



CHARTERHOUSE

SAFEGUARDING & CHILD PROTECTION POLICY

DIRECTORY & QUICK REFERENCE

If there is a risk of serious injury, or danger to life, or you believe a crime is in progress, ring the police on 999 before doing anything else.

If the incident is on the Charterhouse site, ring the duty Security Officer next on 07831 467362.

If you want to report a concern to the police but an immediate response is not required, call 101.

Safeguarding concerns can be raised with the DSL or either of the Deputy DSLs — it does not matter which:

Designated Safeguarding Lead (DSL)	Mrs Alexandra Colclough ALC@charterhouse.org.uk Brooke Hall Offices	07833 435904
Safeguarding Assistant	Mrs Jacqui Holloway mail c/o Brooke Hall, Charterhouse, Surrey GU7 2DX	01483 291619
Deputy Designated Safeguarding Lead	Miss Leanne Rowlands LER@charterhouse.org.uk Brooke Hall Offices	07721 388670
Deputy Designated Safeguarding Lead	Mr James Hazeldine JSH@charterhouse.org.uk	07827 956697
Head	Dr Alex Peterken Head@charterhouse.org.uk	01483 291600
Chair of Governors	Mr Mark Bishop MarkBishopGB@Charterhouse.org.uk	for phone number see para 94
Governor with Leadership Responsibility for Safeguarding	Mrs Helen Goatley HelenGoatleyGB@charterhouse.org.uk	
Deputy Safeguarding Governor	Very Revd Dianna Gwilliams DiannaGwilliamsGB@charterhouse.org.uk	

Anyone with a concern about a child can get advice from, or make a referral to, the local authority (see paragraph 71 (p.21)):

Surrey County Council Children's Services	0300 470 9100 Monday to Friday, 9am to 5pm
Multi-Agency Partnership:	01483 517898 (emergency team, out-of-hours)
Single Point of Access (C-SPA)	cspa@surreycc.gov.uk

Anyone with a concern about the conduct of a member of staff should read Part Three

Local Authority Designated Officer for Surrey	0300 123 1650 (option 3) LADO@surreycc.gov.uk
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You can also seek advice at any time from the NSPCC helpline:

National Society for the Prevention of Cruelty to Children	0808 800 5000 help@nspcc.org.uk
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PART ONE: BASIC INFORMATION

- [Introduction: key principles, documents and definitions](#)
- [The meaning of 'safeguarding' and 'child protection'](#)

PART TWO: CONCERNS ABOUT CHILDREN

- [Levels One, Two and Three: Early Help and Welfare Management](#)

- [Level Four: abuse and neglect](#)

- [physical abuse](#)
- [emotional abuse](#)
- [sexual abuse and child sexual exploitation \(CSE\)](#)
- [neglect](#)

- [Level Four: Some specific safeguarding issues](#)

- [acute mental and physical health problems](#)
- [children missing education \(CME\)](#)

Family and community

- [honour-based abuse and forced marriage](#)
- [female genital mutilation \(FGM\)](#)
- [serious violence, gangs, and child criminal exploitation \(CCE\)](#)
- [radicalisation and the 'Prevent' duty](#)

Child-on-child (peer-on-peer) abuse

- [sexual violence and sexual harassment](#)
- [consensual/non-consensual sharing of sexual imagery](#)
- [violence and physical abuse](#)
- [prejudice-based and discriminatory bullying](#)

PART THREE: PROCEDURES — THE MANAGEMENT OF REPORTS

- [Listening to disclosures from children](#)
- [How to report concerns, and how they are managed](#)
- [Record keeping](#)
- [Whistleblowing](#)

PART FOUR: CONCERNS ABOUT, AND ALLEGATIONS AGAINST, MEMBERS OF STAFF

PART FIVE: THE GOVERNANCE AND MANAGEMENT OF SAFEGUARDING

- [Annex 1: Further information about physical abuse](#)
- [Annex 2: Further information about emotional abuse](#)
- [Annex 3: Further information about sexual abuse](#)
- [Annex 4: Further information about neglect](#)
- [Relevant documents \(bibliography\)](#)

PART ONE: BASIC INFORMATION

■ Introduction: key principles, documents and definitions

1. The purpose of this policy is to provide Charterhouse staff with the framework they need to keep children safe in the School. The policy is openly available to anyone. Staff at Charterhouse are obliged to read it, and the School must ensure it is followed by all staff. The policy also offers information to pupils, parents and others about how safeguarding and child protection work.

2. Charterhouse regards the welfare of its pupils as of paramount importance. It recognises its moral responsibility to safeguard and promote the welfare of children, and its duty to ensure its safeguarding policy and practice follows the law, the government's statutory guidance, and various other directives. Chief among these are:

- *Working Together to Safeguard Children* (HM Government, July 2018)
- *Keeping Children Safe in Education* (Department for Education, September 2023)
- *Boarding Schools: National Minimum Standards* (HM Government, September 2022)
- *Surrey Safeguarding Children Partnership protocols, guidance and procedures* (online)
- *Handbook for the Inspection of Schools: Commentary on the Regulatory Requirements* (Independent Schools Inspectorate, September 2022)

A full list of the laws, regulations and other documents which the School must follow or to which it must have regard in a safeguarding context is included after Annex 4.

3. This policy is reviewed annually by the School's Designated Safeguarding Lead ('DSL') working with the Deputy DSLs and the Governor with Leadership Responsibility for Safeguarding. It is submitted to the Governing Body for approval in the first term of each new school year.

4. In this policy, 'members of staff' means anyone directly employed by Charterhouse (teaching and support staff, as well as music teachers), but must also be taken to include regular contractors such as instructors, sports coaches, Sports Centre and Holroyd Howe employees, in addition to Governors, volunteers, students undertaking placements, and supply teachers or agency staff.

5. Several other Charterhouse documents are mentioned in this policy. Staff can find these on 'Greyhound'. For example:

- *Professional conduct policy*
- *Raising concerns at work ('whistleblowing')*
- *Anti-Bullying strategy and policy*
- *Prevent, and Fundamental British Values*
- *Promotion of Good Behaviour (Pupils)*
- *Safer recruitment, selection and disclosure*
- *IT Acceptable Use Policy*
- *Joiners, Leavers, and Long Term Absences (CME)*

6. The term 'child' is used in this policy to refer to anyone under 18. The School extends the same level of pastoral concern to pupils over 18 but recognises their different legal status. The policy is designed chiefly to apply to Charterhouse's pupils, but the School expects staff to exercise equal care regarding other children resident on the campus or visiting.

7. Organisations or individuals sometimes hire out or use Charterhouse's premises and facilities for the purpose of providing education or activities to children not otherwise connected with the School. When this happens, the School will seek to assure itself that the body concerned has its own policies and procedures in place to keep children safe and understands how to contact Charterhouse's DSL or Deputy DSL 'on call' (see paragraph 70 below). In particular, the DSL will read the user's safeguarding policy, and work with the School's Lettings and Human Resources Departments to decide upon the approach to checking (for example) the identities, DBS certificates and training records of the adults involved. Compliance with these safeguarding requirements will be a condition of the agreement between the School and the body hiring or using its premises.

8. To safeguard and promote the welfare of children, all Schools (including independent schools) are required to act in accordance with the arrangements provided by their local Children's Safeguarding Partnership. The Surrey Safeguarding Children Partnership (SSCP) consists of Surrey County Council, Surrey Police, and (on behalf of Surrey NHS providers) Surrey Heartlands Integrated Care System. The SSCP's *Procedures Manual* can be found at:

<http://surreyscb.procedures.org.uk/page/contents>

The Partnership is based at Fairmount House, Bull Hill, Leatherhead, Surrey KT22 7AH. It can be reached on 01372 833330 or partnership.team@surreycc.gov.uk. Although it sets local policy, referrals of individual children are not made to the SSCP, but to social workers who work for Surrey Council.

9. 'Surrey Council', 'Children's Services' and 'The Local Authority' refer to the same body. The homes of many pupils who board at Charterhouse are not in Surrey, so the School sometimes contacts other local authorities. If the School needs to consult about pupils who live overseas, it contacts Surrey Council (using the contacts on the front cover of this policy).

■ The meaning of 'safeguarding' and 'child protection'

10. There are **four** elements within the government's definition of safeguarding. **Two** of them, **(a)** "Ensuring that children grow up in circumstances consistent with the provision of safe and effective care" and **(b)** "taking action to enable all children to have the best outcomes", refer to the general activity of safeguarding and promoting the welfare of every single one of our pupils.

11. Charterhouse recognises that children have a right to feel safe and secure and cannot learn effectively unless they do. We also recognise the statutory responsibility of every member of our staff to help provide a safe environment for children, and that this principle is especially important in a boarding school. In this sense 'safeguarding' is a huge umbrella concept incorporating several areas covered in separate policies: our recruitment methods, our security arrangements, our health & safety practice, the management of our computer network, and so on.

12. We also aim to teach our pupils how to keep themselves and others safe. To that end we use tutorials, Year Group assemblies, PSHE (Personal, Social and Health Education) and RSE (Relationship and Sex Education, which is now compulsory in secondary schools) to educate our pupils about safeguarding, consent, and how they can recognise and build resilience to various forms of bullying and abuse, including

child-on-child (formerly called 'peer-on-peer') abuse. Access to the internet on campus via the School's own I.T. system is constantly filtered and monitored by 'Watchguard' software, and pupils' access to 3G/4G/5G on their own devices is managed via the system described in our *Mobile Computing Device Policy*. However, we also aim to teach pupils about the risks posed by adults and children who use methods including the internet, mobile technology and social media to bully, groom, exploit, abuse or radicalise other people. We aim to teach them to understand and appreciate the fundamental values of democracy, the rule of law, individual liberty, and mutual respect for and tolerance of those with different faiths and beliefs. Finally, we aim to help our pupils make a safe transition to the world of higher education and work. (These aims are expanded upon in our policies on PSHE and the Prevent duty). Additionally, using focus groups, surveys, pupil forums and tutorials, we aim to listen to our pupils' own views about their safeguarding, and to respond accordingly.

13. The **second two** of the four parts within the definition of safeguarding are **(c)** "protecting children from maltreatment" and **(d)** "preventing impairment of children's health and development", where 'health' means both physical *and* mental health. These relate to protecting children from abuse and neglect, and their consequences. This is sometimes predictive, meaning identifying children at risk and addressing their needs before they become serious problems, and sometimes reactive, meaning responding quickly and effectively to the needs of children who are identified as already suffering.

14. Knowing what to look for is vital. Effective safeguarding then relies on information sharing. We already aim to offer Monitors (prefects), Peer Supporters and other senior pupils age- and role-appropriate training on the kinds of thing to look out for in their dealings with other pupils.

15. Yet if we are to offer our pupils the highest quality pastoral care, we need to have a culture of vigilance amongst our staff. That means staff need to be in the habit of thinking 'it could happen here'; be constantly sensitive to the presentation and needs of pupils; be willing to listen to children; and be instinctively ready to put the best interests of the child above any other considerations.

16. **Barriers to reporting** sometimes involve staff themselves. The Children Act 1989 establishes the right of the state to intervene in family life to protect the child, but adults sometimes lack faith in the system, and fail to raise concerns after personally deciding that the damage caused by the process will be greater than any benefit. In schools, a member of staff's needs to maintain a good relationship with parents can sometimes obscure the best interests of the child. Staff sometimes worry that they cannot share confidential information due to the restrictions of Data Protection legislation, even though the government has made it clear that the legislation is not a barrier to sharing information for the purposes of keeping children safe, and that fears about sharing information **must not** be allowed to stand in the way of the need to promote children's welfare (their emphasis). Other barriers to reporting include an occasional tendency for staff to 'normalise' or 'explain away' low-level concerns, perhaps in the belief that "it will probably be OK tomorrow".

17. Staff themselves must never try to cover up concerns about children, delay reporting them, or otherwise ignore them. Where teaching staff are concerned, the *Teachers' Standards* make it clear they should safeguard children's wellbeing as part of their professional duties. It is not the job of members of staff to investigate safeguarding issues or make judgements about the kinds of concern which ought to matter or not. It is their job to share concerns quickly, and with the right person. (**The procedure for reporting concerns is explained below from paragraph 67**). However, at times staff will need to make

decisions about what action to take. They may need to use professional judgement to decide whether the explanation they have been given satisfactorily accounts for what they have seen or heard.

18. Charterhouse's approach to safeguarding and promoting welfare is child centred. This means, firstly, that the School is committed to acting in the best interests of the child, rather than allowing other considerations to cloud the issue. If there is a conflict of interest between a child and an adult, the welfare of the child will be the paramount consideration. Secondly, it means keeping children in focus when making decisions about their lives and working in partnership with them and their families. As such (unless directed not to by outside agencies), the School will generally always speak with the child to ask about what has happened, and what they would like to happen.

19. Yet children themselves often do not find it easy to speak with adults. They may not feel ready or know how to tell someone they are being abused, exploited or neglected, and they may not recognise their own experiences as being harmful. Children may decide to say nothing at all because they are embarrassed, afraid they will not be believed, struggle with communication, or fear the consequences of speaking up, perhaps concerned that the School will over-react and they will get people they care about in trouble. Pupils do occasionally tell staff directly about (for example) being bullied, or about what they perceive to be abuse or neglect within their own families. However, they may be more likely to reveal worrying details of their own lives and experiences, perhaps even unintentionally, within wider-ranging conversations with staff.

20. Sometimes, it is parents or carers themselves who bring their concerns about pupils to the School's attention, and sometimes, for example where one child is mistreating another physically or sexually, a pupil's friends may report their concerns about the situation, either in person or by leaving an anonymous message for staff. At other times, staff will simply observe physical or behavioural indicators which lead them to think that all is not well in a child's life.

21. Given this wide variety of means by which safeguarding information might come to light, all staff are required to have a good working knowledge of the kinds of concern they should be watching out for constantly, and to be 'professionally curious' about even the smallest hints of those concern. They are required to be familiar with the government's definitions of abuse and neglect in *Keeping Children Safe in Education*. What follows, **Part Two**, is a list of the different kinds of presentation and behaviour to which members of staff and others should be alert. Staff should not wait until they are told by the child or have their suspicions confirmed by someone else, but should report any concerns in a timely fashion, as set out in **Part Three**.

PART TWO: THE DIFFERENT KINDS OF SAFEGUARDING CONCERN

■ Levels One, Two and Three: Early Help and Welfare Management

22. Surrey Safeguarding Children Partnership publishes a document called [Effective Family Resilience](#) (known as 'Levels of Need') which sets out in detail the indicators and behaviours which people who work with children must look out for constantly. It divides these into **four** levels of need. Every single person in Surrey who is under 18 will fit within one of the four levels.

23. **Level One: Universal Support.** Most children at Charterhouse (and in Surrey generally) are said to be at Level One, the lowest of the four Levels of Need, because they are developing and achieving outcomes as expected. As part of growing up, many children will have health concerns, family issues, academic worries or problems with peer relationships. It is a key part of the role of Heads of House and their teams to offer children and families advice about support which is universally open to all pupils: Tutors and Assistant Heads of House, the Wellbeing Centre, the Special Educational Needs department, the Chaplaincy, the Hunt Health Centre, NHS services, and so forth.

24. **Level Two: Early Help.** Sometimes, despite the best efforts of individuals and House teams, a child's problems seem to be going on too long, or getting worse, or becoming a crisis. While it is clear the situation is nowhere near the legal threshold for abuse or neglect, it is nevertheless obvious the child is vulnerable in the sense of (for example) having a disability, or a health condition or mental health need, or home difficulties (such as a family member in prison, or being at risk of honour-based violence), or being persistently absent from education, or having academic or behavioural issues which could escalate to become more serious and longer-term problems.

25. When there is no suggestion at all of abuse or neglect, or the specific issues explained below under Level Four, but a member of staff still has a concern about the welfare (including the mental health) of a pupil or the potential for escalation, he or she should speak either with the pupil's Head of House, or with the DSL or Deputy DSL. The staff member (or, by agreement, Head of House) should then record their concern on the School's pastoral management database CPOMS (which automatically alerts the DSL). This record is important because it reveals whether concerns about the same child have already been raised by others, and thus helps avoid 'the jigsaw effect', whereby several colleagues hold pieces of information which seem to them separately trivial but when put together become significant.

26. Welfare concerns shared in this way with the DSL or Deputy DSLs (in person or via CPOMS), and the best response to them, are likely to be discussed on a pupil-by-pupil basis within the Welfare Management Committee, which meets once per week during term-time with the following members:

- Designated Safeguarding Lead (Chair)
- Deputy Head (Pastoral)
- Assistant Head (Pastoral) (Deputy DSL)
- Deputy Safeguarding Lead
- Senior Chaplain
- Director of Wellbeing
- Senior Nurse
- Special Educational Needs Coordinator

27. The kinds of need which Surrey Council identifies at Level Two are called '**Early Help**', a government phrase meaning "to provide support as soon as any needs emerge or are identified at any point in a child's life". Such needs can often be addressed within Charterhouse, which, as a well-resourced boarding school, is unusually placed to offer a combination of on-site services including (for example) NHS professionals and counselling. If the DSL, working with the Welfare Management Committee, judges that the child's situation can be effectively addressed via a coordinated response from professionals working within the School, he or she is said to be at Level Two. Members of the Committee will write, implement and review different kinds of plan (healthcare plans, educational support plans, safety plans) as appropriate for individual pupils. In such cases there may be no need to consult outside the School, although the option remains to seek

advice from the local authority's South West Surrey Early Help Hub (using the C-SPA access number 0300 470 9100. The Hub is based at St Francis Centre, Southway, Guildford, GU2 8WZ: 0300 123 1640). Any kind of Early Help Plan will be shared with the pupil and their parents, and with House staff and others on a need-to-know basis. If, on review, the pupil's situation does not seem to be improving, the Committee will consider escalation.

28. **Level Three: Targeted Help.** The child's needs may begin to move more clearly beyond what the School alone can provide. For example, the School's Medical Officer may have referred the pupil to CAMHS (CYPMHS) or the SENCO may have decided that specialised external support is required. If the DSL, working with the Welfare Management Committee and the Safeguarding Partnership's [Effective Family Resilience](#) document, judges that the child's needs might best be met by a combination of the School's services working together with the targeted help provided by specialised exterior services, then the DSL will refer the child to the Early Help Hub (as above), or to services provided within the pupil's home area (if not Surrey). Parents must provide written consent for a referral, and the resulting Early Help Plan must be shared with them and the child. An Early Help review at which parents and the professionals who are offering support meet is called a TAF ('Team around the Family') meeting.

■ Level Four: abuse and neglect

29. **Level Four**, the highest level of need, is defined by Sections 17 and 47 of the Children Act 1989. The School must pass on to the local authority any possible Level Four concerns. Section 17 of the Act safeguards children who are 'in need', because, if they were not supported by specialised services, they would be unlikely to achieve or maintain a reasonable level of health or development. This includes children with serious disabilities or complex special educational needs. Under Section 47 of the Act, which covers **child protection**, the local authority must investigate when it becomes aware that a child is suffering (or is likely to suffer) significant harm.

30. Significant harm is caused when a child's health or development is seriously or permanently altered or damaged. 'Health' here means physical or mental health, and 'development' means physical, intellectual, emotional, social or behavioural development. Inflicting significant harm on a child, or failing to act to prevent it, is a definition of child abuse and neglect. Children may be abused in a family, or in an institutional or community setting by those known to them or, more rarely, by others (for example, via the internet). They may be abused by an adult or adults, or another child or children. Abuse and neglect can have a lasting impact throughout childhood, adolescence and into adulthood. Staff should be aware of how they can impact mental health, behaviour, and education.

31. Staff should be aware that a greater risk of abuse or neglect is faced by children who come from chaotic home backgrounds, or might be discriminated against on the grounds of sex, ethnicity or sexual orientation. Children who are disabled, have special educational needs or certain medical conditions, are also particularly vulnerable to abuse. For example, they may be less able to understand the difference between fact and fiction in online content, and may experience additional communication barriers in reporting these or other challenges. Minorities, including LGBT children, may be more at risk because more prone to peer group isolation than other children, or disproportionately impacted by bullying or abuse (without outwardly showing signs). This greater risk may exist in part due to societal attitudes and

assumptions (for example, that indicators of possible abuse such as behaviour, mood and injury must be a function of a child's special needs), rather than to any aspect of the child's real experience.

32. Detailed lists of the symptoms, indicators and behaviours associated with child abuse and neglect which are used by health and social care professionals can be found here:

[Child maltreatment: when to suspect maltreatment in under 18s](#)

These indicators are outlined in the following five paragraphs, parts of which are copied from [Keeping Children Safe in Education, Department for Education, September 2023](#) and the government document [What to do if you're worried a child is being abused](#). Be aware that in practice, however, abuse and neglect can rarely be separated into 'standalone' categories and in most cases, multiple issues will overlap with one another.

33. **Physical abuse** is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. Most children suffer accidental cuts and bruises as part of growing up, but staff who work with children should always be professionally curious about fresh injuries. Information on the kinds of injury most often associated with intentional harm is given Annex 1. A conversation with a child about a recent absence or injury may initially be light-hearted, but staff should be concerned if:

- a child's explanation does not seem to match an injury
- a child is evasive or appears reluctant to discuss the matter
- a child tries to cover up a bruise, wound or scar
- a child's explanation is muddled or alters in re-telling
- a child appears to have avoided changing for sports or seeking treatment for an injury

Unless members of staff are absolutely satisfied by the evidence or explanation, they should treat the matter as a cause for concern and report it. Staff considering the possibility of intentional harm (by an adult or another child) should not take pictures or ask a child to remove clothing.

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

- seem to have low self-esteem or put themselves down ("I'm stupid, ugly, useless")

- appear to blame themselves for problems at home or within a peer group
- offer inappropriate responses to challenging situations (“I deserve this”)
- seem unusually withdrawn, fearful, or anxious about doing something wrong
- suggest that their parents or carers turn affection on and off at a whim, or blame their children for their own problems, or make negative comments about them

Further information on the causes and effects often associated with emotional abuse is given below in Annex 2.

35. **Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (see paragraphs 49-57). Staff should be particularly alert to children who:

- use sexual language or have knowledge you wouldn’t expect them to
- ask others to behave sexually or play sexual games
- display knowledge or interest in sexual acts inappropriate to their age

Further information on sexual abuse is given below, in Annex 3.

36. **Child sexual exploitation** (‘CSE’) is a form of child sexual abuse. It occurs where an individual or group (adult or child) takes advantage of an imbalance of power to coerce, manipulate or deceive a child 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 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. It can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person’s immediate knowledge (eg. through others copying videos or images they have created and posted on social media). Children who are being groomed often resent what they perceive as interference by other adults, and rarely self-report CSE, meaning staff must be particularly vigilant to potential indicators of risk such as a child:

- acquiring money, clothes, mobile phones (etc) without plausible explanation
- becoming isolated from peers and social networks, and/or secretive
- forming relationships with controlling or older individuals or groups
- going missing from home or school without explanation
- regularly returning home late, perhaps under the influence of drugs or alcohol
- exhibiting age-inappropriate sexualised behaviour, or sexually transmitted infection
- suffering from mood swings or changes in emotional wellbeing

Further information about CSE can be found in the government's publication [Child sexual exploitation: definition and guide](#).

37. **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 (for example, as a result of maternal substance abuse). Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Neglect is not a function of social and economic disadvantage, although in affluent families it can be difficult to recognise and address. At Charterhouse, staff should be particularly alert to any suggestion that a child:

- has been left unsupervised during time away from School, or with an inappropriate carer
- has not had medical, dental, food, clothing or other basic needs met while away from School
- has been exposed to dangerous or illegal behaviour during time away from School
- is exhibiting dangerously reckless behaviour (including sexual and/or online)
- appears to begin thriving on return to School

Further information on factors which might suggest neglect can be found below in Annex 4.

■ Level Four: some specific safeguarding issues

38. Any concerns about the varieties of abuse and neglect just described should be reported as per below. In addition, there are several specific forms of abuse and safeguarding issues which people who work in schools are required to know about, and which are now explained separately, because they involve additional reporting requirements:

39. **Acute mental and physical health problems** are primarily health matters and must be reported urgently to the Hunt Health Centre (and perhaps emergency services). However, they often meet Surrey Council's 'Level Four' threshold as safeguarding concerns, too, either because they are potential indicators of abuse and neglect, or because they are significantly harmful in themselves. Thus, after first involving health professionals as appropriate, staff who become aware of any of the following must also report them to the DSL or Deputy DSLs promptly:

- a pupil who is considering, has a plan for, or has made an attempt at suicide
- a pupil who has self-harmed (cutting, burning, picking, scratching, banging, hitting etc.)
- a pupil who has experienced a psychotic episode
- a pupil with an eating disorder
- a child missing all or most immunisations
- a child with emergent serious physical health issues, but without a diagnosed medical problem

Staff should be familiar with the School's document *Mental Health: Policy and Procedures*.

40. **Children Missing Education (CME), and Private Fostering:** pupils who disappear from education, or go missing for periods of time, are far more vulnerable to abuse and neglect. More information is provided

in Charterhouse's separate policy *Joiners, Leavers, and Long Term Absences (CME)*. Appendix A of that policy summarises the School's response to children missing education and must be read by all employees and volunteers new to Charterhouse. It explains that staff are required to notify the DSL of any pupil who leaves the School permanently at an irregular point in their education or, during term-time, remains absent from school for more than 10 days without (for example) medical certification, since schools are required to inform the local authority. We are only required to include Surrey resident children from year 9-11 (and only year 11 if they leave part way through the year – not at end year 11). The exception would be if a child had an Education Health Care Plan – it would be helpful if they could be included for years 11-13 also (but not a requirement). **All schools (including academies and independent schools) must: Notify their Local Authority *within five days* of adding a pupil's name to the admission register and notify their Local Authority when they are about to remove a pupil's name from the school admission register**

It also explains that staff are required to inform the DSL if they become aware that, at any time including during school holidays, a pupil has been resident for 28 days or more (consecutively) with a person in the UK who is not a close family member, since this is the legal threshold at which the local authority must be informed, known as Private Fostering.

Family and community

41. A number of particular family situations can suggest that children have needs at Level Four because they significantly increase the chances of abuse or neglect. Members of staff who become aware of any of the following should consult the DSL:

- families in which relationships have broken down, such that pupils have either moved beyond parental control or been excluded from their home;
- families in which separation or divorce involve the child being unsettled by the need to choose between (perhaps conflicting) alternatives offered by their parents;
- families in which mental health, substance abuse (including alcoholism) or disability make it difficult for parents to provide children with adequate support;
- families in which a parent is in prison or involved in serious criminal activity;
- families in which one member abuses another (domestic abuse and violence).

Staff should be aware that the exposure of children to domestic abuse and/or violence (notably through witnessing the ill treatment of others) can have a serious, long lasting emotional and psychological impact on them. More information can be found on the [Healthy Surrey: domestic abuse](#) website. Advice can be sought from the SW Surrey Domestic Abuse Outreach Service (01483 898884). Charterhouse is signed up to Operation Encompass, which notifies a school's DSL when Surrey Police have been called out to the homes of pupils in this context.

42. **Honour-based abuse** (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or community. One of the most significant is **forced marriage**, which is a marriage entered into without the full and free consent of one or both parties and where violence, threats (physical, emotional or psychological) or any other form of coercion is used. Forcing a person into a marriage is a crime, and should not be confused with arranged marriage. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into

marriage. The government has set up a 'Forced Marriage Unit' to offer advice. It can be reached by email and phone at fm@fco.gov.uk (020 7008 0151, or 020 7008 1500 out-of-hours). Anyone who believes a child (or adult) is in imminent danger of being forced into marriage should phone the police on 999. Anyone with concerns about a family putting pressure on a child in this context should consult the DSL or the local authority.

43. **Female genital mutilation** ('FGM') comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Anyone who believes an act of FGM is about to be carried out on a girl (or woman) should phone the police on 999. There is now a statutory duty upon teachers (along with regulated health and social care professionals) to report to the police personally if they are informed by a girl under 18 that an act of FGM has been carried out on her (or observe visual evidence). Unless the teacher has good reason not to, they should also discuss any such case with the DSL and involve children's social care as appropriate. In Surrey, a girl who has an immediate family history of FGM is considered 'at risk', and members of staff who know of that history must report it to the DSL and/or Children's Services. The same applies when members of staff know that a girl comes from a family with ties to an area where FGM is practised.

44. **Extra-familial harms** ('contextual safeguarding'): in addition to threats to the welfare of children from within their own families and schools, staff should be aware that children may be vulnerable to abuse or exploitation in the wider community and/or online. Abuse that occurs online or outside of the school or family should not be downplayed, and should be treated equally seriously. Parents and staff sometimes have little influence over the relationships that children form in these contexts, meaning that assessments and interventions may need to focus not only on the family, but also on wider environmental factors. The possibilities of sexual exploitation and abuse have already been included (see paragraph 36). Further risks include serious youth violence, criminal exploitation and radicalisation.

45. **Serious violence, gangs, and child criminal exploitation** (CCE). Children are increasingly at risk from criminal gangs and serious violent crime. Staff should be aware that pupils forming new or unusual associations with older individuals or groups, perhaps accompanied by new possessions, unexplained travel patterns or suggestions of violence, should be a cause for serious concern. CCE is a geographically widespread form of harm often associated with 'county lines', in which criminal gangs (using dedicated phone lines for customer 'orders') groom and exploit children and young people to carry drugs and money from urban areas to outlying towns, often on train routes. However, CCE might also involve children being forced or manipulated into shoplifting, pickpocketing, working in cannabis factories, or threatening/committing serious violence to others. As with child sexual exploitation, CCE is typified by an individual or group taking advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in illegal activity. It can still be exploitative, even though the young person consents to the activity, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

46. **Radicalisation** refers to the process by which a person comes to support terrorism and forms of extremism. Detailed information is provided in the School's document *Prevent, Fundamental British Values and Visiting Speakers*. Radicalising children is a form of abuse, and schools have a duty to protect children from it. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised. There is no single way of identifying an individual likely to be susceptible to an extremist

ideology. Specific background factors may contribute to vulnerability which are often combined with influences such as family, friends or online, and with needs to which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people. A few possible indicators:

- a conviction that their religion, culture or beliefs are under threat and treated unjustly
- a tendency to look for conspiracy theories, and a distrust of mainstream media
- a sense of debt or guilt
- blaming parents for family problems
- feeling let down, and perhaps 'religious seeking'
- peer pressure, low self esteem, and/or the need for identity and belonging
- physical change/growth spurt (being bigger than peers)
- being secretive about who they have been talking to online and what sites they visit
- switching screens when you come near the phone, tablet or computer
- possessing items – electronic devices or phones – you have not given them
- becoming emotionally volatile

47. **The Prevent Duty** (see the government's [Revised Prevent Duty Guidance](#)) applies to a range of public-facing bodies, including schools, and legally obliges them to have "due regard to the need to prevent people from being drawn into terrorism". The government's statutory guidance requires schools, amongst other things, to train staff so they can identify children at risk of being drawn into terrorism and challenge extremist ideas. At Charterhouse, the DSL has completed WRAP training ('Workshop to Raise Awareness of Prevent', led by SSCP and Surrey Police), and is able to advise staff on protecting children from the risk of radicalisation. The DSL and other members of staff have also completed online training which includes information on identifying factors that can make people vulnerable to radicalisation. In addition, the School has a risk assessment for pupils being drawn towards terrorism or extremist ideas, and members of staff have an understanding of the risks affecting children. We work to build pupils' resilience to radicalisation by promoting fundamental British values and enabling pupils and staff to challenge extremist views. Although Surrey may appear a low-risk county, the global reach of the internet provides significant opportunities for radicalisation, and the School aims to ensure that pupils are safe from terrorist and extremist material when using its internet facilities.

48. **Reporting concerns under 'Prevent'**: Anyone with cause to believe that a young person is engaging with individuals or groups undertaking extremist activities, or is being taken out of the country for the purpose of radicalisation, must phone the police on 999. Members of staff who have concerns about pupils exploring or expressing extremist views should consult the DSL and/or the local authority. In Surrey, staff are not required to make referrals to the Channel process themselves, but should consult with the DSL and/or local authority. However, anyone seeking advice can also contact Surrey Police's Prevent Supervisor, on 01483 632982 or 07795 043842. Alternatively, Surrey's Prevent referral form, which is attached [here](#), can be completed and sent to

preventreferrals@surrey.pnn.police.uk

In addition, the government's dedicated helpline (020 7340 7264) and mailbox are provided for non-emergency advice for school staff and governors: counter-extremism@education.gsi.gov.uk

Child-on-child (formerly called 'peer-on-peer') abuse

49. People under the age of 18 are capable of physically, sexually or emotionally abusing other people under the age of 18. It can happen anywhere, both inside and outside of school, but since pupils at a boarding school may spend proportionately more time in each other's company, staff at Charterhouse need to be particularly alert to any signs of inappropriate pupil relationships. It can also happen online, or have an online element which facilitates, threatens and/or encourages physical or sexual abuse. Activities involving harassment, abuse or humiliation can be used as a way of initiating a person into a group. Pupils are sometimes reluctant to report abuse by peers, but the absence of reports does not mean it is not happening. Especially where inappropriate sexual behaviour is concerned, the evidence suggests girls are more likely to be victims, and boys perpetrators. During its transition to full co-education, Charterhouse will continue to have a gender imbalance, and as a minority group female pupils may be more vulnerable. Pupils with disabilities, special educational needs or certain health conditions are also more vulnerable. Child-on-child abuse includes, but is not limited to:

- **sexual violence and sexual harassment**, which can occur between two or more children of any age and sex, and also through a group of children assaulting or harassing a single child or group. It can occur between young people who are (or have been) in an intimate personal relationship ('teenage relationship abuse'), and it can relate to those who are (or are perceived to be) either heterosexual or homosexual. 'Sexual violence' means criminal behaviour such as rape or assault as defined by the Sexual Offences Act 2003. It exists on a continuum and may be accompanied by other forms of abuse. In particular, it may well overlap with 'sexual harassment', which refers to abuse of a sexual nature which is unwanted by the person on the receiving end, and to which they do not consent, either in the physical world or online. 'Harassment' usually implies repetition, but in the context of relationships between children can relate to single incidents:
 - calling someone sexualised names, or telling sexualised stories or jokes about them;
 - making sexualised comments about their clothes, appearance or behaviour;
 - making misogynistic, misandrist, or homophobic comments;
 - displaying sexualised images (including graffiti);
 - making sexualised gestures or threats;
 - physical behaviour such as touching or squeezing bottoms, breasts and genitalia (eg. "sack attack"), interfering with someone's clothes (eg. "debugging", flicking bra straps, lifting up skirts), or brushing against someone in a sexual manner. Staff should be aware that sexualised touching can *very easily* cross the line from harassment into sexual assault;
 - 'upskirting' (now a crime under the Voyeurism Act 2019) typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks for sexual gratification, or to cause them humiliation, distress or alarm;
 - causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.

Any and every sign, report or concern of sexual violence or harassment should be taken seriously. Staff should be aware that pupils abused in any of these ways may hide it well, but are likely to be profoundly affected by their experiences. Charterhouse cannot allow its pupils to suffer in this context, and it cannot send young people out into the world believing this kind of behaviour is acceptable. The government's document *Sexual violence and sexual harassment between children in schools and colleges* has now been withdrawn, but much of its content has been transferred to Part Five of *Keeping*

Children Safe in Education. This includes legal definitions, an explanation of 'consent', and lists sources of specialist support.

- **consensual and non-consensual sharing of nude and semi-nude images and/or videos (also called sexting, or Youth Produced Sexual Imagery ('YPSI')):** people under the age of 18 sometimes create and/or share sexualised images, generally using mobile phones and social media sites or direct messaging such as 'Snapchat' or 'WhatsApp'. If two older children of similar age freely choose to share images of themselves, it may not be abusive. However, making, viewing or sharing an indecent image of someone under 18 (even for a child) is a criminal offence and can easily become abusive, since (amongst other things) there is always the potential for coercion and/or sharing the image more widely than was originally agreed. Thus the sharing of nudes and semi-nude images is always a safeguarding issue, and every instance must be referred to the DSL or Deputy DSLs. The School's approach will generally be in line with the [UKCIS guidance](#). Staff who suspect a sexualised image of a child is contained on an electronic device should not view or forward the image, but should consider confiscation (while bearing in mind that the confiscation of one pupil's device may quickly affect the circulation of images amongst other children). Information for school staff on confiscation from pupils is given in the government's document [Searching, screening and confiscation](#).
- **violence and physical abuse** — single or multiple instances of punching, hitting, jabbing, kicking, shaking, slapping, gripping, biting, hair pulling (etc) may well be abusive in the sense they cause harm, and staff should ensure they report every instance as a possible safeguarding issue. Staff should also be alert to potentially harmful initiation or 'hazing'-type violence and rituals, especially amongst boys, such as bed-flipping or the football-based game 'bums'. Members of staff are expected to intervene if there is an immediate risk of harm to a child, although staff are not expected to put themselves unreasonably in harm's way (further information is given in the School's document *Touch and the Use of Reasonable Force*).
- **prejudice-based and discriminatory bullying: racial abuse, and abuse based on gender, religion, culture, disability, special educational need or health condition** (including online bullying through social networks, online gaming or mobile phones). Any form of bullying can become emotionally harmful, and thus abusive, in that — like racial and other forms of abuse — it can quickly have a profound effect on a young person's development or mental health. More detailed information on reporting bullying, and the point at which 'bullying' becomes 'abuse', is provided in the School's Anti-Bullying Policy.

50. Child-on-child abuse is never acceptable and the School has a zero-tolerance approach to it. Each concern will be approached individually, on a case-by-case basis, and 'zero tolerance' should not be taken to imply that the School has a fixed response. Rather, 'zero tolerance' means the School will take seriously, investigate and respond appropriately to every single instance of child-on-child abuse brought to its attention. Ultimately, the School aims to prepare its pupils to play their part in creating a modern British culture which is free from sexism, misogyny, misandry, homophobia, biphobia, transphobia, sexual violence, harassment, and all other forms of abuse.

51. Thus it is crucial that staff becoming aware of any of these forms of behaviour do not downplay them as "just part of growing up" or "boys being boys", or accept pupils' excuses that they are just "banter" or "only meant as a joke". This is because if staff fail to recognise the potential scale of the issue, or dismiss

sexual harassment or tolerate other forms of abuse, it can lead to a school culture in which unacceptable behaviour is normalised and pupils cannot see any point in coming forward to report it, thus leading to an unsafe environment for children. Conversely, addressing even an apparently trivial instance of inappropriate behaviour can be an important intervention that helps prevent abusive or violent behaviour in the future.

52. Thus (without putting themselves in harm's way), staff should intervene to challenge any and all instances of inappropriate behaviour between peers. However, staff should not believe their own intervention to be an end to the matter. Abuse by young people must be taken as seriously as abuse by adults, meaning that when they are talking to the victim or the perpetrator, staff should follow the procedures for listening to and recording pupils' concerns set out in Part Three below. Staff should always reassure victims of child-on-child abuse that they are being taken seriously (regardless of how long it has taken them to say something) and will be supported and kept safe. A victim should never be made to feel ashamed for coming forward or given the impression they are creating a problem by reporting any form of abuse.

53. Staff must report every potential instance of child-on-child abuse to the DSL or Deputy DSL, as set out in Part Three below. Staff are asked to avoid imposing their own disciplinary sanctions before consulting the DSL. It is true there will sometimes be a grey area between, on the one hand, incidents which should be regarded as abusive, and on the other, incidents which are more properly dealt with in schools such as (for example) children fighting or experimenting sexually, but the DSL or Deputy DSLs will be able to advise staff on thresholds.

54. If it is suspected a child has suffered or is in danger of suffering harm at the hands of another child, or a crime has otherwise been committed, the DSL or Deputy DSL will promptly assess and address any immediate risks (including risks to other children who may be involved or impacted), and refer the matter to the local authority and the police (as set out in Part Three below).

55. The victim may be traumatised and is likely to need careful support, especially within a boarding environment. By the very nature of child-on-child abuse, and especially sexual violence and harassment, a power imbalance is likely to have been created between the victim and perpetrator(s). The experience is likely to affect the educational attainment of the victim, who may struggle in a normal classroom environment, and continued close proximity with the alleged perpetrator(s) may well be distressing for them. A priority for the School will be creating a safe situation in which the victim, if they wish, can continue in their normal routine. The School will seek to avoid any action that could have the effect of isolating the victim, but will provide an option to withdraw from lessons and activities if that is what the victim chooses, along with a named 'trusted adult' to whom they can turn in times of need. The School will aim to do whatever it reasonably can to protect the victim from bullying and harassment as a result of a report they have made.

56. A pupil against whom a serious allegation has been made may continue to pose a risk of harm to the victim or others, and (given the time and place of the incident) the School will assess whether any action is required to make the location safer. The School will consider carefully how best to keep the victim and perpetrator(s) a reasonable distance apart by, for example, moving them out of classes or activities, or suspending them from the School during an investigation. In addition, the perpetrator may have unmet needs, since harmful behaviour towards others may be an indication that the child him or herself is a victim

of abuse. It is important that the perpetrator is supported to address any underlying reasons for their behaviour, since this can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

57. To help minimise the risk of child-on-child abuse in the first place, the School's strategy includes (amongst other things):

- PSHE/RSE, including active promotion of a clear anti-bullying policy and school-wide message
- active promotion of the School's core values and fundamental British values
- clear and robust policies, consistently implemented
- a commitment to investigate every report of potential child-on-child abuse
- pupil surveys, careful record-keeping
- regular DSL and SLT review of cases to identify any potential patterns of inappropriate behaviour, and to plan effective responses and policy amendments
- management of pupils' access to electronic devices, and thus to 3G/4G/5G and social media
- provision of safeguarding training for School Monitors and other senior pupils
- opportunities for parents to attend (eg.) safer internet presentations
- inclusion of child-on-child abuse scenarios in school-wide staff update training
- staff training on responding to/managing instances of child-on-child abuse: receiving disclosures, timely reporting, intervention and de-escalation
- the promotion of systems such as 'SaySomething' to make it easier for pupils to raise concerns directly with staff.

PART THREE: PROCEDURES — THE MANAGEMENT OF REPORTS

■ Listening to disclosures from children

58. Charterhouse has in place systems such as 'Say Something', which it aims to ensure are well-promoted and simple for children to access, so they can easily report anything relevant to any of the issues outlined above (including child-on-child abuse) directly to the DSL or Deputy DSLs. However, a pupil (as victim, perpetrator or third party) is probably more likely to choose to speak with an adult they already know and trust.

59. When this happens, the manner in which a member of staff responds is crucially important, for two reasons other than the essential welfare of the child. Firstly, trauma can impact memory, meaning children may be unable to recall all the details in one go, and in any case a victim may be more comfortable providing information to a trusted adult on a piecemeal basis. Secondly, how the School is seen to manage a report can either encourage or undermine the confidence of future victims of abuse in coming forward.

60. The adult's first thoughts should be to offer the child a safe and confidential context in which to speak, and to reassure them that they will be taken seriously and supported. Even if not immediately apparent, the child may have been struggling with the decision for days, and may have had to summon up great courage to speak. Children should never be told to go away and speak to someone else.

61. However, neither must the child be promised that the information will be kept confidential and go no further, since this may not be in their best interests. This ought not to come as a surprise to pupils, who will almost certainly have been told, early in the academic year, that staff with safeguarding concerns are professionally obliged to inform the DSL promptly. In addition, the School will have explained to pupils, ideally without alarming or distressing them, the procedures which will be followed if they disclose significant harm (relating to themselves or others) which is current, or which happened in the past, or which is likely to happen in the future. Thus, in any relevant conversation with a child, staff should remind them, at the earliest point at which it becomes apparent harm could be involved, that information might need to be shared with one of the safeguarding staff.

62. Pupils should be reassured that safeguarding staff are discreet and experienced people who will speak with them and take their wishes and feelings into account. This is especially important in the context of sexual violence and sexual harassment, where victims should be given as much control as is reasonably possible over decisions regarding how any investigation will proceed and any support that they will be offered.

63. The member of staff should listen calmly and carefully to whatever the child has to say. Some issues (for example, child-on-child sexual violence) are likely to be intensely personal and traumatic, and will need an especially sensitive response. Adults should allow children to speak freely, without interruption (for example, to pursue minor details), and should not be judgemental by reacting with strong emotions ("this is outrageous!") or blaming the perpetrator ("I can't believe he did that!"), since this can cause children to feel even more uncomfortable.

64. As a basic principle children should always be given a fair hearing and taken seriously. Even if the adult has suspicions about the truth of the child's disclosure, they should continue to listen without challenging the child or betraying scepticism. Ideally, at the time of the initial disclosure, staff would seek clarification of central facts such as "what?", "when?" and "where?" However, adults must not ask leading questions or invite the child to speculate ("how do you think she felt?"), as this can prejudice investigations. Apart from specific details which might otherwise be lost, it is best practice not to write notes while the child is speaking, but rather to make a written record as soon as possible afterwards.

65. At the end of the disclosure, the adult should reassure the child that he or she has done the right thing, and explain what will happen next. The child should be advised not to discuss the matter with anyone else for the time being. No member of staff is in a position to tell a child not to speak to his/her parents, so children should only be advised about discretion in the broader community, including social media. However, if the subject of the allegation *is* a parent, the advice of the DSL, local authority or police must be sought as a matter of urgency.

66. In rare cases of immediate danger, such as a child expressing suicidal intentions, or worried about returning imminently to an abusive situation, the staff member will need to stay with the child. In particular, staff should be aware that disclosures about physical or sexual child-on-child abuse put all of the young people involved 'at risk'. This means it is important to think carefully about what might happen if the adult were to leave the child, and to act quickly in sharing information so that risks can be assessed.

■ How to report concerns, and how they are managed

If there is a danger to life, or a risk of serious injury, or a crime is in progress or about to happen – ring the police on 999 before doing anything else. If the incident is on the Charterhouse campus, after calling the police ring the duty Security officer on 07831 467362.

67. Otherwise, regardless of how staff became aware of them, they must report any concerns they have about the welfare of pupils to the School's Designated Safeguarding Lead (DSL) or one of the Deputy DSLs immediately.

68. For staff, 'immediately' means as soon as possible, bearing in mind that the welfare of the child is of paramount importance and other commitments cannot take precedence. Members of staff are expected to act without hesitation in the case of children who need immediate support, and otherwise to record any 'Level Four' concerns with the DSL or Deputy DSLs as soon as is practically possible by phone or in person.

69. Emails or other forms of written message (including CPOMS) should not be used as the primary means of reporting potentially significant harm. At the time of reporting to the DSL, staff will generally be asked to write a CPOMS record of what was said or seen (if they have not already done so). Staff should be aware that in some circumstances a child or parent may later read it. Safeguarding concerns should be written down in a factual manner, without including opinion, and using the child's words wherever possible. If any part of what has been seen or heard raises a concern about the conduct of a member of Charterhouse staff, CPOMS should not be used, and instead the procedures in Part Four below should be followed.

70. In term-time, during the school day (08.00 - 18.00), the DSL and/or one or both of the Deputy DSLs will be available to discuss safeguarding concerns with colleagues, pupils or others via the contacts published on the front page of this policy. Charterhouse publishes an 'emergency on call' rota showing which member of the Senior Leadership Team is on duty at any given time. This rota also shows which member of the DSL team is on call during the evenings (18.00 to 22.00), over the weekend, and during School holidays. A copy of the rota is always held by the Duty Security Officer (07831 467362). In addition, when children are resident on the campus out of term-time (for example, during commercial lettings), arrangements are made with the Queen's Sports Centre's DSL and/or residential staff leaders to ensure the presence of someone qualified to take a lead in safeguarding matters.

71. In exceptional circumstances the DSL and Deputy DSLs may not be available. If there is a risk of harm to a child, staff should not delay, but either consult another member of the SLT (using the emergency on call rota), or contact the police and/or local authority directly using the contacts given on the front page of this policy. Anyone can make a referral to Surrey Children's Services. If you do, you are likely to be asked to complete a [Request for Support Form](#). You can find the contact numbers for any other local authority children's care team in England by entering a postcode on this government website:

[Report child abuse to a local council](#)

Staff consulting in this manner, or making a referral, should keep written records and inform the DSL or Deputy DSL as soon as possible. Otherwise, strict confidentiality must be maintained: the matter should not be discussed with persons other than those mentioned here, unless failure to do so would put the child at greater risk.

72. Where the police or local authority have not so far been informed, and the DSL or Deputy DSL decides there is already a clear case for believing that abuse, neglect, or criminal activity is involved, they will either formally refer the case to the local authority and/or the police immediately (and certainly within 24 hours), or consult them with a view to doing so.

73. In less clear cases, however, it may be necessary beforehand to gather enough information to make a decision about referral, and/or to provide the fullest information as part of the referral process. For this reason, the DSL will in such cases speak first with the child who is thought to be the victim of potentially significant harm (unless to seek further information would put the child at risk). In deciding whether or not to report the matter to the local authority or police, the DSL will take into account the guidance in *Keeping Children Safe in Education* and [When to call the police: guidance for schools and colleges](#) (National Police Chiefs' Council, 2020).

74. Depending on the decision, the DSL will explain to the child that the School will be consulting the local authority and/or the police, the purpose of this, and what will happen next. The School will always seek the wishes and views of the victim, for example on what steps the child would like the School to take in order to protect them. The School will always follow the child's wishes where it is reasonable and practicable to do so, but cannot promise to follow them in every regard, and especially when they need to be balanced against the child's best interests and the School's duty to protect other children.

75. In particular, if a child insists, they do not want the School to consult the local authority or police, then the DSL will (if appropriate) try to persuade the child of the advantages of involving external services, but in such a way as to avoid alarming or distressing them. Reasons might include, for example:

- that the law is in place to protect children and young people rather than criminalise them;
- that despite any initial distress, it may offer an opportunity to achieve a more settled situation in the longer term;
- that abuse is best addressed sooner rather than later, since memories can return to trouble victims in future years;
- that talking to a professional about what has happened can be a huge relief;
- that it might help to protect others, and/or encourage them to come forward.

Ultimately, however, statutory duty prevails, and the School will not be able to comply with a child's wishes and views when they conflict with statutory obligations. The DSL will explain that the fact the child is withholding their consent will be recorded and made clear to the local authority or police.

76. Similarly, children sometimes say they do not want their parents informed. The School will not consult parents (prior to any other action) if to do so might lead to a delay in statutory reporting, or impede an investigation, or place the child (or any other person) at increased risk of harm. For example, the School might be advised by a medical professional that to inform a child's parents would exacerbate a mental health crisis; or, if abuse is said to be within the family itself, then the School will leave communications to the local authority or police. Generally, however, the DSL will explain to the child that the School is not in a position to avoid telling parents, for three principal reasons: firstly, a child's parents are their primary carers and it cannot be in a child's best interests for their parents not to be told; secondly, it is unreasonable to expect parents to learn potentially distressing information about their child from a third party (when the school knew already); and thirdly, the school has a contract with parents, which includes an expectation of the two-way sharing of information.

77. The order in which the School will proceed — whether it informs parents first, and then the local authority/police; or, the other way around — will be decided on a case-by-case basis. Sometimes, for

example, the School must consult with the local authority/police first about the management of all communications, and sometimes parents are already aware of the issue before any referral to the local authority/police is made. Generally, however, the two sets of contacts will happen close together.

78. Parents and carers sometimes object to a school consulting with or reporting incidents to the local authority or police without their prior consent. However, schools and colleges are under a statutory duty to co-operate with the arrangements published in *Working Together to Safeguard Children* (§27), and can lawfully share information without consent in order to perform a specific task in the public interest that is set out in statutory guidance.

79. The next step is likely to involve the police or local authority talking to the child who is thought to be the victim. In nearly all cases parents will be informed of any meeting in advance, but in exceptional circumstances, the police or local authority might ask to speak with a child without their parents being aware beforehand. If this were to happen, the School would cooperate with the police or local authority in facilitating the meeting and leave initial parental communications to them.

80. Parents and carers should be aware that the local authority is under a legal obligation (the Children Act 1989, s.17) to ascertain the victim's wishes and feelings. In practice, this means they must try to speak with the child alone wherever possible, and may ask a parent or guardian to wait outside at least for part of a meeting with a child. When parents or guardians are unable to be present at any meeting between the police or local authority and their child, the School will always ensure an adult familiar to the child is either present or close by.

81. If the police ask to speak with a child at the School who is alleged to be the perpetrator of a crime, whether voluntarily or as part of a process of arrest and interview, the School will comply with their directions, but ensure that an Appropriate Adult is present, including during any journey to a police station, in order to act as a source of support, advice, assistance and observation for the child. In such circumstances the School would explicitly ask the police in advance about their arrangements for informing the child's parents.

82. If, after consideration, the local authority (perhaps in consultation with the police) judges that the child's situation meets the threshold for statutory intervention (in Surrey, 'Level Four'), they will take responsibility for assessing the situation, building a safety plan that protects the child and meets complex needs, and coordinating inter-agency working. The School will cooperate fully with this process. It is sometimes possible for a school to consider disciplinary action whilst an exterior investigation is ongoing. If this were to happen, the School would consult the police or local authority to ensure any actions the school took did not jeopardise that investigation.

83. Or, it may be that the local authority and/or police decide there is no further role for them, and hand the matter back to the School. In such a case, the DSL or Deputy DSL will be responsible for any further investigation, and for addressing the needs of the victim (and perhaps the perpetrator) as matters of 'Early Help'. If safety plans are required, the DSL may continue to consult the local authority or police on their content and implementation.

■ Record-keeping

84. The record of any concerns raised, decisions made and actions taken about the safety or welfare of a child at Levels Two, Three or Four constitutes his or her 'safeguarding/child protection file'. These files are kept for pupils individually and include written records of how the concern was addressed, the reasons for the decisions taken, and the outcome. The record may be in a paper form, or stored electronically (on CPOMS), or across both. Unless there is good reason not to, the existence of a paper child protection file will be noted on the School's pupil data systems (ISAMS and CPOMS). The DSL is responsible for keeping these files confidentially and securely and for fulfilling the School's statutory duty to pass them on promptly to the future educational establishment of any pupil leaving Charterhouse before the age of 18 (within the first five days of the start of the new term, or within five days of joining the new school if the pupil transfers in the middle of a year). We generally use Special Delivery ('signed for'), and always pursue confirmation of receipt from the new school or college's DSL. The School does not share child protection or safeguarding records with other schools as part of an admissions process unless either (a) the pupil has already been offered and accepted a firm place, or (b) parents have given their written consent.

85. Where reasonable enquiries fail to identify the child's new school, or where the pupil moves into home-schooling, the DSL will inform the 'Children Missing Education' team in the pupil's home local authority that a child protection file is outstanding. If there is a child protection plan in place, the DSL will immediately notify the child's social worker. Where a pupil with a child protection file moves abroad, the DSL will consider contacting the Head Teacher of the new school to offer a report. The child protection files of pupils who remain at Charterhouse until age 18 will be kept securely for 25 years from the child's date of birth.

■ What to do if you feel your concerns are not being acted upon: whistleblowing

86. A member of staff who has raised a concern with the DSL, or directly with the local authority, should expect a confirmatory response within one working day. Should that not be forthcoming, staff should seek it out, pressing for reconsideration if they feel their concerns have not been addressed, or the child's situation is worsening.

87. A member of staff who has concerns about poor or unsafe practice within the School's safeguarding regime should raise the matter with the Head, or the Governor with Responsibility for Safeguarding (whose contact details are on the front page of this policy). The procedure is set out in the School's *Policy on Raising Concerns at Work (Whistleblowing)*, which is available on the Intranet or from any manager. Staff who do not feel able to speak up about child protection failures internally, or who think their concerns about safeguarding are not being addressed, should seek advice from the National Society for the Prevention of Cruelty to Children's helpline, which is sponsored by the government:

- 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday
- Email: help@nspcc.org.uk
- Post: NSPCC, Weston House, 42 Curtain Road, London EC2A 3NH

Any person who is not a member of staff and feels that safeguarding practices within Charterhouse are not fit for purpose should consult the NSPCC or Surrey County Council.

PART FOUR: CONCERNS ABOUT, AND ALLEGATIONS AGAINST, MEMBERS OF STAFF

88. In a boarding school, staff care for children 24 hours a day, and the number of contexts in which adults might legitimately engage with pupils on a less formal basis is higher than a day school. For these and other reasons Charterhouse has clear expectations about the manner in which staff should conduct themselves around children. Detailed guidance is given in the School's [Professional Conduct Policy](#), which is available on the Intranet or from any manager. All staff read a copy when they join the School, and the policy is regularly reviewed and re-circulated.

89. Members of staff need to be aware that, under the Sexual Offences Act 2003, it is an "abuse of a position of trust", and thus a criminal offence, for someone working in a school to 'groom' or engage in sexual activity with a pupil aged under 18. The consent of the pupil (or the agreement of their parents) is irrelevant. Staff should also note that, under the Serious Crime Act 2015, it is an offence for an adult to communicate with a child under 16 if the communication is sexual or intended to elicit a sexual response. As is made clear in the *Professional Conduct Policy*, a relationship between a member of staff and a pupil aged over 18, or a recent former pupil, is likely to be judged inappropriate by the School, and will lead to an assessment of that member of staff's suitability for work in an educational context.

90. There is a difference between allegations about the behaviour of school staff which might meet 'the harms threshold', and allegations about their conduct which would not. An allegation may meet the threshold if it is suspected or alleged that anyone working in the School (including supply teachers, contractors and volunteers) 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 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 he or she may not be suitable to work with children.

91. Yet in addition, allegations may be made, or concerns raised about the conduct of colleagues relating to questionable professional practices or minor indiscretions (including inappropriate behaviour outside of work) which are inconsistent with the *Professional Conduct Policy*, but nevertheless fall short of this statutory definition (for example, over-familiarity with children, or humiliating pupils). The School is committed to responding constructively to these lower-level concerns or allegations, principally to identify any potential patterns of inappropriate behaviour and support individual members of staff in addressing them at an early stage.

92. For these reasons, all staff working at Charterhouse are trained to raise allegations and concerns, however apparently minor, and not to ignore them, cover them up or delay reporting them. We try to teach all pupils the same thing, and we would ask all parents and others reading this policy to do likewise. It is made clear to staff that, where the welfare of children is concerned, it is not their job to investigate, or address matters personally, or make judgements about the character of colleagues, or decide what ought and ought not to matter in a school: it is their job to share allegations and concerns appropriately.

93. An allegation or concern raised by a former pupil (or other person) about the potentially harmful behaviour of a former member of staff or a former pupil should be passed to the DSL, who will promptly check the existence of relevant records and inform the Head. If the former pupil is now an adult, he or she will be advised in writing to report the allegation to the police. The School will cooperate fully with any subsequent investigation. If the former pupil is still a child, an allegation about the conduct of a former member of staff will be reported to the local authority's 'designated officer' (see paragraph 97), while an allegation about the behaviour of a former pupil will be reported to the relevant local authority's Children's Services department.

94. All allegations and concerns (low-level or otherwise) about the behaviour of current members of staff (including supply staff, volunteers, and contractors) towards children, whether they are pupils at Charterhouse, must be taken directly and immediately to the Head or, in his absence, the Senior Deputy. This includes involvement in incidents outside of the School which did not involve children but could have an impact on their suitability to work with children (for example, involvement in domestic violence at home). They should not be discussed or shared with other colleagues first. If the subject of the concern or allegation is the Head himself, the Chair of Governors must be informed. The Chair of Governors' contact email address is given on the front page of this policy. The phone number will be provided on request by the Senior Deputy, Mr Andrew Turner (who can be contacted on 07824 537599). Staff who raise concerns about colleagues will be offered confirmation that the issue has been addressed, but otherwise staff should expect such matters to be handled by the smallest number of people possible, and with professionalism and confidentiality.

95. If the Head judges that the allegation or concern is valid but does not meet the harms threshold, he may decide on (for example) the provision of re-training, or a reminder by a senior manager on good working practice. If the Head decides to investigate the issue further, he will appoint a senior manager to complete this. Written records of such concerns and the resulting actions are kept securely by the Head's Office and (where pupils are concerned) cross-referenced in the DSL's safeguarding records. Lower-level concerns which relate exclusively to safeguarding children, but do not meet the harms threshold, will not be included in employment references, although at the discretion of the Head (or, for staff in some employment contexts, the Director of Finance & Operations, or the Commercial Director of the QSC, or the Catering Manager) they may be shared with future employers if they are issues which would normally be included in a reference, for example, misconduct or poor performance.

96. If the Head or Chair of Governors judges that the allegation might meet the harms threshold, and that the member of staff could pose an immediate risk to children or could have committed a criminal offence, he or she may contact the police. A member of staff (including the Head) must not be informed of any allegation against him or her until advice has been sought from the police or (as follows) the local authority.

97. The Head or Chair of Governors will consult the local authority's designated officer if he or she believes that a member of staff has behaved in a way that meets (or could meet) any of the four criteria. Discussions will be recorded in writing. Before doing so, the Head (or Chair) may take the initiative in gathering information and establishing basic facts which will be helpful in such discussions, but otherwise investigations will not be undertaken except on the advice of the designated officer, whose statutory function it is to provide guidance and to ensure that an allegation directed against anyone working in a

school is appropriately investigated. In Surrey, this person is called the LADO ('Local Authority Designated Officer'). She (or one of her Assistant LADOs) can be contacted as follows:

- 0300 123 1650 option 3 (general number)
- <mailto:LADO@surreycc.gov.uk>
- Surrey LADO, Fairmount House, Bull Hill, Kingston Road, Leatherhead KT22 7AH

98. Thereafter, in consultation with the LADO, the School will follow the procedures laid out in Part Four of *Keeping Children Safe in Education* and Parts 3 and 4 of the SSCP [Procedures Manual](#). In addition to informing the child, the Head will quickly and formally tell the child's parents and the member of staff against whom the allegation has been made (provided that, in cases in which they are involved, the police agree the timing and content of what is to be disclosed and to whom). Where an allegation relates to a member of contracted staff or supply staff provided by an agency, the contractor or agency will be involved.

99. Where an allegation or concern about the behaviour of a member of staff involves (or might involve) children, the School's priority will be the welfare of the child. The Head or Chair of Governors will consult the DSL with a view to supporting the child, considering any immediate risk to him or her, and consulting Children's Services as appropriate.

100. Charterhouse recognises that members of staff against whom allegations have been made will be in need of support themselves, and that the School owes a duty of care towards them, especially if they appear to have behaved in accordance with guidance on professional conduct. Working with the Director of Human Resources, the Head will consider the possible effect upon the adult against whom the allegation has been made, with recommendations for support as appropriate.

101. The Head will make every effort to guard against unwanted publicity and ensure confidentiality, and will advise children and their parents appropriately. Legal restrictions prevent the publication of anything that may lead to the identification of a teacher against whom an allegation has been made by (or on behalf of) a pupil. This applies up to the point the teacher waives their right to anonymity, or is charged with an offence, or the Secretary of State's comments on the matter are published (usually) by the Teaching Regulation Agency.

102. The Head may decide to suspend the member of staff while the matter is investigated, although alternatives to suspension will always be considered where that is agreed by the LADO. A member of staff suspended in such a context will be provided with a named contact. He or she must not remain on the School site; alternative accommodation for staff normally resident on campus will be arranged. Further information can be found in the School's *Licence to Occupy* document, which is available from the Director of HR.

103. Ultimately, and in consultation with the LADO, the Head will decide upon one of five outcomes. If the allegation is judged to have been (1) malicious, (2) false, (3) unsubstantiated, or (4) unfounded, the decision will not affect the member of staff's employment, and it will not be mentioned in any reference for employment elsewhere. A confidential record of unsubstantiated or unfounded allegations will be kept by the HR Department. Allegations found to have been malicious or false will not be recorded, unless the member of staff consents to retaining the information.

104. If the allegation is (5) substantiated, and the member of staff (whether employed, contracted, a member of agency or supply staff, a volunteer or a student) is either redeployed into work which is not 'regulated activity', or resigns, or is asked to leave the School on the grounds that he or she:

- has harmed (or poses a risk of harm) to a child or vulnerable adult; or
- has received a caution or conviction for a relevant offence; or
- is reasonably believed to have committed a listed relevant offence; or
- has been removed from working (paid or unpaid) in regulated activity;

— then the Head, working with the DSL and the Director of HR, will (as soon as possible after redeployment, resignation or dismissal) notify the Disclosure and Barring Service (PO Box 3963, Royal Wootton Bassett, SN4 4HH (03000 200 190)).

105. 'Ceasing to use a person's services' includes:

- dismissal;
- non-renewal of a fixed-term contract;
- no longer engaging or refusing to engage a supply teacher provided by an agency;
- terminating the placement of a student teacher or other trainee;
- no longer using staff employed by contractors;
- no longer using volunteers; and
- withdrawal from supply teaching, contract working, initial teacher training, or volunteering.

Where a substantiated allegation indicates that a person is not suitable for work with children, the School will not enter into settlement or compromise agreements to prevent a referral being made to the DBS when it is legally required, and will refer to the facts of substantiated allegations in any reference provided for employment involving children or vulnerable adults.

106. Where a member of the teaching staff has been dismissed (or would have been dismissed if he/she had not resigned), then the Head, working with the Director of HR and consulting the LADO, will consider (as required by the Education Act 2002) whether or not to refer the matter to the Teaching Regulation Agency (Cheylesmore House, 5 Quinton Road, Coventry, CV1 2WT (0207 593 5393)). The TRA may issue a prohibition order preventing teachers from working in the profession following a finding of:

- unacceptable professional conduct;
- conduct that may bring the profession into disrepute; or
- conviction, at any time, for a relevant offence.

Further information can be found in this document:

[Teacher misconduct; the prohibition of teachers. Advice on factors relating to decisions leading to the prohibition of teachers from the teaching profession](#)

107. At the end of any process of consultation with the LADO, the question "What lessons can be learned from this?" is asked. The School will work with the LADO to arrive at specific recommendations

(where appropriate) on improving its practice, and implement those promptly. These recommendations (without names) are likely to be recorded in the DSL's annual report to Governors.

PART FIVE: THE GOVERNANCE AND MANAGEMENT OF SAFEGUARDING

108. The Governing Body has a strategic leadership responsibility for the School's safeguarding arrangements and will ensure that:

- a) it complies with its duties under legislation, and in particular ensures that the policies, procedures and training at Charterhouse are effective and comply with the law at all times;
- b) it is familiar with the Charity Commission's guidance [Safeguarding and protecting people for charities and trustees](#);
- c) it is aware of its obligations (as outlined in *Keeping Children Safe in Education*) under the Human Rights Act 1998 and the Equality Act 2010;
- d) it facilitates a 'whole-school' approach, in which safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development, and in which processes are in place for continuous vigilance, maintaining an environment that deters and prevents abuse and challenges inappropriate behaviour;
- e) one Governor is appointed to take leadership responsibility for safeguarding and child protection arrangements within the School;
- f) a senior member of staff is appointed from the School's leadership team to take on the role of Designated Safeguarding Lead; the DSL's lead responsibility for safeguarding and child protection is made explicit in the role-holder's job description; and the DSL has the status, authority, funding, time, training, resources and support to carry out the duties of the post as detailed below;
- g) there are appropriate policies and procedures in place to support action being taken in a timely manner to safeguard and promote children's welfare; and these policies include an effective safeguarding & child protection policy, a whistleblowing policy, and a professional conduct policy;
- h) these policies are provided to all Governors and staff on induction, together with the School's policy on pupil behaviour, an information sheet on its response to children who go missing from education, and either (for School leaders and staff working with children) Part One plus Annex B of *Keeping Children Safe in Education* or (for staff not working with children) Annex A, while a proportionate, risk-based approach is taken to the level of information provided to temporary staff and volunteers;
- i) it is aware of the role of schools within Surrey's three safeguarding partner arrangements; understands the assessment criteria (in *Effective Family Resilience*) as part of the inter-agency procedures set up by Surrey Safeguarding Children Partnership; and is satisfied these are built into the School's safeguarding policy and practice;

- j) it recognises that information sharing between practitioners and local agencies is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare (including their educational outcomes); and is aware that data protection provisions place duties on the School to keep personal information securely and process it fairly and lawfully, while also ensuring that staff have due regard to the special condition under which practitioners may share or withhold information in a safeguarding context;
- k) the School contributes to inter-agency working in line with *Working Together to Safeguard Children* by (amongst other things) providing a co-ordinated offer of 'Early Help' when appropriate, allowing local authority children's services access, and working with them on child protection plans;
- l) the wishes and feelings of children (the child's voice) is heard and taken into account when determining what action to take and what services to provide, and the School has in place systems (which are well promoted, easily understood and easily accessible) for pupils to report abuse confidently (including child-on-child abuse) and express their views safely, knowing their concerns will be treated seriously;
- m) the school's policy on safeguarding & child protection reflects both the fact that additional barriers can exist when recognising abuse and neglect in children with disabilities, special educational needs or certain health conditions, and the fact that these children may be more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;
- n) the same policy recognises that child-on-child abuse may be taking place, even when no instances are reported within the School; includes information on the different kinds of child-on-child abuse and procedures to minimise the risk of it; sets out how allegations of child-on-child abuse will be investigated and dealt with, and measures which will be taken to support any children involved; reflects the different gender issues that can be prevalent in it; and includes a clear statement that child-on-child abuse will never be tolerated, since it can lead to a culture of unacceptable behaviours and an unsafe environment for children;
- o) the School has in place an appropriate safeguarding response to the possibility of children going missing from education;
- p) the School has in place clear processes for identifying possible mental health problems in pupils, including routes to escalate and clear referral systems;
- q) safeguarding and child protection files for pupils are maintained and (when necessary) transferred Annex C of *Keeping Children Safe in Education*;
- r) at induction, all Governors and staff members undertake safeguarding and child protection training (including online safety) in accordance with the SSCP's standards and the requirements of *Keeping Children Safe in Education* 13, which include information on the identity and role of the DSL; and thereafter safeguarding training (which is considered as part of the whole-school safeguarding approach, and within which online safety training is fully integrated) is regularly updated in line with advice from the SSCP;

- s) online safety is a running and interrelated theme in the School's approach to safeguarding, and a 'whole-school' approach to online safety includes a clear policy on the use of mobile technology in the school. There is a separate online safety policy which all staff and Governors should be familiar with. This includes detailed procedures for:
- Ensuring appropriate I.T. filters and monitoring systems are in place
 - Ensuring that such systems are managed effectively and regularly reviewed so that pupils are safeguarded from potentially harmful and inappropriate material, including when they are being asked to learn online at home
 - Reporting and responding to online safety incidents: procedures that need to be followed in the event of an online safety incident taking place
 - Regularly monitoring the effectiveness and impact of the online safety policy
- t) pupils are taught about safeguarding, including online safety, as part of the provision of a broad and balanced curriculum, which may involve covering relevant issues in Relationships and Sex Education (now mandatory); and it recognises that a 'one size fits all' approach may not be appropriate for all children, such that a differentiated approach to teaching pupils about safeguarding may be necessary for more vulnerable children, victims of abuse and some SEND children;
- u) Charterhouse has a written 'safer recruitment' policy which is embedded and effective; prevents people who pose a risk of harm from working with children by adhering to statutory responsibilities in Part Three of *Keeping Children Safe in Education*; takes proportionate decisions on whether to ask for checks beyond what is required; ensures volunteers are appropriately supervised; and is confident that those involved with the recruitment and employment of staff to work with children have received appropriate safer recruitment training;
- v) the School has in place procedures to manage concerns about and allegations against teachers (including the Head), volunteers and other staff; and that it addresses allegations which may meet the harms test as set out in Part Four of *Keeping Children Safe in Education*;
- w) where an allegation against a member of staff is judged to be substantiated, the School works with the LADO regarding any improvements to be made to help prevent similar events in the future;
- x) where the School allows its facilities or premises to be used by organisations or individuals for the purpose of providing education or activities to children not otherwise connected with the School, it ensures that appropriate arrangements are in place to keep children safe;
- y) a review of Charterhouse's *Safeguarding and Child Protection Policy* is undertaken annually, together with an annual review of the effectiveness of its procedures and their implementation (including its contribution to inter-agency work); and that the School completes the SSCP's biennial statutory audit of safeguarding in Surrey schools; and
- z) both the revised policy and the annual review of practice are discussed by the Governing Body, and a detailed minute of those discussions kept.

109. The Designated Safeguarding Lead (DSL) will:

- a) take lead responsibility for safeguarding and child protection at Charterhouse, including online safety. The DSL will not delegate lead responsibility, although some activities will be delegated to the deputy DSLs, who will be trained to the same standard. A list of activities delegated can be found in the DSL and Deputy DSL Job Descriptions, available from the DSL or the Director of HR;
- b) act as a point of contact and liaise closely with the three safeguarding partners, referring cases of suspected abuse as required, contributing to the assessment of children, and taking part in strategy discussions and inter-agency meetings (including discussions on whether or not to make a referral) in line with *Working Together to Safeguard Children*. The DSL will refer cases where a crime may have been committed to the police (bearing in mind the National Police Chiefs' Council's guidance in *When to Call the Police*) and cases where there is a radicalisation concern to the Surrey Police 'Prevent' coordinator;
- c) keep the Head informed (especially about police investigations, enquiries under section 47 of the Children Act 1989, and uses of Surrey's [inter-agency escalation policy](#)), and, as required by the Head, liaise with the LADO and the 'case manager' (as defined in Part Four of *Keeping Children Safe in Education*) in cases which concern a member of staff. The DSL (working with the Head and the Director of HR) will ensure that cases where a member of staff has been dismissed or left due to risk or harm to a child are reported to the Disclosure and Barring Service, as required;
- d) liaise with staff (especially pastoral support staff, school nurses, IT staff and the SENCO) on safeguarding matters (including online safety), and when deciding whether to make a referral;
- e) act as a source of advice and expertise for all staff on safeguarding and child protection matters, and support staff who make their own referrals or are required to take part in meetings with local authority children's services or the police;
- f) maintain an overview of safeguarding within the School and monitor the effectiveness of policies and procedures in practice; in particular, working with the Head to ensure that the *Safeguarding & Child Protection Policy* is known, understood, used appropriately by staff, and updated regularly; and, working with the Governor with lead responsibility, reviewed annually (as a minimum);
- g) ensure that the *Safeguarding & Child Protection Policy* is available publicly, and that parents are both aware of the fact that referrals about suspected abuse or neglect may be made, and aware of the School's role in making referrals;
- h) liaise with SSCP to make sure staff are aware of training opportunities and the latest local policies on safeguarding;
- i) ensure that, when pupils leave the School, their child protection file is transferred to the new school or college as soon as possible, and that files are transferred separately from the main pupil file, secure 'tracked' transit ensured, and confirmation of receipt obtained;
- j) consider whether it would be appropriate to share in advance any other information with the new school or college; for example, information which would allow it to have appropriate support in place for when the pupil arrives;

- k) ensure that adequate and appropriate cover arrangements are made when either the DSL or the Deputy DSLs are out of School, and for any out of hours or out of term activities.

110. The DSL and Deputy DSLs will:

- a) undergo training to provide them with the knowledge and skills required to carry out the role. The training will be updated at least every two years. For the DSL, this will include WRAP training ('Workshop to Raise Awareness of Prevent', provided by the SSCP working with Surrey Police);
- b) refresh their knowledge and skills at regular intervals, but at least annually (in addition to the formal training referred to in the previous paragraph) via e-bulletins, meeting other DSLs, or taking time to read safeguarding developments, so as to allow them to keep up with any developments relevant to their role. These will include:
- understanding the referral, assessment and inter-agency arrangements for statutory intervention and the provision of early help;
 - knowing how local authorities conduct a child protection case (and review) conference and being able to contribute to these effectively when required;
 - ensuring each member of staff (especially new and part time staff) has access to and understands the School's policy and procedures on safeguarding & child protection;
 - being alert to the specific needs of children with special educational needs and young carers;
 - understanding the provisions of the Data Protection Act 2018, the General Data Protection Regulation, and Surrey's [Multi-Agency Information Sharing Protocol](#);
 - understanding the importance of information sharing, both within the School and with the three safeguarding partners, other agencies and practitioners;
 - being able to keep detailed, accurate, secure written records of concerns and referrals;
 - understanding the requirements of the Prevent duty and being able to provide advice and support to staff on protecting children from the risk of radicalisation;
 - understanding the risks associated with online safety and being confident they have the up-to-date knowledge required to keep children safe whilst online at School;
 - recognising the additional risks that children with SEN and disabilities face online and being confident they have the capability to support SEND children to stay safe online;
 - obtaining access to resources and attending any relevant or refresher training courses; and
 - encouraging among all staff a culture of listening to children and, in any measures the School may put in place to protect them, taking account of their wishes and feelings.

111. Where staff training is concerned, the DSL will ensure that:
- a) at induction, all new members of staff (including temporary staff and volunteers) are provided with policies and information in accordance with paragraph 108 (g) and (h);
 - b) all new members of staff are trained in accordance with the SSCP's directions (as published in *Training Pathways*), which include that all school staff in Surrey undertake its "Working Together to Safeguard Children" (WTSC) induction course. This will be delivered by the DSL, who is accredited by the Richmond and Kingston Safeguarding Partnership to deliver training up to and including Level 2. Staff who arrive at Charterhouse in possession of a certificate showing they have completed the Surrey WTSC course within the previous 36 months will be exempt but will be required to undertake a shorter induction and update session with the DSL covering all the areas listed on the SSCP's 'WTSC exemption checklist'. This is also true of staff who have attended WTSC-equivalent courses within the previous 36 months (for example, the Sport England Safeguarding course for sports coaches), although 'equivalence' remains at the DSL's discretion;
 - c) all existing staff and Governors read at least Part One and Annex B or (for staff not working with children) Annex A of *Keeping Children Safe in Education* when required by the government, and are otherwise updated via presentations in whole-staff meetings and/or email/paper bulletins when the document is revised to include specific new duties;
 - d) all new staff working directly with children complete the Home Office's online 'Prevent Awareness' course, and all new and existing staff are helped to develop the knowledge and confidence to identify children at risk of being drawn into terrorism, to challenge extremist ideas and to know how to refer children and young people for further help;
 - e) all staff are helped to understand their safeguarding responsibilities via regular refresher training (including bulletins and presentations at staff meetings) as required. This includes staff responsibilities under Part One and Annexes A and B of *Keeping Children Safe in Education*, online safety, the 'Prevent' duty, responding to or managing child-on-child abuse allegations, and the importance of listening to children. As directed by the SSCP, after initial induction training, formal refresher training will be undertaken regularly. 'Understanding' safeguarding responsibilities will include making special provision for members of staff whose first language is not English.

*Policy written by J.M. Richardson
Designated Safeguarding Lead
August 2022 (v.1)*

Approved by SLT September 2022

Considered by the Governors' Education Committee, minor changes, October 2022

Adopted by the Governing Body at their meeting December 2022 (v.2)

Updated and reviewed with minor changes by AL Colclough September 2023

*Adopted by the Governing Body (via written resolution) following a minor change,
December 2023*

ANNEXES

NB Two good sources of further information on all aspects of child abuse and neglect, including warning indicators (and the source for much of the information in the Annexes below) are the government's booklet [What to do if you're worried a child is being abused](#) (March 2015) and [Spotting the signs of child abuse](#) on the NSPCC website.

Annex 1: Physical Abuse

The following injuries and behaviours are often associated with physical abuse:

Bruising: children often have accidental bruising, but this is usually to the 'hard' areas of the body over bones (eg. knees, shins). Staff should be alert to bruising on the 'soft' areas of the body and on the head, which is the most common location for abusive injuries in children. The following in particular must be considered non-accidental unless the evidence or explanation is wholly satisfactory:

- two simultaneously bruised eyes, without bruising to the forehead (rarely accidental)
- repeated or multiple bruising on the head or on sites unlikely to be injured accidentally
- bald patches, a bruised scalp and/or swollen eyes from hair being pulled violently
- variation in colour possibly indicating injuries caused at different times
- clusters of bruises on the upper arm, outside of the thigh or on the body
- bruises in the shape of a hand or object, e.g. belt marks, finger rings, hand prints or a hairbrush
- bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- bruising around the face
- bruises with dots of blood under the skin
- defensive wounds, commonly on the forearm, upper arm, back of the leg, hands or feet
- bruising on the arms, buttocks and thighs may be an indicator of sexual abuse

Burns and Scalds can be caused by hot liquids, hot objects, flames, chemicals or electricity. It can be difficult to distinguish between accidental and non-accidental burns and scalds. They will always require experienced medical opinion. Any burn with a clear outline may be suspicious, for example:

- circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- linear burns from hot metal rods or electrical fire elements
- burns of uniform depth over a large area
- scalds with upward splash marks or that have a line indicating immersion or poured liquid (a child voluntarily getting into hot water will struggle to get out and cause splash marks)
- old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation

Bite Marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3 cm in diameter are more likely to have been caused by an adult or older child. A medical opinion should be sought where there is any doubt over the origin of the bite.

Fractures may cause pain, swelling and discolouration over a bone or joint. Non-mobile children rarely sustain fractures. There are grounds for concern if:

- the history provided is vague, non-existent or inconsistent with the fracture type
- there are associated old fractures
- medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement

Scars and other physical symptoms

- a large number of scratches, scars, or scars of different sizes or ages, or on different parts of the body, may suggest abuse
- the effects of poisoning such as vomiting, drowsiness or seizures
- respiratory problems from drowning, suffocation or poisoning

Parents and carers

- parents or carers who are apparently evasive, uninterested or undisturbed by an accident or injury
- a child who repeatedly presents (or is presented by a parent/carer) with minor injuries; this may represent a “cry for help” and if ignored could lead to a more serious injury)
- family use of different doctors and A&E departments

Annex 2: Emotional Abuse

A parent, carer or peer can emotionally abuse by:

- humiliating or constantly criticising a child
- threatening, shouting at a child or calling them names
- making the child the subject of jokes or sarcasm
- blaming or scapegoating a child
- persistently ignoring a child or remaining cold and emotionless
- failing ever to say anything kind, express positive feelings or congratulate a child on success
- making a child perform degrading acts
- not recognising a child's own individuality; trying to control their life
- pushing a child too hard or not recognising their limitations
- exposing a child to distressing events or interactions such as domestic abuse or drug taking
- preventing or manipulating a child's friendships

Recognising Emotional Abuse

Emotional abuse is difficult to define, recognise and prove. The indicators are often also associated with other forms of abuse, and the signs in children are usually behavioural rather than physical:

- delay in emotional or physical development
- weak school performance
- poor, fearful or clinging attachment to a significant other person

- neurotic behaviour (eg. rocking, hair-twisting, thumb-sucking)
- self-harm, eating disorders, suicidal ideation
- aggressive or destructive behaviour
- frozen watchfulness, particularly in young children
- low self esteem and lack of confidence
- withdrawal, solitariness, difficulty in relating to others

Annex 3: Sexual Abuse

When young people engage in sexual activity with other young people, the boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. It may involve children and young people who exhibit a range of sexually problematic behaviours such as indecent exposure, obscene telephone calls, fetishism, bestiality, and sexual abuse against adults, peers or younger children.

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

Inappropriate Sexual Behaviour can be either inappropriate socially, or inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, or physical damage. It may also be that the behaviour is “acting out” which derives from other sexual situations to which the child or young person has been exposed. However, boys and girls of all ages may also be sexually abused by adults, as well as by other young people. Whatever the source of the abuse, children are frequently too scared to say anything due to guilt and fear. It is particularly difficult for a child to talk about and full account should be taken of any cultural sensitivities.

Recognition can be difficult, unless the child discloses and is believed. There are a variety of physical symptoms, including pregnancy, sexually transmitted infection, and anal or genital soreness, but there may well be no physical signs, meaning that indications are likely to be emotional or behavioural. Children who are sexually abused may:

- stay away from certain people;
- avoid being alone with people, such as family members or friends;
- seem frightened of a person or reluctant to socialise with them;
- self-harm (including eating disorders), self mutilate and attempt suicide;
- show sexual behaviour that is age-inappropriate ;
- become sexually active or promiscuous at a young age;
- use sexual language or know information that they would not normally be expected to know.

- present with physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy.

Annex 4: Neglect

(a) parents or carers

Neglect may occur during pregnancy. Once a child is born, neglect may involve:

- Physical neglect: when parents or carers leave a child dirty, or keep a child in a home which is indisputably dirty; fail to provide for a child's basic needs such as food, clothing or shelter (including exclusion from home or abandonment); fail to adequately supervise a child, or provide for their safety (this includes the use of inadequate care-givers, and exposing children to dangerous conditions such as drugs, alcohol and violence);
- Educational neglect: failing to ensure a child receives an education;
- Emotional neglect: failing to meet a child's needs for nurture and stimulation, perhaps by ignoring, humiliating, intimidating or isolating them (this is often the most difficult aspect to prove);
- Medical neglect: failing to provide appropriate health care, including dental care — and refusal of care, or ignoring medical recommendations.

(b) children

Evidence of neglect is built up over a period of time and can include a variety of behaviours, for example:

- a child who seems to be listless, unresponsive or constantly tired, with no apparent medical cause
- a child who fails to grow within the normal expected pattern, with accompanying weight loss
- a child who thrives away from the home environment
- a child who is often angry and aggressive, or who self-harms

Relevant documents cited or consulted:**documents with which the School must comply or to which it must 'have regard' are in bold**

- ACPO CPAI Lead's Position on Young People Who Post Self-Taken Indecent Images (Association of Chief Police Officers (n.d., but 2015)
- [Affluent Neglect:] An Exploration of How Social Workers Engage Neglectful Parents from Affluent Backgrounds in the Child Protection System (Claudia Bernard, December 2017)
- Appropriate Filtering for Education Settings (UK Safer Internet Centre, June 2022)
- Appropriate Monitoring for Schools (UK Safer Internet Centre, June 2022)
- **Boarding Schools: National Minimum Standards** (HM Government, September 2022)
- Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism: Statutory guidance for Channel panel members and partners of local panels (HM Government, 2020)
- Child maltreatment: when to suspect maltreatment in under 18s (National Institute for Health and Care Excellence, June 2009 *et seq.*)
- Child protection records retention and storage guidelines (NSPCC, July 2021)
- Child sexual exploitation: Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation (HM Government, February 2017)
- **Children Act 1989**
- **Children Act 2004**
- Children Missing Education: Surrey Council Policy Guidance for Safeguarding Children (May/November 2017)
- Children missing education: Statutory guidance for local authorities (HM Government, September 2016)
- Complexity and Challenge: a triennial analysis of Serious Case Reviews 2014-2017 (HM Government, March 2020)
- Criminal Exploitation of children and vulnerable adults: County Lines guidance (HM Government, Sept 2018)
- Cyberbullying: Advice for headteachers and school staff (HM Government, November 2014)
- **Data Protection Act 2018**
- Disqualification under the Childcare Act 2006: Statutory guidance for local authorities, maintained schools, academies and free schools (HM Government, August 2018)
- **Education Act 2002**
- **Education (Independent School Standards) Regulations 2014**
- **Effective Family Resilience ('Levels of Need') (Surrey Safeguarding Children Partnership, March 2019 *et seq.*)**
- **Equality Act 2010**
- **General Data Protection Regulation 2018**
- Guidance: 16 to 19 study programmes (2021 to 2022 academic year) (HM Govt online, updated 15 July 2022)
- Guidance for Safer Working Practice for professionals working in education settings (Safer Recruitment Consortium, February 2022)
- Guidance for the Management of Extremist Speakers (Association of Chief Police Officers, March 2015)
- **Handbook for the Inspection of Schools: Commentary on the Regulatory Requirements** (Independent Schools Inspectorate, September 2019)
- How Safe Are Our Children? An overview of data on child abuse online (NSPCC, 2019)
- How social media is used to encourage travel to Syria and Iraq (HM Government, n.d., but 2014)
- Independent School Standards: guidance for independent schools (HM Government, April 2019)
- Information guide: adolescent to parent violence and abuse (APVA) (HM Government, n.d., but 2015)
- Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (HM Government, July 2018)
- **Keeping Children Safe in Education** (HM Government, September 2022)
- Mandatory Reporting of FGM – procedural information (HM Government, updated January 2020)
- Multi-Agency Information Sharing Protocol (Surrey County Council, 2014 *et seq.*)
- **Multi agency statutory guidance for dealing with forced marriage** (HM Government, updated July 2022)

- **Multi-agency statutory guidance on female genital mutilation** (HM Government, updated July 2020)
- New Surrey Safeguarding Children Arrangements (from September 2019) (Surrey Statutory Partners)
- Pathways to harm, pathways to protection: triennial analysis of SCRs 2011 to 2014 (HM Government 2016)
- Prevent duty: Departmental advice for schools and childcare providers 2023)
- Preventing and tackling bullying: Advice for headteachers, staff and governing bodies (HM Govt, July 2017)
- Preventing youth violence and gang involvement: Practical advice for schools and colleges (HM Government, March 2015)
- **Procedures Manual** (Surrey Safeguarding Children Partnership, online from May 2016, regularly updated)
- Process for reporting and managing allegations against individuals who work or volunteer with children in Surrey (Surrey Safeguarding Children Board (leaflet) March 2014)
- Promoting fundamental British values as part of SMSC in schools: Departmental advice for maintained schools (HM Government, November 2014)
- Protecting children and young people: The responsibilities of all doctors (GMC July 2012, updated May 2018)
- **Regulated Activity in relation to Children: scope** (Factual note by HM Government, June 2012)
- Research on the use of Part 4 of Keeping Children Safe In Education guidance (February 2020)
- Safe use of changing facilities (Child Protection in Sport Unit/NSPCC, September 2018)
- Supporting children and young people who are bullied: advice for schools (HM Government, March 2014)
- Searching, screening and confiscation: advice for headteachers, school staff and governing bodies (HM Government, July 2022)
- **Sexual communication with a child:** implementation of s.67 of the Serious Crime Act 2015 (Circular 2017/01, HM Government, April 2017)
- **Sexual Offences Act 2003**
- Sexual violence and sexual harassment between children in schools and colleges: Advice for governing bodies, proprietors, headteachers, principals, senior leadership teams and designated safeguarding leads (HM Government, May 2018)
- Sharing nudes and semi-nudes: Advice for education settings [on] Responding to incidents and safeguarding children and young people (UK Council for Internet Safety (December 2020)
- Teacher misconduct: the prohibition of teachers. Advice on factors relating to decisions leading to the prohibition of teachers from the teaching profession (Teaching Regulation Agency, October 2018)
- **Teachers' Standards** (HM Government, 2011 *et seq.*)
- Teaching online safety in school: Guidance supporting schools to teach their pupils how to stay safe online, within new and existing school subjects (June 2019)
- What is peer-on-peer abuse? (Carlene Firmin and George Curtis: MsUnderstood Partnership, 2015)
- What to do if you're worried a child is being abused: advice for practitioners (March 2015)
- When to Call the Police: Guidance for Schools and Colleges (National Police Chiefs' Council, n.d. but 2020)
- **Working Together to Safeguard Children** (HM Government, July 2018)