



# **Safeguarding and Child Protection Policy**

**Effective 1st September 2021**

**Governors' Committee Responsible:** Risk & Compliance Committee

**Governor Lead:** Della Fallon

**Nominated Lead Member of Staff:** Sue Salmon (Deputy Head Pastoral and Lead DSL)

**Status & Review Cycle:** Statutory Annual

**Next Review Date:** August 2022

Reviewed by: SS August 2021

Signed off by: Chair of Governors

**Approved by the Governors 29<sup>th</sup> September 2020**

The School's Designated Safeguarding Leads are:

Sue Salmon (Lead), Claire McCarthy (Deputy),  
Jo Catton (Deputy), Jess Taylor (Deputy) and Christine Wilson (Deputy)

The Designated Safeguarding Governor is

Della Fallon

## REPORTING CHANNELS

Please report concerns about a child to:

The Designated Safeguarding Lead (DSL) is Sue Salmon, Deputy Head (Pastoral), or a Deputy in her absence. The contact details for Sue Salmon are [Susan.Salmon@boxhillschool.com](mailto:Susan.Salmon@boxhillschool.com).

Tel: 01372 373382 ext 5048

The Deputy Designated Safeguarding Leads are:

Claire McCarthy, Assistant Head (Pastoral and Wellbeing), [Claire.McCarthy@boxhillschool.com](mailto:Claire.McCarthy@boxhillschool.com)

Tel: 01372 373382 ext 4272 (office) ext 5069 (House)

Jo Catton, Head of Year 11, [Jo.Catton@boxhillschool.com](mailto:Jo.Catton@boxhillschool.com)

Tel: 01372 373382 ext 5030 (office) ext 5025 (Art)

Jess Taylor, Head of Music, [Jessica.Taylor@boxhillschool.com](mailto:Jessica.Taylor@boxhillschool.com)

Tel: 01372 373382 ext 5038

Christine Wilson, Head of Maths, [Christine.Wilson@boxhillschool.com](mailto:Christine.Wilson@boxhillschool.com)

Tel: 01372 37382 ext 4253 (Maths)

The DSL will report concerns to Children's Social Care where appropriate, and the Police if a crime is committed.

Concerns/allegations about an adult working with children should be reported to the Headmaster (or Chairman of Governors in his absence). The Chair of Governors is Mr Trevor Johnson.

The Head or DSL will contact the Designated Officer (LADO) for advice within one working day. Similarly, in the event of the concern being the Head, the governor contacted will liaise with the LADO.

If the subject is a member of the governing body, then report directly to the Chairman, Mr Trevor Johnson. He is the nominated Governor responsible for liaison with the local authority on strategic issues of child protection. His contact telephone number is available from the Chief Operating Officer and Clerk to the Governors, Stuart Ansell [COO@boxhillschool.com](mailto:COO@boxhillschool.com)

If the subject is the Headmaster, then report directly to the Chairman. In his absence, the Safeguarding Governor, Mrs Della Fallon, should be contacted in this instance. The Head should not be informed. Their contact details can be obtained from the Chief Operating Officer and Clerk to the Governors, Stuart Ansell [COO@boxhillschool.com](mailto:COO@boxhillschool.com)

Never delay in reporting concerns/allegations. Not reporting is a form of abuse. Report immediately.

Anybody can make a referral. Referrals to statutory agencies do not require parental consent.

A child who is considered to have suffered or who is at risk of suffering serious harm will be referred to Surrey Social Care (SSC) immediately. A referral will be made within one working day (24 hours) of the recognition of risk.

A child who is considered to be in need of additional support from one or more agencies will be referred to the relevant external agencies as required and a multi-agency assessment using local processes, which may include use of the Threshold document (Effective Family Resilience Surrey), the Common Assessment Framework (CAF) and the Team around the Family (TAF), will be sought. In such situations the parents will be kept fully informed, as appropriate.

ALL referrals with concerns about children, young people and adults should be discussed with the Surrey Children's Single Point of Access (C-SPA) Monday to Friday 09.00 to 17.00, telephone 0300 470 9100 email [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk)

Outside those hours, urgent concerns about a child's safety to the Emergency Duty Team on 01483 517898.

The LADO number is 0300 123 1650 (Monday to Friday 09.00 to 17.00) or [LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk)

In an emergency where you are concerned for the child's immediate safety you should call Surrey Police on 999. Local Referral, Intervention and Assessment Services for Mole Valley can be called on 0300 123 1620. If a crime may have been committed, the matter should be reported to the Police.

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## **Section One - Introduction**

### **1. Introduction to safeguarding**

#### **1.1 Overview**

Box Hill School fully recognises that the welfare of the child is paramount and takes seriously its responsibility under section 175/157 of the Education Act 2002 to safeguard and promote the welfare of the children and young people in its care. This means that we are committed to protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children at Box Hill School to have the best outcomes. We will always endeavour to act in the best interests of the child.

Box Hill School appreciates that safeguarding and promoting the welfare of children is everyone's responsibility and that hence, we aim to create a culture of safety, equality, vigilance and protection in which safeguarding is seen as part of the School's everyday concerns. Staff, supply staff and volunteers recognise that everyone has a role to play in identifying concerns, sharing information and taking prompt action to safeguard and promote the welfare of the children and young people in its care. Such an approach develops a culture that enables issues about safeguarding and child welfare to be addressed. The approach taken throughout the School is contextual, coordinated and child-centred meaning that what is in the best interests of the child will be considered at all times. The School will aim to ensure that we listen to our pupils.

The Box Hill School Safeguarding Policy reflects the Surrey Multi-agency Partnership Safeguarding Procedures ([www.surreyscp.org.uk](http://www.surreyscp.org.uk)) as laid out by the Surrey Safeguarding Children Partnership (SSCP). The School will maintain this multi-agency approach with the 'safeguarding partners' (the local authority, clinical commissioning group and the chief officer of Police) and will co-operate and act in accordance with the published local partnership arrangements.

The School has regard to national statutory guidance 'Working Together to Safeguard Children' (Sept. 2018 plus 2019 and 2020 updates), 'Keeping Children Safe in Education, KCSiE' (Sept. 2021) and any non-statutory interim supplements to KCSiE published as a consequence of coronavirus (COVID-19). The School also has regard to 'Information Sharing' (2018), 'Disqualification under the Childcare Act 2006' (Sept. 2018), 'Sexual Violence and Sexual Harassment Between Children in schools and colleges' (Sept. 2021), 'Prevent Duty Guidance for England and Wales' (July 2015), 'The Prevent duty: Departmental advice for schools and childminders' (June 2015), 'The use of social media for on-line radicalisation' (July 2015), 'Mental Health and Behaviour in Schools' (November 2018), and 'Counselling in Schools; a blueprint for the future' (February 2016). The government guidance 'What to do if you're worried a child is being abused' (March 2015) has also been consulted as has 'When to call the Police', non-statutory guidance from the National Police Chiefs' Council.

The School will continue to ensure that KCSiE (Sept. 2021) remains fully in force throughout any necessary response to coronavirus (COVID-19). An Annex to the School's Safeguarding and Child Protection Policy was put in place and issued to all non-furloughed staff and supply staff during the period of remote schooling. The School will continue to have due regard to any interim guidance issued by the Department for Education during the pandemic. In addition, the School will regularly review safeguarding and child protection arrangements to ensure that they remain effective while changed circumstances continue. This will include a review of systems to ensure that contact will be maintained with pupils if they are not able to return to School as a consequence of the pandemic.

The Safeguarding Policy will be reviewed annually by the Governing Body, unless new legislation or an incident indicates that an intermediate review is necessary. This is to ensure that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt.

## **1.2 Statement, principles and aims**

### **1.2.1 Statement**

Box Hill School recognises that the welfare of the child is paramount: the needs and wishes of each child will be put first. Legally a 'child' refers to a young person under the age of 18 however this Policy applies to all pupils at the School. All children have the right to be safeguarded from harm or exploitation whatever their age, health or disability, gender or sexual orientation, race, religion, belief or first language and political or immigration status.

Box Hill School is committed to actively promoting and ensuring the well-being of pupils in the broadest sense. Well-being is defined with reference to the Children Act 2004, which lists the following factors:

- physical and mental health and emotional well-being;
- protection from harm and neglect;
- education, training and recreation;
- the contribution made by them to society;
- social and economic well-being.

We take seriously our duty to safeguard and promote the welfare of the children and young people in our care. We consider it is right that safeguarding is a natural part of our everyday considerations as a School so as to provide a safer environment for all of our pupils. The pupils and parents of Box Hill School have a right to expect that the School will provide a safe and secure environment where all are respected and valued. In addition, the School acts *in loco parentis* and recognises its moral responsibility towards those in its care.

Governors, staff, supply staff and regular volunteers in this School understand the importance of taking appropriate action and working in partnership with children, their parents/carers and other agencies in order to safeguard children and promote their welfare.

The purpose of this policy is to:

- afford protection for all pupils
- enable staff, supply staff and volunteers to safeguard and promote the welfare of children
- promote a culture which makes this School a safe place to learn and in which children feel safe

### **1.2.2 Principles**

Safeguarding children is everyone's responsibility and hence all staff have an equal responsibility to act. 'KCSiE (Sept. 2021)' defines safeguarding and promoting the welfare of children as:

- protecting children from maltreatment;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

All children have the right to be safeguarded from harm or exploitation whatever their

- age
- health or disability
- gender or sexual orientation
- race, religion, belief or first language
- political or immigration status

The Governors recognise also their responsibility to ensure that the staff have the skills, knowledge and understanding necessary to keep safe children who are looked after by the local authority, including ensuring that staff have the information they need about the child's status, contact arrangements with parents, care arrangements and delegated authority to carers and information available to the DSL.

The Governing Body is accountable for ensuring that the School meets its statutory responsibilities for safeguarding and that all policies and procedures are in place and effective. The Governing Body will act in accordance with Section 157 / Section 175 of the Education Act 2002 and the supporting statutory guidance 'KCSiE (Sept. 2021)' to safeguard and promote the welfare of children in this School.

The Governing Body have a designated safeguarding lead, Della Fallon, who has the required knowledge, skills and expertise to take leadership responsibility for the School's safeguarding arrangements. The Governors also recognise that safeguarding duties remain the responsibility of the whole Governing Body and hence believe that the culture of safety begins with them.

The Governing Body recognises its legal responsibility for undertaking an annual review of this Policy and of the appropriateness with which the related duties have been completed. As part of this annual review the Governing Body will receive and carefully consider an annual Safeguarding Report. This Report will include reference to the Surrey annual safeguarding audit, its associated action plan and will be used to ensure that the pupils are taught about safeguarding (including online safety), through the curriculum and PSHEE, and other learning opportunities. Taking into account this Report, the Governors will then conduct its annual review in order to ensure that all members of the Governing Body, as part of their legal responsibilities, are satisfied that the Policy is fully appropriate and compliant, and that the related duties have been discharged fully and efficiently. The discussions by the Governors will be minuted in sufficient detail to demonstrate the breadth and depth of the annual review and to show the outcomes of the review. In addition, further review of the policies and procedures will be undertaken by the Governors whenever required to ensure compliance with new legislation or updated best practice guidelines or legislation.

The Governors recognise that they are responsible for ensuring that staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children, creating an environment where staff feel supported in their safeguarding role and able to raise concerns and ensuring practitioners have regular reviews of their own practice so that they have knowledge, skills and experience which improve over time.

This policy applies to all staff working in or for the School. The School defines a member of staff as: any person working at the School whether under a contract of employment, under a contract for services or otherwise than under a contract as set down by the DfE. Staff includes teachers, supply and peripatetic teachers and coaches, trainee teachers, teaching assistants, part-time staff, gap students, administrative staff, support staff, caretakers and other ancillary staff, staff appointed from overseas and pupils paid to work at the School. It also applies to regular volunteers (i.e. those who come into School once a week or more, or on more than 3 days in a 30-day period), Governors or anyone working on behalf of the School.



This Policy, along with all the policies listed below, is available to all pupils, parents, prospective parents, members of staff and volunteers by its publication on the School's website. All staff receive a copy on at least an annual basis. It is always available to view at School and is also available in hard or soft copy upon request to the Chief Operating Officer's PA, Sue Bruinvels [Sue.Bruinvels@boxhillschool.com](mailto:Sue.Bruinvels@boxhillschool.com)

This Safeguarding Policy forms part of a suite of policies and other documents which relate to the safeguarding responsibilities of the School. The Governing body ensures that there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare. This Policy should be read in conjunction with the

- staff behaviour policy; Staff Code of Conduct
- e-safety policies for pupils and staff, which include use of mobile technology
- recruitment policy and procedures
- whistleblowing policy
- procedures to respond appropriately when children are missing education
- anti-bullying Policy
- pupil behaviour policies (*Behaviour and Behaviour Management Policy, Searching, screening and confiscation policy, Mobile Phone Policy, Use of Force to Control or Restrain a Pupil*)
- SEND policy

### **1.2.3 Aims**

We will endeavour to safeguard children and young people by:

- always acting in their best interests
- valuing them, listening to and respecting them
- involving them in decisions which affect them and ensuring the child's wishes and feelings are taken into account when determining what action to take and what services to provide
- maintaining a safe environment in which children can learn and develop, both on and off-site
- creating an environment where children know they can approach adults, are encouraged to talk, and are listened to
- regularly promoting, easily understood and easily accessible systems for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback
- never tolerating bullying, homophobic behaviour, racism, sexism or any other forms of discrimination, including through the use of technology
- ensuring the curriculum affords a range of opportunities to learn about keeping themselves safe, particularly when using technology, helping the pupils to adjust their behaviours in order to reduce risks and build resilience, including to radicalisation
- safeguarding the pupils from potentially harmful and inappropriate online material by ensuring that appropriate filters and monitoring systems are in place
- operating robust and sensible Health and Safety procedures
- operating clear and supportive policies on drugs, alcohol and substance misuse
- exercising our duties under the Counter-Terrorism and Security Act 2015 by ensuring all staff attend 'Prevent' training in respect of radicalisation and extremist behaviour and by assessing the risk of our pupils being drawn into terrorism
- supporting attendance and taking action if a child is missing School regularly
- appointing a member of the Senior Leadership Team (SLT) as the Lead DSL and ensuring this person has the time, funding, training, resources and support to perform the role effectively

- ensuring that there is always cover for the DSL role during School hours for staff to discuss any safeguarding concerns. The School will ensure that there is sufficient cover to allow for DSL absence or illness during the COVID-19 pandemic
- ensuring that all staff working with Looked-After Children have information appropriate to their role regarding, e.g. the child's care arrangements, legal status and contact with birth parents
- ensuring that all staff read at least Keeping Children Safe in Education Part One and Annex A if they work directly with children
- putting in place mechanisms to assist staff to understand and discharge their role and responsibilities as set out in Keeping Children Safe in Education Part One/Annex A
- making sure all staff and volunteers are aware of and committed to the Safeguarding Policy to ensure that staff are able to identify children at risk and understand their individual responsibility to take action
- providing appropriate training for staff, on an annual basis, to provide them with the relevant skills and knowledge to safeguard children effectively
- to establish an ethos of mutual support amongst all staff, so that any questions and concerns may be shared
- identifying any concerns early and ensuring that those children considered to be at risk are provided with the necessary care, support and appropriate help to prevent those concerns from escalating. Such help includes working with parents/carers and other agencies as appropriate
- sharing information about child safeguarding concerns with agencies who need to know, and involving children and their parents/carers appropriately. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children
- to work with individual practitioners and agencies concerned with child protection
- acknowledging and actively promoting that multi-agency working is the best way to support children and their families to promote the welfare of children and to protect them from harm as no single professional can have a full picture of a child's needs and circumstances
- maintaining a close working relationship with Surrey Social Care ensuring open communication that facilitates the use of no name referrals where appropriate. The importance of information sharing between practitioners and local agencies is recognised by the Governors
- taking the right action, in accordance with the Surrey SCP multi-agency safeguarding procedures, if a child discloses or there are indicators of abuse
- promoting a culture in which staff feeling able to report to senior leaders what they consider to be unacceptable behaviour or breaches of the Staff Code of Conduct at Box Hill School by their colleagues, having faith that they will be listened to and appropriate action taken
- dealing appropriately with any allegations/concerns about the behaviour of staff or volunteers in accordance with the process set out in statutory guidance
- keeping clear, accurate and contemporaneous safeguarding and child protection records
- recruiting staff and volunteers (including host families) safely, ensuring all necessary checks are made in accordance with statutory guidance and legal requirements and also making sure that at least one appointment panel member has undertaken safer recruitment training. We check the suitability of staff and volunteers to work with children and ensure that other organisations who provide staff to the School also operate appropriate checks and procedures
- checking that appropriate child protection procedures are in place when pupils attend off-site activities. All staff are bound by the Educational Visits Policy when arranging such trips. Those members of staff responsible for organising exchange visits where

pupils are accommodated by host families are required to check host families and gain appropriate reassurances from partner schools whether in the UK or abroad.

- ensuring that our lettings policy will seek to ensure the suitability of adults working with children. Community users organising activities for children are aware of the School's Safeguarding Policy.
- ensuring all the necessary checks are carried out on the suitability of people serving on the governing body of the School
- ensuring ongoing safe working practices are embedded within the School by using the Staff Code of Conduct for all staff and volunteers which includes acceptable use of technologies, staff/pupil relationships, one-to-one working and communications including the use of social media
- ensuring staff and volunteers understand about 'whistleblowing' and how to escalate concerns about pupils or staff if they think the right action has not been taken to safeguard children
- providing effective management for the above through induction, support and regular training appropriate to role
- making prompt and detailed reports to the Disclosure and Barring Service having consulted the Designated Officer (LADO).

We recognise that because of the day to day contact with children, all School staff are well placed to observe the outward signs of abuse. The School will therefore:

- establish and maintain an environment where children feel secure, are encouraged to talk, and are listened to
- ensure children know that there are many different adults in the School whom they can approach if they are worried
- ensure pupils are taught through the wider curriculum and PSHEE (including Relationships and Sex Education) how to stay safe based on a wide view of what might happen to pupils, both in School and beyond it. This is so as to enable the pupils to recognise when they are at risk and to understand how to get help when they need it
- ensure appropriate Relationships and Sex Education and Health Education are delivered within the PSHEE programme
- include opportunities in the PSHEE curriculum for children to develop the skills they need to recognise and stay safe from abuse, particularly when using technology and where appropriate in respect of radicalisation and extremist behaviour
- be alert, in particular, to the potential need for early help for children who have additional needs (e.g. medical needs, family circumstances, disability or specific learning needs)
- take account of the coeducational, 11-18 age range, international, day and boarding environment provided by adjusting its staff and pupil safeguarding training to reflect the greatest risks posed to the pupils of our School
- take account of the following in considering boarding welfare; isolation from families, gender balance and whether pupils have sufficient free time.

## Section Two - Roles and responsibilities

### 2.1 Overview

All adults in the School have an individual responsibility to safeguard and promote the welfare of children by taking appropriate action. This includes taking action where there are child protection concerns.

The Governing Body is accountable for ensuring the School has an effective safeguarding policy which should be reviewed annually and available publicly. The Surrey SCP recommends that each governing body should nominate an individual member to work closely with the Lead DSL and to provide a link between the School and the governing body to take leadership responsibility for the School's safeguarding arrangements and to monitor whether mandatory policies, procedures and training are in place and are effective.

The Designated Safeguarding Governor for Box Hill School is Della Fallon

The School's safeguarding policies and procedures are reviewed annually by the Governing body and amended as appropriate to ensure full compliance with relevant legislation. Regular meetings between the nominated governor and the DSLs review the efficiency with which the relevant policies and procedures are operating and any deficiencies or weaknesses are remedied without delay. These meetings and other safeguarding issues are discussed and appropriately recorded in the minutes of Governing Body meetings.

This School has a Lead DSL. This is the person who takes lead responsibility for safeguarding. Any concerns about children should be discussed with/reported to the DSL who will decide what action to take including referring to Children's Social Care or the Police as appropriate.

The DSL takes lead responsibility for child protection and the prevention of radicalisation. The DSL will direct and provide advice and support to staff members in carrying out their all their safeguarding duties and will liaise closely with other safeguarding services and agencies.

If the DSL is absent, such as through illness, her duties will be carried out by one of the Deputy DSLs who have all received appropriate training in child protection and multi-agency working and attend refresher training at 2-yearly intervals.

Throughout this policy, reference to the DSL includes the Deputy DSLs where the DSL is unavailable.

The DSL is also the Prevent Lead.

The Designated Safeguarding Lead for Box Hill School is Sue Salmon

The Deputy DSLs are Claire McCarthy, Jo Catton, Jess Taylor and Christine Wilson

If the DSL is the subject of a complaint the DSL duties will be carried out by the Headmaster. The Headmaster will have received appropriate training in child protection.

All action is taken in line with KCSiE (Sept. 2021), 'Working Together to Safeguard Children' (Sept. 2018 plus 2019 and 2020 updates) the Surrey SCP procedures and What to do if you're worried a child is being abused (2015).

## **2.2 All staff**

Box Hill School is committed to taking all reasonable measures to safeguard and promote the welfare of each pupil in its care and expects all staff and volunteers to share this commitment by:

- reading, understanding and applying policies and procedures within the School which support safeguarding
- knowing how to implement the safeguarding procedures as everyone who comes into contact with children and their families has a role to play in identifying concerns, sharing information and taking prompt action
- considering at all times what is in the best interests of the child
- protecting each pupil from any form of abuse, whether from an adult or another pupil
- being alert to changes in behaviour of pupils remembering that abuse and neglect could happen here
- being alert to signs of abuse, neglect and safeguarding issues both in the school and from outside
- being aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label
- being alert to the medical needs of children with medical conditions
- being aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside of these environments
- being aware of indicators, which may signal that pupils are at risk from, or are involved with serious violent crime
- being aware of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk
- considering whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence
- reassuring pupils who disclose abuse that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report
- ensuring that their behaviour and actions do not place pupils or themselves at risk of harm or allegations of harm to a pupil, for example, in one-to-one tuition, sports coaching or transporting a pupil by car
- only ever using reasonable force (i.e. no more force than is needed) to safeguard pupils. This could involve passive physical contact, such as standing between pupils or blocking a pupil's path or active physical contact such as leading a pupil by the arm out of a classroom.
- acting immediately upon any concerns about a child's welfare by sharing information with the DSL to allow a decision to be made as to the most appropriate way forward via internal support, an early help assessment or a referral to Surrey Social Care
- reporting any matters of concern to the DSL or, if the complaint involves the DSL or an allegation is made against a member of staff or volunteer, to the Headmaster
- keeping a full record of any significant complaint, conversation or event
- ensuring all evidence (including scribbled notes, text messages, clothing etc.) is preserved

- working with the DSL as no single professional can have a full picture of a child's needs and circumstances
- identifying children who may benefit from early help i.e. those who would benefit from support as soon as a problem emerges
- attending appropriate safeguarding training upon appointment and subsequent annual school training
- ensuring that we practise safe recruitment procedures in checking the suitability of all staff and volunteers (including staff employed by another organisation) working with our pupils. The School's recruitment procedures are set out in the Recruitment Policy. This Policy outlines the appropriate checks to be carried out to confirm the suitability of a member of staff for appointment including:
  - satisfactory checks concerning identity, medical fitness, right to work in the UK, previous employment history, character references, professional references (where appropriate) and qualifications (where appropriate);
  - satisfactory completion of an enhanced disclosure with barred list information or an enhanced disclosure check for regular volunteers and others as required, such as third party employees, by the DBS. The DBS disclosure certificate which is the subject of the application is obtained before appointment. In accordance with the National Minimum Standards for Boarding Schools (NMSBS) guidance a successful applicant will not be permitted, under any circumstances, to commence employment which involves boarding duties until the School is in receipt of the successful applicant's satisfactory DBS disclosure certificate
  - in the case of any person for whom, by reason of living or having lived outside the UK, obtaining such a certificate is not sufficient to establish suitability to work in a school, such further checks are made as the School considers appropriate
  - in accordance with DBS guidelines the DBS disclosure certificate must be obtained before or as soon as practicable after appointment. The original DBS disclosure certificate must be provided to the School within two weeks of it being received by the applicant. Original certificates must not be sent by post but must be brought to the School in order that it may be checked. If the applicant is unable to attend to provide the certificate he or she must provide a certified copy by post or email within two weeks of receiving the original disclosure certificate. Where a certified copy is sent the original disclosure certificate must be provided either prior to or on the first day of work;
  - satisfactory checks that anyone employed as a teacher is not subject to a Prohibition Order issued by the Secretary of State or any sanction or restriction imposed (that remains current) by the GTCE before its abolition in March 2012;
  - satisfactory checks to ensure that individuals from countries in the European Economic Area (EEA) who will be carrying out teaching work are not subject to a sanction or restriction imposed by another EEA professional regulating authority for teachers
  - satisfactory checks that anyone appointed to management positions after 12<sup>th</sup> August 2015 (amended May 2018) is not subject to a section 128 direction. The School considers a management position to include the Headmaster, members of the Senior Leadership Team (including non-teaching staff), teaching positions with departmental headship, House Parents and all Governors
  - ensuring that we carry out all necessary checks on the suitability of people who serve as volunteers
- making a direct referral to Surrey Children's Services immediately, if at any point, there is an immediate risk of harm.

## 2.3 The DSL

The DSL will:

- take lead responsibility for safeguarding and child protection as they are the most likely to have a complete safeguarding picture
- maintain an overview of safeguarding within the School
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them
- ensure all staff have access to and understand this Policy and the associated procedures
- ensure that this Policy is available publicly
- remain up to date as regards both national and local safeguarding and child protection procedures. Formal training will be undertaken at least every two years. Knowledge and skills will be refreshed at regular intervals, as required, and at least annually
- be the first point of contact for parents, pupils, staff, safeguarding partners and external agencies in all matters of child protection except for allegations against staff, supply staff, volunteers and the DSL which should be reported to the Headmaster
- co-ordinate the child protection procedures in the School
- liaise with the Headmaster to inform him of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and Police investigations
- be familiar with contextual safeguarding, taking into account wider environmental factors to consider whether pupils are at risk of abuse or exploitation in situations outside their families
- maintain open channels of communication with local statutory agencies including the three safeguarding partners
- refer cases of suspected abuse to children's social care and support other staff who make a referral
- make prompt contact with children's social care where there are concerns that a child may be in need of help or at risk and/or with the Designated Officer (LADO) in relation to allegations against someone working in the School and/or with the Police if a criminal offence is suspected. The DSL will be guided in Police contact by the NPCC document 'When to call the police'
- liaise with staff (especially the Pastoral Team, Senior Nurse, Head of IT, and the Head of Learning Support) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies
- act as a source of support, advice and expertise for all staff
- help promote educational outcomes by sharing relevant information about the welfare, safeguarding and child protection issues with SLT and other staff
- maintain an ongoing training programme for all staff and volunteers who work with children
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements
- be alert to the specific needs of children in need, those with special educational needs and young carers
- be aware of pupils who have a Social Worker
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation
- understand the importance of sharing, holding and using information for safeguarding purposes. Information sharing, both within the School, and with the three safeguarding partners, other agencies, organisations and practitioners is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes.
- keep written records of concerns about children, even where there is no need to refer the matter immediately
- ensure all records are kept securely, separately from the main pupil file, and in a locked location
- ensure all staff and volunteers read Keeping Children Safe in Education Part One guidance.

- follow procedures where an allegation is made against a member of staff or volunteer as directed by the Headmaster
- ensure that, where a pupil on the child protection register leaves, the information is transferred to the new school immediately and that the pupil's Social Worker (where relevant) is informed. The safeguarding file will be transferred separately from the main pupil file, using secure transit, and confirmation of receipt will be obtained. The DSL will also proactively share information with the new school to enable the new school to have the necessary support in place when a child arrives and to ensure that key staff are aware of any needs
- liaise with the LADO, co-ordinate action with the LADO and (where applicable) the Police following any child protection allegation or suspicion against a member of staff or volunteer
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service (DBS)
- refer cases where a crime may have been committed to the Police
- liaise with Surrey SCP following any child protection allegation or suspicion against a person who is not a member of the School staff or volunteer
- inform the applicable Local Authority of any pupil missing from education
- ensure that appropriate action is taken in the case of FGM being reported. This includes providing support to any teacher or regulated health/social care professional who reports to the Police cases where they discover that FGM appears to have been carried out on a girl under 18 years of age which is a mandatory reporting duty.
- understand and support the School with regards to the requirements of the Prevent duty and provide advice and support to staff on protecting children from the risk of radicalisation
- ensure that the School has due regard to the need to prevent people from being drawn into terrorism, assessed the risk of children being drawn into terrorism, clear procedures in place for protecting children at risk of radicalisation and established clear protocols for ensuring any visiting speakers are suitable and appropriately supervised. Liaise with Surrey Police in the case of any concerns about radicalisation, refer to the Channel programme where appropriate and support staff who make referrals to the Channel programme.
- understand the unique risks associated with online safety and have the relevant knowledge and up to date capability required to keep children safe whilst they are online at School
- recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and will help to support SEND children to stay safe online
- lead on matters relating to online safety
- ensure that, where appropriate, senior pupils given positions of responsibility (such as the Syndicate and House Prefects) over other pupils are briefed on appropriate action to take should they receive any allegations of abuse
- advise and act upon all suspicion, belief and evidence of abuse reported
- keep the Headmaster informed of all actions unless the Headmaster is the subject of a complaint
- facilitate multi-agency working via liaison with the LADO, Surrey Social Care and other relevant external agencies on behalf of the School
- review the Safeguarding Policy and the Staff Code of Conduct, annually (as a minimum) and ensure that the procedures and implementation are updated and reviewed regularly, and work with Governors regarding this
- undertake an annual safeguarding audit in line with Surrey SCP standards to monitor the effectiveness of policies and procedures in practice



## **Section Three - Recognising abuse**

Box Hill School recognises the importance of all staff having an awareness of safeguarding issues including: bullying including cyberbullying, children missing education, child missing from home or care, child criminal exploitation (CCE), child sexual exploitation (CSE), county lines, domestic abuse, drugs, fabricated or induced illness, faith abuse, female genital mutilation (FGM), forced marriage, gangs and youth violence, gender-based violence/violence against women and girls (VAWG), hate, mental health, private fostering, preventing radicalisation, relationship abuse, youth produced sexual images and trafficking. It is recognised that behaviours linked to activities such as drug taking, alcohol abuse, truancing and sexual images put children in danger.

Note that private fostering is defined as 'when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent, person with parental responsibility, or a 'close relative'. (Close relatives are defined as step-parents, grandparents, brothers, sisters, uncles or aunts. It does not include great-aunts or uncles, great grandparents or cousins). This is a private arrangement made between a parent and a carer, for 28 days or more. Box Hill School recognizes its mandatory duty to inform Surrey Social Care of any pupils with such arrangements.

### **3.1 Child protection**

Child protection is one very important aspect of safeguarding. It refers to the activity which is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

### **3.2 Significant harm**

The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention by statutory agencies in family life in the best interests of children. There are no absolute criteria on which to rely when judging what constitutes significant harm. Sometimes it might be a single traumatic event but more often it is a compilation of significant events which damage the child's physical and psychological development. Decisions about significant harm are complex and in each case require discussion with the statutory agencies: Children's Social Care and Police.

### **3.3 Child abuse**

Knowing what to look for is vital to the early identification of abuse and neglect. All staff should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. If staff are unsure, they should always speak to the DSL or a Deputy DSL.

Staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

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

It is generally accepted that there are four main forms of abuse. It is accepted that in all forms of abuse there are elements of emotional abuse, and that some children are subjected to more than one form of abuse at any one time. The following definitions are from 'KCSiE (Sept. 2021)':

#### **i) 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.

**ii) Emotional abuse**

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child 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, though it may occur alone.

**iii) Sexual abuse**

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

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

### **3.4 Recognising child abuse – signs and symptoms**

KCSiE (Sept. 2021) is clear: 'All School and college staff members should be aware of the signs of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection'. Recognising child abuse is not always easy, and it is not the responsibility of School staff to decide whether or not child abuse has definitely taken place or if a child is at significant risk. We do, however, have a clear responsibility to act if we have a concern about a child's welfare or safety or if a child talks about (discloses) abuse. We must maintain an attitude of 'it could happen here'.

Staff should be concerned (on questioning) when:

- explanation for injuries is superficially plausible, but may be inappropriate, or inaccurate in detail
- given varying explanations of an injury
- vague explanations are offered, e.g.: “fell off bike”, “bruises easily”
- a history of repeated episodes is evident.

Appendix Three details examples of possible indicators of each of the four kinds of abuse. The government guidance ‘What to do if you’re worried a child is being abused’ (March 2015) (<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>) provides more information on understanding and identifying abuse and neglect. The NSPCC website (<https://www.nspcc.org.uk/>) provides information upon the types and indicators of abuse. Knowing what to look for is vital to the early identification of abuse and neglect. If staff are unsure they should always speak to the DSL.

## Section Four - Procedures

These procedures explain what action should be taken if there are concerns that a child is or might be suffering harm. A 'child' is a person under 18 years but the principles of these procedures apply to all pupils at this School, including those over 18.

### 4.1 Responding to the child who discloses (talks about) abuse

All staff, volunteers and senior pupils will:

- listen carefully to what is said, keeping an open mind and not making a decision as to whether or not abuse has taken place even if unsubstantiated allegations have been made previously
- maintain an attitude of 'it could happen here' and act in the best interests of the child
- avoid showing shock or disbelief
- observe the child's demeanour
- find an appropriate opportunity to explain that the information will need to be shared with others to ensure that the correct action is taken and state who that will be. They will not promise to keep the information confidential or a 'secret'. If you are told about abuse, you have a responsibility to report it, so that action can be taken
- allow the child to continue at his/her own pace and do not interrupt if the child is freely recalling events. They will not stop him/her in order to find a 'witness' as this could inhibit the child from saying more
- avoid asking questions or pressing for more information. Ask for clarification only. If questions are necessary, they should be framed in an open manner and not 'lead' the child in any way. Remember TED: Tell me.... Explain.... Describe...
- reassure the child, if necessary, that he/she has done the right thing in telling
- explain what will happen next and with whom the information will be shared
- not ask the child to repeat the disclosure to anyone else in School – including the DSL - or ask him/her or any other children who were present to write a written account or 'statement'
- not make a judgement about whether or not abuse has occurred and will not conduct an 'investigation' to establish whether the child is telling the truth. That is a task for Social Workers and the Police following a referral to them of concern about a child. The role of School staff is to act promptly on the information received
- make an immediate, careful record of what has been said using the child's actual words wherever possible (not an interpretation of them). The written record will ideally be made on the standard School 'concern' form. The record should include the date, time, place and those present during the conversation and be signed by the person taking the record. The record will be kept securely and handed to the DSL unless the allegation involves the Headmaster or a member of staff, including the DSL
- preserve all evidence, for example scribbled notes, text messages, clothing and mobile devices
- where physical injuries have been observed, these will be carefully noted but not photographed. The staff member will not ask to see injuries that are said to be on an intimate part of the child's body
- immediately tell the DSL, unless someone has made an accusation about a member of staff in which case the Headmaster will be informed. If someone has made an accusation about the Headmaster, the Chair of Governors and the LADO will be informed. In all cases, this information will not be discussed with other adults (this includes the parents/carers) or young people. The Chair of Governors, Trevor Johnson, can be contacted via Stuart Ansell, Chief Operating Officer and the Clerk to the Governors. Staff should state that the contact is required as the result of an allegation against a member of staff/volunteer; no details of that allegation will be sought by the Clerk to the Governors.
- discuss with the DSL whether any steps need to be taken to protect the person who has told you about the abuse. This may need to be discussed with the person who disclosed.

- liaise as necessary with all relevant practitioners including the DSL and Children's Social Care
- if in exceptional circumstances, the DSL (or deputy) is not available, this should not delay appropriate action being taken. Staff should speak to a member of SLT and/or take advice from Children's Social Care. In these circumstances, any action taken should be shared with the DSL (or deputy) as soon as is practically possible.
- understand that such issues necessitate a high degree of confidentiality, not only out of respect for those concerned but also to ensure that evidence is not compromised by discussion in the public domain
- never attempt to carry out an investigation of suspected or alleged abuse by interviewing people or asking other people, such as parents. Social Care and Health and Police staff are the people trained to do this. Such action could cause more damage and interfere with possible criminal proceedings
- remember that anyone can make a referral if necessary. Staff have a right and duty to refer potential or actual child abuse direct to the Local Authority Children's Services or the Police if the situation is an emergency and the DSL, the Headmaster, Chair of Governors or the Governor for Child Protection are not available and they are convinced that a direct report is the only way to ensure the pupil's safety or if they feel that senior staff action is/has been inadequate and/or inappropriate
- Surrey Social Care (Help and Protection Teams) telephone number is:
  - Surrey Children's Single Point of Access (C-SPA) 0300 470 9100
  - Out of hours service 01483 517898

Where a member of staff makes a referral directly, s/he should inform the DSL as soon as possible thereafter

- the LADO is contactable on 0300 123 1650. Further help or guidance may also be available from Ofsted who are contactable on 0300 123 1231 during normal working hours  
Where a member of staff makes a referral directly, s/he should inform the DSL as soon as possible thereafter.
- **if a child is in immediate danger or is at risk of harm a referral should be made to Children's Social Care and/or the Police immediately.** Anyone can make the referral. Where a member of staff makes a referral directly, s/he should inform the DSL as soon as possible thereafter
- remember that any suspicion or concern that a child or young person may be suffering or at risk of suffering significant harm, **MUST** be acted on. Doing nothing is not an option, safeguarding and promoting the welfare of children is everyone's responsibility. Any suspicion or concerns will be reported without delay to the DSL or Deputy. During term time the DSL should always be available to discuss any safeguarding concerns. However, if for whatever reason they are not available the staff member will discuss their concerns as soon as possible with either another senior member of staff or the duty worker in the Help and Protection Team (contact the Surrey Children's Single Point of Access).
- if a staff member has concerns about a child (as opposed to a direct disclosure or a child who is in immediate danger) a decision will need to be made as to the most appropriate action. Staff should seek advice from the DSL in such situations as options such as referral to social care, referral to specialist services or early help services are available

## 4.2 Action taken by the DSL

Any disclosure or indicators of abuse will be reported verbally to the DSL or Deputy straight away. Within 24 hours, the DSL will refer the matter to Surrey Social Care or the Police without further investigation within the School. The School will follow their guidance about what to do next. Their statutory responsibility is to initiate any necessary investigations, and they will want relevant School staff to assist in the way appropriate to the circumstances, and will advise on this. Anyone who feels that their concerns have not been dealt with seriously must contact Surrey Social Care.

Where the child already has an allocated Social Worker, that person or a manager or duty worker in the same team will be contacted promptly.

The DSL will keep a record of the conversation with the duty worker and other Social Workers, noting what actions will be taken and by whom, giving the date and time of the referral. The referral will be confirmed in writing on the multi-agency referral form (known as the Request for Support form and available on the Surrey SCP website) as soon as possible and at least within 24 hours. Any pre-existing assessments such as through the Common Assessment Framework will be attached.

A School child protection file will be started in the child's name, where the child is not already known to Social Workers. If a file already exists, the new information will be added to the chronology.

If the child can understand the significance and consequences of making a referral to Social Workers, they will be asked for their views. It will be explained that whilst their views will be taken into account, the School has a responsibility to take whatever action is required to ensure the child's safety and that of other children.

The DSL will decide whether to contact parents at this stage, judging whether do so is likely to place the child at risk of harm from their actions or reactions - for example in circumstances where there are concerns that a serious crime such as sexual abuse, domestic violence or induced illness has taken place. If in any doubt, the DSL or staff member will call the duty worker first and agree with him/her when parents/carers should be contacted and by whom. The reason for the decision not to contact parents first will be recorded in the child's School child protection file.

A child protection referral from a professional cannot be treated as anonymous.

It is important to ensure that even allegations that appear less serious are followed up and taken seriously, and that they are examined objectively by someone independent of the School. Consequently, the LADO will be informed of all child protection allegations or suspicions against a member of staff or volunteer at the School that come to the School's attention and appear to meet the criteria for referral, so that he or she can consult Police and social care colleagues as appropriate. Any child protection allegation or suspicion against anyone outside the School will be referred to Surrey SCP. The relevant criteria are that one or more persons have: behaved in a way that has caused a child to suffer or are at risk of suffering serious harm to a child or may have caused serious harm to a child; or possibly committed a criminal offence against or related to a child; or behaved towards a child or children in a way that indicates that they are unsuitable to work with children.

When deciding whether to make a referral, following an allegation or suspicion of abuse, the Headmaster and DSL should not make their own decision over what appear to be borderline cases, but rather the doubts and concerns should be discussed with the LADO/Surrey SCP. This may be done tentatively and without giving names in the first instance. What appears trivial at first can later be revealed to be much more serious, and an allegation of child abuse or neglect may lead to a criminal investigation. Thus the School should not do anything that may jeopardise a Police investigation, such as asking a child leading questions or attempting to investigate the allegations of abuse, but should discuss their doubts and concerns with the LADO on a no names basis without identifying the family. If the LADO advises that sufficient concern exists that a child may be at risk of significant harm, a referral will be made without delay. If the initial referral is made by telephone, the DSL will keep a dated and timed record of the conversation, noting what actions are to be taken and by whom. The DSL will then confirm the referral in writing to Surrey SCP within 24 hours by using the multi-agency referral form (known as the Request for Support form and available on the Surrey SCP website). Any pre-existing assessments such as a CAF will be attached. If no response or acknowledgment is received within one working day, the DSL will contact Surrey SCP again.

Where the child is not already known to Social Workers, a child protection file will be started in the pupil's name. If a file already exists, the new information will be added to the chronology.

Where there is no disclosure by a child but concerns are accumulating, such as in relation to neglect or emotional abuse, the DSL will ensure that all information is brought together and that s/he makes a professional judgement about whether to refer to outside agencies; use will be made of the Surrey SCP threshold document (Effective Family Resilience Surrey) available on the Surrey SCP website. Such an approach helps to identify the pathway required for the pupil; whether concerns will be managed within the School; or with the help of other agencies as part of early help which may include use of the Common Assessment Framework (CAF) and the Team around the Family (TAF) approach; or whether they require specialised support such as a social work assessment or referral to CAMHS.

The DSL will reassess the concerns following action when the situation does not improve for the child and, where appropriate, challenge inaction by external agencies.

A member of staff who reports concerns to the DSL should expect some feedback, although confidentiality might mean in some cases that this is not detailed. If the member of staff is not happy with the outcome s/he can press for reconsideration and if following this, s/he still believes the correct action has not been taken, will refer the concerns directly to Social Workers.

#### **4.3 Responding to concerns reported by parents or others in the community**

Occasionally parents or other people in the local community tell School staff about an incident in or accumulation of concerns they have about the family life of a child who is also a pupil at the School.

If the incident or concern relates to child protection, the information cannot be ignored, even if there are suspicions about the motives for making the report. Members of staff will therefore need to pass the information to the DSL in the usual way.

It is preferable if the parent/community member who witnessed or knows about the concerns or incident makes a call to Children's Social Care themselves as they will be better able to answer any questions. They can ask for their name not to be divulged if a visit is made to the family. The DSL will advise accordingly and later confirm that this referral has been made.

If the parent/community member refuses to make the referral, the DSL will clarify that s/he has a responsibility to do so and will also need to pass on to Social Workers how s/he is aware of the information.

This process also applies to parents/community members who are also School staff. As practitioners who work with children they cannot be anonymous when making the referral but can ask for the situation to be managed sensitively and, if necessary, for their identity to be withheld from the family if it will cause difficulties in their private life.

#### **4.4 Referral guidelines**

The DSL will have regard for the criteria set out in KCSiE (Sept. 2021) when determining whether to make a referral to the LADO or SSC (Surrey Social Care) as appropriate where a pupil or another person has:

- behaved in a way that has harmed a child, or may have harmed a child;
- Or
- possibly committed a criminal offence against or related to a child
- Or

- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
- Or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The DSL will also consider if there are concerns about a child's welfare and there are signs that a child:

- is experiencing or may already have experienced abuse or neglect;
- is likely to suffer significant harm in the future

In considering a referral, the DSL will differentiate between safeguarding children who have suffered or are at risk of suffering serious harm and those who are in need of additional support from one or more agencies.

Where a referral is made the School recognises that any assessments undertaken by Social Care should consider where children are being harmed in contexts outside the home. Hence, the School will provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

A child who is considered to have suffered or is at risk of suffering serious harm will be referred to Surrey Social Care (SSC) immediately. A referral should be made within one working day of the recognition of risk.

A child who is considered to be in need of additional support from one or more agencies will be referred to one or more external agencies as required and a multi-agency assessment using local processes, which may include use of the Threshold document (Effective Family Resilience Surrey), the Common Assessment Framework (CAF) and the Team around the Family (TAF), will be sought. In such situations the parents will be kept fully informed, as appropriate.

The safety of children is paramount in all decisions in relation to the welfare of children and members of staff should take all reasonable steps to offer a child immediate protection from an aggressive parent.

An allegation against a member of staff or volunteer will be discussed with the LADO whose advice will be followed. A referral to SSC or Police of a child protection allegation or suspicion against a member of staff or volunteer at the School will not normally be made where the case is one which, upon the advice of the LADO, can be satisfactorily investigated and dealt with under the School's internal procedures. In such situations additional support from one or more external agencies will be sought and the parents will be kept fully informed, as appropriate.

A referral to SSC or Police of a child protection allegation or suspicion against a person who is from outside the School and not a member of staff or volunteer at the School will be made and the advice of SSC followed.

A complaint or suspicion of abuse involving the identification of someone who may already be engaged in illegal terrorist-related activity, will always be referred to Surrey SCP and, if appropriate, the Police. The relevant contact details for preventing terrorism and radicalisation referrals in Surrey are [preventreferrals@surrey.pnn.Police.uk](mailto:preventreferrals@surrey.pnn.Police.uk)

In cases where further advice from the Police is needed the Prevent Supervisor for Surrey will be contacted on 01483 632982.

In relation to Channel referrals, the DSL will consider seeking the consent of the child (or their parent/guardian) when determining what information can be shared. Whether or not consent is



sought will be dependent on the circumstances of the case but may relate to issues such as the health of the individual, law enforcement or protection of the public.

#### **4.5 Response from Children's Services Social Care to a School referral**

- **Referral**  
Once a referral is received by the relevant team, a manager will decide on the next course of action within one working day. Where there is a belief that the child is in need they will be assessed under section 17. When there is concern that a child is suffering, or likely to suffer significant harm, this will be decided more quickly and a strategy discussion held with the Police and Health practitioners and other agencies as appropriate (section 47 Children Act 1989).

The DSL should be told within three working days of the outcome of the referral. If this does not happen s/he will contact the duty worker again.

- **Assessment**  
All assessments should be planned and co-ordinated by qualified Social Worker. They should be holistic, involving other practitioners, parents/carers and the children themselves as far as practicable. Assessments should show analysis, be focused on outcomes and usually take no longer than 45 working days from the point of referral. School staff have a responsibility to contribute fully to the assessment.
- **S47 Enquiries (regarding significant harm)**  
The process of the investigation is determined by the needs of the case, but the child/young person will always be seen as part of that process and sometimes without parents' knowledge or permission. On occasions, this will mean the child/young person is jointly interviewed by the Police and Social Workers, sometimes at a special suite where a video-recording of the interview is made.
- **The Child Protection Conference**  
If, following the s47 enquiries, the concerns are substantiated and the child is judged to be at risk of significant harm, a Child Protection Conference (CPC) will normally be convened. The CPC must be held within 15 days of the first strategy discussion and School staff will be invited to attend - normally the DSL or Headmaster. This person will produce a written report in the correct format (a pro forma is available on the Surrey SCP website). This will be shared with the child/young person and his/her family before the conference is held. A copy will also be sent to the person chairing the initial CPC at least 24 hours in advance.

More information is in the multi-agency safeguarding procedures 'Child Protection Conferences' on the Surrey SCP website ([www.surreyscp.org.uk](http://www.surreyscp.org.uk)).

If the DSL disagrees with the decisions made by Social Workers regarding the outcome of the referral, the conclusions of the assessment or any actions taken, the matter should be discussed and if necessary escalated to more senior managers (under the escalation policy available on the Surrey SCP website), *particularly* if the child's situation does not appear to be improving.

#### **4.6 Responding to allegations or concerns about staff or volunteers**

It is expected that all staff and Governors involved in the management of allegations of abuse made against a member of staff or volunteer or former member of staff or volunteer will comply at all times with DfE statutory guidance contained within KCSiE (Sept. 2021) (the procedure to follow is to be found in part four of KCSiE). The School will follow up on both those concerns and allegations that may meet

the harms threshold (often known as the 'harms test') along with 'lower level' concerns and allegations that do not meet the harms threshold.

#### **4.6.1 Responding to allegations that may meet the harm threshold**

This section outlines the management of allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in the School. The procedures in this section should be followed where it is alleged that anyone working in the School including supply teachers, volunteers and contractors 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 use of rigorous recruitment and selection procedures in addition to adhering to the School's Staff Code of Conduct will mean that there are relatively few allegations against, or concerns about, staff or volunteers. If a member of staff, or any other person, has any reason to believe that another adult (whether staff, supply staff, volunteer, DSL or Deputy DSL) has acted inappropriately or abused a child or young person, they will take action by reporting to the Headmaster (not the DSL) immediately. The Headmaster will inform the Chair of Governors.

The following must be reported to the Headmaster: allegations of behaviour that a member of staff, supply staff or volunteer has harmed a child, or may have harmed a child; the possibility of a criminal offence against or related to a child; behaviour towards a child or children in a way that indicates he or she may pose a risk of harm to children and behaviour or possible behaviour that indicates they may not be suitable to work with children.

A member of staff who has behaved or may have behaved in a way that indicates they may not be suitable to work with children does not need to have been involved in an incident which involves children. The issue here is one of transferrable risk; for example, a member of staff involved in perpetrating domestic abuse at home, will bring into question their suitability to work with children. In such cases, an assessment of transferable risk to the children with whom the person works would be undertaken and advice from the LADO sought.

Even though it may seem difficult to believe that a colleague may be unsuitable to work with children, the risk is far too serious for any member of staff themselves to dismiss such a suspicion without taking action. Doing nothing is not an option; safeguarding and promoting the welfare of children is everyone's responsibility. We all have a role to play in identifying concerns, sharing information and taking prompt action so as to act in the best interest of the child. Hence, all concerns should be reported to the Headmaster without delay.

There are two aspects to consider when an allegation is made:

- Looking after the welfare of the child  
The DSL is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the Children's Social Care and as appropriate, the Police. The School will work in association with external agencies to support the child. The School will also act if there are associated concerns about the welfare of other children in the School or about the member of staff's family. A risk assessment of the situation will be undertaken and where necessary, a referral to Children's Social Care will be made.
- Investigating and supporting the person subject to the allegation

The Headmaster will act as the 'case manager' (unless the Headmaster is the subject of the allegation when the case manager will be the Chair of Governors). The allegation will be discussed with the LADO (the nature, content and context of the allegation), and a course of action agreed.

The person suspected of abuse must not be approached on the matter. In cases where serious harm is suspected, the Police should be informed from the outset.

This procedure relates to members of staff, (including supply staff or volunteers) who are currently working in the School regardless of where the abuse is alleged to have taken place.

Should the initial allegation first be made to any other member of staff that member of staff must either request the person raising the allegation to report it to the Headmaster or if that is not possible, to pass details of the allegation to the Headmaster immediately. If the Headmaster is absent, the allegation should be passed to the Chair of Governors.

The Chair of Governors, Trevor Johnson, can be contacted via Stuart Ansell, Chief Operating Officer and the Clerk to the Governors. Staff should state that the contact is required as the result of an allegation against a member of staff, supply staff, volunteer; no details of that allegation will be sought by the Clerk to the Governors.

If the allegation or concern is about the Headmaster, the person with concerns will contact the Chair of Governors or the LADO immediately (without informing the Headmaster). All allegations about the Chair of Governors should be reported to the LADO without the Chair of Governors being informed.

The Surrey LADO can be contacted on 0300 123 1650 or [LADO@Surreycc.gov.uk](mailto:LADO@Surreycc.gov.uk)

If an allegation requires immediate attention, but is received outside normal office hours, the allegation should be referred to the Surrey Social Care out of hours service (Tel: 01483 517898) or the local Police and the LADO informed as soon as possible.

See also Appendix Two for all contact numbers.

Any allegation against a member of staff, supply staff or volunteer will be dealt with as quickly as possible and without unnecessary delay. The School's priority will be to achieve a quick resolution of that allegation in a fair and consistent way that provides effective protection for any child involved and at the same time supports the person who is the subject of the allegation. All such allegations will be dealt with as a priority without delay.

In all cases of allegations against staff, supply staff or volunteers, the Headmaster and Chair of Governors, will contact the LADO immediately, without delay and within one working day at the latest. There will be no unnecessary delay in referring an allegation.

Before contacting the LADO, the School will conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation, being careful not to jeopardise any future Police investigation.

The LADO will provide advice and preside over the investigation of any allegation or suspicion of abuse directed against anyone working in the School. The LADO's role is not to investigate the

allegation, but to ensure that an appropriate investigation is carried out, whether that is by the Police, Children's Social Care, the School or a combination of these.

The discussion with the LADO will include the nature, content and context of the allegation. When to inform the individual concerned of the allegation will be considered carefully on a case by case basis, with guidance as required from the LADO, and if appropriate Children's Social Care and the Police.

A course of action will be agreed with the LADO, including any involvement of the Police. Any communication with both the individual and the parents of the child (or children) will be agreed with the LADO. GDPR requirements will not be allowed to stand in the way of safeguarding a pupil.

Advice will be sought from the LADO, Police and SSC to agree the following:

- who needs to know and, importantly, exactly what information can be shared;
- how to manage speculation, leaks and gossip;
- what, if any information can be reasonably given to the wider community to reduce speculation; and
- how to manage press interest if and when it should arise.

All discussions, including those with the LADO will be recorded in writing and any communication with the individual and the parents of the child concerned will be agreed.

Where the initial discussion with the LADO leads to no further action, the case manager will record the decision and justification for it; and agree on what information should be put in writing to the individual concerned and by whom.

The School will not investigate allegations nor undertake actions within an investigation, before speaking to the LADO so as not to jeopardise statutory investigations. If a crime may have been committed, the matter will be reported to the Police and their advice followed.

Where the initial discussion with the LADO establishes that further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. In straightforward cases, the investigation should normally be undertaken by a senior member of the School's staff. If the nature or complexity of the allegation requires it, it may be that the allegation will require an independent investigator; this would be discussed with the LADO.

The case manager will monitor the progress of cases to ensure that they are dealt with as quickly as possible in a thorough and fair process. Reviews will be conducted at fortnightly or monthly intervals, depending on the complexity of the case. Wherever possible, the first review should take place no later than four weeks after the initial assessment. Dates for subsequent reviews, ideally at fortnightly intervals, will be set at the review meeting if the investigation continues.

Records concerning allegations of sexual abuse will be preserved for the term of the Independent Inquiry into Child Sexual Abuse. All other records will be retained at least until the accused has reached normal pension age or for ten years from the date of the allegation if that is longer.

The School has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. Individuals will be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless external agencies object to this. The individual concerned will be advised to contact their trade union representative, if they have one, or a colleague for support. S/he will also be given access to welfare counselling and medical advice.

If the Police decide to take the case further and the allegation is against a member of staff, supply staff or volunteer it is possible that he or she might be suspended or, where the circumstances are considered to warrant it, dismissed. Suspension will not be an automatic response to an allegation.

The School aims to strike a balance between the need to protect children from abuse and the need to protect staff from false or unfounded allegations. However, the School must consider the following when assessing its actions:

- Is the pupil at risk?
- Are other pupils at risk?
- Will the presence in School of the member of staff impede an investigation?

The School will always consider alternative arrangements that would achieve the same result as suspension of the member of staff, supply staff or volunteer. The School will give due weight to the views of the LADO, KCSiE and 'Working Together to Safeguard Children' (Sept. 2018 plus 2019 and 2020 updates) when making a decision about suspension.

A member of staff, supply staff or volunteer will not be automatically suspended when an allegation is reported. All options to avoid suspension will be considered prior to taking that step. The case manager will consider carefully whether the circumstances warrant suspension from contact with children at the School, or until the allegation is resolved. Suspension will be considered only in cases where there is cause to suspect a child or other children at the School is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. A suspension decision will involve seeking views from HR, the LADO, and the Police and Children's Social Care where they have been involved. The case manager will consider the potential permanent professional reputational damage to employees that can result from suspension where an allegation is later found to be unfounded, unsubstantiated, malicious, or false.

Where the School is made aware that the Secretary of State has made an interim prohibition order, in respect of an individual who works at the School, the School will take immediate action to ensure the individual does not carry out work in contravention of the order. This means that pending the findings of the TRA investigation, the individual must not carry out teaching work.

Based on advice from HR provider and/or a risk analysis drawn up with the LADO, the following alternatives will be considered by the case manager before suspending a member of staff: redeployment within the School so that the individual does not have direct contact with the child or children concerned; providing an assistant to be present when the individual has contact with children; redeploying to alternative work in the School so the individual does not have unsupervised access to children; moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes accounts of their views. It should be made making it clear that this is not a punishment and parents have been consulted; or temporarily redeploying the member of staff to another role in a different location.

Hence, a member of staff, supply staff or volunteer will only be suspended if there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification will be recorded; this will include what alternatives to suspension have been considered and why they were rejected. The member of staff will be notified of the suspension and associated reasons in writing within one working day.

Appropriate support will be provided for the suspended individual and contact details provided of the named contact within the School. Social contact with colleagues and friends should not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence. The School recognises its duty of care to its employees. The School will offer

appropriate welfare support for a member of staff who is the subject of an investigation and recognises the sensitivity of the situation. Information is confidential and will not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation. The School will also manage and minimise the stress caused by the allegation; inform the individual as soon as possible, explaining the likely course of action, guided by the LADO, and the Police where necessary; advise the individual to contact their trade union representative, or a colleague for support; and provide access to counselling or medical advice where appropriate.

Accommodated staff who are being investigated following an allegation will be provided with alternative accommodation away from children. Accommodated staff who are suspended will be required to remain off-site for the duration of their suspension and will be provided with alternative accommodation away from children.

If the allegation is made against a supply agency worker, contractor or other person not directly employed by the School, the organisation or agency of employment will be informed in addition to following the procedures outlined in this policy. The School will never simply cease to use supply staff where there are safeguarding allegations; the correct procedures will always be followed. The School will, following advice from the LADO, discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the School, whilst the investigation is carried out. The School will usually take the lead while keeping the supply agency fully informed and involved. This is because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. Supply teachers, whilst not employed by the School, are under its supervision, direction and control whilst working at the School. They will be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School during the investigation. The School ensures that it informs the agencies that it uses of its process for managing allegations and keeps them up to date with information about policies.

If an allegation is made against a Governor, the School will consult with the LADO and follow the local procedures as advised by the LADO. Where an allegation is substantiated, the School will follow the procedures to consider removing them from office.

The School will have regard to the guidance and restriction on the reporting or publishing of allegations made against teachers and make all reasonable effort to maintain confidentiality and guard against unwanted publicity. The School will not make any statement about an allegation without consulting the LADO, and where relevant, Children's Social Care and the Police. This includes statements to parents. This will apply up to the point at which the alleged perpetrator is charged with an offence, or the DfE publish information about an investigation or reach a decision in a disciplinary case.

The reporting restrictions are disapplied if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so or if a court lifts the reporting restrictions in response to a request to do so.

The parents or carers of the child or children involved will be formally told about the allegation as soon as possible. The case manager will consult the LADO and where involved Children's Social Care and/or the police on what information can be disclosed. The parents will be kept informed about the progress of the case, only in relation to their child (no information can be shared regarding the staff member); and made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against teachers in schools whilst investigations are in progress.

The possible outcomes of an investigation following an allegation are:

- Substantiated: there is sufficient evidence to prove the allegation;
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation;
- False: there is sufficient evidence to disprove the allegation;
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence; or,
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

If there has been a substantiated allegation against a member of staff, supply staff or volunteer, the School will work with the LADO to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.

A 'settlement agreement', should not be used, where there are allegations that indicate the person is a risk or poses a risk of harm to children or deemed not suitable to work with children.

If the allegation is substantiated and the person is dismissed; resigns, or otherwise ceases to provide his or her services; or the School ceases to use the person's services, the School has a legal duty to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. The DBS contact details for referrals are PO Box 181, Darlington, DL1 9FA, [customerservices@dbb.gov.uk](mailto:customerservices@dbb.gov.uk) and 03000 200 190.

If an allegation is substantiated and the member of staff, supply staff, contractor, volunteer, student is dismissed or the School ceases to use his/her service or the individual resigns or otherwise ceases to provide his/her services, before a disciplinary process is completed the Headmaster should inform the person about the employer's statutory duty to report the case to the DBS and will so inform the Authority.

If an allegation is substantiated and the member of staff, supply staff, contractor, volunteer, student is dismissed or the School ceases to use the his/her service or the individual resigns or otherwise ceases to provide his/her services, and a judgement is made that a disciplinary process would have been instituted if the person had remained in post the Headmaster should similarly inform the person about the employer's statutory duty to report the case to the DBS and will so inform the Authority.

Ceasing to use a person's services includes: dismissal, non-renewal of a fixed-term contract, no longer engaging or refusing to engage a supply teacher provided by an employment agency, terminating the placement of a student teacher or other trainee, no longer using staff employed by contractors, no longer using volunteers, resignation, and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training or volunteering.

If a referral is to be made it should be submitted within one month of the allegation being substantiated and as much evidence about the circumstances of the case as possible will be included in the report. If the member of staff being referred to the DBS is a teacher, the case manager will also consider whether to refer the matter to the Teaching Regulation Agency (TRA) to consider prohibiting the individual from teaching. Failure to report constitutes an offence as there is a legal requirement for employers to make a referral to the DBS where they consider an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child.

Referral to the DBS cannot be prevented by a compromise agreement when referral is legally required nor can an individual's refusal to cooperate with an investigation prevent referral. The School has a responsibility to respond to requests from the DBS for information that is already held.

The School also has a duty to refer to the TRA where a teacher has been dismissed (or would have been dismissed if he or she had not resigned) and a prohibition order may be appropriate. Hence, the School will consider referral if a teacher has been dismissed (or might have been dismissed had they not resigned) because of serious misconduct. Reasons for a prohibition order include 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' and a 'conviction, at any time, for a relevant offence'. Advice about referrals to the TRA and the DBS are available at <https://www.gov.uk/guidance/teacher-misconduct-referring-a-case>. More information is available in the multi-agency procedures on the Surrey SCP website ([www.surreyscp.org.uk](http://www.surreyscp.org.uk)).

If an allegation is determined to be unsubstantiated, unfounded, false or malicious, the LADO, the case manager and 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 Social Care may be appropriate. If a report is shown to be deliberately invented or malicious, the School will consider whether any disciplinary action is appropriate against the individual who raised the allegation.

Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the School will consider how best to facilitate this.

The School will review cases to determine whether any lessons can be learnt and whether any improvements can be made.

Where an adult makes an allegation to the School that they were abused as a child, this must be referred to the Headmaster. For such non recent allegations, the individual will be advised to report the allegation to the Police. Non recent allegations made by a child, will be reported to the LADO. Abuse can be reported no matter how long ago it happened.

#### **4.6.2 Responding to allegations that do not meet the harm threshold (low level concerns)**

The School will also follow up on concerns that do not meet the harm threshold set out above. The School works to ensure the promotion of an open and transparent culture in which all concerns about all adults working in or on behalf of the School (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

It is important that all concerns about adults including allegations that do not meet the harms threshold are shared with the Headmaster (unless the allegation concerns the Headmaster, in which case it must be shared with the Chair of Governors). This allows the School to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; maintain appropriate professional boundaries and the ethos and values of the School. If the allegation concerns supply staff or contractors the Headmaster will ensure that their employers are notified so that any potential patterns of inappropriate behaviour can be identified.

The term 'low-level' concern does not mean that it is insignificant, but that the behaviour does not meet the harm threshold. 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 of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Example behaviours include, but are not limited to:

- being over friendly with children;



- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

Concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

School staff are clear about what constitutes appropriate behaviour and act in accordance with the staff Code of Conduct. Staff are empowered to share any low level safeguarding concerns and are encouraged self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

All low-level concerns will be recorded in writing including details of the concern, the context in which the concern arose, and the action taken. The name of the individual sharing their concerns will also be noted (if the individual wishes to remain anonymous then this will be respected as far as reasonably possible).

If the concern has been raised via a third party, the Headmaster will collect as much evidence as possible by speaking directly to the person who raised the concern, unless it has been raised anonymously, and to the individual involved and any witnesses. The information collected will help to categorise the type of behaviour and determine what further action may need to be taken. This will be recorded along with the rationale for the decisions and action taken.

Records of low-level concerns will be kept confidential, held securely and comply with GDPR and the Data Protection Act 2018. The School has the right to decide how long such information is retained, but it is recommended that it is retained at least until the individual leaves their employment.

The records held will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the School will decide on an appropriate course of action. This will either be through the disciplinary procedure or will be referred to the LADO where a pattern of behaviour moves from a concern to meeting the harms threshold.

The records review might identify there are wider cultural issues that enabled the behaviour to occur. If this is the case, the School will take steps such as revising appropriate policies or delivering extra training to minimise the risk of it happening again.

#### **4.7 Responding to allegations or concerns about peer on peer abuse**

Staff at Box Hill School recognise that safeguarding issues can manifest themselves via peer on peer abuse meaning that children can abuse other children. It is recognised that it can happen both inside and outside of School and online. Hence, the School ensures that it has processes, procedures and systems to minimise the risk of peer on peer abuse and to deal with it in a timely way when it does happen. Peer on peer abuse is likely to include (but is not limited to):

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

- sexual violence such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment such as sexual comments, remarks, 'jokes' and online sexual harassment which may be stand-alone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nudes and semi nude images and or videos (also known as sexting or youth produced sexual imagery)
- upskirting (which is a criminal offence) which typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any gender can be a victim
- 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).

Staff understand, that even if there are no reports at School that it does not mean that peer on peer abuse is not happening, it may be the case that it is just not being reported. As such, staff recognise that it is important if they have any concerns regarding peer on peer abuse that they speak to the Lead DSL or one of the Deputy DSLs.

Staff recognise the importance of challenging inappropriate behaviours between peers, many of which are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

The nature of the allegation or concern will determine whether staff should implement the School's anti-bullying procedures or whether a referral needs to be made to Social Workers.

The School recognises its responsibility to minimise the risk of peer on peer abuse and ensures that:

- information on the School's Anti Bullying Policy is provided to parents and known to staff, as well as being available and known to the pupils themselves
- no 'initiation' ceremonies' intended to cause pain, anxiety or humiliation to pupils are allowed, with all pupils and staff being made aware of the fact that such ceremonies are strictly and absolutely forbidden
- there are regular assemblies, external speakers, PSHEE lessons alongside training of older pupils to promote the anti peer on peer abuse and anti-bullying) message
- there are effective levels of staff supervision during the School day
- pastoral care structures support staff in preventing incidents of peer on peer abuse
- staff are empowered to challenge inappropriate behaviour between peers
- staff understand the important role they have to play in preventing peer on peer abuse and in responding where they believe a pupil may be at risk from it
- effective measures are in place to prevent peer on peer abuse (including bullying) and to deal effectively with it should it arise, in order that pupils feel safe and do not identify this as a problem in the School
- the pupils are regularly surveyed to understand their perspective. This assists along with regular reflection of procedures and processes, in ensuring that the pupils feel able to report abuse, knowing that their concerns will be treated seriously
- the vulnerabilities of those with special educational needs or disabilities (SEND) or certain health conditions are recognised

- appropriate measures are in place to ensure that any pupil who experiences peer on peer abuse (including being bullied) is suitably supported and that pupils who may bully others are given appropriate help, support and guidance
- all incidents will be taken seriously, parents/carers will be contacted, and appropriate action taken.

Concerns must always be shared as no single professional can have a full picture of a child's needs and circumstances and what might appear to one member of staff as a one-off minor incident may very well not be. Everyone has a role to play in identifying concerns, sharing information and taking prompt action so as to act in the best interests of the child.

Bullying is a subset of abuse that can take many forms, all of which can be seen in the bullying of boys, including physical, emotional, verbal, ostracism, homophobic and gender-related bullying and/or cyber bullying (which includes abusive messages posted online or sent by SMS or email or via other electronic means using technology). In addition, pupils may be subject to initiation or hazing type violence; such practices may include:

- forced activities for new 'recruits' to 'prove' their worth to join
- forced or required consumption of alcohol, spicy foods or other substances
- requirement to endure hardships such as staying awake, menial tasks, physical labour, running while blindfolded, etc.
- humiliation
- isolation
- beatings, paddling, or other physical acts
- requirements for new or potential members to do things established members are not required to do
- illegal activities such as requirement to steal items from local shops

Bullying will often involve more than one form. The School is determined that no type of bullying will be tolerated by staff, pupils, or parents at Box Hill; abuse is abuse and will not be tolerated or passed off as 'banter', 'part of growing up' or 'having a laugh'. Bullying on the basis of protected characteristics is taken particularly seriously. The gendered nature of peer on peer abuse is also recognised (i.e. that it is more likely that girls will be victims and boys perpetrators and that the bullying may take different forms for girls and boys). Staff will intervene in all such cases as all peer on peer abuse is unacceptable and will be taken seriously. Staff will inform the Head of Year/House Parent and Deputy Head Pastoral (DHP).

Further information is available in the School's Anti Bullying Policy and the Behaviour Management Policy. These policies apply to bullying behaviour outside of the School of which the School becomes aware.

All incidents of bullying behaviour must be reported to the Head of Year/House Parent, and DHP. All reports, however minor, will be coordinated by the DHP and investigated by the Head of Year/House Parent (unless the seriousness of the incident warrants an investigation by the DHP) to ensure that a potentially serious case does not develop. Parents will be informed by the Head of Year/House Parent of such incidents. A record is maintained centrally by the Pastoral team of all such incidents.

In serious cases a summary of the interviews and findings, will be forwarded to the Headmaster for consideration to determine the appropriate course of action and possible sanctioning response for the perpetrator. An appropriate record of the incident, investigation and sanction is placed in the School file of all those pupils involved. A record is maintained centrally by the Pastoral team of all such incidents.

Both the victims of bullying and those who have been involved in bullying behaviour themselves can expect the support of the School. The motivation behind the bullying behaviour will be considered. If this gives rise to concerns that the perpetrator of the behaviour is at risk of harm then the School will follow the Safeguarding and Child Protection procedures.

The support for the victim of bullying behaviour will seek to help them recover from the unpleasant and upsetting effects of bullying and to begin once more to enjoy their experience of being a member of the School. This process will involve thorough discussion with the pupil, their parents, Head of Year/House Parent and DHP. Support from external services such as Social Care and CAMHS will also be sought if appropriate as it might be that early help or additional support is needed.

The support for the perpetrator of the bullying behaviour will involve efforts to help them change their behaviour. Other than in the cases of those required to leave the School (including those who have been permanently excluded as a result of their bullying), this will be through discussion with the pupil concerned, their parents, Head of Year/House Parent and DHP. Support from external services will also be sought if appropriate as it might be that early help or additional support is needed for the perpetrator. Whilst the School recognises the need to support those who have been involved in bullying behaviour in changing their behaviour, it also accepts that sanctions will often be necessary and appropriate as part of its response to bullying incidents.

An annual report is made to the governing body through the Governors' Pastoral Committee on the prevention of bullying and the anti-bullying strategies being followed by the School.

All School staff, parents and pupils should be aware that engaging in bullying behaviour or condoning or failing to challenge or report bullying could lead to the application of child protection procedures. In the case of a member of staff being complicit, or otherwise involved, in bullying behaviour, the procedure outlined in section 4.7 Responding to allegations or concerns about staff or volunteers above will be applied.

Under the Children Act 1989, a bullying incident (including cyber bullying) will be treated as a child protection concern where there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm'. The School will refer to local agencies and take advice from the Surrey SCP as to the appropriate action to take, including the timing of informing parents. Parents will be informed as soon as possible, unless it is not in the best interests of the child to do so. It is an expectation that in the event of disclosures about pupil on pupil abuse that all children involved, whether as perpetrator or victim, are treated as being at risk. Child protection concerns involving an allegation against a pupil when there is reasonable cause to suspect that a child is suffering, or likely to suffer significant harm will be referred to the LADO.

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation and the School's policies on behaviour and discipline will apply.

A referral to Children's Social care will be made in all cases of domestic abuse whether physical, emotional, sexual and/or financial abuse, or coercive control.

These child protection procedures will be followed if a child or young person displays sexually harmful behaviour. This involves one or more children engaging in sexual discussions or acts that are inappropriate for their age or stage of development. It is also considered harmful if it involves coercion or threats of violence or one of the children is much older than the other.

The process for managing sexually harmful behaviour can be found in the multi-agency safeguarding procedures on the Surrey SCP website ([www.surreyscp.org.uk](http://www.surreyscp.org.uk)). In brief, a multi-agency meeting should be convened by Children's Social Care following the referral and an action plan agreed. A School risk

assessment will be put in place, preferably by way of a meeting, which includes parents/carers and other practitioners where they are involved.

Staff should not dismiss abusive behaviour as 'normal' between young people and should not develop high thresholds before taking action.

#### **4.8 Responding to suspicions of harm occurring outside of School**

A member of staff who suspects that a pupil is suffering harm from outside the School should seek information from the child with tact and sympathy using 'open' and not leading questions. A sufficient record should be made of the conversation and if the member of staff continues to be concerned he or she should follow the appropriate guidelines as set out in this policy.

#### **4.9 Early help**

A member of staff who believes that a pupil would benefit from early help should speak to the Pastoral Team including the DSL. Early help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years. The School listens to the voice of the child, puts its pupils at the centre of its care and recognises the importance of pupils receiving the right help at the right time to address risks and prevent issues escalating. The School provides a wide range of early help options including those interventions that are put in place by the Tutor, Head of Year, House Parent, Medical Centre and Pastoral Team.

Effective early help relies upon local agencies working together and hence the DSL will provide support and lead throughout the Surrey SCP early help assessment process. This process involves the use of the Common Assessment Framework (CAF), the Surrey SCP threshold tool (Effective Family Resilience Surrey) and the Team around the Family approach. These early help assessments are designed to identify what help the child and family require to prevent needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989.

Early help will not be appropriate if a child may be suffering, or likely to suffer, significant harm, and/or may be in immediate danger and in need of immediate protection (where referrals to the Police and/or Children's Social Care should be made immediately).

All staff should, in particular, be alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs;
- is a young carer;
- is showing signs of engaging in anti-social or criminal behaviour;
- Is frequently missing;
- Is misusing drugs or alcohol;
- Is at risk of modern slavery, trafficking or exploitation;
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems and domestic violence;
- has returned home to their family from care;
- is showing early signs of abuse and/or neglect;
- Is at risk of being radicalised or exploited;
- Is a privately fostered child.

In addition to identifying emerging problems and liaising with the DSL to share information with other practitioners so to support early identification and assessment staff may be asked, in some cases, to act as the lead professional in undertaking the early help assessment. The lead professional provides support to the child and family, acts as an advocate on their behalf and coordinates the delivery of support services. The lead professional role could be undertaken by a General Practitioner (GP), family

support worker, teacher, health visitor and/or special educational needs coordinator. Decisions about who should be the lead professional will be taken on a case by case basis and will be informed by the child and their family.

For an early help assessment to be effective:

- the assessment should be undertaken with the agreement of the child and their parents or carers. It should involve the child and family as well as all the practitioners who are working with them;
- a teacher, GP, health visitor, early years' worker or other professional should be able to discuss concerns they may have about a child and family with a Social Worker in the local authority. Local authority children's social care should set out the process for how this will happen; and
- if parents and/or the child do not consent to an early help assessment, then the lead professional should make a judgement as to whether, without help, the needs of the child will escalate. If so, a referral into local authority children's social care may be necessary.

The agreement of the child and their parents or carers will be sought by the person within the School who has the closest working relationship with them; this might be the DSL, Head of Year, House Parent, Tutor, a teacher or another member of staff. Each case will be judged individually and the decision as to the most appropriate person to undertake this will be made by the DSL in consultation. If agreement is refused by the child and/or their parents or carers the advice of Children's Social Care will be sought by the DSL.

If early help is considered to be appropriate, the situation will be kept under constant review and a referral made to Children's Social Care if the child's situation does not appear to be improving.

If at any time it is considered that the child may be a child in need as defined in the Children Act 1989 (a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled), or that the child has suffered significant harm or is likely to do so, a referral should be made immediately to Children's Social Care. This referral can be made by any professional.

Further guidance can be found in 'Working Together to Safeguard Children' (September 2018 plus 2019 and 2020 updates).

#### **4.10 Mental health**

The School recognises the important role that all staff have to play in supporting the mental health and wellbeing of all pupils. The School has due regard to 'Mental health and behaviour in schools' (Nov. 2018). All staff at the School are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff know the pupils at the School as individuals and so are well placed to observe and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Staff training covers the fact that where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, that this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff are aware that such experiences, can impact upon pupil mental health, behaviour and education.

Staff understand that only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. School staff are not expected or trained to diagnose mental health conditions or issues but may notice behaviours that may be of concern. Where staff have a mental health concern about a child that is also a safeguarding concern, (this could include but is not limited

to, self harm or suicidal ideation), immediate action is taken to inform the DSL. The DSL will ensure that the School works with any external agency involved in the support of the pupil. Mental health is taught to pupils through the PSHEE programme and reinforced by assemblies and support of national events such as Mental Health week. The School aims to promote positive health, wellbeing and resilience among its pupils.

#### **4.11 Pupils engaging in under-age sexual activity**

Sexual activity where one of the partners is under the age of 16 is illegal. Whilst it is not usual for consenting partners of a similar age to be criminalised if a pupil reveals that they are sexually active it may be a child protection matter. The DSL will exercise professional judgement when deciding whether to refer to Social Workers, taking into account such things as the age of the pupils, imbalance of power, wide difference in ages or developmental stages and the possibility of peer abuse etc.

Where a child is under the age of 13 penetrative sex is classified as rape under the Sexual Offences Act 2003 so must be reported to Social Workers in every case.

The multi-agency safeguarding procedures, on the Surrey SCP website, have more information about under-age sexual activity ([www.surreyscp.org.uk](http://www.surreyscp.org.uk)).

Sexual activity may also be considered a disciplinary matter.

#### **4.12 Youth produced sexual imagery ('sexting')**

There is no clear definition of 'sexting'. Practitioners consider sexting to be 'sending or posting sexually suggestive images, including nude or semi-nude photographs, via mobiles or over the Internet.' Young people, however, are more likely to interpret sexting as 'writing and sharing explicit messages with people they know'. Similarly, many parents think of sexting as flirty or sexual text messages rather than images.

This section covers the sharing of sexual imagery by young people. Creating and sharing sexual photos and videos of under-18s is illegal and therefore causes the greatest complexity for schools and other agencies when responding. It also presents a range of risks, particularly if the imagery is shared further, including embarrassment, bullying and increased vulnerability to sexual exploitation, which need careful management.

School staff are advised to use the term 'youth produced sexual imagery' or to refer to the sharing of nudes and semi nudes rather than 'sexting' to ensure clarity surrounding this issue. The types of incidents covered are:

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

This section does not cover the sharing of sexual imagery of people under 18 by adults as this constitutes child sexual abuse. In this instance, the School will use the reporting procedures described earlier in the Policy.

The term 'sharing nudes and semi-nudes' means the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The term 'nudes' is used as it is most commonly recognised by young people. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where children and young people: find nudes and semi-nudes online and share them claiming to be from a peer; digitally manipulate an image of a young person into an existing nude online; create or share images to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame.

All incidents of youth produced sexual imagery must be dealt with as a safeguarding concern. Consensual and non-consensual sharing of nudes and semi-nude images and/or videos can be signs that children are at risk. The procedure for dealing with such incidents is as follows:

- if staff become aware of such an incident they must report it to the DSL as soon as possible. Disclosures about such incidents can happen in a variety of ways. The young person affected may inform a member of staff, or a friend or parent may inform someone in School, or inform the Police directly
- any direct disclosure by a young person should be taken very seriously and handled sensitively. A young person who discloses they are the subject of sexual imagery is likely to be embarrassed and worried about the consequences. It is likely that disclosure in School is a last resort and they may have already tried to resolve the issue themselves
- where an electronic device is involved staff should confiscate the device and hand it to the DSL without any content first being viewed as staff should not be viewing or forwarding illegal or potentially illegal images of a child
- the DSL will hold an initial review meeting with appropriate School staff. This initial review meeting aims to establish:
  - whether there is an immediate risk to a young person or young people
  - if a referral should be made to the Police and/or Children's Social Care
  - if it is necessary to view the imagery in order to safeguard the young person – in most cases, imagery should not be viewed
  - the nature of the incident (Finkelhor and Wolak's (UKCIS guidance) typology of youth-produced imagery cases may be used to define and assess incidents according to motivations)
  - what further information is required to decide on the best response (there should be subsequent interviews with the children or young people involved where appropriate)
  - whether the imagery 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 from devices or online services
  - any relevant facts about the young people involved which would influence risk assessment
  - if there is a need to contact another school, college, setting or individual
  - whether to contact parents or carers of the pupils involved - in most cases parents should be involved
- an immediate referral to the Police and/or Children's Social Care (via Surrey Children's Single Point of Access) will be made if at this initial stage;
  - the incident involves an adult
  - there is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example, owing to special educational needs)
  - what is known about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
  - the imagery involves sexual acts and any pupil in the imagery is under 13



- we have reason to believe a young person is at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming

If none of the above apply, then the School may decide to respond to the incident without involving the Police or Children's Social Care (the School can choose to escalate the incident at any time if further information/concerns come to light). For example, consensual image sharing, between older children of the same age, might not be abusive (although it is illegal) however, this cannot be assumed to be the case and so the process outlined must be followed.

- if at the initial review stage a decision has been made not to refer to the Police and/or Children's Social Care, the DSL should conduct a further review. This will include subsequent interviews with the young people involved (if appropriate) to establish the facts and assess the risks. The risks considered include:
  - why was the imagery shared? Was it consensual or was the young person coerced or put under pressure?
  - who has shared the imagery?
  - was it shared without the consent of the child or young person who produced the image?
  - where and how widely has the imagery been shared? What steps have been taken to contain the spread?
  - age of those involved?
  - are there any adults involved in the sharing of the imagery?
  - what is the impact on the young people involved?
  - do the young people involved have additional vulnerabilities?
  - does the young person understand consent?
  - has the young person taken part in this kind of activity before?
- parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm. Any decision not to inform the parents would generally be made in conjunction with other services such as Children's Social Care and/or the Police, who would take the lead in deciding when the parents should be informed.

If, at any point in the process if there is a concern a young person has been harmed or is at risk of harm, a referral will be made to Children's Social Care and/or the Police immediately.

If the DSL is aware that Children's Social Care are currently involved with a young person involved in an incident of youth produced sexual imagery, then they will contact Children's Social Care. They will also contact Children's Social Care if they believe they may be involved, or have been involved with a young person in the past.

If as a result of the investigation the DSL believes there are wider issues which meet the threshold for Children's Social Care involvement, then they will make a referral in line with the child protection procedures.

The decision to respond to the incident without involving the Police or Children's Social Care would be made in cases when the DSL is confident that they have enough information to assess the risks to pupils involved and the risks can be managed within the School's pastoral support and disciplinary framework and, if appropriate, their local network of support. The decision will be made by the DSL after consultation with the Headmaster and input from other members of staff where appropriate. The decision will be recorded. Suitable consideration will be given to deleting imagery from devices and online services to limit any further sharing of the imagery.

If a young person has shared imagery consensually, such as when in a romantic relationship, or as a 'joke', and there is no intended malice, it is usually appropriate for the School to manage the incident

directly. In contrast any incidents with aggravating factors, for example, a young person sharing someone else's imagery without consent and with malicious intent, should generally be referred to Police and/or Children's Social Care. Where there are doubts about whether to involve other agencies, a referral will be made.

Whilst the School recognises the need to support those who have been involved in youth produced sexual imagery behaviour in changing their behaviour, it also accepts that sanctions will often be necessary and appropriate as part of its response to such incidents. The response of the School is always guided by the principle of proportionality and the primary concern at all times is the welfare and protection of the young people involved.

Adults should not view youth produced sexual imagery unless there is good and clear reason to do so. Wherever possible responses to incidents should be based on what DSLs have been told about the content of the imagery.

The decision to view imagery should be based on the professional judgement of the DSL. Imagery should never be viewed if the act of viewing will cause significant distress or harm to the pupil. If a decision is made to view imagery, the DSL needs to be satisfied that viewing:

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

If it is necessary to view the imagery, then the DSL will:

- never copy, print or share the imagery; this is illegal
- discuss the decision with the Headmaster
- ensure viewing is undertaken by the DSL or another member of the safeguarding team with delegated authority from the Headmaster
- ensure viewing takes place with two members of staff present in the room, both of whom are ideally members of the Senior Leadership Team with one at least being the same sex as the pupil involved
- ensure wherever possible ensure that viewing takes place on School premises
- record the viewing of the imagery in the School's safeguarding records including the date, who was present, why the image was viewed and any subsequent actions
- ensure if any devices need to be confiscated and passed onto the Police, that they are disconnected from Wi-Fi and data, and turned off immediately to avoid imagery being removed from the device remotely through a cloud storage service. The device will be stored securely until collected by the Police.

If youth produced sexual imagery has been unavoidably viewed by a member of staff either following a disclosure from a young person or as a result of a member of staff undertaking their daily role (such as IT staff monitoring School systems) the DSL will ensure that the staff member is provided with appropriate support.

Once a report is made to the Police, the report has to be recorded and the Police will conduct an investigation. This may include seizure of devices and interviews with the young people involved.

The use of outcome 21 by the Police means that schools the Police have discretion to respond appropriately in cases of youth produced sexual imagery and to record incidents in a way which should not have a long term negative impact on young people. (Outcome 21 states 'further investigation,

resulting from the crime report, which could provide evidence sufficient to support formal action being taken against the suspect is not in the public interest. This is a Police decision.’)

Whilst young people creating and sharing sexual imagery can be very risky, it is often the result of young people’s natural curiosity about sex and their exploration of relationships. Hence, teaching about safeguarding issues can prevent harm by providing young people with skills, attributes and knowledge to help them navigate risks. The School locates learning within relevant lessons and within its PSHEE programme throughout the age range. The School also uses external speakers to deliver presentations alongside assemblies delivered by CEOP trained staff.

Further information may be found in the following documents (both of which have been used in the update of this policy):

Department for Education advice document, ‘Searching, screening and confiscation’ (January 2018)

UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people (December 2020)

Support is available from:

ChildLine (for children)

0800 1111

<https://www.childline.org.uk/get-support/1-2-1-counsellor-chat/>

NCA-CEOP (for parents/carers concerned that their child is being contacted by adults as a result of having sharing sexual imagery )

[www.ceop.Police.uk/safety-centre](http://www.ceop.Police.uk/safety-centre)

NSPCC Helpline

0808 800 5000

[help@nspcc.org.uk](mailto:help@nspcc.org.uk)

NSPCC Online Safety Helpline

0808 800 5002

#### **4.13 Child on child sexual violence and sexual harassment**

Further information may be found in ‘Sexual violence and sexual harassment between children in schools and colleges’ (Sept. 2021). The School will respond to all reports and concerns of child on child sexual violence and sexual harassment, including those that have happened outside of the School and/or online.

Sexual violence and sexual harassment can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. It can also occur in intimate personal relationships.

Box Hill School has a zero tolerance towards and is clear that sexual violence and sexual harassment is never acceptable and will not be tolerated; it is not an inevitable part of growing up nor is it ‘banter’ or ‘having a laugh’, ‘part of growing up’ or ‘boys being boys’. The School maintains an attitude of ‘it could happen here’. Staff understand that addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Staff have received training in this area to ensure that such inappropriate behaviour is recognised and acted upon as the School understands that not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying some behaviours related to abuse can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

The School will educate the pupils about appropriate behaviour and will challenge physical behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts as dismissing or tolerating such behaviours risks normalising them.

Sexual violence as defined under the Sexual Offences Act 2003 is:

**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 that sexual assault covers a wide range of behaviours hence a single act of kissing someone without consent or touching someone 's bottom, breasts or 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. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

**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 and 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; and sexual intercourse without consent is rape.

**Sexual harassment** is defined as 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of a 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. Sexual harassment can include (this list is not exhaustive):

- 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;
- upskirting which is a criminal offence. The Voyeurism (Offences) Act 2019 criminalised the act of 'upskirting'. 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. It is not only confined to victims wearing skirts or dresses and equally applies when men or women are wearing kilts, cassocks, shorts or trousers. It is often performed in crowded public places, for example on public transport or at music festivals, which can make it difficult to notice offenders.
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (this could indicate sexual violence) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - consensual and non-consensual sharing of nude and semi-nude images and videos. (the UK Council of Internet Safety (UKCIS) Guidance: Sharing nudes and semi-nudes provides detailed advice; the taking and sharing of nude photographs of those aged under 18 is a criminal offence);

- sharing of unwanted explicit content;
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media; and
- sexual exploitation; coercion and threats.

Victims of sexual violence and sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

The School has systems in place (that are well promoted, easily understood and easily accessible) for children to confidently report abuse, knowing their concerns will be treated seriously. Staff also understand children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. Staff understand that if they have any concerns about a child's welfare, they should act on them immediately by following the guidelines regarding disclosures and then immediately referring to the DSL who is more likely to have a complete safeguarding picture.

The School will take any report of sexual violence or sexual harassment seriously. It should be noted that it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. It is also recognised that pupils with SEND needs are more likely to be abused than their peers as are LGBT children.

Staff are aware that the initial response to a report from a pupil is particularly important as the response can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. 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. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Where the report is of sexual violence, the DSL will make an immediate risk and needs assessment (it will also be considered for cases of sexual harassment). This will consider the protection and support of the victim, the alleged perpetrator and all other pupils at the school with particular regard to their protection. The DSL will work closely with external agencies throughout this process and act in line with part five of KCSiE. The management of each case of sexual violence or harassment will be considered on a case by case basis and a decision made (with the help of external agencies) as to whether the approach to be taken is that of internal management, early help, or a referral to Social Care (and a parallel report to the Police). Whatever the management route, the safety of the children involved is paramount and those involved will be supported over the longer term. Support will be tailored on an individualised basis.

Each report will be considered on a case-by-case basis and the best interests of the child will come first. The School will also consider decisions regarding safeguarding and support for the alleged perpetrator. A child abusing another child may be a sign they have been abused themselves or a sign of wider issues that require addressing. Taking disciplinary action and providing appropriate support, can, and should, occur at the same time if necessary.

Decisions and actions will be regularly reviewed, and relevant policies updated to reflect lessons learnt. The School will be alert to potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, this will be acted upon with consideration given to additional teaching and/or staff training to minimise the risk of it happening again.

If a report is determined 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 Social Care may be appropriate.

#### **4.14 Children missing education (CME)**

All children, regardless of their circumstances, are entitled to a full time education which is suitable to their age, ability, aptitude and any special educational needs they may have. A child going missing from education is a potential indicator of abuse or neglect., which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM or risk of forced marriage. The School has due regard for the statutory guidance on children missing education and the protocols that it advises. The School's Attendance Policy also pays due regard to 'School attendance: Guidance for maintained schools, academies, independent schools and local authorities' (July 2019), published by the Department for Education (DfE). The School monitors attendance and addresses poor or irregular attendance.

If a pupil goes missing, then the Missing Pupil Procedure must be followed. The DHP must be informed on all occasions if a pupil is missing to help identify vulnerable pupils and to help to prevent the risks of their going missing in the future. It is particularly important that information on those who go missing on more than one occasion is passed to the DSL. Where a pupil is missing from School staff should also have in mind the potential safeguarding concerns relating to travelling to conflict zones and forced marriage.

The School requests that parents provide at least two emergency contacts for their child.

The School will notify the local authority within five days when a pupil's name is added to the admission register.

The School will notify the local authority when a pupil's name is added to or removed from the admissions register at non-standard transitions. The School will inform the local authority when a pupil is deleted from its register under any of the fifteen grounds set out in the Education (Pupil Registration) (England) Regulations 2006 as amended, as soon as the ground for deletion is met and not before the pupil's name is deleted from the register.

This is undertaken so that the local authority can, as part of their duty to identify children of compulsory school age who are missing education, follow up with any child who might be in danger of not receiving an education and who might be at risk of being harmed, exploited or radicalised.

The School has a legal duty to inform the local authority of any pupil who fails to attend School regularly or has been absent without the School's permission for a continuous period of 10 school days or more.

Further guidance can be found in the government's Missing children and adults' strategy (December 2011) (<https://www.gov.uk/government/publications/missing-children-and-adults-strategy>) and in 'Children missing education: statutory guidance for local authorities' (September 2016) (<https://www.gov.uk/government/publications/children-missing-education>).

#### **4.15 Homelessness**

Being homeless or being at risk of homelessness presents a real risk to a child's welfare. If staff become concerned that a pupil is at risk of homelessness it is referred to the DSL. Indicators that a family may

be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property.

#### **4.16 Child criminal exploitation (CCE)**

As stated in 'KCSiE' (2021) CCE is a form of abuse that occurs where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into criminal activity.

As with CSE, this power imbalance can also be due to a range of factors including age, gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants 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. The abuse can be perpetrated by individuals or groups, males or females, and children or adults and can include violence or the threat of violence.

CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

CCE can include children being forced to work in cannabis factories, being forced or manipulated into moving drugs or money across the country (see the section on county lines for more information), forced to shoplift or pickpocket. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

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. As children involved in CCE often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

Recognition of CCE is part of staff training and understand that the following are potential indicators of CCE: children who appear with unexplained gifts, money or new possessions; children who associate with other young people involved in exploitation; gang association and/or isolation from peers/social networks, children who suffer from changes in emotional well-being, self harm, children who receive excessive volumes of texts or phone calls, concerning use of the internet and/or social media, increasing secretiveness around behaviours, children who misuse drugs and alcohol; children who leave home/care without explanation, go missing for periods of time or regularly come home late; and children who regularly miss school or education, are excluded or do not take part in education.

Staff are aware that the experience of girls who are criminally exploited can be very different to that of boys and that the indicators may not be the same. Staff are also aware that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Staff will discuss any concerns about CCE with the DSL who will take appropriate action in line with local safeguarding procedures. The School recognises that children who have been exploited will need additional support to help maintain them in education.

#### 4.17 Child sexual exploitation (CSE)

As stated in 'Child sexual exploitation: Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation' (February 2017), child sexual exploitation (CSE) is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

It is recognised that children can be both experiencing CSE and perpetrating it at the same time. Victims of CSE may have been exploited by other children, who themselves may be experiencing exploitation – where this is the case, we understand it is important that the child perpetrator is also recognised as a victim.

CSE can occur over time or be a one-off occurrence. As a form of child sexual abuse, CSE may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative 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 affect any child, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

There are a range of other factors that could make a child more vulnerable to exploitation, but not all children with these indicators will be exploited and CSE can occur without any of these factors. Possible include, the age of the child (which may be a contributing factor for an imbalance of power), sexual identity, cognitive ability, learning difficulties, social isolation or difficulties, communication ability, physical strength, status, bereavement, access to economic or other resources, prior experience of neglect and/or abuse, lack of a stable home environment and/or accommodation, economic vulnerability, being in care, connections with other children who are being sexually exploited and family members or other contacts involved in sex work.

CSE is never the victim's fault, even if there is some form of exchange (sexual activity in return for something); all children and young people have a right to be safe and protected from harm.

We recognise that any child or young person may be at risk of sexual exploitation, regardless of family background or other circumstances. Boys may be less likely than females to disclose experiences of CSE and so it is important that we remain alert to CSE. We recognise that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of



abuse, such as CCE (including county lines) and CSE. We also recognise that the long-term impact of CSE can lead to significant harm to physical and mental health.

Recognition of CSE is part of staff training. Possible indicators of risk include for example, acquisition of money, clothes, mobile phones, unexplained gifts or new possessions etc. without plausible explanation, excessive volume of texts and/or telephone calls, isolation from peers, inappropriate sexualised behaviour, display of sexual behaviours beyond expected sexual development, suffering from sexually transmitted infections or becoming pregnant, evidence of/suspicions of physical or sexual assault, relationships with controlling older individuals or groups (including those with older boyfriends or girlfriends), associating with other young people involved in exploitation and increasing secretiveness, gang association and/or isolation from peers/social networks, frequenting areas known for sex work. Other indicators include suffering from changes in emotional well-being, self harm, concerning use of the internet and/or social media, increasing secretiveness around behaviours, misuse of drugs and alcohol, leaving home/care without explanation, going missing for periods of time or regularly returning home late, missing school or not taking part in education.

Due to the grooming methods used by abusers, it is common for young people not to recognise they are being abused and may feel they are 'in a relationship' and acting voluntarily. Pupils at this School are educated about CSE to build awareness and we promote resilience via the recognition of healthy relationships. Pupils discuss CSE as part of the PSHEE programme.

Any concerns about child sexual exploitation will be discussed with the DSL who will take appropriate action including completing a Surrey SCP risk assessment form. We recognise that the early sharing of information is key to providing effective help and will work closely with all external agencies involved. There are more detailed local procedures and the risk assessment tool in the multi-agency safeguarding procedures on the Surrey SCP website <https://www.surreyscp.org.uk>

The School has due regard to both the Surrey SCP procedures and to DfE guidance Child Sexual Exploitation: Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation (Feb 2017).

#### **4.18 County lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas (within the UK), using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move (and store) drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are increasingly being targeted and recruited online using social media.

Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CCE and CSE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators include children who:

- go missing and are subsequently found in areas away from their home;
- have been the victim or perpetrator of serious violence (e.g. knife crime);

- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing.

The School recognises that any child can become a victim of county lines activity and hence staff will report any concerns about CCE to the DSL. It is recognised that one of the ways of identifying potential involvement in county lines are missing episodes (both from home and School), when the victim may have been trafficked for the purpose of transporting drugs.

The School will consider whether there are signs present that suggest the child may be a victim of modern slavery and so a referral to the National Referral Mechanism will always be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral will be made alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

#### **4.19 Serious violence**

It is recognised by staff that children can be at risk from or involved with serious violent crime. Hence, recognition of the indicators of such activity is included in staff training. Such indicators 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 or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that pupils have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Staff are aware that there is a range of risk factors which increase the likelihood of involvement in serious violence. These include being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Any concerns about serious violence will be discussed with the DSL who will take appropriate action and will work closely with external agencies. The School will make use of the relevant Home Office guidance in this area.

#### **4.20 Cybercrime**

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the DSL will consider referring 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.

Additional information can be found at <https://www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices>

#### **4.21 Domestic abuse**

The Domestic Abuse Act 2021 has introduced a statutory definition of domestic abuse. Domestic abuse is defined as any of the following behaviours; either as a pattern of behaviour, or as a single incident, between two people over the age of 16 who are ‘personally connected’ to each other:

- physical or sexual abuse
- violent or threatening behaviour
- controlling or coercive behaviour
- economic abuse (means any behaviour that has a substantial adverse effect on the victim’s ability to acquire, use or maintain money or other property, or obtain goods or services)
- psychological, emotional or other abuse.

People are ‘personally connected’ when they are, or have been, married to each other or civil partners; or have agreed to marry or become civil partners (whether or not the agreement has been terminated); if they are or have been, in an intimate personal relationship with each other; have had a parental relationship in relation to the same child or they are relatives.

The definition of domestic abuse applies to children if they see, hear or experience the effects of the abuse and they are related to the people involved.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, race, ethnicity, socio- economic status, gender, sexuality, religion, mental or physical ability or background. Domestic abuse can take place inside or outside of the home and can also involve other types of abuse.

We use the term domestic abuse to reflect that a number of abusive and controlling behaviours are involved beyond violence. Slapping, punching, kicking, bruising, rape, ridicule, constant criticism, threats, manipulation, sleep deprivation, social isolation, and other controlling behaviours all count as abuse. The signs and symptoms of a child suffering or witnessing domestic abuse are similar to other forms of abuse or neglect.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. They may also be directly targeted by the abuser or take on a protective role and get caught in the middle. In the long term this can lead to mental health issues such as depression, self-harm and anxiety.

Young people can also experience domestic abuse within their own intimate relationships. This form of peer on peer abuse is sometimes referred to as ‘teenage relationship abuse’. Depending on the age of the young people, this may not be recognised in law under the statutory definition of ‘domestic abuse’ (if one or both are under 16). Where there is concern in this area, it is vital that staff report their concerns to the DSL.

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

Any concerns about domestic abuse will be discussed with the DSL who will take appropriate action. The School is signed up to Operation Encompass which 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 School. This ensures that the School has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs.

Further help is available from:

National Domestic Abuse Helpline (free and available 24 hours a day) 0808 2000 247

Surrey Domestic Abuse Helpline 01483 776822

East Surrey Domestic Abuse Services (covering Reigate & Banstead, Mole Valley and Tandridge)  
01737 771350

#### **4.22 Forms of abuse linked to culture, faith or belief**

All staff in this School will promote mutual respect and tolerance of those with different faiths and beliefs. Staff should strive to suspend professional disbelief (i.e. that it 'could not happen here') as some forms of abuse are linked to a lack of respect and tolerance. All staff should report promptly any concerns to the DSL who will seek further advice from statutory agencies, prior to contacting parents/carers. There are more detailed local procedures in the multi-agency safeguarding procedures on the Surrey SCP website.

#### **4.23 'Honour-based' abuse (HBA)**

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. This dynamic and additional risk factors will be taken into account when deciding what form of safeguarding action to take.

It can exist in all communities and cultures and occurs when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code. Females are predominantly, but not exclusively, the victims and the violence is often committed with some degree of approval and/or collusion from family or community members.

All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated to the DSL as such.

#### **4.24 Female genital mutilation (FGM)**

Female genital mutilation (FGM) is illegal as it is a form of child abuse. It involves intentionally altering or injuring female genital organs for non-medical reasons. It can have serious and long lasting implications for physical health and emotional well-being. There is a range of possible indicators, including taking the girl out of school / country for a prolonged period or talk of a 'special procedure' or celebration, which individually may not indicate risk but if two or more indicators are present this

could signal a risk. Victims of FGM are likely to come from a community that is known to practice FGM, such as Somali, Kenyan, Sudanese, Sierra Leonean, Egyptian, Nigerian, Eritrean, Yemeni, Kurdish and Indonesian communities.

If any member of staff has a concern about a girl, the local safeguarding procedures must be activated; staff must speak to the DSL. Evidence of FGM may come from disclosure or from visual evidence. Such visual evidence must not come from an individual examining the girl. From October 2015 Section 5B of the Female Genital Mutilation Act 2003 placed a statutory duty upon a teacher along with regulated health and social care practitioners. In addition to reporting any concerns to the DSL, teachers along with regulated health and social care practitioners have a statutory duty to report personally to the Police if they discover that FGM has or appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions.

Further information on reporting can be found at:

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

In those cases where a teacher merely suspects that an act of FGM may have been carried out or that a girl may be at risk of FGM (as opposed to cases where the teacher discovers an act of FGM) and in cases relating to girls aged 18 or over, teachers should discuss their concerns with the DSL who will follow the School's normal safeguarding procedures and involve children's social care as appropriate.

#### **4.25 Forced marriage**

Forced marriage is also illegal and occurs where one or both people do not or, in cases of people with learning disabilities, cannot consent to the marriage and pressure or abuse is used. It is not the same as arranged marriage. Young people at risk of forced marriage might have their freedom unreasonably restricted or being 'monitored' by siblings. There might be a request for extended absence from School or might not return from a holiday abroad. We recognise that School staff can play an important role in safeguarding children from forced marriage and staff will escalate all concerns in this area to the DSL.

#### **4.26 Preventing radicalisation**

Schools are subject to a duty under section 26 of the 'Counter-Terrorism and Security Act' (2015) to have due regard to the need to prevent people from being drawn into terrorism. This duty is known as the 'Prevent' duty. In this School we recognise that safeguarding against radicalisation and extremism is no different from safeguarding against any other vulnerability hence all such concerns would be passed to the DSL.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised.

Extremism is defined by HM Government as 'Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs; and/or calls for the death of members of our armed forces, whether in this country or overseas'.

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

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

Our curriculum promotes respect, tolerance and diversity. Pupils are encouraged to share their views and to understand that they are entitled to have their own different beliefs which should not be used to influence others. The curriculum is also used to ensure that the pupils understand how people with extreme views share these with others, especially using the internet.

Appendix Four identifies the indicators that we should be aware of.

The Prevent Strategy has three main objectives;

- response to the ideological challenge of terrorism and the threat we face from those who promote it;
- prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support;
- work with sectors and institutions where there are risks of radicalisation which we need to address.

The School has statutory requirements in four key areas: risk assessment, working in partnership, staff training and ICT policies:

- the School has assessed the risk of pupils being drawn into terrorism. Any pupils who are considered at risk of radicalisation will be identified and supported
- the School works in partnership with Surrey SCP to ensure that our safeguarding arrangements take into account the policies and procedures at a local level
- the School recognises the importance of 'Prevent' awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. The DSL is able to provide advice and support to staff on protecting children from the risk of radicalisation
- pupils are taught about how to stay safe when using the internet and are encouraged to recognise that people are not always who they say they are online. They are taught to seek adult help if they are upset or concerned about anything they read or see on the internet. The School ensures that suitable filtering is in place so that the pupils are safe from terrorist and extremist material when accessing the internet via the School system.

The School aims to build pupils' resilience to radicalisation by actively promoting fundamental British values and enabling them to challenge extremist views. The School provides safe spaces in which children and young people can understand and discuss sensitive topics, including terrorism and the extremist ideas that are part of terrorist ideology, and learn how to challenge these ideas. The School is committed to ensuring appropriate emphasis in its curriculum to promote fundamental British values as an essential aspect to counter radicalisation and enable staff and pupils to develop the knowledge and skills to challenge extremist arguments. The School recognises that effective engagement with parents and the family of those at risk of radicalisation is key to the identification of signs of radicalisation. The School will also assist and advise families who raise concerns and point them to the right support mechanisms.

As with managing other safeguarding risks, staff should be alert to changes in pupil's behaviour which could indicate that they may be in need of help or protection. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately. This may include making a referral to the 'Channel' programme, which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Outward

expressions of faith, in the absence of any other indicator of vulnerability, will not be regarded as a reason to make a referral to Channel.

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Surrey has a 'Channel Panel' in place, in accordance with its duties under the Counter-Terrorism and Security Act 2015. This is a multi-agency meeting which discusses individuals who have been referred by the Police as being vulnerable to being drawn into terrorism. Where pupils at School are being discussed, the DSL or Headmaster will attend the Panel meetings. An individual's engagement with the programme is entirely voluntary at all stages.

Any concerns about pupils becoming radicalised or being drawn into extremism should be reported to the DSL who will not speak to parents/carers or other family members at this stage but will take prompt advice from the Surrey SCP as to the most appropriate referral given the level of risk. This may include a referral to Children's Social Care, or Channel via Surrey Police.

Although decisions to seek support for a child about whom there are concerns relating to radicalisation, would normally be taken in consultation with parents and pupils, parental consent is not required for a referral when there are reasonable grounds to believe that a child is at risk of significant harm.

Further information may be found in:

*Prevent Duty Guidance: for England and Wales* (July 2015)

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/445977/3799\\_Revised\\_Prevent\\_Duty\\_Guidance\\_England\\_Wales\\_V2-Interactive.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/445977/3799_Revised_Prevent_Duty_Guidance_England_Wales_V2-Interactive.pdf)

*The use of social media for online radicalisation* (July 2015)

<https://www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation>

#### **4.27 Children with special educational needs and disabilities or certain health conditions**

The School's child protection procedures will be followed if a child with special educational needs and disabilities (SEND) or certain health conditions discloses abuse or there are indicators of abuse. There are no separate child protection procedures for such children; the School ensures that reasonable adjustments are in place. Reasonable adjustments may include, for example, one to one sessions, pastoral support, and appropriate support for communication. The DSL will work closely with the SENCO as research shows that children who have special educational needs and disabilities or certain health conditions can face additional safeguarding challenges. They are especially vulnerable to abuse and adults who work with them need to be vigilant and take extra care when interpreting apparent signs of abuse or neglect.

Additional barriers can exist when recognising abuse and neglect in this group of children. This can include: (a) assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration; (b) being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children; (c) children with SEN and disabilities or certain medical conditions can be disproportionately impacted by things like bullying - without outwardly showing any signs; and (d) communication barriers and difficulties in managing or reporting these challenges.

Staff responsible for intimate care of children will undertake their duties in a professional manner at all times in accordance with the relevant procedures.

#### **4.28 Children with Social Workers (Child in Need and Child Protection Plans)**

Children may need a Social Worker due to safeguarding or welfare needs caused by abuse, neglect and complex family circumstances. At Box Hill School, we recognise that when a child has a Social Worker, it is an indicator that the child is more at risk than most pupils. The School recognises that a child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged as they are likely to face barriers to attendance, learning, behaviour and mental health.

Where a pupil in the School has a Social Worker, the child's local authority will share with the DSL the fact that the pupil has a Social Worker. The DSL will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes as a matter of routine. This information will also inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

#### **4.29 Looked after children and previously looked after children**

The most common reason for children becoming looked after is as a result of abuse and/or neglect. The School recognises that both looked after and previously looked after children remain vulnerable. The DSL ensures that the School works with all relevant agencies and ensures that it has the details of any Personal Advisors for those pupils who have left care. In addition, relevant staff have the necessary information regarding the pupil's looked after legal status and all relevant contact details to safeguard the pupil.

The Designated teacher for looked after and post looked after children is Sue Salmon, the Deputy Head Pastoral.

The School will pay due attention to the statutory guidance to local authorities about how they are to support schools with the care and education of looked after and previously looked after children: <https://www.gov.uk/government/publications/promoting-the-education-of-looked-after-children>

#### **4.30 Online safety**

The School pays due regard to the Department for Education's guidance; 'Teaching online safety in school: Guidance supporting schools to teach their pupils how to stay safe online, within new and existing school subjects' (June 2019).

Mobile devices and computers are important tools for communication, education, recreation and socialising. However, the use of technology has become a significant component of many safeguarding issues including CSE, radicalisation and sexual predation. Technology often provides the platform that facilitates harm. It is essential that children are safeguarded from potentially harmful and inappropriate online material.

There are four broad areas of risk (known as the 4Cs), (i) online content (being exposed to illegal, inappropriate or harmful content such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism); (ii) contact (being subjected to harmful online interaction with other users for example, peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes); (iii) conduct (personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and



online bullying); and (iv) commerce (risks such as online gambling, inappropriate advertising, phishing and or financial scams).

The School recognises its responsibility to do all that it reasonably can to limit the pupil's exposure to the four broad areas of risk when using the School's IT system. The School has appropriate filters and monitoring systems in place that do not lead to 'overblocking' but which protect the pupils from inappropriate content. The filters and monitoring systems used have been informed in part by the risk assessment undertaken as part of the Prevent Duty. As part of the risk assessment process the management of access to the internet whilst on School premises via 3G, 4G and 5G personal technology was considered.

The School also ensures that the appropriate level of security protection procedures is in place, in order to safeguard the systems, staff and pupils. These procedures reviewed periodically to assess the effectiveness against evolving cybercrime technologies.

The School's Staff Code of Conduct and the e-safety policies for both staff and pupils explain the responsibilities of each group when online. The School also has a Mobile Phone (and smart technology) Policy to limit usage as the School recognises the fact many children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G). The Mobile Phone (and smart technology) Policy is in place as the School recognises that such technology could mean that some children, whilst at school, sexually harass their peers via their mobile and smart technology, share indecent images: consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content.

Staff receive online safety training and clear guidance to enable them to identify children who may be at risk of harm as a result of their or others' use of technology or the internet, to intervene in such cases appropriately and with sensitivity, and to escalate such cases in accordance with the School's child protection procedures.

The School takes a wide view of what may happen to pupils online, both at School and beyond. Pupils receive guidance on the safe use of the web (including the dangers of cyber bullying and sexting) through the curricula, in assemblies and in presentations given by external organisations. Presentations are also run for parents.

The curriculum covers online safety and harms, including being what positive, healthy and respectful online relationships look like, the effects of online actions on others and knowing how to recognise and display respectful behaviour online. Attention is paid to helping pupils to adjust their behaviours to reduce risks and build resilience, including to radicalisation. The pupils are taught to understand the risks posed by adults or young people who use the internet and social media to bully, groom, abuse or radicalise others especially the vulnerable. The materials address online safety and appropriate behaviour in an age appropriate way.

Where pupils are asked to learn online the School will take account of all guidance issued in this area by the Department for Education. The School has a clear protocol, contained in the staff Code of Conduct, that all staff must follow when undertaking remote learning so as to protect all parties concerned.

Given the speed of change of the online world the School's teaching focuses on critical underpinning knowledge and behaviours including:

- how to evaluate what is viewed online
- recognising techniques used for persuasion
- recognising acceptable and unacceptable online behaviour
- how to navigate the internet and manage information

- recognising the potential impact on wellbeing
- how to identify and manage online risks
- how and when to seek support.

The School uses a wide variety of resources in this area including those found at:

<https://www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation>,

the UK Safer Internet Centre <https://www.saferinternet.org.uk/>

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

UK Safer Internet Centre <https://www.saferinternet.org.uk/>

#### **4.31 Safer working practice**

All adults who come into contact with children at this School will behave at all times in a professional manner which secures the best outcomes for children and also prevents allegations being made.

The School's Staff Code of Conduct separately sets out expectations of staff. All staff are expected to adhere to this Staff Code of Conduct.

Staff at Box Hill School should ensure that their behaviour and actions do not place pupils or themselves at risk of harm or allegations of harm to a pupil. Special care should be taken to be highly professional at all times and mindful of the duty of care responsibility when dealing with pupils and particularly so during, for example, one-to-one tuition, music, performing arts or sports coaching, conveying a pupil by car and all forms of electronic communication.

We promote a culture whereby members of the School community should feel able to raise with the Headmaster, or any member of the SLT, any concerns about staff conduct. If the reporter feels that the issue has not been addressed they should contact the Chair of the Governors or the LADO.

#### **4.32 Training**

As part of the School's commitment to safeguarding the children in its care, all members of staff including part time staff and volunteers are supported, trained and involved in safeguarding within the School.

The Headmaster and Designated Safeguarding Governor will receive enhanced training in safeguarding incorporating the role of the DSL every 2 years.

When DSLs and Deputies take up the role they attend enhanced training provided through the Surrey SCP multi-agency course and includes local multi-agency working protocols, early help and intervention, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, Prevent awareness, record keeping and promoting a culture of listening to children. The Deputies are trained to the same standard as the Lead DSL.

Enhanced safeguarding and child protection training is undertaken at 2 yearly intervals; the DSL and Deputies in School have all undertaken this training (or are scheduled to do so where new to post). In addition, knowledge and skills are refreshed on a regular basis, at least annually, to allow the DSL to understand and keep up to date with any developments relevant to the role. This includes, for example, attending Surrey SCP training and completing on-line training.

Child protection will be part of induction for all staff (including temporary staff) and volunteers new to the School. This training is given as soon as he or she starts at the School or earlier where possible. This induction training includes this policy, the signs of abuse or neglect, peer on peer abuse, the Staff Code of Conduct including e-safety and acceptable use of IT, the Whistleblowing Policy, Prevent awareness training, Part One of KCSiE/Annex A, details about the identity and role of the DSL and

Deputies, the School's Behaviour and Behaviour Management Policy, online safety and Policy for Children Missing Education. The DSL meets with all staff at induction and contact information (including photographs) for the DSLs is widely available throughout the School.

The induction training will be followed up by basic child protection training that equips individuals to recognise and respond appropriately to concerns about pupils. All staff will also have training in preventing radicalisation and extremism.

Staff who do not have designated responsibility for safeguarding and child protection, will undertake suitable refresher training at appropriate intervals. Appropriate update training in child protection procedures and safeguarding, including online safety, is provided at least annually. Such training is designed to provide staff with the relevant skills and knowledge to safeguard children effectively. Where necessary the formal training for staff will be supplemented by informal updates. Formal updates will always be provided when new duties are introduced, such as the requirement to read Part One of Keeping Children Safe in Education or the introduction of Prevent. Such training, when arranged, is a priority.

The School has put in place mechanisms to assist staff to understand and discharge their role and responsibilities as set out in Part One KCSiE in addition to ensuring that all staff read at least Part One. This includes asking line managers to identify those who may find the understanding of such documents difficult due to such factors as eyesight, literacy or learning difficulties, providing written summary documents and undertaking group discussions.

Attendance records are maintained for all training events; the records are held by Human Resources and are regularly checked by the DSL to ensure that all staff remain up to date.

It is recommended by the Surrey SCP that all Governors attend training, briefings or other input which equips them to understand fully and comply with their legal safeguarding duties as governors, set out in KCSiE (Sept. 2021). Attendance includes those who also work with children and have attended child protection training in that role.

The Syndicate are also provided with child protection training on appointment because children and young people often tell other young people, rather than staff or other adults, about abuse. All senior pupils are trained to know the main points on dealing with allegations of abuse as the House system provides many opportunities for support across the year groups.

The Headmaster, members of the SLT and a number of Governors have completed safer recruitment training.

#### **4.33 Record keeping**

The importance of good, clear child welfare and child protection record keeping has been highlighted repeatedly in national and local Serious Case Reviews (to become Child Safeguarding Practice Reviews).

The common law of confidentiality, Data Protection and Human Rights principles must be adhered to when obtaining, processing or sharing personal or sensitive information or records. In summary, the Data Protection Act requires that records should be securely kept, accurate, relevant, up to date and kept for no longer than is necessary for the purpose for which they were made.

In 2015 the School received authority to hold particular child protection records lawfully within the Data Protection Act for the foreseeable future. The School must not destroy any records for the foreseeable future which could potentially come within the scope of the Independent Inquiry into Child Sexual Abuse established by the Home Secretary.

Any member of staff who receives a disclosure of abuse (when a child talks about abuse) must make a record applying the following guidelines:

- the record should be made as soon as possible after the individual hearing the disclosure has reported it verbally to the DSL. The facts, not opinions (unless of particular relevance), should be accurately recorded in a non-judgemental way. It is important to remember that expressing an opinion as to whether the child is telling the truth is not helpful and can prejudice how a case proceeds
- the record should ideally be on the standard 'concerns' form (see Appendix Seven) but if this is not used, should include:
  - The child's name, gender and date of birth
  - date and time of the conversation
  - what was the context and who was present during the disclosure?
  - what did the child say? (verbatim if possible)
  - what questions were asked? (verbatim if possible)
  - responses to questions (verbatim if possible)
  - any observations concerning child's demeanour and any injuries
  - the name of the person to whom the disclosure was reported
  - printed name and job title of the author, followed by signature and date
- if staff have any doubt about the recording requirements they should discuss this with the DSL.

The record about a disclosure of abuse should be passed to the DSL. It will be retained in the pupil's child protection file in its original and contemporaneous form (as it could be used as evidence in court proceedings), even if later typed or if the information is incorporated into a report. Such a record is kept confidentially by the DSL in a specified locked filing cabinet.

Any member of staff who has concerns about a pupil (but who has not received a disclosure of abuse) should also make a record using the concern form. It is important that all concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements staff should discuss this with the DSL.

In cases of concern (as opposed to disclosure) the concern form should be passed to the DSL who will make a judgement about what action needs to be taken, in accordance with local multi-agency safeguarding procedures. The decision about any action, whether or not a referral is made to Social Care, will be recorded clearly by the DSL.

Concerns which initially seem trivial may turn out to be vital pieces of information later, so it is important to give as much detail as possible. A concern raised may not progress further than a conversation by the DSL with the parent, or, at the other end of the scale, could lead to matters being heard in a court. Such a record is kept confidentially by the DSL in a specified locked filing cabinet and reviewed regularly so that concerning patterns of behaviour can be spotted. The records held include an outline of the concerns, discussions and decisions made, and the reasons for those decisions, details of how the concern was followed up and resolved, a note of any action taken, decisions reached and the outcomes.

#### **4.34 Monitoring of this policy**

The Headmaster will monitor the operation of this policy and the effectiveness of its procedures taking into account any improvements advised by the LADO following a substantiated allegation against a member of staff or volunteer.

The Designated Safeguarding Governor responsible for overseeing the implementation of this Policy will make an annual report on safeguarding and child protection to the Board of Governors. Any

deficiency that is noted in the School's safeguarding and child protection arrangements will be remedied without delay.

The Governors recognise the expertise staff build by undertaking safeguarding training and managing concerns on a daily basis. Hence, when the Governors undertake their thorough annual review of this Policy opportunity is provided for staff to contribute to and shape both the safeguarding arrangements in place and the Policy itself.

#### **4.35 Visiting speakers**

The School recognises its duty to establish clear protocols for ensuring that any visiting speakers, whether invited by staff or by the pupils, are suitably and appropriately supervised.

A visiting speaker will only be invited with the permission of the Headmaster. The member of staff who has invited the speaker will obtain such formal or informal background information about the visiting speaker as is reasonable in the circumstances to decide whether to invite and/or permit a speaker to attend the School. When assessing suitability of speakers the School will always have regard to the Prevent Duty Guidance and the definition of "extremism" set out in KCSiE (Sept. 2021). All visiting speakers will be subject to the School's Visitor Policy and it is the responsibility of the member of staff who invited the speaker to ensure that this happens. The Visitor Policy includes signing in and out at the School, the wearing of a visitors badge at all times and being escorted by a fully vetted member of staff between appointments.

#### **4.36 Raising concerns about safeguarding practice in School (whistleblowing)**

In this School we promote a culture where any staff or volunteers feel able to raise with the Headmaster (or member of the School's SLT) and DSL team any concerns about safeguarding or child protection practice whether about poor or unsafe practice or about potential failures. Such concerns will always be taken seriously by the School's SLT. We also value reflective practice.

All staff and volunteers are required to report to the DSL any concern or allegations about School practices which are likely to put pupils at risk of abuse or other serious harm. Any concern with the behaviour of colleagues or allegation made against a member of staff or volunteer or the DSL should immediately be reported to the Headmaster or, if the Headmaster is absent, the allegation should be passed directly to the Chairman of Governors. If an allegation is made against the Headmaster the member of staff receiving the allegation must immediately inform the Chairman of the Governors.

In addition, if you have concerns over how child protection issues are being handled in this or another organisation, you can talk to the NSPCC anonymously on their Whistleblowing Helpline, 0800 028 0285 (Monday to Friday 08.00 to 20.00) or [help@nspcc.org.uk](mailto:help@nspcc.org.uk). This advice line is not intended to replace any current practices or responsibilities of organisations working with children. Colleagues are encouraged to raise any concerns about a child to the DSLs in the first instance.

Staff and volunteers have the right to make direct referrals to the local Authority or Ofsted or the Channel Police Practitioner. The School has a Whistleblowing Policy in place and those who report in good faith are protected by it.

Staff should refer to the School's Whistleblowing Policy for more information.

#### **4.37 Information for parents and carers**

At this School we are committed to keeping our pupils safe. Our first priority is your child's welfare and we will usually discuss with you any concerns we have about your child. There might be rare occasions, however, when we have to provide information to or consult other agencies such as

Children's Services Social Care before we contact you. This will include situations where we judge that to tell you first will or might put your child at risk of significant harm.

Our responsibilities are set out in this policy. It reflects statutory guidance and the multi-agency safeguarding procedures, which can be found on the Surrey Safeguarding Children Partnership website ([www.surreyscp.org.uk](http://www.surreyscp.org.uk))

#### **4.38 Further guidance**

If you have any questions about this Policy, please speak to the Deputy Head Pastoral and Designated Safeguarding Lead: Sue Salmon.

This policy can be made available in larger print or more accessible format if required.

S Salmon  
Deputy Head Pastoral and Lead DSL  
August 2021

**Appendix One - Responding to concerns summary**

## Appendix Two - Contact details

### 1) **Surrey Social Care**

To make new referrals to Social Care regarding individual children

Surrey Children's Single Point of Access (09.00 to 17.00 Mon to Fri) 0300 470 9100

### 2) **To contact children's allocated Social Workers:**

- North East (Elmbridge, Epsom and Ewell & Spelthorne) 0300 123 1610
- North West (Runnymede, Surrey Heath & Woking) 0300 123 1630
- South East (Tandridge, Reigate and Banstead & Mole Valley) 0300 123 1620
- South West (Guildford & Waverley) 0300 123 1640

### 3) **Out of Hours Service**

01483 517898

### 4) **Surrey LADO**

The Designated Officer (also known as the LADO) to whom allegations against adults who work with children in education establishments must be reported

0300 123 1650

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

### 5) **Surrey Schools Child Protection Consultation Line**

For advice and support to Schools

0300 470 9100

### 6) **Surrey Education Safeguarding Team**

The team comprises Education Safeguarding Advisors who offer advice and support to Headteachers and Designated Safeguarding Leads in relation to safeguarding and child protection issues

- Team Office 01483 517008
- Team email [education.safeguarding@surreycc.gov.uk](mailto:education.safeguarding@surreycc.gov.uk)

### 7) **Surrey Virtual School for children who are in care/ Looked after**

0208 541 7761

[virtual.school@surreycc.gov.uk](mailto:virtual.school@surreycc.gov.uk)

### 8) **Online concerns**

ChildLine (for children)

0800 1111

<https://www.childline.org.uk/get-support/1-2-1-counsellor-chat/>

NCA-CEOP (for parents/carers concerned that their child is being contacted by adults as a result of having sharing sexual imagery)

[www.ceop.Police.uk/safety-centre](http://www.ceop.Police.uk/safety-centre)

NSPCC Helpline

0808 800 5000

[help@nspcc.org.uk](mailto:help@nspcc.org.uk)

NSPCC and O2 Online Safety Helpline

0808 800 5002

Anti-Phishing Working Group (risks such as online gambling, inappropriate advertising, phishing and or financial scams)

[apwg.org/](http://apwg.org/)



**9) Prevent referrals**

Preventing terrorism and radicalisation referrals in Surrey

[preventreferrals@surrey.pnn.Police.uk](mailto:preventreferrals@surrey.pnn.Police.uk)

Prevent Supervisor for Surrey (for Police advice)

01483 632982

DfE dedicated telephone helpline for non-emergency advice for staff and Governors for the prevention of radicalisation

020 7340 7264

[counter-extremism@education.gov.uk](mailto:counter-extremism@education.gov.uk)

**10) Other External Agencies for reporting Prevent concerns relating to terrorism and extremism are as follows:**

Anti-Terrorist hotline

0800 789 321

Crime stoppers

0800 555 111

Local Police

101

<https://www.gov.uk/report-suspicious-activity-to-mi5>

<https://www.gov.uk/report-terrorism> (for reporting online material)

**11) Homelessness referrals**

Mole Valley Housing

01306 885001

01372 376533 (out of hours)

**12) Other external agencies**

Police (non-emergency)

101

NSPCC

0808 800 5000

NSPCC Whistleblowers Advice Line

0800 028 0285

[help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## Appendix Three - Possible indicators of abuse

The following information is not designed to turn School staff into experts, but it will help everyone to be more alert to the signs of possible abuse. The examples below are not meant to form an exhaustive list; DSLs and other staff will find it helpful to refer to Government advice 'What to do if you are worried about a child being abused' (2015) and the Multi-Agency safeguarding procedures on the Surrey SCP website for more detailed information.

### i) **Physical Abuse**

Most children will collect cuts and bruises in their daily lives. These are likely to be in places where there are bony parts of the body, like elbows, knees and shins. Some children, however, will have bruising which is less likely to have been caused accidentally. An important indicator of physical abuse is where bruises or injuries such as burns are unexplained or the explanation does not fit the injury or there are differing explanations. A delay in seeking medical treatment for a child when it is obviously necessary is also a cause for concern. Bruising may be more or less noticeable on children with different skin tones or from different ethnic groups and specialist advice may need to be taken.

Patterns of bruising that are suggestive of physical child abuse can include:

- bruising in children who are not independently mobile
- bruises that are seen away from bony prominences
- bruises to the face, back, stomach, arms, buttocks, ears and hands
- multiple bruises in clusters
- multiple bruises of uniform shape
- bruises that carry the imprint of an implement used, hand marks, fingertips or a belt buckle

Although bruising is the commonest injury in physical abuse, fatal non-accidental head injury and non-accidental fractures can occur without bruising. Any child who has unexplained signs of pain or illness must be seen promptly by a doctor.

Other physical signs of abuse can include:

- cigarette burns, especially burns found on palms, soles of feet, abdomen, buttocks
- immersion burns producing 'stocking' or 'glove' marks on hand and feet
- rope burns
- burns in the shape of common household utensils or appliances
- infected burns indicating delay in treatment
- adult bite marks
- broken bones
- scalds

Changes in behaviour which can also indicate physical abuse:

- fear of parents being approached for an explanation
- aggressive behaviour or severe temper outbursts
- flinching when approached or touched
- withdrawal from physical contact
- bald patches
- self-destructive tendencies
- reluctance to get changed, for example wearing long sleeves in hot weather
- refusal to discuss injuries
- admission of punishment which appears excessive
- missing School
- running away from home

## ii) **Emotional Abuse**

Emotional abuse can be difficult to measure, and often children who appear otherwise well cared for may be emotionally abused by being taunted, put down or belittled. They may receive little or no love, affection or attention from their parents or carers. *Children who live in households where there is domestic violence often suffer emotional abuse.* Emotional abuse can also take the form of children not being allowed to mix/play with other children.

The physical signs of emotional abuse can include:

- a failure to thrive or grow, particularly if the child puts on weight in other circumstances, e.g. in hospital or away from parents' care
- sudden speech disorders
- developmental delay, either in terms of physical or emotional progress.

Changes in behaviour which can also indicate emotional abuse include:

- neurotic behaviour, e.g. sulking, hair twisting, rocking
- being unable to play
- fear of making mistakes
- self-harm
- fear of parents being approached
- fear of new situations
- inappropriate emotional responses to painful situations
- extremes of passivity or aggression
- cruel behaviour, seeming to derive pleasure from hurting others or animals
- drugs/solvent abuse
- chronic running away
- compulsive stealing
- scavenging for food or clothes

## iii) **Sexual Abuse**

Adults who use children to meet their own sexual needs abuse both girls and boys of all ages, including infants and toddlers. Children can also be sexually abused by other children (i.e. those under 18)

Usually, in cases of sexual abuse it is the child's behaviour which may cause concern, although physical signs can also be present. In all cases, children who talk about sexual abuse do so because they want it to stop. It is important, therefore, that they are listened to, taken seriously and appropriate action taken promptly.

The physical signs of sexual abuse can include:

- pain or itching in the genital/anal areas
- bruising or bleeding near genital/anal areas or in the throat
- sexually transmitted diseases
- vaginal discharge or infection
- stomach pains
- discomfort when walking or sitting down
- pregnancy

Changes in behaviour which can also indicate sexual abuse can include:

- sudden or unexplained changes in behaviour, e.g. becoming aggressive or withdrawn
- fear of being left with a specific person or group of people
- be fearful of undressing for gym
- having nightmares

- missing School
- running away from home
- sexual knowledge which is beyond their age or developmental level
- being inappropriately seductive
- sexual drawings or language
- bedwetting
- eating problems such as overeating or anorexia
- self-harm or mutilation, sometimes leading to suicide attempts
- saying they have secrets they cannot tell anyone about
- alcohol / substance / drug use
- depression
- suddenly having unexplained sources of money
- not being allowed to have friends (particularly in adolescence)
- acting in a sexually explicit way towards adults or other children
- have chronic ailments such as stomach pains and headaches
- mixing with older people
- sexually abuse a child, sibling or friend

Please also be mindful of the possibility of CSE if you have concerns about sexual abuse.

#### **iv) Neglect**

Neglect can be a difficult form of abuse to recognise, yet have some of the most lasting and damaging effects on children and young people.

The physical signs of neglect can include:

- constant hunger, sometimes stealing food from other children
- being constantly dirty or smelly
- loss of weight, or being constantly underweight
- inappropriate dress for the conditions
- untreated injury or illness

Changes in behaviour which can also indicate neglect can include:

- complaining of being tired all the time
- not requesting medical assistance and/or failing to attend appointments
- having few friends
- mentioning being left alone or unsupervised
- assuming adult responsibilities for siblings

It is important that we recognise that providing compensatory care might address the immediate and presenting issue but could cover up or inhibit the recognition of neglect in all aspects of a child's life. Compensatory care is defined as 'providing a child or young person, on a regular basis, help or assistance with basic needs with the aim of redressing deficits in parental care'. This might involve, for example, providing each day a substitute set of clothing because those from home are dirty, or showering a child whose personal hygiene or presentation is such that it is affecting his/her interaction with peers. It does not include isolated or irregular support such as giving lunch money or washing a child who has had an 'accident'. If any adult in School finds s/he is regularly attending to one or more aspects of a child's basic needs then this will prompt a discussion with the DSL.

The general rule is: the younger the child, the higher the risk in terms of their immediate health. However, serious neglect of older children and adolescents is often overlooked, on the assumption that they have the ability to care for themselves and have made a 'choice' to neglect themselves. Lack of engagement with services should be seen as a potential indicator of neglect.

All staff should be mindful of the above and discuss any concerns with the DSL who will take the appropriate action in accordance with the Multi-Agency neglect guidance on the Surrey SCP website.

## **Appendix Four - Prevent within schools**

### **Indicators of vulnerability or involvement in extremism**

There is no such thing as a 'typical extremist' and those involved in extremism come from a range of backgrounds and experiences. A list of indicators is given below to assist practitioners to understand and identify factors that could suggest a child, young person or their family may be vulnerable or involved with extremism.

The list of indicators is not exhaustive and all or none may be present in individual cases of concern. Nor does it mean that vulnerable people/ young people experiencing these factors are automatically at risk of exploitation for the purposes of extremism. The accepted view is that a complex relationship between the various aspects of an individual's identity determines their vulnerability to extremism. Over-simplified assessments based upon demographics and poverty indicators have consistently demonstrated to increase victimisation, fail to identify vulnerabilities and, in some cases, increase the ability of extremists to exploit, operate and recruit.

#### **1. Vulnerability**

- Identity Crisis - Distance from cultural/ religious heritage and uncomfortable with their place in the society around them
- Personal Crisis – Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging
- Personal Circumstances – Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy
- Unmet Aspirations – Perceptions of injustice; feeling of failure; rejection of civic life
- Criminality – Experiences of imprisonment; poor resettlement/ reintegration, previous involvement with criminal groups

#### **2. Access to extremism / extremist influences**

- Is there reason to believe that the child/young person associates with those known to be involved in extremism - either because they associate directly with known individuals or because they frequent key locations where these individuals are known to operate? (e.g. the child/young person is the partner, spouse, friend or family member of someone believed to be linked with extremist activity)
- Does the child/young person frequent, or is there evidence to suggest that they are accessing the internet for the purpose of extremist activity? (e.g. Use of closed network groups, access to or distribution of extremist material, contact associates covertly via Skype/email etc.)
- Is there reason to believe that the child/young person has been or is likely to be involved with extremist/ military training camps/ locations?
- Is the child/young person known to have possessed or is actively seeking to possess and/ or distribute extremist literature/ other media material likely to incite racial/ religious hatred or acts of violence?
- Does the child/young person sympathise with, or support illegal/illicit groups e.g. propaganda distribution, fundraising and attendance at meetings?
- Does the child/young person support groups with links to extremist activity but not illegal/illicit e.g. propaganda distribution, fundraising and attendance at meetings?

### **3. Experiences, Behaviours and Influences**

- Has the child/ young person encountered peer, social, family or faith group rejection?
- Is there evidence of extremist ideological, political or religious influence on the child/ young person from within or outside UK?
- Have international events in areas of conflict and civil unrest had a personal impact on the child/ young person resulting in a noticeable change in behaviour? It is important to recognise that many people may be emotionally affected by the plight of what is happening in areas of conflict (i.e. images of children dying) it is important to differentiate them from those that sympathise with or support extremist activity
- Has there been a significant shift in the child/ young person's behaviour or outward appearance that suggests a new social/political or religious influence?
- Has the child/ young person come into conflict with family over religious beliefs/lifestyle/ dress choices?
- Does the child/ young person vocally support terrorist attacks; either verbally or in their written work?
- Has the child/ young person witnessed or been the perpetrator/ victim of racial or religious hate crime or sectarianism?

### **4. Travel**

- Is there a pattern of regular or extended travel within the UK, with other evidence to suggest this is for purposes of extremist training or activity?
- Has the child/ young person travelled for extended periods of time to international locations known to be associated with extremism?
- Has the child/ young person employed any methods to disguise their true identity? Has the child/ young person used documents or cover to support this?

### **5. Social Factors**

- Does the child/ young person have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the child/ young person experience a lack of meaningful employment appropriate to their skills?
- Does the child/ young person display a lack of affinity or understanding for others, or social isolation from peer groups?
- Does the child/ young person demonstrate identity conflict and confusion normally associated with youth development?
- Does the child/ young person have any learning difficulties/ mental health support needs?
- Does the child/ young person demonstrate a simplistic or flawed understanding of religion or politics?
- Does the child/ young person have a history of crime, including episodes in prison?
- Is the child/young person a foreign national, refugee or awaiting a decision on their immigration/ national status?
- Does the child/ young person have insecure, conflicted or absent family relationships?
- Has the child/ young person experienced any trauma in their lives, particularly any trauma associated with war or sectarian conflict?
- Is there evidence that a significant adult or other in the child/young person's life has extremist view or sympathies?

**6. More critical risk factors could include**

- Being in contact with extremist recruiters
- Articulating support for extremist causes or leaders
- Accessing extremist websites, especially those with a social networking element
- Possessing extremist literature
- Using extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues
- Joining extremist organisations
- Significant changes to appearance and/or behaviour

**If you have any concerns discuss them with your DSL and local Prevent Officer**



## Appendix Five – FGM

It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM. The school has a mandatory duty to report possible FGM or concerns that a young person may be at risk (including siblings).

### What is FGM?

It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons. FGM typically takes place between birth and around 15 years old. It is important not to assume that FGM only happens outside the UK.

#### 4 types of procedure:

Type 1 Clitoridectomy – partial/total removal of clitoris

Type 2 Excision – partial/total removal of clitoris and labia minora

Type 3 Infibulation entrance to vagina is narrowed by repositioning the inner/outer labia

Type 4 all other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

### Why is it carried out?

Belief that:

- FGM brings status/respect to the girl – social acceptance for marriage
- Preserves a girl's virginity
- Part of being a woman / rite of passage
- Cleanses and purifies the girl
- Upholds family honour
- Gives a sense of belonging to the community
- Fulfils a religious requirement
- Perpetuates a custom/tradition
- Helps girls be clean / hygienic
- Is cosmetically desirable
- Mistakenly believed to make childbirth easier

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

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

- Child talking about getting ready for a special ceremony or procedure to become a woman
- Family taking a long trip abroad (especially if before the summer holiday)
- Child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leone, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan)
- Visiting female elder
- Knowledge that the child's mother or sibling has undergone FGM
- Child talks about going abroad to be 'cut' or to prepare for marriage
- Parents who wish to withdraw their child from learning about FGM

### Signs that may indicate a child has undergone FGM:

- Prolonged or repeated absence from school and other activities
- Behaviour change on return to school (possibly following a holiday abroad, such as being withdrawn and appearing subdued)
- Bladder or menstrual problems

- Finding it difficult to sit still, walk or stand and looking uncomfortable
- Complaining about pain or discomfort between the legs
- Spending longer in the bathroom or toilet due to difficulties urinating
- Mentioning something somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group
- Reluctance to take part in physical activity
- Repeated urinal tract infection, menstrual or stomach problems
- Reluctance to undergo normal medical examinations
- Disclosure including not being explicit about FGM due to embarrassment or fear

## Appendix Six - Concern form

**For ALL staff/volunteers logging a concern / disclosure about a child's welfare**

**A serious concern, such as a disclosure of abuse, should be passed on verbally, without delay, so that a referral can be made promptly to Social Care by your DSL.**

**You should then complete this form.**

Pupil's Name:		Dob:
Date (include year):		Time:
Print your name	Signature	
Job title:		
Note the reason(s) for recording the incident / concern: (Be <u>factual</u> and include Who? What? Where? When? Any witnesses?)		
If relevant, offer an opinion and say what your opinion is based on. (Leave this blank if you are unsure)		
Note the action you have taken, including names and positions of anyone to whom your information was passed and when: (Do not inform parents unless agreed with DSL)		

**Check to make sure your report is clear now – and will also be clear to someone else reading it in the future, perhaps years later.**

## DSL checklist

Child's name:

Factual account of the incident or information, attached on concern form? <i>(Ask for more information if necessary)</i>	Yes	No
Names and job titles of any other staff involved:	1.  2.  3.	
With whom and when has the information been shared? Give names and job titles: <i>(Do not inform parents if there is a disclosure of abuse or concern about significant harm, unless agreed by Social Care. Referrals to Social Care should be followed up in writing using the Request for Support form and a school CP file started)</i>		
Outcomes: <i>(Call Social Care if they have not told you the outcome of a referral within a reasonable time)</i>		
Chronology started on child's file? <i>(It is recommended that a chronology of significant events is started on a CP file if there is a referral to Social Care. It can also be useful for 'welfare' issues where there is more than one incident of concern)</i>	Yes	No
Where is the information to be filed? Any cross-reference to another file or child? <i>(CP files should be kept separately from the child's main school file)</i>		
DSL Name	Date	

## Appendix Seven – Flow Chart for raising safeguarding concerns about a child

