and the child's best interests, wishes and feelings, are considered in everything the school does.

- There is a whole school approach to safeguarding, involving everyone in the organisation, and ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. This includes online safety.
- 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) and relationships and sex education (RSE).
- The organisation has effective safeguarding policies and procedures in place including a Child Protection Policy, a Staff Behaviour Policy / Code of Conduct, a Behaviour Policy and a response to children who go missing from education.
- The school's policies, procedures and training follow the local safeguarding partnership arrangements and the law, including the school's duties under the Human Rights Act 1998, Data Protection Act 2018 and Equality Act 2010.
- The school's leadership team are held to account for the school's safeguarding arrangements.
- Safeguarding is a standing item on the agenda for Governing Body meetings.
- The appointed designated safeguarding lead (DSL) is given the additional time, funding, training, resources and support needed to carry out the role effectively.
- An experienced governor takes leadership responsibility for the school's safeguarding arrangements.
- There is an appointed designated teacher for looked after children who is appropriately trained.
- The governing body takes into account children who are more at risk of harm and any barriers that can make it difficult to recognise abuse and / or neglect. For example, children with special educational needs and disabilities (SEND).
- Safeguarding and child protection files are maintained as set out in Annex B of KCSIE.
- The school adds to multi-agency working and shares information appropriately and in a timely manner.
- All staff receive regular safeguarding information, updates and in-depth training.
- Staff sign to say they have read the appropriate part of KCSIE. Governors also sign to say they have read and understood KCSIE and this policy.
- Children are taught about keeping safe, including when online.
- The governing body does all that they reasonably can to limit children's exposure to online risks from the school's online IT systems and assigns a member from the senior leadership team and a governor to ensure standards are met.
- Appropriate safer recruitment processes and procedures are in place.
- Procedures are in place to identify and address children absent from education, including persistent absence, and when safeguarding concerns coincide.
- There are procedures for reporting and managing safeguarding concerns about adults who work for the school. The chair of governors will manage any allegations against the headteacher.
- There are effective safeguarding arrangements for when the site is being hired / let.
- All members of the governing body receive safeguarding training at induction, which is regularly updated.
- The SSCP is informed in line with local requirements about the discharge of duties via the Biennial (s 157 s 175) Statutory Audit for Safeguarding Arrangements and Termly Safeguarding Data Collections via PHEW to Surrey County Council.

The Safeguarding Link Governor

The Safeguarding Link Governor will:

- Meet with the DSL and visit the school regularly asking questions that allow them to monitor how the school's safeguarding policies and procedures are being put into practice.
- Be part of the biennial safeguarding audit, led by the DSL and headteacher (if not the DSL), and make sure it is submitted via Phew.

- Be the governing body's 'safeguarding specialist', feeding back their findings following school visits and meetings with the DSL.
- Attend appropriate training that guides them in how to monitor and progress any areas of weakness in the school's safeguarding arrangements.
- Keep up to date with the SSCP's safeguarding arrangements and guidance.

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

If staff have concerns about a child's welfare, they must act on them immediately by following the procedures below. Our staff can use the What to do if you're worried a child is being abused guidance with the school's procedures. As a school work hard to make sure our staff and safeguarding team are approachable and available, such that anyone can speak to them about any concern quickly, no matter how small or whether there is evidence.

We recognise the significant emotional impact being involved with or aware of safeguarding incidents can have. Staff should approach our safeguarding team if they need any support during or following a safeguarding incident. The names of the DSL and deputy are clearly advertised around the school, including in reception to help inform visitors to school. Furthermore, when visitors sign in, they are expected to read and adhere to the displayed safeguarding statement.

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

Call the police on **999** if a child is in immediate danger.

Anyone can make a referral to children's services if a child is suffering or likely to suffer significant harm; however, the referral is usually made by the DSL or deputy DSL. For children's services' contact details, **click here**.

If staff make a direct referral to children's services, they will update the DSL or a deputy as soon as is practically possible.

Disclosures

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

- Children may not feel ready or know how to tell someone they are being harmed.
- The child may not realise what is happening to them is harmful.
- They may feel embarrassed, humiliated or are being threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.

Our staff know they must show professional curiosity, i.e. explore and try to understand what is happening for a child, rather than making assumptions or taking what is being said on face value. As a school we encourage staff to ask the child if they are OK or if they can help in any way.

A child who makes a disclosure may have to tell their story more than once, such as to the police and social workers. Therefore, at Clarendon we know how important it is that a child's first experience of talking to a trusted adult about a worry is a positive one.

Handling a disclosure

- Listen to the child carefully and believe in what they are saying. Do not be afraid of silence moments.
- Be careful not to express your own views or feelings and stay calm.

- Do not investigate. Only ask enough questions to work out if you need to share this matter with the DSL or a deputy DSL. Only ask open questions, such as: How? When? Who? Where?, and open statements, such as “Tell me”, “Describe” and “Explain”. Otherwise, you may invalidate your and the child’s evidence in any later court proceedings.
- If there are injuries or marks on the child, do not examine the child intimately or take pictures.
- Reassure them that they have done the right thing by telling you. Do not say to the child that you wish they had told you sooner.
- Do not automatically offer physical touch to comfort the child. Consider what may be comforting for the child, rather than how you prefer to be comforted.
- Tell the child it is not their fault, and you are taking them seriously.
- Explain what you will do next. Tell the child that you cannot keep what they have told you a secret and that you will pass this information onto someone who can help.

After a child has made a disclosure

- Write up the conversation as soon as possible.
- Make sure the DSL or a deputy DSL is aware of the disclosure. If appropriate, contact children’s services and / or the police directly and tell the DSL as soon as possible.
- Do not share the disclosure with **anyone** else unless children’s services, the police or another relevant agency involved in the safeguarding process tells you to.
- Remember to provide ongoing support for the child: listen, reassure, and be available. Get support for yourself if you need it.
- After informing the DSL, make sure you follow up on your concerns with the DSL at a later date.

Recording a disclosure or safeguarding concern

- Record the date, time, place, persons present and any usual context information.
- Use the child’s own words, verbatim where possible, and stick to the facts. Avoid making assumptions and do not put your own judgement on it.
- Record any noticeable non-verbal behaviour. Detail any visible marks or injuries and record them on a body map.
- Keep any original notes you have made on file. (Pass them to the DSL to store securely.)
- Do not ask children to make written statements themselves or sign records.

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

- First, speak to the DSL or a deputy DSL.
- If in exceptional circumstances, the DSL or a deputy are not available, this should not delay you from taking appropriate action. Instead, you will speak to a member of the senior leadership team or take advice from children’s services, if necessary. (The CSPA consultation line can be contacted on 0300 470 9100 option 3.)

How children can report concerns

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

- Speaking to an adult they trust.
- Putting a written or an anonymous disclosure on their teacher’s desk or on the head / deputy headteacher’s desk.

Furthermore, how children can share any worries they have (both inside and outside of school) is talked about in class and during assemblies, and also forms part of our PSHE curriculum.

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

Early help

Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. At Clarendon Primary School we are keen to provide support to families as soon as a problem becomes visible. If an early help assessment is appropriate, the DSL or a deputy will work with other agencies to support this. Other staff may also be required to support this process, and in some cases acting as the lead practitioner.

Our DSL and / or deputy use the Helping families early - Surrey County Council information to explore emerging needs.

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

As a school we are aware that any child may benefit from support before statutory intervention is required. This includes support from universal services and community-based Early Help, or from the targeted early help level of Family Help. Staff who work directly with children will be particularly alert to the potential need for early help for children listed under Part 1, paragraph 17 of KCSIE.

Referral to children's services

Concerns about a child or a disclosure should be discussed with the DSL who will help decide whether a referral to children's services is appropriate. The DSL and deputy DSL's are aware of the Continuum of Support for Children and Families in Surrey and Continuum of Support Indicators which will be used to inform their response to any safeguarding concern. If a referral is needed, then the DSL should make it; however, anyone can make a referral and if for any reason a staff member thinks a referral is appropriate and one hasn't been made, they can and should consider making a referral themselves. Where referrals are not made by the DSL, the DSL should be informed as soon as possible.

The school will try to discuss any concerns about a child's welfare with the parent / carer and where possible obtain their consent before making a referral to the C-SPA; however, this should only be done when:

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

Where there are doubts or reservations about involving the child's family, the DSL will clarify with the C-SPA or the police whether the parents / carers should be told about the referral and, if so, when and by whom. This is important in cases where the police may need to conduct a criminal investigation. The child's views should also be considered.

If it is suspected that a child is suffering, or is likely to suffer, harm or abuse the DSL must contact the C-SPA. If the DSL feels unsure about whether a referral is necessary, they can phone the C-SPA consultation line to discuss concerns. (0300 470 9100 option 3.)

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

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

What is child abuse?

The following definitions help define the 5 forms of abuse, including neglect. In addition to these definitions, it should be understood that children can also be abused by being sexually exploited, through honour-based violence, forced marriage or female genital mutilation.

To support the local context, all staff have access to Surrey's Continuum of Need Matrix.

Forms of abuse and neglect

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, 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 in so far 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 or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

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

The Surrey Neglect Risk Assessment Tool is used to support with initial identification of neglect.

General indicators of abuse:
Indicators of abuse can include, but are not limited to:

- Unexplained changes in behaviour or personality
- Becoming withdrawn
- Seeming anxious
- Becoming uncharacteristically aggressive
- Lacks social skills and has few friends, if any
- Poor bond or relationship with a parent
- Knowledge of adult issues inappropriate for their age
- Running away or going missing
- Always choosing to wear clothes which completely cover their body
- Patterns of repeated lateness or absence

It is important that staff report all of their concerns, however minor or insignificant they may think they are. Staff do not need 'absolute proof' that the child is at risk.

For further information on indicators of abuse can be accessed via NSPCC or by referring to the appendices below.

Contextual safeguarding

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

As a school we will maintain records of concerns about contextual safeguarding in accordance with our safeguarding procedures. We know the importance of information sharing, therefore if

we identify contextual safeguarding concerns about the local area we will share this information with relevant partners. If there is a specific concern about a child, we will consult with children's services.

Useful links:

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

Female genital mutilation

Female genital mutilation (FGM) is illegal in England. It involves removal, part removal or injury to the female genital internal or external organs for non-medical reasons. It is sometimes known as 'cutting' or female 'circumcision'.

Teachers

(For this section only, teachers means qualified teachers or persons who are employed or engaged to carry out teaching work in schools and other institutions.)

All staff should speak to the DSL (or a deputy) when a concern about female genital mutilation (FGM) arises. If a teacher suspects that FGM has been carried out on a child or believes that the child is at risk of FGM, they will follow the school's internal safeguarding procedures.

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

Other members of staff

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

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

See appendix 8 for further details on FGM.

Useful links:

Mandatory reporting of female genital mutilation: procedural information

Concerns about nudes or semi-nudes

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

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

young person into sending more images, money, or in some cases, into recruiting more victims. Images can be both real or generated by artificial intelligence.

When an incident comes to a member of staff's attention, they will respond as follows:

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

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

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

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

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

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

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

- They become aware of the making or sharing of nudes or semi-nudes.

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

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

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

- Is the only way to make a decision about whether to involve other agencies because it is not possible to establish the facts from any child or young person involved.
- Is necessary to report it to a website, app or suitable reporting agency (such as the IWF) to have it taken down or support the child or parent / carer in making a report.
- Is unavoidable because a child or young person has presented it directly to a staff member or nudes or semi-nudes have been found on a school device or network.

Deletion of images
If the school has decided that other agencies do not need to be involved, then consideration will be given to deleting imagery from devices and online to limit any further sharing. This decision will be based on the DSL's or a deputy's DSL's judgement and in line with the guidance. (Further information is available in the Sharing nudes and semi-nudes section of this policy.)

Child-on-child abuse – harassment and violence (including sexual)

Our school does not tolerate child-on-child abuse in any form. We know that even when there are no reported cases, it could still be happening but yet to be reported. We do not downplay child-on-child abuse, especially sexual violence and sexual harassment, as "just banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviour, misogyny and an unsafe environment for children. For children to feel safe at our school, we make sure they know child-on-child abuse is not acceptable behaviour and how to report it to a trusted adult if they are experiencing or witnessing it.

All staff are aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator. Child-on-child abuse is preventable, and staff know how to recognise behaviours and indicators of risk early and that timely, evidence-based support can be key to preventing children from going on to commit abuse or violence. We also recognise that it can occur face-to-face or online; between children of any age and sex; through a single child or a group of children assaulting or harassing a single child or group of children.

Children who are victims of harassment and violence (including that of a sexual nature) will likely find the experience stressful and distressing. Harassment and violence exist on a continuum and may overlap; they can occur online and offline (both physically and verbally) and are never acceptable. This will, in all likelihood, negatively affect their educational attainment and be worsened if the alleged perpetrator(s) attends the same school. If a child reports an

incident, they will be reassured that they have done the right thing by telling a trusted adult, will be taken seriously, supported and kept safe. We will further reassure those affected that the law is there to protect them, not criminalise them.

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

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

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying) abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse').
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- Physical assault and harm, or the threat of harm with a weapon.
- Sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence).
- Harmful sexual behaviour, sexual violence and sexual harassment – which may include misogyny/misandry.
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Consensual and non-consensual making or sharing of nudes and semi-nudes, consensual making or sharing of nudes and semi-nudes, including those generated using AI.
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.
- Initiation / hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

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

We recognise that children are capable of abusing other children and their peers and this will be dealt with under our child protection policy and in line with KCSIE (2026). We know that even when there are no reported cases, it could still be happening but yet to be reported.

For children to feel safe at school, we make sure they know child-on-child abuse is not acceptable behaviour and how to report it to a trusted adult if they are experiencing or witnessing it.

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

- Making clear that there is a zero-tolerance approach to **any form** of harassment and violence, (including of a sexual nature) it is never acceptable, and it will not be tolerated.
- Training staff to spot the signs that a child is, or may be experiencing, child-on-child abuse and how to report it. They maintain an attitude that 'it could happen here'.
- Recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported.
- Challenging any inappropriate behaviour between children, including the use of derogatory language or physical behaviour such as grabbing bottoms, breasts and genitalia, pulling

down trousers, and lifting up skirts. As we believe that dismissing or tolerating such behaviours risks normalising them.
- In all areas of school life, such as lessons, assemblies and in the playground, we teach children how to act and to treat other people, including when they are online.
- Having effective systems in place for children to report child-on-child incidents.

Prevention
- Taking a whole school approach to safeguarding and child protection.
- Providing training to staff.
- Providing a clear set of values and standards, underpinned by the school's behaviour policy and pastoral support; and by a planned programme of evidence-based content delivered through the curriculum.
- Engaging with specialist support and interventions.

Responding to allegations of child-on-child abuse
- If a member of staff is concerned about suspected child-on-child abuse, including sexual violence and sexual harassment, they will follow the 'handling a disclosure' procedure set out above.
- They will make a record of the allegation and inform the DSL or a deputy DSL immediately.
- If the DSL and a deputy are not available, due to emergency circumstances, the staff member will speak to a member of the senior leadership team and / or contact the relevant children's services.

Following a concern and depending on the level of risk or harm, the DSL or a deputy DSL will make one of the following decisions:
1. Manage the concern internally providing pastoral support to all those involved.
1. Complete an early help assessment.
2. Make a referral to children's services and / or, where necessary, the police. (The DSL may also choose to consult children's services to assist them with making a decision.)

Please note, the police will always be informed of any criminal offences. (If the child is aged under the criminal age of responsibility, the police will take a welfare approach.)

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

Where the DSL, children's services or the police decide the concern should be handled by the school internally, the school will thoroughly investigate the concern, using our behaviour policy and related processes. Where a safeguarding risk has been identified, a risk assessment and prevention plan will be completed. The plan will be monitored and a date set for a follow-up evaluation with everyone concerned. The school will support all children involved in the incident, including the child/ren who displayed the behaviour and the children who experienced it. This support could take a range of forms including targeted education and prevention work, access to ELSA support and / or an adult mentor.

Responding to allegations of sexual harassment and sexual violence

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously.

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

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

- Children with SEND.
- Children who are lesbian, gay, bisexual or questioning their gender or who are perceived to be lesbian, gay, bisexual or questioning their gender by their peers.

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

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

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

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

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

Unsubstantiated, unfounded, false or malicious reports

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

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

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

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

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

See appendix 7 for further information relating to serious violence and specific types of exploitation. These include:

- Serious violence
- Child sexual exploitation (CSE) and child criminal exploitation (CCE)
- Child sexual exploitation (CSE)
- Child criminal exploitation (CCE)
- Upskirting

See appendix 9 for information relating to other forms of control / illegal practice in this country, including:

- So-called 'honour'-based abuse (HBA)
- Forced marriage
- The one Chance Rule
- Child abuse linked to faith or belief

Harmful Sexual Behaviour (HSB)

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

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

Our DSL and deputy will:

- Have a good understanding of HSB.
- Assist in planning the curriculum aimed at preventing HSB.
- Ensure staff spot and report inappropriate behaviour to prevent an escalation.
- Incorporate our approach to sexual harassment and sexual violence into the whole school approach to safeguarding.

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

- Healthy and respectful relationships.
- What respectful behaviour looks like.
- Gender roles, stereotyping, equality.
- Body confidence and self-esteem.

Where staff have concerns, these will be reported to the school's (DSL) who will consider whether a referral to the C-SPA is appropriate. Based on the nature of the concerns, they will also consider what other types of internal or external support may be appropriate.

The school will refer to the Brook Traffic Light Tool to help them identify and categorise the sexual behaviours of children. The tool can be used to help staff:

- 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.

Useful links:

- Responding to children who display sexualised behaviour
- Sexual development and behaviour in children | NSPCC Learning
- Surrey Safeguarding Children Partnership Procedures Manual- Harmful Sexual Behaviour
- NSPCC Harmful Sexual Behaviours
- Stop it Now
- Shore Space

A guide to identifying sexual behaviours

This 'Traffic Light Tool' forms part of a resource designed to help professionals who work with children and young people to identify, assess and respond appropriately to sexual behaviours.

By identifying sexual behaviours as GREEN, AMBER or RED, professionals across different agencies can work to the same criteria when making decisions and protect children and young people with a unified approach. The normative list aims to increase understanding of healthy sexual development and distinguish it from harmful behaviour.

This tool must be used within the context of the guidance provided at **www.brook.org.uk/traffic-lights** and should not be used in isolation.

SEXUAL BEHAVIOURS
TRAFFIC LIGHT TOOL

brook
www.brook.org.uk

What is a Green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

Expressing sexuality through sexual behaviour is natural, healthy and a part of growing up.

Green behaviours provide an opportunity to positively reinforce appropriate behaviour, and to provide further information and support.

What is an Amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy development. They may be:

- unusual for that particular child or young person
- of potential concern due to age or developmental differences
- of potential concern due to activity type, frequency, duration or the context in which they occur

Amber behaviours signal the need to take notice and gather information to consider appropriate action.

Please refer to internal guidance or safeguarding frameworks to decide on the next steps to take or talk to a designated safeguarding lead.

What is a Red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading, or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration, or the context in which they occur

Red behaviours indicate a need for immediate intervention and action, though it is important to consider actions carefully.

Please refer to internal guidance or safeguarding frameworks to decide on the next steps to take or talk to a designated safeguarding lead.

	Green behaviours	Amber behaviours	Red behaviours
Age 0 – 5	• holding or playing with own genitals • attempting to touch or curiosity about other children's genitals • attempting to touch or curiosity about breasts, bottoms or genitals of adults • games e.g. mummies and daddies, doctors and nurses • enjoying nakedness • interest in body parts and what they do • curiosity about the differences between boys and girls	• preoccupation with adult sexual behaviour • pulling other children's pants down/skirts up/trousers down against their will • talking about sex using adult slang • preoccupation with touching the genitals of other people • following others into toilets or changing rooms to look at them or touch them • talking about sexual activities seen on TV/online	• persistently touching the genitals of other children • persistent attempts to touch the genitals of adults • simulation of sexual activity in play • sexual behaviour between young children involving penetration with objects • forcing other children to engage in sexual play
Age 5 – 9	• feeling and touching own genitals • curiosity about other children's genitals • curiosity about sex and relationships, e.g. differences between boys and girls, how sex happens, where babies come from, same-sex relationships • sense of privacy about bodies • telling stories or asking questions using swear and slang words for parts of the body	• questions about sexual activity which persist or are repeated frequently, despite an answer having been given • sexual bullying face to face or through texts or online messaging • engaging in mutual masturbation • persistent sexual images and ideas in talk, play and art • use of adult slang language to discuss sex	• frequent masturbation in front of others • sexual behaviour engaging significantly younger or less able children • forcing other children to take part in sexual activities • simulation of oral or penetrative sex • sourcing pornographic material online
Age 9 – 13	• solitary masturbation • use of sexual language including swear and slang words • having girl/boyfriends who are of the same or opposite gender • interest in popular culture, e.g. fashion, music, media, online games, chatting online • need for privacy • consensual kissing, hugging, holding hands with peers	• uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing • verbal, physical or cyber/virtual sexual bullying involving sexual aggression • LGBT (lesbian, gay, bisexual, transgender) targeted bullying • exhibitionism, e.g. flashing or mooning • giving out contact details online • viewing pornographic material • worrying about being pregnant or having STIs	• exposing genitals or masturbating in public • distributing naked or sexually provocative images of self or others • sexually explicit talk with younger children • sexual harassment • arranging to meet with an online acquaintance in secret • genital injury to self or others • forcing other children of same age, younger or less able to take part in sexual activities • sexual activity e.g. oral sex or intercourse • presence of sexually transmitted infection (STI) • evidence of pregnancy
Age 13 – 17	• solitary masturbation • sexually explicit conversations with peers • obscenities and jokes within the current cultural norm • interest in erotica/pornography • use of internet/e-media to chat online • having sexual or non-sexual relationships • sexual activity including hugging, kissing, holding hands • consenting oral and/or penetrative sex with others of the same or opposite gender who are of similar age and developmental ability • choosing not to be sexually active	• uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing • concern about body image • taking and sending naked or sexually provocative images of self or others • single occurrence of peeping, exposing, mooning or obscene gestures • giving out contact details online • joining adult-only social networking sites and giving false personal information • arranging a face to face meeting with an online contact alone • accessing exploitative or violent pornography	• exposing genitals or masturbating in public • preoccupation with sex, which interferes with daily function • sexual degradation/humiliation of self or others • attempting/forcing others to expose genitals • sexually aggressive/exploitative behaviour • sexually explicit talk with younger children • sexual harassment • non-consensual sexual activity • use of/acceptance of power and control in sexual relationships • genital injury to self or others • sexual contact with others where there is a big difference in age or ability • sexual activity with someone in authority and in a position of trust • sexual activity with family members • involvement in sexual exploitation and/or trafficking • sexual contact with animals • receipt of gifts or money in exchange for sex

Concerns about mental health

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

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

- Significant changes in behaviour
- Ongoing difficulty sleeping
- Withdrawing from social situations
- Not wanting to do things they usually like
- Physical signs of self-harm or neglecting themselves.

As a school we aim to promote positive mental health for all staff and children. To do so, we take into account the government's Mental health and behaviour in schools guidance. We will ensure early targeted support is provided and liaise with/refer to specialist services where needed. The DSL will consider whether to inform parents/carers to support the child's wellbeing, where doing so would not place the child at additional risk.

We support children who are presenting with a 'mental health' difficulty by offering them:

- A key adult who will 'check in' regularly and provide time to talk.
- Access to agreed strategies that will help managed the presenting need.
- ELSA support or Drawing and Talking therapy.
- Complete a 'safety plan' with the individual concerned and share it with parents and appropriate staff.
- Make a referral to our attached mental health specialist for advice and support.
- Complete urgent reviews to required specialists, including CAMHS etc.

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

Although you may be well placed to observe children day-to-day and identify those whose behaviour suggests they may be experiencing a mental health problem or be at risk of developing one, only appropriately trained professionals should attempt to diagnose a mental health illness. Where necessary, the DSL or a deputy DSL will make a referral to Children's Single Point of Access (CSPA)

Useful links:

- Mindworks Surrey
- Surrey Young Suicide Prevention Toolkit
- The Surrey Self-Harm Protocol
- Install - R;pple Suicide Prevention
- Mind
- NSPCC: Child mental health
- Homepage - Surrey Safeguarding Children Partnership
- Mental health and behaviour in schools - GOV.UK
- Promoting Children and Young People's Emotional Health and Wellbeing GOV.UK
- Better Health Every Mind Matters | Campaigns | Campaign Resource Centre

Domestic Abuse

Domestic abuse can include a wide range of behaviours and may be a single or pattern of incidents. This form of abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional, and includes coercive or controlling behaviour. It can take place inside and outside the home. The Domestic Abuse Act 2021 states that children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and / or suffer domestic abuse in their own intimate relationships (e.g. teenage relationship abuse).

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

As a school we have signed up to the police initiative Operation Encompass, a scheme between Surrey Police, Surrey Domestic Abuse Service and Surrey schools. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the DSL in the school before the child or children arrive at the school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs.

Useful links:

- Surrey Safeguarding Children Partnership Procedures Manual - Domestic Abuse
- Homepage - Surrey Safeguarding Children Partnership
- Surrey Against Domestic Abuse Strategy 2024-2029 | Healthy Surrey
- Multi agency risk assessment conferences | Healthy Surrey
- Request information under Clare's Law: Make a Domestic Violence Disclosure Scheme (DVDS) application | Metropolitan Police
- NSPCC-UK domestic abuse Signs Symptoms Effects
- Refuge what is domestic abuse/effects of domestic abuse on children
- Safe Young Lives | Young people & domestic abuse - SafeLives
- Domestic abuse: specialist sources of support - GOV.UK (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence / abuse)

Homelessness

The school recognises that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL is aware of contact details and referral routes into the Local Housing Authority so they can raise / progress concerns at the earliest opportunity.

Indicators that a family may be at risk of homelessness include: household debt; rent arrears; domestic abuse and antisocial behaviour; and / or the family being asked to leave a property. If a child has been harmed or is at risk of harm, a referral to children's social care will be made.

Useful links:

- Homelessness Reduction Act Factsheets - GOV.UK

Concerns about extremism and radicalisation

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

Extremism is the vocal or active opposition to our fundamental British values. Radicalisation is the process of a person legitimising support for, or use of, terrorist violence. See additional information about radicalisation and extremism in Appendix 6.

Opportunities are provided in the curriculum to enable children to discuss issues of religion, ethnicity and culture and the school follows the Promoting fundamental British values through SMSC and its PSHE curriculum.

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

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

The Educate against hate government website lists signs that could indicate that a child is being radicalised. These include:

- Becoming increasingly argumentative
- Refusing to listen to different points of view
- Unwilling to engage with children who are different
- Becoming abusive to children who are different
- Embracing conspiracy theories
- Feeling persecuted
- Changing friends and appearance
- Distancing themselves from old friends
- No longer doing things they used to enjoy
- Converting to a new religion
- Being secretive and reluctant to discuss their whereabouts
- Changing online identity
- Having more than one online identity
- Spending a lot of time online or on the phone
- Accessing extremist online content
- Joining or trying to join an extremist organisation

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

The DSL may decide to discuss their concerns with children's services and will make referrals to the police Prevent team and / or the Channel programme; however, the DSL will need to seek the individual's consent when referring to the Channel programme.

When making a referral to prevent, the DSL will use the **Prevent referral form** which will then be e-mailed to preventreferrals@surrey.pnn.police.uk. *(**N.B –** This email address is solely for prevent referrals and not general enquires).*

In cases where further advice from the Police is felt necessary, the Prevent Supervisor for Surrey will be contacted by either dialling 101, 07795 043842 or 01865 555618.

Current Prevent leads in and for Surrey are:

- Claire McDonald, Prevent Supervisor, Surrey Police: claire.mcdonald@surrey.police.uk - 07795 043842
- Lara Bowden, Project Officer, Surrey County Council: lara.bowden@surreycc.gov.uk
- Helene Morris - Dfe Regional Prevent Co-ordinator for Southeast - Counter- Extremism. Department for Education Prevent Coordinator for South-East Prevent.SouthEast@service.education.gov.uk

National Prevent referral form (healthysurrey.org.uk)

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

Racist Incidents

Our policy on racist incidents is set out in our behaviour policy and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of racist incidents.

Bullying

Our school policy on anti-bullying is set out in our behaviour and anti-bullying policies, which include measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying).

We keep a record of known bullying incidents which is shared with and analysed by the Governing body/Proprietor/Management Committee. All staff are aware that children with SEND and/or children who identify as Lesbian, Gay, Bisexual, or questioning their gender, those from minority ethnic backgrounds, children open to children's services and children from low-income families are more susceptible to being bullied/victims of child abuse.

Risks can be compounded where children who have additional vulnerabilities lack a trusted adult with whom they can be open. As a result, staff endeavour to reduce the additional barriers faced and create a culture where children can speak out or share their concerns with members of staff.

Also see the school's separate policy – Anti-Bullying.

Children potentially at greater risk of harm

As a school we know that all children need to be protected from harm. In addition, we recognise that some groups of children are potentially at greater risk of harm than others. The information below highlights some of the groups of children this applies to; however, there are several other groups not listed.

Children who have a social worker

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

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

The Virtual School is a statutory service that exists to provide advice and support for children who have a social worker, children placed in care and children who were previously looked after. The aim of this service is to help ensure these children have the opportunities required to meet their full educational potential. Where needed, our school works with the Virtual school to support these children.

Children looked after and previously looked after

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

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

Useful links:

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

Also see the school's separate policy - Looked After Children.

Young Carers

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

Children in a Private Fostering Arrangements

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

A child who is looked after or placed in any residential home, hospital or school (where they are receiving full-time education) is excluded from the definition and therefore not considered privately fostered. In a private fostering arrangement, the parent retains parental responsibility. However, children under 16 who spend more than 2 weeks in residence during holiday time in a school, become privately fostered children for the purposes of the legislation during that holiday period. See also Schedule 8 (para 9) Children Act 1989.

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

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

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

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

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

Useful links:
Multi agency risk assessment conferences | Healthy Surrey

Children with special educational needs and disabilities
Our Special Educational Needs Co-ordinator and DSL work closely together to safeguard and support children who have special educational needs and disabilities (SEND), in particular when there are any reports of abuse. Our safeguarding curriculum, i.e. the ways we teach children to keep themselves and others safe, is adapted to meet the needs of children with SEND.

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

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

We offer additional pastoral support for children with SEND, including (where necessary), additional adult support in the classroom, an adult mentor to support them in school, and access to ELSA / Drawing and Talking Sessions.

Useful links:

- Surrey Safeguarding Children Partnership Procedures Manual Children with Disabilities/Complex Needs

Also see the school's separate policy – SEND Policy.

Children with medical conditions

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

Useful links:

- Supporting pupils with medical conditions at school - GOV.UK
- Allergy safety in schools - GOV.UK

Children who are lesbian, gay or bisexual

Staff at school know that a child or young person being lesbian, gay, or bisexual is not in itself a risk factor for harm but they can sometimes be vulnerable to discriminatory bullying. We will take steps to prevent discriminatory bullying and put appropriate sanctions in place where this has been reported.

Children who are questioning their gender

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

As a school staff will normally work in partnership with parents/carers when supporting a child who is questioning their gender. However, where involving parents/carers could place a child at risk of significant harm, appropriate safeguarding procedures will be followed, and advice will be sought from the DSL. Any requests relating to social transition or other significant changes will be considered carefully on a case-by-case basis, with decisions informed by safeguarding considerations, professional judgement and, where appropriate, advice from relevant agencies. The school will take all reasonable steps to protect children who are questioning their gender from bullying, harassment, discrimination, abuse and victimisation and will maintain appropriate records of concerns, decisions and support arrangements.

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

The school recognises that when children are absent from education, this can be a vital warning sign of a range of safeguarding possibilities. They are also at significant risk of underachieving, being victims of abuse and harm, exploitation, radicalisation, and not being in education, employment or training (NEET) later in life.

Where possible the school will hold more than one emergency contact number for each child. If a child goes 'missing from education' contact will first be made with the child's parents to find out where they are and why they are not in school. Where a concern exists contact will be made with the Surrey Inclusion Service. Depending on the nature of the concern, the school may also make contact with children's services or the police.

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

When removing a child's name, the school will notify Surrey County Council of:
(a) The full name of the child.
(b) The full name and address of any parent with whom the child normally resides.
(c) At least one telephone number of the parent.
(d) The child's future address and destination setting, if applicable.
(e) The ground in regulation 8 under which the child's name is to be removed from the school's register.

The school will make reasonable enquiries to establish the whereabouts of a child, jointly with the Local Authority, before deleting the child's name from the school's register; if the deletion is under regulation 8(1), sub-paragraphs (f) (iii) and (h) (iii)of The Education (Pupil Registration) (England) 2006 (amended 2016).

For any child joining the school will:
- Enter child/ren on the admissions register on the first day the school has agreed, or has been notified, that the child will attend the school.
- Notify Surrey County Council, within five days, of adding a child's name to the admission register. The notification must include all the details contained in the admission register for the new child.
- Monitor each child's attendance through the daily register and follow Surrey County Council's procedure in cases of unauthorised absence.
- Remove a child's name from the admissions register on the date that they leave the school.
- The school will notify Surrey County Council when they are about to remove a child's name from the school's 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.

Also see the school's separate policy - Safeguarding Children Missing in Education

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

The school will gain consent from parents / carers to put in place alternative provision and /or a reduced or modified timetable.

The school will ensure that parents / carers (and the Local Authority where the child has an Education Health Care Plan (EHCP).

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

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

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

The school's leadership will report to governors information regarding the use and effectiveness of alternative provision and modified/reduced timetables. The school will also report to Governors any formal direction of a child to alternative provision to improve behaviour.

Also see the school's separate policy – Safeguarding – Children Missing in Education Policy.

Children absent from education

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

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

Our attendance policy and procedures are set out in a separate document, which can be found **here.** The school follows the government's Working together to improve school attendance statutory guidance which sets out how schools must work with the local authority children's services where school absence indicates safeguarding concerns.

Useful links:

- The Inclusion Service Resources Area (Surrey Education Services)
- Inclusion Service - Pupils missing out on education (PMOOE) (Surrey Education Services)
- Children Missing Education statutory government guidance
- Surrey Safeguarding Children Partnership Procedures Manual Children Missing Education

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

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

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

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

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

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

Useful links:
- Crime - Surrey Safeguarding Children Partnership
- Modern slavery - GOV.UK
- Modern slavery: how to identify and support victims
- Behind the Behaviour: Identifying the criminal exploitation of migrant children | ECPAT UK
- Protecting children from trafficking and modern slavery | NSPCC Learning
- Surrey Safeguarding Children Partnership Procedures Manual Children from Abroad, including Victims of Modern Slavery, Trafficking and Exploitation

Identified areas of risk for our school
The DSL attends the Police and Education Intelligence Briefings. These briefings help identify current localised risks which could present possible safeguarding risks for our children. Where this is deemed to be the case, staff will be made aware so that they can be extra vigilant, and any additional safeguards felt necessary are implemented within the school.

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

Confidentiality, Sharing and Withholding Information

The school takes our responsibility to protect and look after the data (information) we hold about children and our families seriously. The Data takes our responsibility to protect and look after the data (information) we hold about children and our families seriously. The Data Protection Act (DPA) 2018, the General Data Protection Regulation (GDPR) and the Data (Use and Access) Act 2025 guide us in how to do so. Under the DPA 2018, we will share information without consent if 'the safeguarding of children and individuals at risk' is our reason for doing so, and It is not possible to gain consent.

- It cannot be reasonably expected that a practitioner (for example, teacher) gains consent, or
- To gain consent would place a child at risk.

The government's information sharing advice for safeguarding practitioners supports staff who have to make decisions about sharing information. Staff are aware they can look at the data protection in schools toolkit or speak to a member of the safeguarding team if they are unsure about sharing information. Government guidance emphasises that: "The Data Protection Act 2018 and GDPR and Data (Use and Access) Act 2025 do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children."

To keep children safe, we will share information in a timely manner including sharing information with agencies and professionals in line with the Working Together to Safeguard Children 2023 guidance. We respect that safeguarding matters are personal to families, so the DSL, deputy and headteacher will only share information about a child to members of staff and professionals on a need-to-know basis.

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

Notifying parents or carers

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

Useful links:

- Information Sharing
- For organisations | ICO
- Sharing information to safeguard children and young people in the education sector in the UK | ICO

Record Keeping

Each child has an electronic safeguarding file on CPOMS where all safeguarding concerns and referrals are stored. The designated safeguarding lead is responsible for keeping written records of all concerns, discussions and decisions, including the rationale for those decisions. Records reflect the reason why referrals are or are not made to another agency, such as children's services or the Prevent program. Safeguarding files will be stored securely, and access will be limited to those who need it.

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 as soon as possible and report this via CPOMS. Information should include:
   - Date
   - Time
   - Place
   - Who was present
   - Context
   - Details of disclosure/concern (using the child's words)
   - Demeanour/non-verbal behaviours of the child
   - Child's voice
   - Any injuries
   - Rationale for decision making
   - Actions taken
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. The records must be signed & dated by the author or / equivalent on electronic based records.
5. In the absence of the DSL or DDSL, staff must be prepared to and know how to refer directly to C-SPA (and the Police if appropriate) if there is the potential for immediate significant harm or contact the consultation line at the C-SPA for support and advice.

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

If we are the last school that the child attends, their safeguarding file will be securely stored by the school until their 25th birthday is reached, when it will be securely disposed of.

Use of physical intervention

We recognise that sometimes touch is appropriate in the context or working with children. All staff have been given safe practice guidance to ensure they're clear about professional boundaries.

We acknowledge that staff must only ever use physical intervention as a last resort, when a child is at immediate risk of harming themselves or others, and that at all times it must be the minimal force necessary to prevent injury to another person. Such events should be fully recorded and signed by a witness.

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

Staff understand that physical intervention, of a nature which causes injury or distress to a child, may be considered under child protection and / or disciplinary procedures.

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

of physical intervention is likely, the child will have their own risk assessment / behaviour management plan in place.)

Also see the school's separate policy – Use of Restrictive Interventions Policy.

Concerns or allegations made about adults in our school

If you have a low-level concern or have an allegation to make about a member of staff presenting a risk to children, speak to the headteacher immediately. This includes any concerns in school, out of school, online and / or offline. ***(N.B –** If an allegation is made against the Headteacher, the concern needs to be raised with the Chair of governors or directly with the LADO if they are not available.)*

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

- Behaved in a way that has harmed a child, or may have harmed a child
  and / or
- Possibly committed a criminal offence against or related to a child
  and / or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
  and / or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

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

Where the allegation is in relation to a member of supply staff or trainee teacher, the school will inform the agency/teacher training provider of the process for managing allegations and ensure they are fully involved in enquiries.

The school may also receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities).

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

- Report any concerns to the Headteacher immediately, who will consider whether an onward referral to the LADO is required.
- If an allegation is made against the Headteacher, the concerns need to be raised with the chair of governors as soon as possible. If the chair of governors is not available, then the LADO should be contacted directly.
- There may be situations when the Headteacher or chair of governors will want to involve the Police immediately if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.
- Once an allegation has been received by the Headteacher or chair of governors they will contact the LADO (as part of their mandatory duty) on 0300123 1650 option 3 LADO or Email: LADO@surreycc.gov.uk immediately and before taking any action or investigation.
- Following consultation with the LADO inform the parents / carers of the allegation unless there is a good reason not to.
- In liaison with the LADO, the school will determine how to proceed and if necessary, the LADO will refer the matter to Social Care and / or the Police.
- If the matter is investigated internally, the LADO will advise the school to seek guidance in following procedures set out in part 4 of KCSIE (2025) and the SSCP procedures.

For further details of how concerns or allegations are managed, please refer to the school's 'Managing allegations of abuse made against staff or volunteer's policy' which can be found on the school's website.

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

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

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

The organisation aims to create an environment where staff are encouraged and feel confident to self-refer where they have found themselves in a situation.

Reports should be made to the William Neale (headteacher), or if required, Karen Handley (chair of governors) in a timely manner. If the either of these people have any doubt as to whether the information which has been shared about the individual, as a low-level concern, in fact meets the harm threshold, they will consult with the LADO.

Useful links:

- Surrey Safeguarding Children Partnership Procedures Manual Allegations Against Staff or Volunteers
- Surrey Safeguarding Children Partnership Procedures Manual Non-recent Abuse Policy

Whistleblowing

A whistleblower is a worker who reports certain types of wrongdoing. All staff have a duty to do so. We aim to create an environment where staff feel able to raise concerns about poor or unsafe practice and potential failures in how we manage safeguarding. Any concerns should be raised with the senior leadership team and will be taken seriously. As a school we have a separate whistleblowing policy, which lists the procedures for raising concerns. This can be found on our school website.

Whistleblowing regarding the Headteacher should be made to the chair of governors who can be contacted at ChairofGov@Clarendon.surrey.sch.uk.

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

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

Where staff feel unable to raise a concern with our senior leadership team or feel that their genuine safeguarding concerns are not being addressed, there are other options available to them, such as the NSPCC whistleblowing advice line. Staff can call 0800 028 0285 from 8am-8pm or email: help@nspcc.org.uk.

Also see the school's separate policy – Whistle Blowing Policy.

Online safety and the use of smart devices

This section summarises our whole school approach to online safety and the use of smart devices (e.g. mobile phones, smart watches, tablets etc). Our detailed approach is covered in our online safety which can be accessed via our school website. This policy aims to empower us to protect and educate pupils, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. The school also has a clear policy on the use of mobile phones, which can also be found on our school website.

As a school we understand the significant and essential role that we have in making sure children are protected from potentially harmful and inappropriate online material, and learn about online safety as part of their curriculum / school life.

Our aim is to:

- Have in place online safety processes that protect our children and staff including how we identify, intervene in and escalate online concerns, where appropriate.
- Make sure technology is used responsibly and safely through education.
- Set clear expectations for the use of mobile phones and smart technology.

We fulfil our aims by:

- Ensuring appropriate filtering and monitoring systems are in place on the school's network and devices.
- Educating children to learn how to keep themselves safe when, what to do if they are harmed or spot a risk, and what the consequences are if they break the school rules about online safety.
- Engaging with parents and carers about what online safety looks like.
- Making sure our whole school approach is reflected in all relevant policies.
- Regularly training staff on online safeguarding risks and how to be online safely.
- Making sure children, staff, parents / carers, governors and volunteers sign an understandable acceptable use agreement that covers how they should use the school's IT systems and their mobile and smart technology.
- Making parents / carers, children and staff aware that staff can search an electronic device they have confiscated. See government guidance for Searching, Screening and Confiscation.

Due to constant changes to online technology and the related harms, we will carry out an annual review and risk assessment of our online safety policies, procedures and systems.

Whilst the breadth of issues classified within online safety is considerable and ever evolving, they can be categorised into four areas of risk, content, contact, conduct and commerce.

The 4Cs

Whilst being online can be a great source of fun, entertainment, communication and education, some people's online behaviour places others at risk. The number of issues covered under online safety is large and constantly growing; however they can be categorised into the following four areas of risk:

Content: being exposed to illegal, inappropriate or harmful content, for example: 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 generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and

adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

Conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images including those generated using AI and online bullying.

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

Where staff have an online safety concern about a child, this should be reported to the DSL (or deputy DSL in their absence), with details of the concern reported electronically via CPOMs. The DSL (or deputy DSL), will review this concern and identify an appropriate course of action, which could include one of the following:

- Education and support for the child / family in question regarding safe / appropriate use of the internet / smart technology. (This work may also include, where appropriate, the provision of appropriate support material.)
- Depending on the nature of the concern the completion of a referral to an external agency for advice and support, e.g. children's services via the CSPA or prevent.
- In cases where it is felt the child is at immediate risk, contact with the police.

Mobile phones and smart technology (including smart watches and glasses)

Many children have unlimited and unrestricted access to the internet via mobile phone networks, and as result could be harmed or harm others online when at school. This may include sexually harassing, bullying and the making or sharing of nudes or semi-nudes (often via large chat groups). To protect children from these risks while they are at our school the following procedures are in place:

- Whilst the school is a is a mobile phone free environment by default, older children are allowed to bring their mobile phones to school, which have to he handed in as they come through the school gate at the start of the day. (For children that require the use of a mobile phone for medical reasons, a separate risk assessment and procedure will be implemented.)
- The use of smart watches by children is not permitted in school, and the use of 'meta glasses in school is not permitted by anyone.
- The dangers of inappropriate use of mobile phones / smart technology are taught to the children, and regularly revisited, particularly when an issue as occurred or brought to the school's attention.
- All staff, governors and volunteers in school are expected to read, sign and follow the schools' acceptable user agreement'.
- Staff do not have their phones on in the classroom or early year's setting.
- Each class has their own class iPad to use for taking photos and videos of the children and their work. (These are only taken for the purposes of learning and evidencing outcomes.)
- Professional contact with parents / carers is only made using school equipment.
- Parents are only allowed to film or photograph school performances; however, they this is for personal use and parents are informed that they are not allowed to post them on, e.g. social media. (Permission has been sought for this.)
- Phones used on an off-site school visit, e.g. so that staff can keep in contact with each other, form part of the school visit's risk assessment. (Parents are not permitted to use their phones or photograph the children.)

The school's online safety policy, behaviour policy, staff code of conduct, mobile phone policy and use of staff issued mobile phone policy can be found on the school's website.

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

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

Filtering and monitoring

To limit children's exposure to online risks from our IT systems, we have strong and effective filtering and monitoring systems in place, which follow the government's Meeting digital and technology standards in schools and colleges guidance. We also follow the government's Plan technology for your school guidance to self-assess against the filtering and monitoring standards and receive personalised recommendations on how to meet them.

As a school we will make sure that:

- Specific staff have assigned roles and responsibilities to manage systems.
- Staff know about the systems in place and how to escalate concerns.
- There are annual reviews of the systems, or more frequently if there is a significant change or issue.
- Our governing body reviews the systems in place with the DSL, IT staff and service providers, to find out what more can be done to keep children safe.
- The systems are effective for the age range of children and consider children potentially at greater risk of harm.
- When we block online content, it does not impact teaching and learning.
- Filtering works across all school devices including mobile devices and smart technology.

Our filter and monitoring systems take place in 3 main ways in order to help us closely monitor and review computer use across the school, take any action required to ensure this technology is appropriately used and ensure children remain safe when accessing content online in school

1. **Daily emails from Talk Straight which identifies website searches under the following categories. These are reviewed by the headteacher / DSL:**
   - Illegal online content
   - Inappropriate online content
   - Copyright infringement
   - Security related risks
   - All denied keywords.
   - Top 10 search words.
2. **Monthly checks to test or filtering systems.** These are completed by Mrs Stondzik our online safety co-ordinator.
3. **Ongoing user monitoring reports completed by Senso**. These flag any word searches or words typed that appear on their 'filtering watch list' immediately to the DSL. These screenshots of these are reviewed with any concerns either followed up with the user.

Remote education

In the rare event of children needing to be taught remotely, e.g. at home, school staff will be in regular contact with parents and carers. The school will also make sure parents and carers are aware of:

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

Information security and access systems

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

Children are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated. The school's online safety co-ordinator is Louise Stondzik – deputy headteacher.

Children with particular skills and interests in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the DSL will consider a referral into the Cyber Choices programme which aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

If required, seek further advice and support from Surrey children's service's consultation line.

Useful links:

- Childnet International
- Safer Internet Centre webpages
- Generative AI: product safety expectations
- Generative artificial intelligence (AI) in education - GOV.UK
- Using AI in education settings: support materials - GOV.UK

Lettings and off-site arrangements

When services or activities are provided by the governing body, under the direct supervision or management of our school staff, the safeguarding procedures listed in this policy will apply; however, this may not be the case when we hire or rent the out school to other organisations or individuals, such as community groups, sport associations and extra-curricular activities providers. Where this is the case the school will make sure there are arrangements in place to keep children safe, regardless of whether they are children at our school.

To make sure the provider has the appropriate safeguarding arrangements in place, we will follow the government's Keeping children safe during community activities, after-school clubs and tuition non-statutory guidance and operate a clear lettings procedures which includes the school sharing our expectations and obtaining relevant documentation with the person / company making the letting. This includes:

- Public liability insurance certificate
- Qualification certificates, if appropriate
- DBS certificate if appropriate
- Letting agreement with the school

Where the letting involves children, providers are also expected to:

- Complete and return Partnership Agreement
- Agree to, and sign our expectable use of ICT agreement.
- Give the school a copy of their DBS check and public liability insurance certificate.
- Sign in and out of the school via the INTENTRY system in the school office. (This includes the reading of our safeguarding statement.)

- Meet with the deputy headteacher, before starting, for an induction meeting to the school and discussion regarding the planned programme being delivered as well as details of the school's DSL and DDSL.
- Give the school a copy of copies of the providers safeguarding training certificates.
- Give the school a copy of risk assessments relating to their activity
- The school a copy of signed confirmation that they have read and understood 'Keeping Children Safe in Education - Part 1)
- Complete a register of attendees and return to the office.
- Provide a copy of their staff's safeguarding training and details of their DSL. (Where relevant.)
- Sign a copy of the staff code of conduct.
- Provide copies of required qualifications. (Where relevant.)

If the provider does not follow the listings agreement, above expectations and safeguarding requirements, the school will terminate our agreement with the provider

Extended school and off-site arrangements

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

When our children attend an alternative provision provider, we continue to be responsible for their safety and wellbeing. We will satisfy ourselves that the placement can meet the child's needs and obtain written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. checks that we would otherwise perform on our own staff. This includes written confirmation that the alternative provider will inform us of any arrangements that may put the child at risk (i.e. staff changes), so that we can ensure ourselves that appropriate safeguarding checks have been carried out on new staff. We will always know where a child is based during school hours. This includes having a record of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. We will regularly review the alternative provision placements we make. Reviews will be at least half termly to provide assurance that the child is regularly attending, and the placement continues to be safe and meets the child's needs. Where safeguarding concerns arise, the placement will be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed. (This process is in line with the government's statutory guidance for alternative provision which we follow in as a school.

Where a parent / carer expresses their intention to educate their child at home (also known as elective home education), we will work together with the parent / carer and other professionals to ensure that this decision has been made in the best interests of the child. We recognise that this is particularly relevant for children who have SEND, are vulnerable and / or have a social worker.

Useful links:

- Education provision for SEND - Surrey County Council
- Alternative Provision: Alternative Curriculum Pathways and Reintegration Support - Surrey County Council

Staff Training

Designated safeguarding lead

The designated safeguarding lead will attend regular training to prepare and assist them in leading the school's safeguarding response and approach. Additional training or research may be required

as local or school specific safeguarding issues arise. Minimally, the designated safeguarding lead will:

- That on appointment, the DSL and DDSL initially undertake Surrey DSL 'New to Role' with 'Refresher' training at least every two years as well as attending DSL network events, to refresh knowledge and skills.
- Stay up to date with safeguarding knowledge, resources and changes.
- Have a good understanding of, and form a good relationship with, the Surrey Safeguarding Children Partnership by attending the triannual DSL Network events, sharing the learning with staff as appropriate and making sure staff are aware of any safeguarding training on offer.
- Attend harmful sexual behaviour and Prevent awareness training.
- Receive and share safeguarding (including online safety) updates with staff.
- Make sure staff have regularly updated safeguarding training, updating staff who miss training at the earliest opportunity.
- Gain an understanding of how the school's filtering and monitoring systems work and how they can be best used to keep children safe at our school.

Governors

All governors receive safeguarding and child protection training (including online safety) at induction, which prepares them for testing and challenging the school's procedures and policies, making sure they are working as they should. The training will be regularly updated. In addition to this:

- The governing body will make sure the designated safeguarding lead has the time and resources to attend training.
- The chair of governors will receive training about managing allegations against the headteacher to assist them in the eventuality that an allegation is made.
- The governing body will make sure that online safety is a theme in all staff training.
- Senior members of the board will make sure that those involved with the recruitment and employment of staff to work with children have received appropriate safer recruitment training.
- The link safeguarding governor will make sure that staff and governors attend safeguarding training at induction and regularly after that. The link safeguarding governor will attend regular training and receive e-bulletins or equivalent to stay up to date with the latest statutory guidance.
- The governing body will make sure at least one member of every recruitment panel has completed safer recruitment training within the last five years. The school has a separate safer recruitment policy that explains what safeguarding checks are completed before employment to make sure those who work with children are suitable. A copy of this policy can be found on the school website.

Useful links:

- Check a teacher's record
- Individuals prohibited from managing or governing schools

All staff

Governors recognise the expertise that staff build up by managing safeguarding concerns on a daily basis and, as a result, have the opportunity to contribute to and shape staff training and this policy. All staff receive safeguarding and child protection training (including online safety) at induction. The training is regularly updated and reflects the whole school approach to keeping children safe. In addition, staff receive regular, at least annual, safeguarding updates (for example, via email, e-bulletins and staff meetings) to provide them with what they need to keep children safe.

Our training ensures that staff:

- Can spot the signs of possible abuse, neglect and exploitation.
- Know the school's safeguarding procedures and their role in carrying them out.

- Have awareness of and understand their role in the early help process and the process for making a referral to the local authority's children's services, including what may follow after a referral.
- Know what to do if a child tells them they are being harmed, including how to manage this information confidentially.
- Understand the reasons why children may not feel ready or know how to tell someone that they are being harmed.
- Receive Prevent training, which will prepare them for identifying children at risk of being radicalised into terrorism and how to challenge extremist ideas.
- Understand what cyber security the school has in place to keep children and staff safe when online at school and how to report any issues.
- Understand what ineffective filtering and monitoring systems look like and how to report any concerns or issues.
- Know that children who identify as or are perceived to be lesbian, gay, bisexual or questioning their gender can be targeted by other children.
- Know what to do if they have concerns about a member of staff (including supply staff, trainee teachers, volunteers and contractors) posing a risk of harm to children.

We make sure that staff members provided by other agencies and third parties, for example supply teachers and contracted staff (such as catering staff) are aware of this policy, our school's safeguarding procedures, and have received appropriate safeguarding training.

The headteacher will receive training about managing allegations against staff to assist them in the eventuality that an allegation is made.

The designated teacher for children who are looked after (CLA)

We follow the Role and responsibilities of the designated teacher's statutory government guidance. The designated teacher will have training to make sure they understand the needs of children looked after / previously looked after and how they can best be supported to have the same opportunities as their peers. They will work closely with Surrey Virtual School accessing their training and forums to stay up to date.

Teaching and learning

As a school we aim to prevent our children from coming to any harm. We recognise how important it is that we teach and role-model to children how to keep themselves and others safe. Our curriculum meets the needs of all children, including those with SEND and / or those that have been abused. It is taught both explicitly in subjects such as computing, science, PE and PSHE, and more widely across the school as part of assemblies, visitors to school and 'special' days / weeks.

As part of our school culture, children are encouraged to have an active voice and appropriately share and explore their ideas and opinions both in class and through teaching opportunities as well as through involvement in either out school council or through our nurture ambassadors.

If specific safeguarding issues arise during the school year, the headteacher will make sure the curriculum is adapted to cover current issues.

Useful links:

- Relationships Education, Relationships and Sex Education and Health Education guidance
- Promoting children and young people's mental health and wellbeing - GOV.UK
- Promoting Fundamental British Values as part of SMSC in schools (guidance for maintained schools on promoting basic important British values as part of pupils' spiritual, moral, social and cultural (SMSC))

- SMSC requirements for independent schools (guidance for independent schools on how they should support pupils' spiritual, moral, social and cultural development)
- PSHE: Relationships & Sex Education an Health Education Guidance
- PSHE Drug Education Teaching and Learning Resource EYFS-KS5
- Surrey Young People's Substance Misuse | Catch22
- Teaching about relationships, sex and health - GOV.UK

Linked policies

This policy is one of a range of documents that set out what our responsibilities are and how we should carry them out. Other relevant documents include

• Safeguarding Audit • Recruitment and Selection Policy • Whistle blowing and Managing Allegations against staff Policy • Staff Code of Conduct Policy • Complaints policy • Behaviour Policy • Positive Touch and Restraint Policy	• Online Safety Policy • Use of mobile phones Policy • School Attendance Policy • Administration of medicines Policy • Health & Safety Policy • Health and Safety Audit • First Aid Policy

It also links with other policies in school, including:

• Anti-bullying Policy • Looked After and Previously Looked After Children Policy • Curriculum Policy • Teaching and Learning Policy • Keeping School's Safe Policy • Intimate Care Policy • Volunteer Policy • PSHE and Citizenship Policy	• Attendance Policy • Responding to Parental Concerns Policy • Relationship and Sex Education Policy • Drug and Alcohol Policy • Educational Visits Policy • Fire and Lockdown Policy • Safer Recruitment Policy • Equality Policy • Children with Medical Needs

Appendix 1 – additional information about Neglect

Indicators of abuse - Neglect

The nature of neglect:
Neglect is a lack of parental care but poverty and lack of information or adequate services can be contributory factors.

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

Neglect can include parents or carers failing to:
- provide adequate food, clothing and shelter
- protect a child from physical and emotional harm or danger
- ensure adequate supervision or stimulation
- ensure access to appropriate medical care or treatment

NSPCC research has highlighted the following examples of the neglect of children under 12 years old:
- frequently going hungry
- frequently having to go to school in dirty clothes
- regularly having to look after themselves because of parents being away or having problems such as drug or alcohol misuse
- being abandoned or deserted
- living at home in dangerous physical conditions
- not being taken to the doctor when ill
- not receiving dental care

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

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

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

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

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

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

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

Appendix 2 – additional information about Emotional Abuse

Indicators of abuse - Emotional abuse

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

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

Indicators of emotional abuse
Developmental issues
- Delays in physical, mental and emotional development
- Poor school performance
- Speech disorders, particularly sudden disorders or changes

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

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

Emotional responses
- Extreme fear of new situations
- Inappropriate emotional responses to painful situations ("I deserve this")
- Fear of parents being contacted
- Self-disgust
- Low self-esteem
- Unusually fearful with adults
- Lack of concentration, restlessness, aimlessness
- Extremes of passivity or aggression

Appendix 3 – additional information about Physical Abuse

Indicators of abuse - Physical abuse

The nature of physical abuse:
Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly, it is not necessary to be concerned about most of these minor injuries. But accidental injuries normally occur on the *bony prominences* – e.g. knees, shins.

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

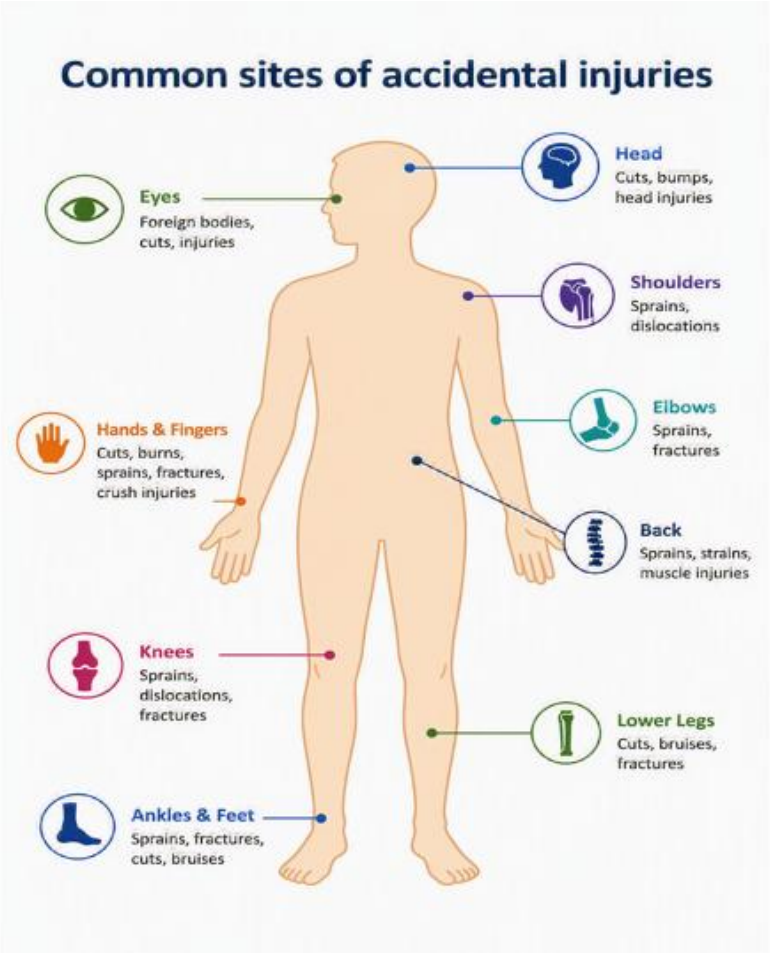
Indicators of physical abuse / factors that should increase concern
- Multiple bruising or bruises and scratches (especially on the head and face)
- Clusters of bruises – e.g., fingertip bruising (caused by being grasped)
- Bruises around the neck and behind the ears – the most common abusive injuries are to the head
- Bruises on the back, chest, buttocks, or on the inside of the thighs
- Marks indicating injury by an instrument – e.g., linear bruising (stick), parallel bruising (belt), marks of a buckle
- Bite marks
- Deliberate burning may also be indicated by the pattern of an instrument or object – e.g., electric fire, cooker, cigarette
- Scalds with upward splash marks or *tide marks*
- Untreated injuries
- Recurrent injuries or burns
- Bald patches

In the context of the school, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when:
- the explanation given does not match the injury
- the explanation uses words or phrases that do not match the vocabulary of the child (adults words)
- no explanation is forthcoming
- the child (or the parent/carer) is secretive or evasive
- the injury is accompanied by allegations of abuse or assault

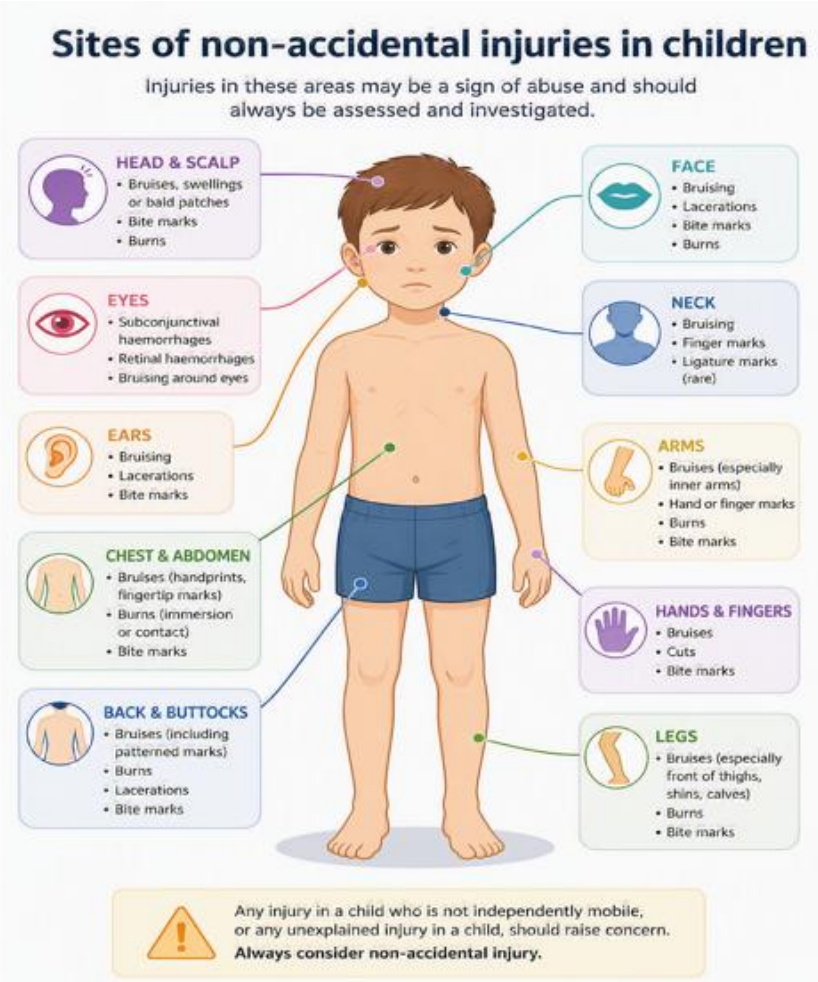
You should be concerned if a child:
- is reluctant to have parents/carers contacted
- runs away or shows fear of going home
- is aggressive towards themselves or others
- flinches when approached or touched
- is reluctant to undress to change clothing for sport
- wears long sleeves during hot weather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

Remember accidental injuries typically:

- Involve bony areas of the body
- Match the history of the accident
- Are in keeping with the development of the child



Remember:
Concerns are raised by –
-Injuries to both sides of the body
-Injury to soft tissue
-Injuries with particular patterns
-Injury that does not fit the explanation
-Delays in presentation
-Untreated injuries.



Appendix 4 – additional information about Sexual Abuse

Indicators of abuse – Sexual abuse

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

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

Most people who sexually abuse children are men, but women and other children can commit sexual abuse too.

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

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

Appendix 5 – additional information about Sexual Violence, Consent and Sexual Harassment

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

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

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

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

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

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

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

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

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

Sexual harassment
When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment.

Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

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

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names.
- Sexual "jokes" or taunting.
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes. School's should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim.

- Displaying pictures, photos or drawings of a sexual nature.
- Upskirting (this is also a criminal offence).
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - Consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of U18s is a criminal offence. . Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK (www.gov.uk)
  - Sharing of unwanted explicit content.
  - Sexualised online bullying.
  - Unwanted sexual comments and messages, including, on social media.
  - Sexual exploitation; coercion and threats.
  - Coercing others into sharing images of themselves or performing acts they're not comfortable with online.

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

Appendix 6 – additional information about Radicalisation and Extremism

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence. It can occur over a period of time or quickly. In some cases it is triggered by a specific incident or news item and can happen much quicker. Sometimes there are clear warning signs of radicalisation, in other cases the changes are less obvious. There is no single route to radicalisation; however, there are some behavioural traits that could indicate a child has been exposed to radicalising influences.

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

Terrorism is an action that:
- Endangers or causes serious violence to a person/people
- Causes serious damage to property, or
- Seriously interferes or disrupts an electronic system.

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

The Educate against hate government website lists signs that could indicate that a child is being radicalised:
- becoming increasingly argumentative
- refusing to listen to different points of view
- unwilling to engage with children who are different
- becoming abusive to children who are different
- embracing conspiracy theories
- feeling persecuted
- changing friends and appearance
- distancing themselves from old friends
- no longer doing things they used to enjoy
- converting to a new religion
- being secretive and reluctant to discuss their whereabouts
- changing online identity
- having more than one online identity
- spending a lot of time online or on the phone
- accessing extremist online content
- joining or trying to join an extremist organisation

Possibly indicators of vulnerability include:
- **Identity Crisis –** the student / child is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
- **Personal Crisis –** the student / child may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
- **Personal Circumstances –** migration; local community tensions; and events affecting the student / child's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
- **Unmet Aspirations –** the student / child may have perceptions of injustice or a feeling of failure,
- **Experiences of Criminality –** which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration;
- **Special Educational Needs and Disability –** students / children may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

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.

Again, 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.

Useful links:

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

Appendix 7 – information relating to serious violence and specific types of exploitation.

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

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

Some of the following can be indicators of both child criminal and sexual exploitation where children:
- appear with unexplained gifts, money or new possessions
- associate with other children involved in exploitation
- suffer from changes in emotional well-being
- misuse alcohol and other drugs
- go missing for periods of time or regularly come home late
- regularly miss school or education or do not take part in education

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

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. This can be committed by an individual or an organised network. Most sexual abuse is committed by those previously known to the victim. Some children may not realise they are being exploited, for example believing they are in a genuine romantic relationship.

CSE can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Some additional specific indicators that may be present in CSE are children who:
- have older boyfriends or girlfriends
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development
- become pregnant

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

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. CCE can include children being forced and/or manipulated:
- to work in cannabis factories.
- into moving drugs or money across the country (county lines).
- to shoplift or pickpocket.
- to threaten serious violence to others.
- into committing vehicle crime.

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

Serious violence
Staff will be aware that serious violence may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying and can also be associated with criminal exploitation.

Staff will report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the DSL or DDSL.

Staff will be aware of the indicators, which may signal children are at risk from, or are involved in serious violence.

Indicators which may signal children are at risk from, or are involved with, serious violent crime may include:
- increased absence from school.
- a change in friendships or relationships with older individuals or groups.
- a significant decline in performance.
- signs of self-harm or a significant change in wellbeing.
- signs of assault or unexplained injuries.
- unexplained gifts or new possessions (could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation).

The range of risk factors increasing the likelihood of involvement in serious violence include:

- being male.
- having been suspended, spent time in Alternative Provision or permanently excluded from school.
- having experienced child maltreatment.
- having been involved in offending, such as theft or robbery.

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

Useful links:

- Home Office – Serious Violence Strategy, April 2018
- Homepage - Surrey Safeguarding Children Partnership
- Crime - Surrey Safeguarding Children Partnership
- Preventing youth violence and gang involvement government guidance
- Criminal exploitation of children and vulnerable adults: county lines government guidance
- Child exploitation | Catch22
- Keeping kids safe - Children's Commissioner for England | Children's Commissioner for England

Upskirting

‘Upskirting’ is a criminal offence and will not be tolerated. The Criminal Prosecution Service (CPS) defines 'upskirting' as: “a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person’s clothing to take a voyeuristic photograph without their permission”.

The management of an ‘upskirting’ incident needs to be decided on a case-by-case basis, with the DSL or a deputy DSL taking a leading role and using their professional judgement, supported by other agencies, such as children’s social care and the police, as required.

Appendix 8 – Further information about Female Genital Mutilation (FGM)

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

Signs that FGM might happen:

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

Signs FGM might have taken place:

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

Useful information:

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

Appendix 9 – additional information relating to other forms of control / illegal practice in this country

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

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

An arranged marriage is different. The families of both spouses take a leading role in arranging the marriage, but the choice of whether or not to accept the arrangement remains with those who are considered for marriage.

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

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

The one Chance Rule
There is a 'One Chance' Rule' in relation to forced marriage, FGM and HBA as there may only be one chance' to speak to a child who is a potential victim and one chance to save a life. If the victim is not offered support following disclosure that the 'One Chance' opportunity may be lost.

Child abuse linked to faith or belief
This type of abuse can happen anywhere across any community and / or religion. There are a variety of definitions associated with abuse linked to faith or belief. It can include, but is not limited to, the concept of belief in:
- Witchcraft and spirit possession, demons or the devil acting through children or leading them astray (traditionally seen in some Christian beliefs).
- The evil eye or djinns (traditionally known in some Islamic faith contexts) and dakini (in the Hindu context).
- Ritual or multi-murders where the killing of children is believed to bring supernatural benefits or the use of their body parts is believed to produce potent magical remedies.
- use of belief in magic or witchcraft to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation.

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

Useful links:
Child abuse linked to faith or belief | Surrey Police
Short Youtube introduction video