



# ALDRO

## Child Protection and Safeguarding Policy

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<b>Governor lead:</b>	Carolyn Betts
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## Safeguarding Statement

### “It could happen here”

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

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

The purpose of this policy is to provide staff, volunteers and governors with the framework they need in order to keep children safe and secure in our school. The policy also informs parents and carers how we will safeguard their children whilst they are in our care.

#### Key Personnel

##### Designated Safeguarding Lead (DSL) is:

Mr Gilbert Watson (Deputy Head)                      01483 813551                      [DSL@aldro.org](mailto:DSL@aldro.org)

##### Deputy DSLs are:

Miss Suzie Shaw (Head of Junior School)                      01483 810266                      [shaws@aldro.org](mailto:shaws@aldro.org)

Mrs Katie Croall (Assistant Head Pastoral)                      01483 810266                      [croallk@aldro.org](mailto:croallk@aldro.org)

Mrs Sarah Jenkins (Head Nurse)                      01483 813548                      [jenkinss@aldro.org](mailto:jenkinss@aldro.org)

Mr James Balcombe (Head of Digital Learning & Strategy)                      [balcombej@aldro.org](mailto:balcombej@aldro.org)

##### The nominated safeguarding governor is:

Mrs Carolyn Betts                      01483 810266                      [safegov@aldro.org](mailto:safegov@aldro.org)

##### Headmaster

Mr Chris Carlier                      01483 813530                      [head@aldro.org](mailto:head@aldro.org)

##### The Chair of Governors is:

Mr James Geffen                      [chair@aldro.org](mailto:chair@aldro.org)

Surrey's safeguarding Children's Service (SSCS):                      [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk)

**Urgent referrals should be made by telephone 0300 470 9100**

## Terminology

**Safeguarding and promoting the welfare of children** is defined as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing 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
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework

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

**Harm** can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others.

**Early Help** means providing support as soon as additional needs emerge at any point in a child's life.

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

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

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

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

**C-SPA** refers to the Children's Single Point of Access (Surrey).

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

**DSL** where appropriate also refers to Deputy Designated Safeguarding Leads (DDSL)

## Introduction

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002, and in line with statutory guidance: 'Working Together to Safeguard Children' 2023, Revised Safeguarding Statutory Guidance 'Framework for the Assessment of Children in Need and their Families' 2000, 'What to do if You are Worried a Child is Being Abused' 2015, the Education (Independent School Standards) Regulations 2014, the Non-Maintained Special Schools (England) Regulations 2015 and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended).

The policy also reflects, both statutory guidance 'Keeping Children Safe in Education' 2023 (KCSIE), and Surrey Safeguarding Children Board (SSCP) Procedures.

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

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

## Guidance and documents referred to in this policy

- [Surrey Safeguarding Children Partnership protocols, guidance and procedures](#)
- [Working Together to Safeguard Children \(2023\)](#)
- [Keeping Children Safe in Education 2023 \(KCSIE\)](#)
- [Disqualification under the Childcare Act 2006 \(2018\)](#)
- [Prevent Duty Guidance: for England and Wales \(July 2023\)](#)
- [FGM Act 2003 Mandatory Reporting Guidance 2016](#)
- ['What to do if you are worried a child is being abused' 2015](#)
- [Teacher Standards 2011](#)
- [Equality Act 2010](#)
- [Information Sharing Advice for Practitioners' guidance 2018](#)
- [SCC Children Missing Education](#)
- [SCC Touch and the use of physical intervention when working with children and young people](#)
- [The use of social media for on-line radicalisation \(July 2015\)](#)
- [When to call police](#)

## Equalities Statement

With regards to safeguarding we will consider our duties under the [Equality Act 2010](#) and our general and specific duties under the [Public Sector Equality Duty](#). General duties include: Eliminate discrimination, harassment, victimisation, and other conduct that is prohibited by the Equality Act 2010.

Advance equality of opportunity between people who share a protected characteristic and people who do not share it.

Foster good relations across all protected characteristics between people who share a protected characteristic and people who do not share it.

Staff are aware of the additional barriers to recognising abuse and neglect in children with Special Educational Needs and Disabilities (SEND).

## Policy Principles & Values

- ✓ The welfare of the child is paramount
- ✓ Maintain an attitude of “It could happen here”
- ✓ Children have a right to feel safe and secure; they cannot learn effectively unless they do so.
- ✓ All children have a right to be protected from harm and abuse.
- ✓ All staff have a role in the prevention of harm and abuse and an equal responsibility to act immediately on any suspicion or disclosure that may indicate a child is at risk of harm, either in the school or in the community, taking into account contextual safeguarding, in accordance with statutory guidance.
- ✓ We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working to protect and safeguard children.
- ✓ Whilst the school will work openly with parents as far as possible, it reserves the right to contact Social Care or the police, without notifying parents if this is believed to be in the child’s best interests.

## Policy Aims

To demonstrate the school’s commitment regarding safeguarding and child protection to pupils, parents and other partners.

To raise the awareness of all teaching and non-teaching staff of their responsibilities to safeguard children through identifying and reporting possible cases of abuse.

To enable the school to contribute effectively to Early Help, assessments of need and support for those children.

To provide robust school systems and procedures that are followed by all members of the school community in cases of suspected abuse.

To develop and promote effective working relationships with other agencies, in particular Early Help providers, the Police, Health and Social Care.

To ensure that all staff working within our school who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory DBS check (according to KCSIE guidance), and a single central record is kept for audit.

We comply with the [Disqualification under the Childcare Act 2006](#) guidance issued in February 2015, as amended in September 2018.

## **Supporting Children**

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

We recognise that a child who is abused or witnesses abuse and/or violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth.

We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn. Staff should remain aware that children may not feel ready or know how to tell others that they are being abused, exploited or neglected and/or may not recognise their experiences as harmful.

Our school will support all children:

- We will promote a caring, safe and positive environment within the school.
- We will encourage self-esteem and self-assertiveness, through the curriculum and through positive relationships within the school community.
- We will ensure children are taught to understand and manage risk through personal, social, health and economic (PSHE) education and Relationship and Sex Education (RSE) and through all aspects of school life. This includes online safety.
- We will never give children the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment.
- We will respond sympathetically to any requests for time out to deal with distress and anxiety.
- We will offer details of helplines, counselling or other avenues of external support.
- We will liaise and work in partnership with other support services and agencies involved in Early Help and the safeguarding of children.
- We will notify Social Care immediately if there is a significant concern.
- We will provide continuing support to a child about whom there have been concerns who leaves the school by ensuring that information is shared under confidential cover to the child's new setting and ensure the school medical records are forwarded as a matter of priority and within statutory timescales.

## Prevention / Protection

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

The school will:

- Establish and maintain an ethos where children feel safe and secure, are encouraged to talk and are always listened to.
- Include regular consultation with children e.g. through questionnaires, participation in anti-bullying activity, wellbeing surveys and pupil councils.
- Ensure that all children know they can access an adult in the school whom they can approach if they are worried or in difficulty.
- Include safeguarding across the curriculum, including PSHE, providing opportunities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help. In particular, this will include anti-bullying work, online-safety, accessing emergency services and, where possible, road safety, pedestrian and cycle training.
- Ensure all staff are aware of school guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.

## Safe School, Safe Staff

We will ensure that:

- The school operates a safer recruitment procedure that includes statutory checks on staff suitability to work with children and further enquiry reflecting best practice, such as internet searches.
- All staff receive information about the school's safeguarding arrangements, the school's safeguarding statement, staff code of conduct policy, child protection policy, the role and names of the Designated Safeguarding Lead and their deputy(s), and [Keeping Children Safe in Education part 1 and Annex B](#).
- All staff receive training on Child-on-Child abuse and how to manage a report, following a disclosure, as outlined on page 35.
- Induction training will also include information about the school's Behaviour and Anti-bullying procedures.
- All staff receive safeguarding and child protection training at induction in line with advice from [Surrey Safeguarding Children's Partnership](#) which is regularly updated, and receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually. Any significant updates are communicated at the earliest opportunity, either through training, staff meetings or email.
- All members of staff are trained in and receive regular updates in online safety and reporting concerns.
- All staff and governors have regular child protection awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse and neglect. In addition to this, we will include in this training an understanding of contextual safeguarding, so that staff remain aware that children can be at risk of harm in and out of school and their home, and online.



- The child protection policy is made available via the school website and that parents/carers are made aware of this policy.
- All parents/carers are made aware of the responsibilities of staff members regarding child protection procedures through the publication of the Child Protection Policy and reference to it in the school's handbook.
- We provide a coordinated offer of Early Help when additional needs of children are identified and contribute to early help arrangements and inter-agency working and plans.
- Our lettings policy will seek to ensure the suitability of adults working with children on school sites at any time.
- Community users organising activities for children are aware of the school's Child Protection Policy, guidelines and procedures.
- The name of the designated members of staff for child protection, the Designated Safeguarding Lead and deputy (deputies), are clearly advertised in the school with a statement explaining the school's role in referring and monitoring cases of suspected harm and abuse
- All staff will be given a copy of Part 1 (including Annex B) of Keeping Children Safe in Education 2023 and will complete an online questionnaire to ensure that they have read and understood it. This also applies to the Governing Body in relation to part 2 of the same guidance.

## **Roles and Responsibilities**

### **All School Staff:**

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

- Provide a safe environment in which children can learn.
- Understand the need to build trusted relationships in order to establish and maintain an environment where children feel secure, are encouraged to talk and are listened to.
- Ensure children know that there are adults in the school they can approach if they are worried or have concerns.
- Plan opportunities within the curriculum for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe.
- Maintain a "zero-tolerance" approach to sexual violence and sexual harassment.
- Attend training in order to be aware of and alert to the signs of abuse.
- Maintain an attitude of "it could happen here" with regards to safeguarding and retain a high level of professional curiosity, remaining aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or are being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers.
- Be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Know how to respond to a pupil who discloses harm or abuse following training based on 'Working together to Safeguard Children' (2023), and 'What to do if you are worried a child is being Abused' (2015).
- Record their concerns if they are worried that a child is being abused and report these to the DSL immediately that day. If the DSL is not contactable immediately a Deputy DSL should be informed.

- Be prepared to refer directly to the C-SPA, and the police if appropriate, if there is a risk of significant harm and the DSL or their Deputy is not available.
- Follow the allegations procedures (page 19) if the disclosure is an allegation against a member of staff.
- Follow the procedures set out by the Surrey Safeguarding Children’s Partnership and take account of guidance issued by the Department for Education.
- Provide support for children subject to Early Help, Child in Need or Child Protection that is in keeping with their plan.
- Treat information with confidentiality but never promising to “keep a secret”.
- Notify the DSL or their Deputy of any child on a child protection plan or child in need plan who has unexplained absence.
- Have an understanding of early help and be prepared to identify and support children who may benefit from early help.
- Identify children who may benefit from early help, liaising with the DSL in the first instance. (Options may include managing support for the child internally via the school’s pastoral support process or an early help assessment.)
- Be particularly alert to the potential need for early help for a child who:
  - Is disabled and has specific additional needs
  - Has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
  - Is a young carer.
- Liaise with other agencies that support pupils and provide early help.
- Know who the DSL and Deputy DSLs are and know how to contact them, and the Governor responsible for safeguarding.
- Have an awareness of the role of the DSL, the schools Child Protection Policy, Behaviour Policy and Staff Code of Conduct, and procedures relating to the safeguarding response for children who go missing from education.
- Report low-level concerns (as defined in KCSIE 2023) about any member of staff/supply staff/volunteer or contractor to the Headmaster or the DSL.
- Be mindful that the Teacher Standards states that teachers should safeguard children’s wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- Assist the Governing Body and Headmaster in fulfilling their safeguarding responsibilities set out in legislation and statutory guidance.

### **The Headmaster**

In addition to the role and responsibilities of all staff the Headmaster will ensure that:

- The school fully contributes to inter-agency working in line with Working Together to Safeguard Children 2023 guidance.
- The Child Protection and Safeguarding Policy and procedures are implemented and followed by all staff.
- That the setting has appropriate policies in place that make it clear that sexual harassment, online sexual abuse and sexual violence (including sexualised language) is unacceptable, with appropriate sanctions and support in place.
- That the setting’s staff have appropriate knowledge of KCSIE (2023) part 5.

- That all children are supported to report concerns about harmful sexual behaviour freely. That concerns are taken seriously and dealt with swiftly and appropriately, and children are confident that this is the case. Comprehensive records of all allegations are kept.
- All staff are aware of the role of the designated safeguarding lead (DSL), including the identity of the DSL and any deputies.
- Sufficient time, training, support, funding, resources, including cover arrangements where necessary, are allocated to the DSL to carry out their role effectively, including the provision of advice and support to school staff on child welfare and child protection matters, to take part in strategy discussions/meetings and other inter-agency meetings and/or support other staff to do so; and to contribute to the assessment of children.
- Provide opportunities for a co-ordinated offer of early help when additional needs of children are identified
- Ensure Deputy DSLs are trained to the same standard as the DSL and the role is explicit in their job description.
- With the DSL, ensure adequate and appropriate cover arrangements are in place for any out of hours/out of term activities.
- Where there is a safeguarding concern that the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Child-centred systems and processes are in place for children to express their views and give feedback.
- All staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle-blowing procedures.
- That pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.
- Ensure that allegations or concerns against staff are dealt with in accordance with guidance from Department for Education (DfE), Surrey Safeguarding Children Partnership (SSCP) and Surrey County Council (SCC).
- Record low-level concerns in cases which concern a member of staff/supply staff/contractor or a volunteer. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that will be respected as far as reasonably possible.
- Ensure that statutory requirements are met to make a referral to the Disclosure and Barring Service and additionally in the case of teaching staff the Teacher Regulation Agency where they think an individual has engaged in conduct that harmed (or is likely to harm) a child; or if the person otherwise poses a risk of harm to a child.
- Ensure that any allegations against outside organisations or individuals using school premises are dealt with in accordance with this policy and guidance from the Department for Education (DfE), Surrey Safeguarding Children Partnership (SSCP) and Surrey County Council (SCC).

### **The Designated Safeguarding Lead:**

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

- Holds the lead responsibility for safeguarding and child protection (including lead responsibility for online safety and responsibility for understanding the filtering and monitoring systems and processes in place) in the school; this responsibility is not able to be delegated.

- Will have an “it could happen here” approach to safeguarding.
- Will liaise with the local authority and work in partnership with other agencies in line with Working Together to Safeguard Children.
- Will manage and submit a referral for a child if there are concerns about suspected harm or abuse, to the Surrey Children’s Single Point of Access (C-SPA), and act as a point of contact and support for school staff. Referrals should be made safe and securely by email to [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk) using the [Multi Agency Referral Form](#) (MARF) urgent referrals should be made by telephone 0300 470 9100. If the referral is required to be made to another county, the DSL will follow that counties referral process.
- Will refer cases to the Channel programme where there is a radicalisation concern via the C-SPA and act as a point of contact and support for staff to discuss concerns.
- Will refer cases where a crime may have been committed to the Police as required.
- Will liaise with the “case manager” and Local Authority “Designated Officer” for child protection concerns in cases which concern a member of staff or a volunteer; and refer cases where a person is dismissed or has left service due to risk/harm to a child to the Disclosure and Barring Service and Teaching Regulation Agency, as required.
- Will follow DfE and KCSIE guidance on ‘Child on Child Abuse’ when a concern is raised that there is an allegation of a pupil abusing another pupil within the school (see pages 34-37)
- Be available during term time (during school hours) for staff in school to discuss any safeguarding concerns. Appropriate and adequate cover arrangements will be arranged by the DSL and the school leadership for any out of hours/term activities.
- Ensure that any allegations against outside organisations or individuals using school premises are dealt with in accordance with this policy and guidance from the Department for Education (DfE), Surrey Safeguarding Children Partnership (SSCP) and Surrey County Council (SCC).
- Act as a source of support and expertise in carrying out safeguarding duties for the whole school community.
- Will encourage and promote a culture of listening to children and taking account of their wishes and feelings, amongst all staff.
- Will access training and support to ensure they have the knowledge and skills required to carry out the role. DSL training should be updated at least every two years and their knowledge and skills refreshed at regular intervals but at least annually.
- Will have a secure working knowledge of SSCP procedures and understands the assessment process for providing early help and statutory intervention, in line with [Surrey’s Effective Family Resilience levels of need document](#).
- Will have a clear understanding of access and referral to the local early help offer and will support and advise members of staff where early help intervention is appropriate.
- Will understand and support the school delivery with regards to the requirements of the Prevent duty and provide advice and guidance to staff on protecting children from radicalisation.
- Will liaise with school staff (especially pastoral support, behaviour leads, school health colleagues and the SENDCO) on matters of safety and safeguarding and consult the SSCP Levels of Need document to inform decision making and liaison with relevant agencies.
- Will be alert to the specific needs of children in need, those with SEND and young carers.
- Will understand the risks associated with online activity and be confident that they have the up to date knowledge and capability to keep children safe whilst they are online at school; in particular, understand the additional risks that children with SEND face online and the associated and appropriate support they require.

- Will keep detailed, accurate records (using CPOMS), that include all concerns about a child even if there is no need to make an immediate referral and the rationale for decisions made and action taken.
- Will ensure that an indication of the existence of the additional child protection file is marked on the pupil school file record.
- Will ensure that when a pupil transfers school, their child protection file is passed to the new school as soon as possible, and within statutory timescales (separately from the main pupil file and ensuring secure transit) and that confirmation of receipt is received.
- Will ensure that where a pupil transfers school and is on a child protection plan or is a child looked after, their information is passed to the new school immediately and that the child's social worker is informed. In addition, consideration should be given to a multi-agency schools transition meeting if the case is complex or on-going.
- Will ensure that a copy of the Child Protection file is retained until such a time that the new school acknowledges receipt of the original file. A copy of the file will be retained if required according to our Privacy Policy and the copy should be securely destroyed on confirmation of receipt.
- Will ensure that all appropriate staff members have a working knowledge and understanding of their role in case conferences, core groups and other multi-agency planning meetings, to ensure that they attend and are able to effectively contribute when required to do so. Where a report is required, this should be shared with the parents prior to the meeting.
- Will report to the Headmaster any significant issues for example, use of the [SSCP multi-agency escalation procedures](#), enquiries under section 47 of the Children Act 1989 and police investigations.
- Will ensure that the case holding Social Worker is informed of any child currently with a child protection plan who is absent without explanation.
- Will ensure that all staff complete training to ensure that they have read, understood and agree to work within the School's child protection policy, staff behaviour policy (code of conduct) and Keeping Children Safe in Education (KCSIE) Part 1 and Annex B, and ensure that the policies are used effectively.
- Will organise child protection and safeguarding induction, regularly updated training and a minimum of annual updates (including online safety) for all school staff, keep a record of attendance and address any absences.
- Ensure that in collaboration with the school leadership and governors, the child protection policy is reviewed annually and the procedures and implementation are updated and reviewed regularly.
- Ensure that the Child Protection Policy is available publicly and that parents are aware that referrals about suspected harm and abuse will be made and the role of the school in this.
- Establish and maintain links with the three safeguarding partners to make sure staff are aware of training opportunities and the latest policies on local safeguarding arrangements.
- Will contribute to and provide, with the Headmaster and Chair of Governors, the "Audit of Statutory Duties and Associated Responsibilities" to be submitted biennially to the Surrey County Council, Education Safeguarding Team.
- Will ensure that the name of the designated members of staff for Child Protection, the Designated Safeguarding Lead and deputies, are clearly advertised in the school, with a statement explaining the school's role in referring and monitoring cases of suspected abuse.
- Meet all other responsibilities as set out for DSLs in Keeping Children Safe in Education 2023.

**The Deputy Designated Safeguarding Lead(s):**

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

- Be trained to the same standard as the Designated Safeguarding Lead (with the role explicit in their job description).
- Provide support and capacity to the DSL in carrying out delegated activities of the DSL; however, the lead responsibility of the DSL cannot be delegated.
- In the absence of the DSL, carries out the activities necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the DSL the deputy will assume all of the functions above.

**All members of The Governing Body understand and fulfil their responsibilities to ensure that:**

- There is a whole setting approach to safeguarding, involving everyone in the setting and ensuring that safeguarding, and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- All members of the Governing Body receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the setting are effective and support the delivery of a robust whole setting approach to safeguarding. Training should be regularly updated.
- The child's wishes and feelings are considered when determining what action to take and what services to provide.
- The school has effective safeguarding policies and procedures including a Child Protection Policy, a Staff Behaviour Policy or Code of Conduct, a Behaviour Policy (Including guidance on the use of restraint) and a response to children who go missing from education. Ensure policies are consistent with Surrey Safeguarding Children's Partnership (SSCP) and statutory requirements, are reviewed annually and that the Child Protection policy is available on the school website.
- The SSCP is informed in line with local requirements about the discharge of duties via the Biennial (s 157 s 175) Statutory Audit for Safeguarding Arrangements and Termly Safeguarding Data Collections via [PHEW](#) to Surrey County Council.
- That the school operates a safer recruitment procedure that includes statutory checks on staff suitability to work with children and by ensuring that there is at least one person on every recruitment panel who has completed safer recruitment training. If there is not a panel conducting interviews, then the individual will have completed safer recruitment training.
- Staff regularly complete a self-declaration regarding disqualification on the grounds outlined in Disqualification under the childcare Act 2006.
- That at least one member of the governing body has completed safer recruitment training to be repeated every five years.
- Staff have been trained appropriately and this is updated in line with guidance and all staff have read Keeping Children Safe in Education (2023) part 1 and Annex B and that mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance.
- Considering the above training requirements, Governing bodies/Proprietors/Management Committee should have regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all children.

- That all staff including temporary staff and volunteers are provided with the school's child protection policy and staff behaviour policy and that a proportionate risk-based approach is taken to the level of information that is provided to temporary staff, volunteers and contractors.
- That the school has procedures for dealing with allegations of abuse against staff (including the Headmaster), volunteers and against other children and that a referral is made to the DBS and/or the Teaching Regulation Agency (as applicable) if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have done had they not resigned.
- That Policies and processes are in place to deal with concerns (including allegations) which do not meet the harm threshold or low-level concerns as defined in KCSIE 2023.
- That a nominated governor for safeguarding is identified. The safeguarding governor liaises between the DSL and FGB, meeting with the DSL at least half-terminly to receive updates on safeguarding concerns, and will be informed of any serious safeguarding issues as they occur.
- That a member of the senior leadership team has been appointed as the Designated Safeguarding Lead (DSL), who will take lead responsibility for safeguarding and child protection and that the role is explicit in the role holder's job description.
- That the designated safeguarding lead has the appropriate status and authority within the school or college to carry out the duties of the post. The role carries a significant level of responsibility and the postholder should be given the additional time, funding, training, resources, and support needed to carry out the role effectively.
- That on appointment, the DSL and deputy(deputies) undertake interagency training (SSCP Modules 1&2) and also undertake DSL 'New to Role' and 'Update' training every two years as well as attending DSL network events, to refresh knowledge and skills.
- That children are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through personal, social, health and economic education (PSHE) and relationship and sex education (RSE).
- That the school will comply with DfE and Surrey County Council [Children Missing Education](#) requirements.
- That the school will comply with regular data returns requested by the Local Authority, regarding all pupils, of statutory school age, attending alternative provision and/or on a reduced or modified timetable
- That appropriate online filtering and monitoring systems are in place and are reviewed with the DSL and IT Department.
- That clear systems and processes are in place for identifying possible mental health concerns, including routes to escalate and clear referral and accountability systems.
- That safeguarding and child protection files are maintained as set out in KCSIE 2023 Annex C.
- Enhanced DBS checks (without barred list checks, unless the governor is also a volunteer at the school) are in place for all Governors.
- That section 128 checks are undertaken as defined in KCSIE 2023.
- That where the Governing Body hire or rent out school facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) they should ensure that appropriate arrangements are in place to keep children safe.

## **Confidentiality and Sharing Information**

All matters relating to child protection will be treated as confidential and only shared as per the [‘Information Sharing Advice for Practitioners’ \(DfE 2018\) guidance](#).

Information will be shared with staff within the school who ‘need to know’.

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

All staff must be aware that they cannot promise a child to keep secrets which might compromise the child’s safety or wellbeing. However, staff are aware that matters relating to child protection and safeguarding are personal to children and families, in this respect they are confidential, and the Headmaster or DSLs will only disclose information about a child to other members of staff on a need-to-know basis.

All staff will always undertake to share our intention to refer a child to Social Care with their parents /carers unless to do so could put the child at greater risk of harm or impede a criminal investigation.

### **Child Protection Procedures**

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

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

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

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

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

1. Make an initial record of the information related to the concern.
2. Report it to the DSL immediately.
3. The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available.
4. Make an accurate record on CPOMS (which may be used in any subsequent court proceedings) as soon as possible and within 24 hours of the occurrence, of all that has happened, including details of:
  - Dates and times of their observations
  - Dates and times of any discussions in which they were involved.
  - Any injuries
  - Explanations given by the child / adult



Rationale for decision making and action taken

Any actual words or phrases used by the child

5. The records must be signed and dated by the author or / equivalent on electronic based records
6. In the absence of the DSL or their Deputy, staff must be prepared to refer directly to C-SPA (and the police if appropriate) if there is the potential for immediate significant harm

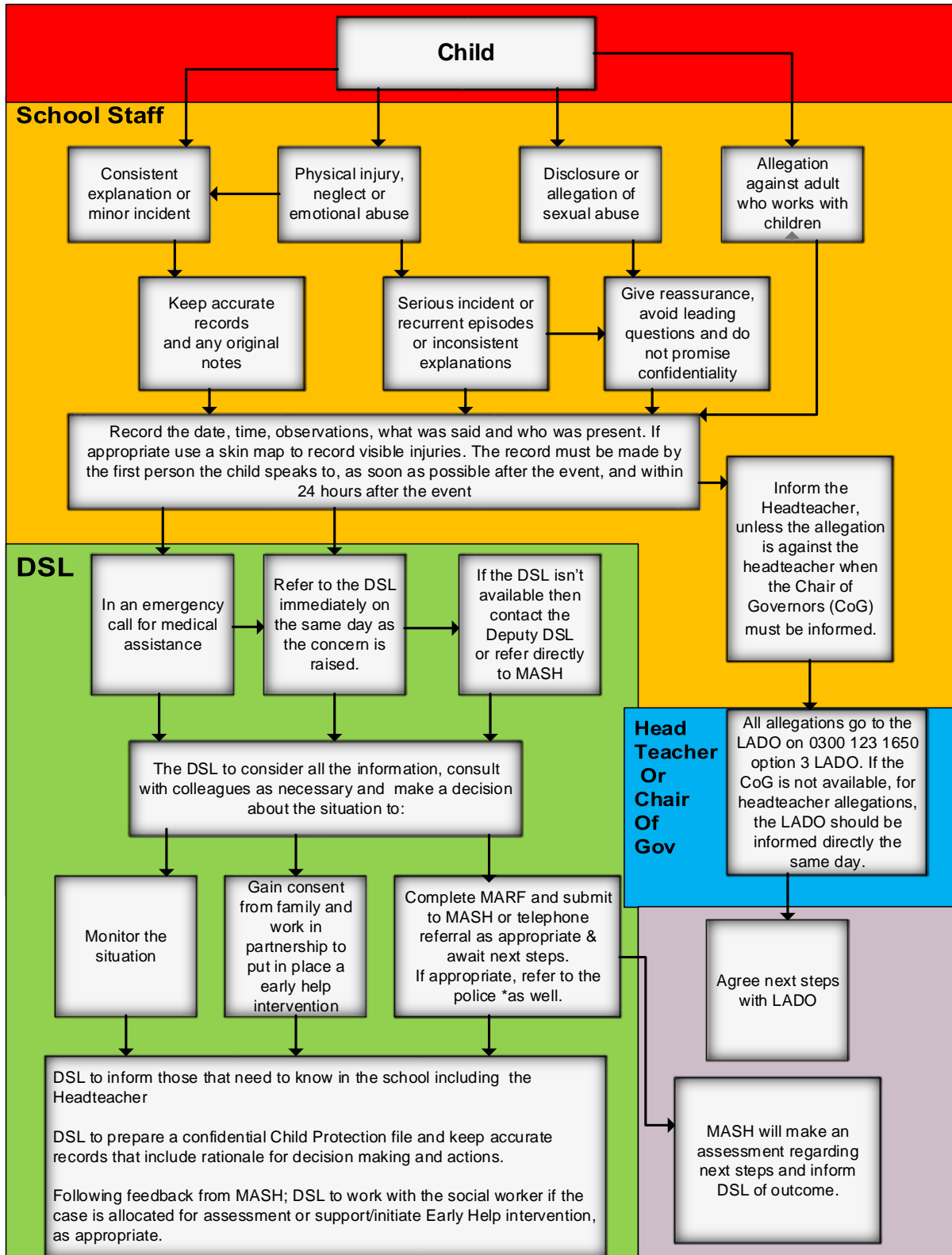
**Following a report of concerns the DSL must:**

1. [Use the SSCP Effective Family Resilience and Levels of Need document](#), to decide whether or not there are sufficient grounds for suspecting significant harm, in which case a referral must be made to the C-SPA and the police if it is appropriate.
2. Normally the school should try to discuss any concerns about a child's welfare with the family and where possible to seek their agreement before making a referral to the C-SPA. However, this should only be done when:
  - it will not place the child at increased risk
  - or sexual/organised abuse is suspected
  - or the fabrication of an illness is suspected
  - or where the discussion could impact a Police investigation or Social Work enquiry

If there are grounds to suspect a child is suffering, or is likely to suffer, significant harm or abuse the DSL must contact the C-SPA. By sending a [Multi-Agency Referral Form \(MARF\)](#) by email to: [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk) or contact the C-SPA on 0300 470 9100. If a child is in immediate danger and urgent protective action is required, the Police (dial 999) must be called. The DSL must also notify C-SPA of the occurrence and what action has been taken.

3. If the DSL feels unsure about whether a referral is necessary, they can phone the C-SPA to discuss concerns.
4. If there is not a risk of significant harm, the DSL will either actively monitor the situation or consider the Early Help.
5. Where there are doubts or reservations about involving the child's family, the DSL should clarify with the C-SPA or the police whether the parents should be told about the referral and, if so, when and by whom. This is important in cases where the police may need to conduct a criminal investigation.
6. When a pupil is in need of urgent medical attention and there is suspicion of abuse the DSL or their Deputy should take the child to the accident and emergency unit at the nearest hospital, having first notified the C-SPA. The DSL should seek advice about what action the C-SPA will take and about informing the parents, remembering that parents should normally be informed that a child requires urgent hospital attention.
7. The exception to this process will be in those cases of known FGM where there is a mandatory requirement for the teacher to report directly to the police. The DSL should also be made aware.

## Child Protection Procedures Flowchart



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

## **Dealing with disclosures**

### **All staff**

A member of staff who is approached by a child should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they may need to pass information to other professionals to help keep the child or other children safe. The degree of confidentiality should always be governed by the need to protect the child.

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

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

### **Guiding principles, the seven R's**

#### **Receive**

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

#### **Reassure**

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

#### **Respond**

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

#### **Report**

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

## **Record**

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

## **Remember**

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

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

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

## **What happens next?**

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

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

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

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

## Allegations against adults who work with children

### Procedure

This procedure should be used in all cases in which it is alleged a member of staff or volunteer in a school, or another adult who works with children has:

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

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

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

In dealing with allegations or concerns against an adult, staff must:

- Report any concerns about the conduct of any member of staff or volunteer to the Headmaster immediately.
- If an allegation is made against the Headmaster, the concerns need to be raised with the Chair of Governors as soon as possible. If the Chair of Governors is not available, then the LADO should be contacted directly. This must be done without informing the Headmaster first.
- There may be situations when the Headmaster or Chair of Governors will want to involve the police immediately if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.
- Once an allegation has been received by the Headmaster or Chair of Governors they will contact the LADO on 0300 123 1650 option 3 *LADO*  
Email: [LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk) immediately and before taking any action or investigation.
- Following consultation with the LADO inform the parents of the allegation unless there is a good reason not to

In liaison with the LADO, the school will determine how to proceed and if necessary the LADO will refer the matter to Children's Social Care and/or the police.

If the matter is investigated internally, the LADO will advise the school to seek guidance from local authority colleagues in following procedures set out in part 4 of 'Keeping Children Safe in Education' (2023) and the SSCP procedures.

## **Low-Level Concerns**

Aldro takes safeguarding very seriously. This includes ensuring that adults who work with children do so in accordance with the ethos and policies set out by the school, including the Staff Code of Conduct.

This policy sets out our approach to low-level concerns and details the processes available to all staff who may have concerns about the behaviour of other staff, adults or volunteers working with children.

## **Context and culture**

Keeping Children Safe in Education (2023) advises that *'As part of their whole school approach to safeguarding, schools and colleges should ensure that they promote an open and transparent culture in which **all** concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.'*

Aldro is committed to creating an open and transparent culture in which ALL concerns about adults are shared responsibly, with the right people, and recorded and dealt with appropriately.

## **Allegations against adults who work with children**

The school's Child Protection and Safeguarding Policy and Whistleblowing Policy outline procedures that should be followed when allegations against adults may meet the following harms threshold:

Where it is alleged that anyone working in the school or a college that provides education for children under 18 years of age, 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.

## **What constitutes a low-level concern?**

As per Keeping Children Safe in Education (2023), 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 or college 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.

Examples of such behaviour could 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;
- using inappropriate sexualised, intimidating or offensive language; or,
- humiliating children

The school is aware that these behaviours could exist across a wide spectrum, from inadvertent or thoughtless behaviour through to that which is ultimately intended to enable abuse.

From time to time an individual may find him/herself in a situation which might appear compromising to others or which could be misconstrued. Equally, an individual may for whatever reason have behaved in a manner which on reflection he/she considers falls below the standard set out in the Code of Conduct. Self-reporting in these circumstances is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived. As such, the school sees self-reporting of low-level concerns as an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

### **Procedure**

A member of staff who has a low-level concern should raise that concern verbally with the Headmaster or with the school's DSL. If, for any reason, the Headmaster and DSL are absent, the concern can be raised with the DDSL.

Concerns should be shared as soon as possible, and within 24 hours where the concern relates to a specific incident. It is, nevertheless, important for staff to understand that it is never too late to share a low-level concern.

### **Response**

The DSL will discuss all low-level concerns he receives with the Headmaster as soon as possible and in any event within 24 hours of becoming aware of it.

The Headmaster will in the first instance satisfy himself that it is a low-level concern and should not be reclassified as an allegation and dealt with under the appropriate procedure below. The circumstances in which a low-level concern might be reclassified are where:

- (a) the threshold is met for an allegation
- (b) there is a pattern of low-level concerns which collectively amount to an allegation or
- (c) there is other information which, when considered, leads to an allegation.

Where the Headteacher is in any doubt whatsoever, advice will be sought from the LA Designated Officer, if necessary on a no-names basis.

Having established that the concern is low-level, the DSL or Headmaster, as appropriate, will discuss it with the individual who has raised it and will take any other steps to investigate it as necessary.

## **Recording**

Where a low-level concern has been communicated, a confidential record will be kept in a central file which logs all low-level concerns. This is necessary to enable any patterns to be identified.

However, no record will be made of the concern on the individual's personnel file (and no mention made in job references) unless either:

- (a) the concern (or group of concerns) has been reclassified as an allegation as above; or
- (b) the concern (or group of concerns) is sufficiently serious to result in formal action under the school's grievance, capability or disciplinary procedure.



## **What is child abuse?**

The following definitions are taken from *Working Together to Safeguard Children* (2023). In addition to these definitions, it should be understood that children can also be abused by being sexually exploited, honour-based violence, forced marriage or female genital mutilation. To support the local context, all staff have access to the [Surrey Safeguarding Children Partnership Levels of Need Threshold Document](#).

## **What is abuse and neglect?**

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear, or experience its effects. Children may be abused in a family or in an institutional or extra-familial contexts by those known to them or, more rarely, by 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.

### **Physical abuse**

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

### **Emotional abuse**

The persistent emotional maltreatment of a child such as to cause severe and 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 a 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 cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur in isolation.

### **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 (including online).

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

## **Neglect**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate care-givers)
- ensure access to appropriate medical care or treatment
- provide suitable education

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

[The SSCP Neglect Strategy](#) is available to provide more detailed information regarding neglect.

## Indicators of abuse

### Neglect

The nature of neglect

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

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

Neglect can include parents or carers failing to:

- provide adequate food, clothing and shelter
- protect a child from physical and emotional harm or danger
- ensure adequate supervision or stimulation
- ensure access to appropriate medical care or treatment

NSPCC research has highlighted the following examples of the neglect of children under 12 years old:

- frequently going hungry
- frequently having to go to school in dirty clothes
- regularly having to look after themselves because of parents being away or having problems such as drug or alcohol misuse
- being abandoned or deserted
- living at home in dangerous physical conditions
- not being taken to the doctor when ill
- not receiving dental care.

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

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

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

### Indicators of neglect

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

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

#### Physical indicators of neglect

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

#### Behavioural indicators of neglect

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

## **Emotional abuse**

The nature of emotional abuse

Most harm is produced in *low warmth, high criticism* homes, not from single incidents.

Emotional abuse is difficult to define, identify/recognise and/or prove.

Emotional abuse is chronic and cumulative and has a long-term impact.

All kinds of abuse and neglect have emotional effects although emotional abuse can occur by itself.

Children can be harmed by witnessing someone harming another person – as in domestic abuse.

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

### **Indicators of emotional abuse**

Developmental issues

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

Behaviour

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

Social issues

- Withdrawal from physical contact
- Withdrawal from social interaction
- Over-compliant behaviour

- Insecure, clinging behaviour
- Poor social relationships

#### Emotional responses

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

## Physical abuse

The nature of physical abuse

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

Injuries on the *soft* areas of the body are more likely to be inflicted intentionally and should therefore make us more alert to other concerning factors that may be present.

A body map can assist in the clear recording and reporting of physical abuse. The body map should only be used to record observed injuries and no child should be asked to remove clothing by a member of staff of the school.

### Indicators of physical abuse / factors that should increase concern

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

In the context of the school, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when:

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

You should be concerned if a child:

- is reluctant to have parents/carers contacted
- runs away or shows fear of going home
- is aggressive towards themselves or others
- flinches when approached or touched

- is reluctant to undress to change clothing for sport
- wears long sleeves during hot weather
- is unnaturally compliant in the presence of parents/carers.
- has a fear of medical help or attention
- admits to a punishment that appears excessive.



## Sexual abuse

The nature of sexual abuse

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

Sexual exploitation is seen as a separate category of sexual abuse. The [SSCP Screening Tool and guidance](#) provides school staff with information regarding indicators of CSE (further information about CSE is available on pages 43-44).

Characteristics of child sexual abuse:

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

Most people who sexually abuse children are men, but some women sexually abuse too.

### Indicators of sexual abuse

Physical observations:

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

Behavioural observations:

- Sexual knowledge inappropriate for age
- Sexualised behaviour or affection inappropriate for age
- Sexually inappropriate behaviour
- Hinting at sexual activity
- Inexplicable decline in education progress
- Depression or other sudden apparent changes in personality as becoming insecure
- Lack of concentration, restlessness, aimlessness
- Socially isolated or withdrawn
- Overly-compliant behaviour
- Acting out, aggressive behaviour
- Poor trust or fear concerning significant adults
- Regressive behaviour,
- Onset of wetting, by day or night; nightmares
- Arriving early at school, leaving late, running away from home
- Suicide attempts, self-mutilation,
- Suddenly drawing sexually explicit pictures
- Eating disorders or sudden loss of appetite or compulsive eating

- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Become worried about clothing being removed
- Trying to be 'ultra-good' or perfect; overreacting to criticism.

## **Child-on-child Abuse**

### **Sexual violence and sexual harassment**

#### **Context**

We recognise that children can abuse other children - referred to as child-on-child abuse. This is most likely to include but may not be limited to:

- Bullying (including Cyber-bullying, prejudice-based, and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse (such as hitting, kicking, shaking, biting, hair-pulling or otherwise causing physical harm)
- Sexual violence (such as rape, assault by penetration, and sexual assault)
- 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.
- Upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing the genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm.
- Consensual and non-consensual sharing of nude and semi-nude images/videos.
- Causing someone to engage in sexual activity without consent.
- Initiation/hazing type violence and rituals.

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. We recognise that it is more likely that girls may be victims, and boys perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously.

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

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

#### **Policy**

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

We recognise that children are capable of abusing other children and this will be dealt with under our child protection policy and in line with Keeping Children Safe in Education (2023)

We are clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.

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

### **Prevention**

- Taking a whole school approach to safeguarding & child protection
- Providing training to staff
- Providing a clear set of values and standards, underpinned by the school's behaviour policy and pastoral support; and by a planned programme of evidence-based content delivered through the curriculum.
- Recognising that there is no place for 'banter' or dismissing behaviour as 'boys will be boys' or 'just having a laugh'.
- Engaging with specialist support and interventions

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

Children making a report of sexual violence or sexual harassment will be reassured that they are being taken seriously, will be kept safe and be well supported.

Children who report abuse should never be given the impression that they are creating a problem by reporting any form of abuse or neglect, nor should victims of sexual violence or sexual harassment ever be made to feel ashamed for making a report.

If the report includes an online element staff will be mindful of the [Searching, Screening and Confiscation: advice for schools \(DfE 2022\)](#) guidance. Along with our guidance on how to receive a disclosure (don't promise confidentiality, listen, be non-judgemental, don't lead, take notes, report to DSL etc.) **it is imperative that staff should not view, copy or forward illegal images of a child.**

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

Staff taking a report will never promise confidentiality.

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

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

### **Risk Assessment: -**

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

The Risk assessment will consider;

- The victim, especially their protection and support.
- The alleged perpetrator, their support needs, and any disciplinary action.
- All other children at the school.
- The victim and the alleged perpetrator sharing classes and space at school.

The risk assessment will be recorded and kept under review.

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

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

**Action: The DSL will consider: -**

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

**Options: The DSL decision making regarding the issue with the following possible options:**

- Manage internally
- Early Help intervention
- Refer to C-SPA
- Report to the police (generally in parallel with a referral to C-SPA)

**Ongoing Response:**

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

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

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

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

Where a criminal investigation into sexual assault leads to a conviction or caution, the school or college will, if it has not already, consider any suitable sanctions in light of their behaviour policy, which may include consideration of permanent exclusion. Where the perpetrator is going to remain at the school or college, the Headmaster should continue keeping the victim and perpetrator in

separate classes and continue to consider the most appropriate way to manage potential contact on school and college premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

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

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

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

### **Physical Abuse**

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

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

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

### *References:*

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

## Harmful and Problematic Sexual Behaviours (HSB & PSB)

The school recognises that children's sexual behaviour exists on a wide continuum (ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent) and that HSB can occur online and/or face-to-face.

HSB can be defined as:

"Sexual behaviours expressed by children...that are developmentally inappropriate, may be harmful towards self or others, or be abusive towards another child...or adult."

PSB can be defined as:

"developmentally inappropriate or socially unexpected sexualised behaviour which doesn't have an overt element of victimisation or abuse."

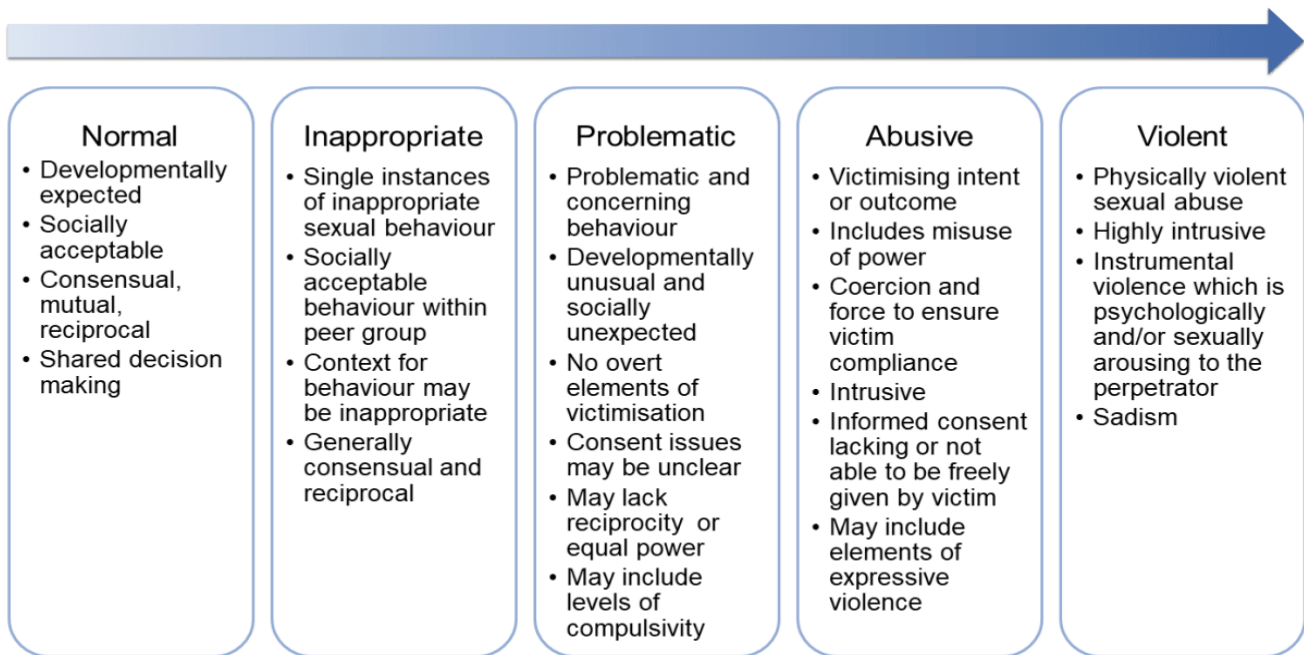
If a pupil displays PSB or HSB, staff will follow the child protection procedures outlined in this policy, particularly:

- Recording incidents accurately on CPOMS, including:
  - the date and time
  - what was happening before the incident took place
  - specific details of the behaviour – avoid generalised terms such as 'inappropriate touch'
  - any power imbalance between the children involved
  - whether the behaviour appeared spontaneous or premeditated
  - any coercion, force or secrecy involved
  - whether the behaviour was consensual
  - how any other children involved reacted (making sure the children are not named or identifiable in the record).
- Discussing concerns or incidents as soon as possible with the DSL or DDSL.

The DSL (or DDSL) will respond to the incident, considering particularly (but not exclusively) the following:

- The nature of the incident and whether a crime may have been committed
- The ages and developmental stages of the children involved, and whether there is any sort of power imbalance
- Whether the incident is a one-off or part of a sustained pattern.

The DSL team will, at all times, be mindful of local guidance from [Surrey Safeguarding Children Partnership](#) and may also refer to Hackett's sexualized behaviour continuum (see below) to gauge whether an incident is low level (requiring a response via the school's behaviour policy) or high level (requiring a referral to the C-SPA).



(Hackett, 2011)

## Mental health

The school has clear systems and processes for identifying possible mental health problems, including:

- The use of specific monitoring categories with CPOMS,
- The effective use of data to help identify changes in patterns of attainment, behaviour or attendance, and
- A strong pastoral system that ensures that specific staff (e.g. Form Tutors, houseparents) know all pupils well.

The Pastoral Care Team (PCT) meet weekly to review pupils and any pupil identified as being at risk may, initially, be referred to the School Counsellor for support and guidance. The School Counsellor is well placed to advise on further support, but the PCT will also refer to best practice guidance, such as the DfE documents [Mental health and behaviour in schools](#), and [Promoting children and young people's emotional health and well-being](#): a whole school and college approach.

## Anti-Bullying/Cyberbullying

Our school policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. The [Surrey Anti Bullying Strategy and guidance](#) provides further resources for school staff.

We keep a record of known bullying incidents which is shared with, and analysed by the governing body. All staff are aware that children with SEND and/or differences/perceived differences are more susceptible to being bullied/victims of child abuse.



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

PHSE education regularly provides opportunities for children to understand bullying is wrong, its impact and how to deal with it.

## **Online Safety**

The school has an E-safety policy which explains how we try to keep pupils safe in school and how we respond to online safety incidents.

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

Some adults and other children use these technologies to harm children. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing children to engage in extremist or sexual behaviour such as webcam photography or face-to-face meetings.

Pupils may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders

Pupils are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated. The school online safety co-ordinator is currently the DSL, Gilbert Watson.

## **Monitoring and Filtering**

To safeguard and promote the welfare of children and provide them with a safe environment to learn, the school reserves the right to filter and monitor the use of its ICT facilities and network. This includes, but is not limited to, the filtering and monitoring of:

- Internet sites visited
- Bandwidth usage
- Email accounts
- Telephone calls
- User activity/access logs
- Any other electronic communications

The DSL and ICT Systems Manager will receive alerts for when any web content has been blocked.

The school will regularly review the filtering system by using 'SWGfL Test Filtering'. The Governing Board will also regularly review the effectiveness of the school's monitoring and filtering systems.

Internet access is filtered for all users. Differentiated internet access is available for staff and customised filtering changes are managed by the school. Content is filtered from three sources: the firewall, the antivirus and the monitoring software. These filters are reviewed and regularly updated. All internet use is logged and frequently monitored and the monitoring process alerts the school to breaches of the filtering policy, which are then acted upon by the safeguarding team.

## **Racist Incidents**

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

## **Radicalisation, Extremism and Terrorism**

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

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

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

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

It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL making a [Prevent Referral](#) .

The DSL should report concerns that a child may be at risk of radicalisation or involvement in terrorism, use the [Prevent referral form](#) to refer cases by e-mail to [preventreferrals@surrey.pnn.police.uk](mailto:preventreferrals@surrey.pnn.police.uk) .

If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101

To speak to the Prevent Supervisor for Surrey call 07795043842

There is a dedicated telephone helpline 0800 0113764 for staff and Governors/Proprietor/ Management committee to raise concerns around Prevent .

School staff receive training to help identify early signs of radicalisation and extremism.

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

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

When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL. They should then follow the safeguarding procedures and refer cases to the C-SPA. If the matter is urgent then Police must be contacted by dialling 999. In non-urgent cases where police advice is sought then dial 101 and ask to speak to the Surrey Police Prevent Coordinator.

The Department of Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).

### **Indicators of vulnerability to radicalisation**

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

Extremism is defined by the Crown Prosecution Service as:

- The demonstration of unacceptable behaviour by using any means or medium to express views which:
- Encourage, justify or glorify terrorist violence in furtherance of beliefs;
- Seek to provoke others to terrorist acts;
- Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
- Foster hatred which might lead to inter-community violence in the UK.

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

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

Indicators of vulnerability include:

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

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

More critical risk factors could include:

- Being in contact with extremist recruiters;
- Accessing violent extremist websites, especially those with a social networking element;
- Possessing or accessing violent extremist literature;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Justifying the use of violence to solve societal issues;
- Joining or seeking to join extremist organisations; and
- Significant changes to appearance and / or behaviour;
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

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

### **Aldro visiting speaker risk assessment**

Aldro takes seriously its responsibility to exclude those promoting extremist views that support or are conducive to terrorism. Outside speakers who are deemed to have extremist views will not be invited into the school.

Aldro has a robust system for assessing and rating risks associated with any planned events and visiting speakers, providing evidence to suggest whether an event should not proceed, be cancelled or whether mitigating action is required (for example a member of staff alerting the Headmaster to concerns in relation to a guest speaker).

All events and speakers are assessed and approved by the Senior Leadership Team (SLT) and recorded on the [Visiting Speaker Risk Assessment](#) form, who may ask to see the content of speaker's materials prior to the event, including an outline of the topics to be discussed and sight of any presentations, footage to be broadcast etc. All visiting speakers will be supervised by a member of the staff, who are expected to interject or stop an event if they feel that the speaker is promoting extremist views or inequality in any form.

Outside speakers who are deemed to have extremist views will not be invited to Aldro. Staff are required to book events with sufficient notice to allow SMT to undertake checks and for cancellation to take place if necessary.

### **Domestic Abuse**

Domestic abuse represents one quarter of all violent crime. It is actual or threatened physical, emotional, psychological or sexual abuse. It involves the use of power and control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, mental or physical ability. Domestic abuse can also involve other types of abuse.

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

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.

Living in a home where domestic abuse takes place is harmful to children and can have a serious impact on their behaviour, wellbeing and understanding of healthy, positive relationships. Children who witness domestic abuse are at risk of significant harm and staff are alert to the signs and symptoms of a child suffering or witnessing domestic abuse.

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

### **Homelessness**

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

### **Child Exploitation (CSE)**

Child sexual exploitation 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. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. All staff are aware of the link between online safety and vulnerability to CSE.

Any concerns that a child is being, or is at risk of being, sexually exploited should be passed immediately to the DSL.

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

The DSL will complete the Surrey Safeguarding Children's Board [CSE Screening Tool](#) alongside staff who know the child well on any occasion when there is a concern that a child is being or is at risk of being sexually exploited or where indicators have been observed that are consistent with a child who is being or who is at risk of being sexually exploited.

In all cases if the tool identifies any level of concern (green, amber or red) the DSL should contact the C-SPA and email the completed CSE Screening Tool along with a Multi-Agency Referral Form (MARF). If a child is in immediate danger the police should be called on 999.

The school is aware that a child often is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. Consequently, the child may resent what they perceive as interference by staff.

However, staff must act on their concerns as they would for any other type of abuse. Children also rarely self-report CSE so staff must be particularly vigilant to potential indicators of risk.

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

## **Child Criminal Exploitation & Gangs**

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

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

The risk or potential risk of harm to the child may be as a victim, a gang member or both - in relation to their peers or to a gang-involved adult in their household. Teenagers can be particularly vulnerable to recruitment into gangs and involvement in gang violence. This vulnerability may be exacerbated by risk factors in an individual's background, including violence in the family, involvement of siblings in gangs, poor educational attainment, or poverty or mental health problems.

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

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

## **Serious violence**

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in well-being, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by or are involved with individuals associated with criminal networks or gangs.

All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges is provided in the Home Office's [advice to schools on gangs and youth violence](#).

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

A referral to the C-SPA will be made when any concern of harm to a child as a consequence of gang activity including child criminal exploitation becomes known. Any member of staff who has concerns that a child may be at risk of harm should immediately inform the DSL. The DSL will contact the C-SPA. If there is concern about a child's immediate safety, the Police will be contacted on 999.

## Sharing of nudes and semi-nudes

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

Sharing of nudes and semi-nudes refers to both images and videos where:

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

All incidents of this nature should be treated as a safeguarding concern and in line with the UKCIS guidance [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)

Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child is child sexual abuse and should be responded to as per the relevant section of this policy.

If a member of staff becomes aware of an incident involving the sharing of nudes and semi-nudes, they should follow the child protection procedures and refer to the DSL immediately.

The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. **Staff must never** view, copy, print, share, store or save the imagery – **This is illegal.**

Further guidance for staff can be found [here](#).

The DSL should hold an initial review meeting with appropriate school staff and subsequent interviews with the children involved (if appropriate).

Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the child at risk of harm.

At any point in the process if there is concern a young person has been harmed or is at risk of harm a referral should be made to the C-SPA or the Police as appropriate.

Immediate referral at the initial review stage should be made to Children's Social Care/Police if:

- The incident involves an adult.
- There is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs).

- What you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent.
- The imagery involves sexual acts.
- The imagery involves anyone aged 12 or under.
- There is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.

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

During the decision making the DSL will consider if:

- There is a significant age difference between the sender/receiver.
- There is any coercion or encouragement beyond the sender/receiver.
- The imagery was shared and received with the knowledge of the child in the imagery.
- The child is vulnerable, for example subject to Child in Need, Child Protection or Early Help plans, Looked After, SEND.
- There is a significant impact on the children involved.
- The image is of a severe or extreme nature.
- The child involved understands consent.
- The situation is isolated or if the image been more widely distributed.
- There are other circumstances relating to either the sender or recipient that may add cause for concern.
- The children have been involved in incidents relating to youth produced imagery before.

If any of these circumstances are present the situation will be referred according to our child protection procedures, including referral to the C-SPA or the Police.

The DSL will record all incidents of youth produced sexual imagery, including the actions taken, rationale for actions and the outcome.

## **Modern Slavery**

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

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

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

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

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



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

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

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

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

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

### **Forced Marriage**

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

Forced marriage is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.

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

School staff should never attempt to intervene directly as a school or through a third party. Contact should be made with the C-SPA and/or the Forced Marriage Unit 020 7008 0151.

### **So-called 'Honour'-based Abuse**

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

HBA might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion;
- want to get out of an arranged marriage; become involved with a boyfriend or girlfriend from a different culture or religion;
- want to get out of an arranged marriage;
- want to get out of a forced marriage

- wear clothes or take part in activities that might not be considered traditional within a particular culture

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

### **One Chance Rule**

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

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

### **Private Fostering Arrangements**

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

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

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

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

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

### **Looked After Children and Previously Looked After Children**

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

The school ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child and contact arrangements with birth parents or those with parental responsibility.

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

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

## Children with Special Educational Needs and Disabilities or Health Issues

Children with SEND or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. These can include:

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

Any reports of abuse will require close liaison with the DSL and the SENDCO. The setting will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

## Children Absent from Education

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

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

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

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

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

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

The school will:

- Enter pupils on the admissions register on the first day on which the school has agreed, or has been notified, that the pupil will attend the school.
- Notify the Local Authority within five days of adding a child's name to the admission register. The notification must include all the details contained in the admission register for the new pupil.

- Monitor each child's attendance through their daily register and follow the SCC procedure in cases of unauthorised absence.
- Remove a child's name from the admissions register on the date that the child leaves the school.
- The school will notify the Local Authority when they are about to remove a child's name from the school register under any of the fifteen grounds listed in the regulations, no later than the date that the child's name is due to be removed.
- Where parents notify the school, in writing, of their intention to electively home educate the school will forward a copy of the letter to the Elective Home Education Team / Education Welfare. Where parents orally indicate that they intend to withdraw their child to be home educated and no letter has been received, the school will not remove the child from roll and will notify Education Welfare at the earliest opportunity.

### **Pupils Missing Out on Education**

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

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

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

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

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

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

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

The school leadership will report to governor's information regarding the use and effectiveness of the use of alternative provision and modified timetables.

## **School Attendance and Behaviour**

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

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

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

## **Restrictive Physical Intervention**

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

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

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

We recognise that touch is appropriate in the context of working with children, and all staff have been given 'Safe Practice' guidance to ensure they are clear about their professional boundaries.

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

Surrey County Council guidance [Touch and the use of restrictive Physical Intervention When Working with Children and Young People](#) provides further detailed information.

## **Whistleblowing**

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

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

The NSPCC whistleblowing helpline: <https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/> is available for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about a way a concern is being handled by their school. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

Whistle-blowing regarding the Headmaster should be made to the Chair of the Governing Body whose contact details are available to staff.

**Links with other school policies:**

Anti-bullying Policy  
Behaviour Policy  
Children Missing from Education and Missing Pupil Policy  
Complaints Policy  
Curriculum Policy  
E-Safety, including staff use of mobile phones  
Health & Safety  
Healthcare and Pastoral Care Policy  
Privacy Policy  
PSHE, SMSC and RSE Policy  
Recruitment Policy  
Risk Assessment Policy  
Staff Code of Conduct  
Whistleblowing Policy

**Further advice on safeguarding and child protection is available from:**

[Surrey County Council Education Safeguarding Team](#)

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

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

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

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

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

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

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

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

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