Charitable Objects of St. Catherine's School- The Objects for which the Company is established are to promote and provide for the advancement of education by providing, conducting, governing, carrying on and maintaining in the United Kingdom, or elsewhere, a boarding or day School or Schools for girls in which the teaching shall be in accordance with the principles of the Church of England.

ST CATHERINE'S SCHOOL BRAMLEY

SAFEGUARDING AND CHILD PROTECTION POLICY

'Believe… Achieve… Succeed'

Policy Holder	Kirsty Meredith DSL, Denise Irons and Emily Jefford
Date Approved	September 2026
Approval	Pastoral and Wellbeing Committee
Date for next review	September 2027

This policy will be reviewed annually or sooner if there are statutory revisions.

The Policy

The Governors and Staff at St. Catherine's School take seriously their moral and statutory responsibility to safeguard and promote the welfare of children, both day and boarding; and to work together with other agencies to ensure there are robust arrangements within our school to identify, assess, and support those children who are suffering harm or at risk of suffering harm.

The School makes every effort to provide an environment in which the welfare of the child is paramount and where everyone feels safe, secure, valued and respected, and feels confident to talk if they are worried, believing they will be effectively listened to. We maintain a safeguarding culture of "it could happen here" supported by our positive approach towards communicating effectively with staff, pupils and parents.

This policy applies to all staff, governors and volunteers working in the School and all sections of St Catherine's School, which includes the EYFS and is reviewed by the Governing Body annually, as a minimum. It is available to all on the School's website and is available on request from the School Office.

The policy demonstrates the school's commitment with regard to safeguarding and child protection to pupils, parents and other partners. It provides staff, volunteers and governors with the framework they need in order to keep children safe and secure in our school. The policy also informs parents and carers how we will safeguard their children and young people, including boarders, whilst they are in our care.

The Child Protection Policy, within this document, identifies robust school systems and procedures that are followed by all members of the school community where a safeguarding concern has been raised including cases of suspected abuse, neglect or exploitation. The policy reflects statutory guidance referencing: Keeping Children Safe in Education 2026 (KCSIE), National Minimum Standards for Boarding (May 2026), Surrey Safeguarding Children Partnership (SSCP) Procedures and work with other agencies including our partnership with Surrey and Sussex Police as part of Operation Encompass.

Other Relevant Policies

This policy has regard to the following guidance and advice:

- Surrey Safeguarding Children Partnership protocols, guidance and procedures
- Keeping Children Safe in Education (September 2026) ("KCSIE")
- KCSIE: Disqualification under the Childcare Act 2006 (August 2018)
- Working Together to Safeguard Children (March 2026)
- Information Sharing Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers (May 2024)
- Prevent duty guidance: Guidance for specified authorities in England and Wales (March 2024)
- Relationships education, relationships, and sex education (RSE) and health education (For implementation Sep 2026)
- Behaviour in schools (February 2024)
- Working together to improve school attendance: statutory guidance for maintained schools, academies, independent schools and local authorities (July 2026)
- Keeping children safe in out of school settings (September 2023)
- National Minimum Standards for Boarding (2026)
- Meeting digital and technology standards in schools and colleges (August 2026)
- After school clubs, community activities, and tuition (safeguarding guidance for providers) (February 2026)
- SCC Children Missing Education (CME) (June 2026)
- SCC Touch and the use of physical intervention when working with children and young people (2020)
- Filtering and monitoring standards (DfE) (August 2026)
- The Charity Commission guidance Safeguarding and protecting people for charities and trustees (June 2022)

This policy should be read in conjunction with the following School policies and documents:

- Recruitment (Safer Recruitment)
- Induction of New Staff
- Equal Opportunities
- Anti-Bullying (Prep School and Senior School)
- Anti-Bullying in the Workplace
- Whistleblowing
- Educational Visits
- Action if a Pupil is Missing
- Children Missing from Education
- Staff Code of Conduct
- Online Safety Policy
- ICT Policy including Guidelines for the use of Digital Technology
- Behaviour Policy (Prep School and Senior School)
- Futures: Life (Senior School) / Life Matters (Prep School): our bespoke PSED/PSHE and RSE scheme of work
- EYFS Policy
- Boarding Principles and Practice
- Missing Boarder Procedure
- Boarding House Handbook
- Supervision of Boarders
- Visitor Management
- Staff Accommodation Protocol
- Boarding House Risk Assessments
- Medical Care of Boarders
- Complaints Procedure for Boarders
- Boarder Induction

School absence procedures are outlined in the Parent and Staff Handbooks. Specific care for Boarders is also covered in the Boarding Staff Handbook.

EQUALITY ACT 2010

The School understands and recognises their obligations under the Equality Act, including in the context of safeguarding and that the school must not discriminate against pupils because of a protected characteristic including sex, race, disability, religion or belief, gender reassignment, pregnancy, maternity, or sexual orientation.

The School works hard to meet the specific needs of all pupils and will also consider their duty to make reasonable adjustments for disability.

The School also complies with its legal duties under the Equality Act 2010, including putting special provisions in place to support dialogue with children who may not be able to convey their wishes and feelings as they may want to. Provision is available initially through form teachers/tutors and the academic mentoring

department for those who may have communication difficulties and those who do not speak English or for whom English is not their first language.

CONCERNS ABOUT A CHILD

The School adopts a 'whole school' approach to safeguarding involving everyone at St Catherine's Prep School and Senior School, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. The School has a duty to consider at all times the best interests of the pupil and take action to enable all pupils to achieve the best outcomes.

The School adheres to the following safeguarding principles:

- Safeguarding and promoting the welfare of children is everyone's responsibility.
- The welfare of the child is paramount: all children have a right to be protected from harm and abuse.
- All staff, visitors and volunteers should maintain an attitude of, "It could happen here".
- All children have a right to feel safe and secure - they cannot learn effectively unless they do so.
- Where there is a safeguarding concern, the school will ensure the child's wishes and feelings are taken into account.

Safeguarding in Boarding

The School recognises that boarding presents additional safeguarding considerations due to overnight accommodation, residential living arrangements, increased opportunities for peer interaction, and pupils spending extended periods in the care of the School.

The School ensures that safeguarding arrangements in boarding operate at all times, including overnight, weekends, and other periods when pupils remain in the School's care.

Boarding staff receive safeguarding training appropriate to their residential role and are trained to identify risks associated with overnight accommodation, child-on-child abuse, harmful sexual behaviour, online safety, mental health concerns and pupils who are away from home.

The School maintains appropriate supervision arrangements, welfare checks, reporting systems and safeguarding procedures to ensure that boarders are protected and supported at all times. At least one appropriately trained member of boarding staff is available overnight and boarders know how to contact staff at any time during the night. Any safeguarding concern arising during boarding hours is recorded and reported to the DSL in accordance with school procedures.

Child-on-child abuse within boarding accommodation - The School recognises that risks of child-on-child abuse may arise within boarding accommodation, including dormitories, bedrooms, bathrooms, changing facilities and overnight social environments. Risk assessments, supervision arrangements and boarding routines are designed to minimise opportunities for abuse and ensure pupils know how to seek help at any time.

Boarders online safety and personal devices - The School recognises that boarders may access online content through personal devices using mobile data networks, including 3G, 4G and 5G services that operate independently of the School's filtering and monitoring systems. Boarding staff maintain appropriate oversight, education and supervision to minimise risks associated with harmful content, pornography, child-on-child abuse, image sharing, online exploitation and contact with unsuitable individuals.

Boarders have access to a range of sources of support including House Staff, the DSL Team, Health Centre staff, the School Counsellors, the Independent Listener, the Children's Commissioner Help at Hand service, Childline and NSPCC services.

The School has arrangements for listening to children and providing Family Help (including targeted early help). The Pastoral Team in the Senior School hold regular tutorials with their tutees, and all girls are encouraged to speak to their tutor, Head of House or any other member of staff with whom they feel comfortable if they have any worries or concerns. Pupils also make good use of the Health Centre in such circumstances too. Prep School Form Teachers develop positive relationships with the girls in their class and are encouraged to actively listen to the girls within their care. Girls are encouraged to speak to their Form Teacher, a member of Prep Senior Leadership Team (SLT) or any other members of staff they feel comfortable with to share any worries or concerns. Family help could include liaising with the Inclusive Learning Team, the Designated Safeguarding Lead and Team providing information or signposting to local services, liaising with the Health Centre Team/external agencies or supporting the family with targeted early help assessments or referrals.

Parents are encouraged to raise any concerns directly with the School, if necessary, using this Safeguarding and Child Protection Policy for concerns about the safety and/or welfare of children. Parents may contact the Independent Schools' Inspectorate directly if they wish.

Local Safeguarding Partners

The School's Local Safeguarding Partnership is Surrey Safeguarding Children Partnership. The safeguarding partners are:

- Surrey County Council - a full copy of their local procedures can be found on the link above
- Surrey Police
- ICB NHA Surrey Heartlands
- In addition, school staff can contact **Operation Encompass** on 0204 513 9990 (8 am to 1pm, Monday to Friday) for advice in respect of children who have experienced domestic abuse.

Staff responsible for leading safeguarding procedures at St Catherine's School:

- Kirsty Meredith DSL kirsty.meredith@stcatherines.info
- Vic Alexander DDSL vic.alexander@stcatherines.info
- Denise Irons DDSL denise.irons@stcatherines.info
- Emily Jefford DDSL with responsibility for the Early Years emily.jefford@stcatherines.info
- Sarah Stewart DDSL sarah.stewart@stcatherines.info
- Isi Cook DDSL isabel.cook@stcatherines.info

- Catherine Peel DDSL catherine.peel@stcatherines.info
- Jo Paish DDSL joanna.paish@stcatherines.info
- Tracy Evans DDSL tracy.evans@stcatherines.info
- Caroline Good is the Governor in charge of safeguarding and child protection

Alternatively, contact can be made with the DSL team through DSL@stcatherines.info

Definitions of child protection and safeguarding and types and signs of abuse

Safeguarding and promoting the welfare of children is defined as:

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

Child protection is part of safeguarding and promoting the welfare of children is defined as:

- activity that is undertaken to protect children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.

Abuse is a form of maltreatment of a child. Abuse can be:

- physical abuse;
- emotional abuse;
- sexual abuse; and/or
- neglect.

Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others.

This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet).

Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

Staff are referred to Appendix 1 of this policy for further detail of the types of abuse and possible signs of abuse, as well as further information regarding specific safeguarding issues such as child criminal and/or sexual exploitation.

INFORMATION SHARING

Early information sharing between agencies is vital. Neither the Data Protection Act 2018 nor the UK GDPR prevent the sharing of information for the purposes of keeping children safe. The governing body recognises the importance of information sharing between staff, practitioners and local agencies, local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required. Further guidance is provided by *Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers.*

If in doubt about what information can and should be shared, staff should speak to the Designated Safeguarding Lead.

The governing body will ensure that staff understand the relevant data protection principles which allow them to share (and withhold) personal information, including:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal and should be treated as 'special category personal data'.
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows the sharing of special category personal data, including without consent where there is good reason to do so. For example, information may be shared without consent where: it is not possible to gain consent; it cannot be reasonably expected to gain consent; and gaining consent would place a child at risk
- not providing pupils' personal data where the serious harm test is met.

CHILD PROTECTION PROCEDURES

St Catherine's School implements a child-centred approach to safeguarding. Whilst the School is committed to working collaboratively and in partnership with parents and carers as far as possible the wishes and feelings of the child and what is in their best interest is always central to the School's decision-making process.

Staff must:

- know the identity of the DSL and Deputy DSLs including those who are responsible for Boarders;
- understand and follow School's procedures for responding to and reporting a disclosure, including an allegation or complaint of abuse, exploitation, or neglect from a child or any third party;
- ensure all children know how to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback;
- ensure the pupil's wishes and feelings are considered when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence.

RESPONDING TO A DISCLOSURE AND DEALING WITH CONCERNS ABOUT A CHILD

Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe.

When dealing with concerns about a child, all staff should remember to:

- listen carefully;
- avoid asking leading questions;
- observe their behaviour;
- reassure the individual that the allegation/complaint will be taken seriously and that they will be supported and kept safe;
- ensure that the individual is not made to feel ashamed for making the report or given the impression that they are creating a problem by making the report;
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken;
- be aware that the individual may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful. Staff should exercise professional curiosity and speak to the DSL if they have concerns;
- determine how best to build trusted relationships with children and young people which facilitate communication.

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

Procedure to follow at St Catherine's School following a disclosure:

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

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

- Rationale for decision making and action taken
- Any actual words or phrases used by the child

5. The records must be signed and dated by the author or / equivalent on electronic based records.
6. In the absence of the DSL or their Deputy, staff must be prepared to refer directly to Surrey Children's Single Point of Access (C-SPA) https://www.surreycc.gov.uk/children/contact-childrens-services (and the police if appropriate) if there is the potential for immediate significant harm.

Or report via the Helpline via email help@nspcc.org.uk anytime or call 0808 800 5000 between 10am and 4pm Monday to Friday.

Following a report of concerns the DSL must:

1. Alert the Police (dial 999) if a child is in immediate danger and urgent protective action is required.
2. Decide whether or not there are sufficient grounds for suspecting significant harm, in which case a request for support must be made to the Surrey Children's Single Point of Access (C-SPA) https://www.surreycc.gov.uk/children/contact-childrens-services and the Police if it is appropriate. Using the SSCP Continuum of Support. https://surreyscp.trixonline.co.uk/chapter/continuum-of-support-for-children-and-families-living-in-surrey
3. Discuss any concerns about a child's welfare with the family and where possible to seek their agreement before making a referral to the C-SPA. *NB this should only be done when it will not place the child at increased risk or could impact a police investigation. Where possible. the child's views should also be taken into account.*
4. If there are grounds to suspect a child is suffering, or is likely to suffer, significant harm or abuse the DSL must contact the C-SPA by sending a Request for Support Form by secure email to: cspa@surreycc.gov.uk and contacting the C-SPA consultation line on 0300 470 9100 to discuss the concerns. The DSL must also notify the C-SPA of the occurrence and what action has been taken.
5. If the DSL feels unsure about whether a referral is necessary, they can phone the C-SPA consultation line to discuss concerns.
6. If there is not a risk of significant harm, the DSL will either actively monitor the situation or consider offering family help.
7. Where there are doubts or reservations about involving the child's family, the DSL should clarify with the C-SPA or the police whether the parents should be told about the referral and, if so, when and by whom. This is important in cases where the police may need to conduct a criminal investigation.
8. When a pupil is in need of urgent medical attention and there is suspicion of abuse, the DSL or their Deputy should take the child to the accident and emergency unit at the nearest hospital, having first notified the C-SPA. The DSL should seek advice about what action the C-SPA will take and about informing the parents, remembering that parents should normally be informed that a child requires urgent hospital attention.
9. The exception to this process will be in those cases of known FGM where there is a mandatory requirement for the teacher to report directly to the police. The DSL should also be made aware.

10. Where the allegation relates to harmful sexual behaviours, if possible, the disclosure should be managed with two members of staff present (preferably one of them being the DSL or their deputy).
11. All disclosure information should be kept confidential and stored securely, ensuring that the file is only accessible to those who need to see it, and is shared in accordance with the guidance set out in Parts one and two of *KCSIE*.

What happens next?

It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. The member of staff should be informed by the DSL that the referral is receiving appropriate attention. If they do not receive this information, they should seek it out.

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

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

Surrey Child Protection Revised model (Surrey Safeguarding Partnership)

1. Triage

If you have safeguarding concerns about a child or young person you can submit a request for support to the CSPA. The referrer will receive confirmation of receipt. The Request for Support Officer will undertake an initial check.

2. Threshold decision

The Continuum of Support is applied by a Social Worker to assess the needs of the child, young person and family.
**Requests for support which are deemed to be Universal or Community Support/Emerging needs can be accessed directly through the services and do not need a submission into CSPA.*

3. Allocation

The request will be allocated to the best team to undertake screening activity.

Multi-agency checks (if required)

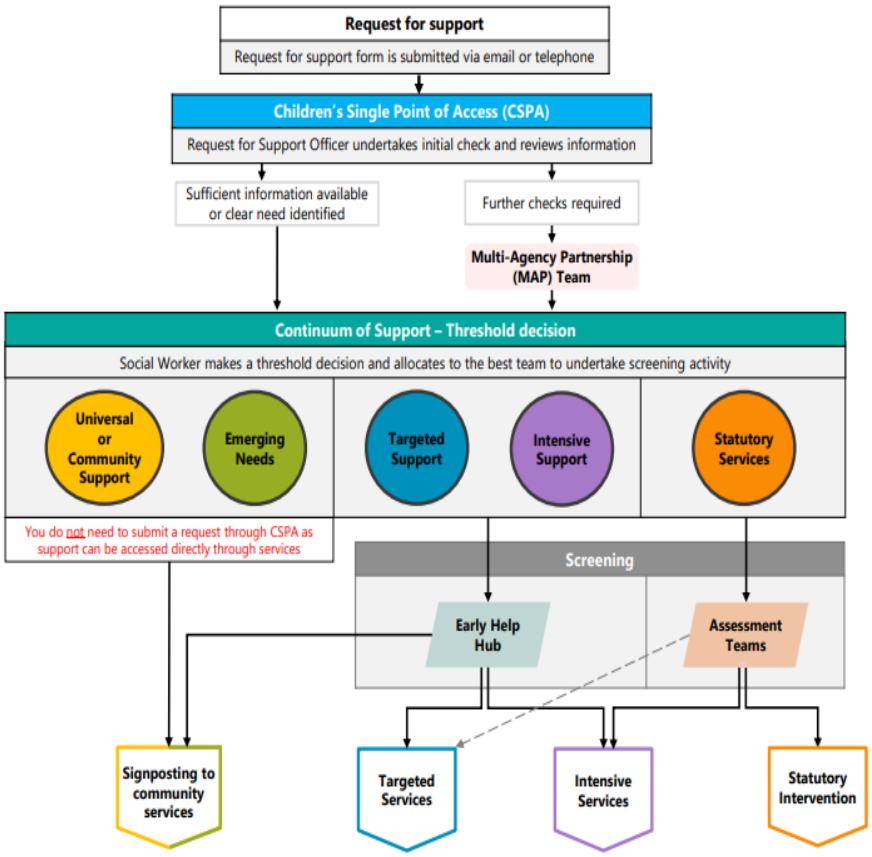
If necessary, the MAP team will undertake agency checks and make multi-agency decisions.

4. Screening

The team will gather information, speak to the family and key professionals to determine eligibility for early help services or threshold for section 17 or 47.

5. Outcome

Next steps are identified which may include signposting for the family or further support required. The referrer will be notified of the outcome.



Guiding principles for staff when responding to a disclosure, the seven R's:

Receive

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

Reassure

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

Respond

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

Report

- Share concerns with the DSL immediately
- If you cannot contact your DSL or the Deputy DSL, and the child is at risk of immediate harm, contact the Surrey Children's Single Point of Access (C-SPA) https://www.surreycc.gov.uk/children/contact-childrens-services or Police directly, as appropriate
- If you are dissatisfied with the level of response, you receive following your concerns, you should press for re-consideration

Record

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

Remember

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

Review (led by DSL)

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

Family Help (including Targeted Early Help)

Any child may benefit from Family Help, but all staff should be particularly alert to the potential need for Family Help for a child who:

- Is disabled or has certain health conditions and has specific additional needs.
- Has special educational needs (whether or not they have a statutory education, health, and care plan).
- Has a mental health need.
- Is a young carer.
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement as association with organised crime groups or county lines.
- Is frequently missing/goes missing from education, home or care.
- Repeated removal from classroom.
- Has experienced multiple suspensions, is at risk of being permanently excluded from schools, or in Alternative Provision or a Pupil Referral Unit.
- Part-time timetables.
- Is misusing drugs and other alcohol themselves.
- Is at risk of modern slavery, trafficking, and/or financial, sexual or criminal exploitation.
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse.
- Is at risk of being radicalised or exploited.
- Has a parent or carer in custody or is affected by parental offending.
- Is a privately fostered child.
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage.
- is pregnant or a teenage parent.

Family Help is support for children of all ages that improves resilience and outcomes or reduces the chance of a problem getting worse. Family Help may be appropriate for children who have several needs, or whose circumstances might make them more vulnerable.

The School has effective measures in place to identify emerging problems and potential unmet needs of individual pupils. All staff undertake appropriate training to ensure that they know when to share information with other agencies and what action to take to support early identification and assessments.

In the first instance, staff who identify a pupil who may benefit from Family Help should discuss this with the School's DSL. If appropriate, the DSL will work with Surrey Safeguarding Children's Partnership, Surrey Police and / or Surrey Heartlands Integrated Care Board to undertake an assessment of the need for Family/ targeted early help. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. Further guidance on effective assessment of the need for Family Help can be found in Working Together to Safeguard Children (March 2026) (WT).

If Family Help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving.

Contextual Safeguarding

All staff, but especially the DSL and deputies, should consider the context within which such incidents and/or behaviours occur as these can be associated with factors outside the School and can occur between children outside School. The School will, as part of the wider assessment of children, consider whether environmental factors are present in a child's life that are a threat to their safety and/or welfare. The School will share as much information with Children's Social Care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

What staff should do if they have concerns about a child

If staff (including governors, supply staff, agency staff and volunteers) have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action, although staff can make a direct referral to children's social care.

As set out above, staff should not assume that somebody else will take action and share information that might be critical to keep a child safe; they should maintain an attitude of "it could happen here". If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a child's situation does not appear to be improving, the DSL should press children's social care for reconsideration. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

What staff should do if a child is in danger or at risk of harm

If staff (including governors, supply staff, agency staff and volunteers) believe that a child is in **immediate danger or at risk of harm**, they should make an immediate referral to children's social care and/or the police. Anyone can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's social care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

What staff should do if a child is seen as at risk of radicalisation

Staff should follow the School's normal referral processes when there are concerns about children who may be susceptible to radicalisation into terrorism.

This may include:

- a Prevent referral or referral to children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism;
- call 999 or the national police Prevent advice line 0800 011 3764;
- Advice can also be sought from Surrey Safeguarding Children's Partnership
- Advice and support can also be sought from children's social care.

In discussion with the Head, DSL and safeguarding governor, the School, in recognition that pupils may be susceptible to being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with local partners, such as the police) which assess how their learners or staff may be at risk of being radicalised into terrorism, including online. These arrangements are sufficiently robust to ensure that those at risk of radicalisation are identified, and appropriate support is provided and is regularly revised as needed.

What staff should do if they discover an act of Female Genital Mutilation (FGM)

Staff must report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with DSL and involve children's social care as appropriate. Staff are referred to Appendix 1 of this policy for the procedure to be followed where they suspect that a pupil may be at risk of FGM.

What staff should do if they have concerns that children are at risk from or involved with serious violent crime

All staff should be aware of the indicators which may signal that children are at risk from or are involved with serious violent crime. These may include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, signs of assault or unexplained injuries.

If staff have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action, although staff can make a direct referral to children's social care.

How should staff respond to an incident of nudes and semi-nudes being shared by pupils

All members of staff in an education setting have a duty to recognise and refer any incidents involving nudes and semi-nudes and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns. Whilst similar-age, consensual sharing may not be abusive, it is still illegal. Non-consensual sharing is both illegal and abusive.

For this purpose, 'sharing nudes/semi-nudes' means the sending or posting of nude or semi-nude images, videos, or live streams by persons under the age of 18 online, including those generated by AI. This could be via social media (including Snapchat), gaming platforms, chat apps (including WhatsApp and iMessage) or

forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. Images may be self-generated, taken by another or altered/generated using AI. The images, videos or live streams may include more than one child. The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

Many professionals may refer to 'nudes and semi-nudes' as:

- youth produced sexual imagery or 'youth involved' sexual imagery;
- indecent imagery. This is the legal term used to define nude or semi-nude images and videos of children and young people under the age of 18;
- 'sexting'. Many adults may use this term, however some young people interpret sexting as 'writing and sharing explicit messages with people they know' rather than sharing images;
- image-based sexual abuse. This term may be used when referring to the non-consensual sharing of nudes and semi-nudes;
- Deep fakes/Deep nudes.

Terms such as 'revenge porn' and 'upskirting' are also used to refer to specific incidents of nudes and semi-nudes being shared. However, these terms are more often used in the context of adult-to-adult non-consensual image sharing offences outlined in sections 33-35 of the Criminal Justice and Courts Act 2015, Voyeurism (Offences) Act 2019 and section 67A of the Sexual Offences Act 2003.

Terms such as 'deep fakes' and 'deep nudes' may also be used by adults and young people to refer to digitally manipulated and AI-generated nudes and semi-nudes. Any direct disclosure by a child will be taken seriously and staff will ensure the child is feeling comfortable and will only ask appropriate and sensitive questions, to minimise further distress or trauma to them.

If staff are notified or become aware of an incident of nudes or semi-nudes being shared by a pupil or of a pupil, they should refer the incident to the DSL as soon as possible.

The DSL will follow the Department for Digital, Culture, Media and Sport (DDMSC) / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" (March 2024) when responding to a report of sharing nudes and/or semi-nudes. This will include:

- Holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.
- Carrying out interviews with the children involved (if appropriate).
- Informing parents and carers at an early stage and keeping them involved in the process to best support the pupil unless there is good reason to believe that involving them would put the child at risk of harm. Any decision not to inform them should be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when they should be informed.
- Carrying out a risk assessment to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process.

An immediate referral to police and/or children's social care through the Multi-Agency Safeguarding Hub (MASH) or equivalent will be made if any of the following points apply:

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

If none of the above apply, the School may decide to respond to the incident without involving the police or children's social care. All incidents relating to nudes and semi-nudes being shared need to be recorded, whether they have been referred externally or not. The decision to respond to an incident without involving the police or children's social care will only be made in cases where the DSL (or equivalent) is confident that they have enough information to assess the risks to any child or young person involved and the risks can be managed within the School's pastoral support and disciplinary framework. Any decision in this regard will be made by the DSL (or equivalent) with input from the Head. The decision will be made and recorded in line with this Policy and will be based on consideration of the best interests of any child or young person involved. Any decision will consider proportionality as well as the welfare and protection of any child or young person. The decision will be reviewed throughout the process of responding to the incident. If doubts remain local safeguarding arrangements will be followed.

This guidance does not apply to the sharing of images of persons under 18 by an adult over 18 as this constitutes child sexual abuse. If staff become aware of such an incident, they should notify the DSL immediately, who should always inform the police as a matter of urgency.

What staff should do if a child is absent from education (CME)

Children who are absent from education particularly on repeat occasions and/or for prolonged periods, and children missing education can act as a vital warning sign to a range of safeguarding issues, including neglect and child sexual and/or criminal exploitation, particularly county lines. It is important that the School's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future.

The School's procedures for unauthorised absence and for dealing with children who are absent, repeatedly and/or for prolonged periods, and children missing from education are detailed in the School's Attendance Policy. Further detail can also be found at Appendix 1 of this policy.

Where reasonably possible, the School will hold more than one emergency contact number for each pupil to provide the School with additional options to make contact with a responsible adult particularly when a child who is repeatedly absent and/or absent for prolonged periods is also identified as a welfare and/or safeguarding concern.

The School will report to Surrey Local Authority a pupil who fails to attend school regularly or has been absent from school without the School's permission for a continuous period of 10 school days or more.

When working with local authority children's services where school absence indicates safeguarding concerns the School will have regard to the DfE guidance *'Working together to improve school attendance: statutory guidance for maintained schools, academies, independent schools and local authorities.*

What staff should do if a child needs a social worker (Children in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect, exploitation and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.

Local authorities should share the fact a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes. This should be considered as a matter of routine.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

The DSL / DDSL will liaise closely with the Social Worker and ensure information about a pupil's progress and welfare at school are shared in a timely manner.

What staff should do if a child requires mental health support

The School has an important role to play in supporting the mental health and wellbeing of its pupils. The School recognises that cumulative harm, trauma, abuse, neglect and exploitation can have long term effects on a young person's mental health, attendance, behaviour and educational outcomes. Staff will consider whether mental health concerns may indicate an underlying safeguarding concern. Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff can access a range of advice to help them identify children in need of extra mental health support; this includes working with external agencies. More information can be found in the DfE *Mental Health and*

Behaviour in Schools guidance. Public Health England has produced a range of resources to support school staff in promoting positive health, wellbeing, and resilience among young people.

What staff should do if they have safeguarding concerns about another staff member

If staff have safeguarding concerns about another staff member (including supply staff, agency staff, volunteers and contractors), then this should be **referred to the Head(s).**

Where there are concerns about the Head, this should be **referred to the Chair of Governors**.

In the event of allegations of abuse being made against the Head, staff are referred to the procedures below regarding managing allegations of abuse against staff (including supply staff, agency staff, volunteers, and contractors) and refer the matter directly to the Surrey Local Authority Designated Office (LADO) on 0300 123 1650. More information about their role can be found here https://surreyscp.org.uk/documents/lado-professionals-poster/

What staff should do if they have concerns about safeguarding practices in the School

The School aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'. Where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding systems, these should be raised in accordance with the School's Whistleblowing Policy which are accessible to all staff internally via the Staff Policies repository. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. Contact details for the NSPCC helpline can be found on the Key Contacts page at the start of this policy.

ARRANGEMENTS FOR DEALING WITH CHILD-ON-CHILD ALLEGATIONS (INCLUDING CHILD-ON-CHILD SEXUAL VIOLENCE AND HARASSMENT)

Child-on-child abuse is abuse by one or more children against another child. It can be standalone or as part of wider abuse and can happen both inside and outside of school, and online. It can manifest itself in many ways and can include abuse within intimate partner relationships, bullying (including cyber bullying, prejudice-based and discriminatory bullying), abuse within intimate partner relationships between peers, physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm), initiation/hazing type violence and rituals, upskirting, sexting, consensual and non-consensual sharing of nudes and/or semi-nudes, sexual assault, gender-based issues, discriminatory behaviour including racism and faith-targeted abuse, sexual behaviours including child on child sexual violence and sexual harassment, 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. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

These arrangements apply to all reports and concerns of child-on-child abuse, whether they have happened in school or outside of it, and/or online. Abuse that occurs online or outside of school should not be downplayed and should be treated equally seriously.

The School takes a zero-tolerance approach and abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up" and are challenged by school staff. The School is aware that any such abuse can significantly affect a child's welfare, wellbeing and sense of safety. Nor will harmful sexual behaviours, including physical behaviours, sexual comments, remarks or jokes and online sexual harassment, be dismissed as the same or "just having a laugh". The school recognises the importance of preventing Violence Against Women and Girls (VAWG), misogyny, misandry, harmful gender stereotypes and discriminatory attitudes. Through PSHE, RSE, assemblies, pastoral programmes and staff intervention, pupils are taught about respectful relationships, consent, equality and appropriate conduct. Any sexist, misogynistic or sexual harmful behaviour will be challenged and addressed. Staff will also challenge physical behaviours (that are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them. The school is aware that downplaying these behaviours can lead to a culture of unacceptable behaviour.

The School acknowledges that even if there have been no reported cases of child-on-child abuse in relation to pupils within the School, such abuse may still be taking place and is simply not being reported. The School will ensure that children are aware of how they can report abuse, and that they are aware of the procedures that the School will follow once a report has been made. These procedures will be well promoted and in a format that is easily accessible and easily understood by children.

The School recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust. The School also recognises that children may not find it easy to tell staff about their abuse verbally and that instead they may show signs or act in ways they hope adults will notice and react to. It is also recognised that an incident may come to a member of staff's attention through a report of a friend, or by overhearing conversations. It is therefore important that all staff are clear on the School's policy and procedures with regards to child-on-child abuse, can recognise the indicators and signs of child-on-child abuse and know how to identify it and how to respond to reports.

The School recognises that a first disclosure to a trusted adult may only be the first incident reported. It is not necessarily representative of a singular incident. Staff will take all reports of abuse seriously regardless of how long it has taken for the child to come forward. Staff will act immediately and will support the victim when they raise a concern.

The School recognises that children with special educational needs and disabilities (SEND) or certain health conditions are three times more likely to be abused by their peers, can face additional safeguarding challenges and may be more prone to peer-on-peer group isolation or bullying (including prejudice-based bullying) than other children. The School will consider extra pastoral support for those children. The School

also recognises that certain children may face additional barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

The School recognises that children can be particularly vulnerable in residential settings and are alert to the potential for child-on-child abuse. The School will comply with its obligations as set out in the National Minimum Standards in relation to safeguarding at all times.
The School takes the following steps to minimise the risk of child-on-child abuse:

- Education and increasing awareness through Life Matters Curriculum, Assemblies, Drama lessons;
- Training staff to spot potential indicators of such behaviour;
- Early intervention when cases happen.

Where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer harm', staff should follow the procedures below rather than the School's Anti-Bullying and Behaviour Policies:

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from the Surrey Safeguarding Children's Partnership, Surrey Police and the Surrey Heartlands ICB on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved, including the alleged victim and perpetrator(s). If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of the above safeguarding partners, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from Surrey Police and Surrey Safeguarding Children's Partnership as appropriate. The School will have regard to the procedures set out in *KCSIE* at all times.

The victim may ask the School not to tell anyone about the sexual violence or sexual harassment. Advice should be sought from the DSL or DDSL who should consider: parents or carers should normally be informed unless doing so would put the victim at greater risk; the basic safeguarding principal that if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care; and whether a crime has been committed. Ultimately, the DSL or DDSL will balance the victim's wishes against their duty to protect the victim and other children.

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. Where a report has been made to the police, the School will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents/guardians or carers. If the DSL decides to make a referral to children's social care and/or a report to the police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered. The DSL may also decide that the children involved may benefit from Family Help and may make the necessary referral in accordance with the Surrey Safeguarding Children's Partnership and Surrey Police.

The School's approach to consensual and non-consensual making or sharing of nudes and semi-nudes is:

- When there is concern of the making or sharing of nudes or semi-nudes, the pupil should be supported and the matter raised immediately with a DSL. Explain to the young person the need to report the matter to a DSL, and where possible encourage them to voice if they have a preferred DSL with whom they would feel comfortable. Do not attempt to investigate; this is the task of the DSL only.
- Staff should never view, download or share the imagery, nor should they ask a child to share, copy or download it.
- Staff members should never view, download or share the imagery, nor should they ask a child to share or download anything. To do so would be illegal.
- If, by accident, a staff member has already viewed the imagery, for example during a search of a device or shown by a pupil before they could be stopped, then this should be reported to a DSL.
- It is important **not** to delete imagery. Where appropriate retain devices on which the imagery may appear so that these can be passed to the DSL and provided to the police if necessary.
- It is important that information about the incident is shared only with DSLs, and not with other staff members.
- A DSL will meet the young person / young persons involved, establishing whether the concern involves an image, video or message. They will try to establish who sent it, who is featured in it and whether any adults are involved. They will also try to establish whether it has been shared elsewhere and how.
- Using this information they will risk assess the situation, liaising with a fellow DSL, and referring to the Brook Sexual Behaviours Traffic Light Tool and / or Finkelhor and Wolak's typology and harmful sexual behaviour tools. DSLs will identify any immediate risks and will contact the Police and C-SPA immediately if:
    - The incident involves an adult, being mindful an adult may have pretended to be a child
    - There is reason to believe a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent.
    - What has been learned about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage or are violent in nature.
    - The images involve sexual acts and any young person in the images or videos is under the age of 13.
    - There is reason to believe a child or young person is at immediate risk of harm owing to the sharing of the material, for example are presenting as suicidal or self-harming.
- If none of these factors apply, we may decide to respond to the incident without involving the police or children's social services. In such cases, the matter should be discussed with the Head and the reasons for the decision recorded.
- When assessing the risks and deciding whether a referral is needed, the following should also be considered:
    - Was the image or video shared?
    - Was it consensual or was the young person put under pressure or coerced?
    - If it was consensual, are the peers of similar age?

    - Has the image been shared beyond its intended recipient? Was it shared without the consent of the young person who produced the image?
    - Has the image or video been shared on social media or anywhere else online? What steps have been taken to contain the spread?
    - What age are the young people involved?
    - Did the young person send it to more than one person?
    - Are there any other concerns about the young person's vulnerability?
    - Are there any additional concerns if parents or carers are informed?
- If the young person is considered at risk of harm, a referral will be made.
- Parents should ideally be made aware at an early stage, unless to do so increases risk of harm to the young person.

The school will ensure that the young person is supported, and that self-reflection and further education on the situation is provided.

Once it is known that the police will not need to see images or videos as part of an investigation, the young person and parents (if appropriate) should be made aware of, and encouraged to use, the IWF and Childline's Report Remove tool https://www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/report-remove/.

The School will follow the DDMSC / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" (February 2024) when responding to an allegation that nudes and/or semi-nudes have been shared.

In the event of disclosures about child-on-child abuse, all children involved (both victim(s) and perpetrator(s)) will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by one of the DSL team, and one of our Therapy Team as appropriate. Support from external agencies such as Surrey Police and professional organisations such as RASASC.

When there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim;
- whether there may have been other victims;
- the alleged perpetrator(s); and
- all the other children (and, if appropriate, staff) at the School, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments will be recorded (written or electronic) and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL (and indeed all staff) will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be made to feel ashamed for making a report nor will they be given the impression that they are creating a problem by

reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report or have their experience minimised. The School will explain to the child in a way that avoids alarming or distressing them that the law is in place to protect children rather than to criminalise them. The School will consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. The School acknowledges that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s). The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe and to ensure their educational attainment is not adversely affected as far as is possible. This may include careful consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing School premises (including during any before or after school-based activities), and School transport. The School will also consider the risks posed to the victim from other health needs, including physical, mental and sexual health problems, as well as unwanted pregnancy which may arise because of the incident, and will consider recommending additional support.

The School will consider intra familial harms and whether any support for siblings is necessary following an incident.

The School will keep a written record of all concerns, discussions and decisions made.

The School will reflect on reported concerns, including the decisions made and actions taken, in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or amendments to relevant policies. Where a pattern is identified the School will decide on an appropriate course of action.

In the event that a report is proven to be false, unsubstantiated, unfounded or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against the individual who made it in accordance with the School's Behaviour Policy.

DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS MADE ABOUT STAFF (INCLUDING SUPPLY TEACHERS), VOLUNTEERS AND CONTRACTORS

The School's procedures for managing concerns or allegations against staff (including supply staff, trainee teachers, volunteers and contractors) who are currently working in the School whether in a paid or unpaid capacity follows DfE statutory guidance and Surrey Safeguarding Children's Partnership and Surrey Police arrangements and applies when staff (including volunteers) have (or are alleged to have):

- Behaved in a way that has harmed a child, or may have harmed a child; and/or
- Possibly committed a criminal offence against or related to a child; and/or
- Behaved towards a child or children in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children, including behaviour that may have happened outside of school.

In this section reference to 'allegations' also covers concerns. Allegations that do not meet the above harm test should be dealt with using the School's procedure for handling low-level concerns set out below.

A low-level concern made against a member of staff should be reported to the Head or the Prep School Head as appropriate. All low-level concerns raised will be recorded in writing. The record will include details of the concern, the context in which the concern arose and the action taken. The School will monitor and review records so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where such a pattern of behaviour is identified, the relevant Head will decide on a course of action through disciplinary proceedings. Where a pattern of behaviour moves from a concern to meeting the harm threshold, the case will be referred to the LADO.

Allegations against a teacher who is no longer teaching should be referred to the police. Historical (non-recent) allegations of abuse should be referred to the police and the LADO. Non-recent allegations made by a child will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children social care and the police.

If an allegation is made against anyone working with children in the School, before contacting the LADO, the School will conduct a basic enquiry in line with local procedures to establish the facts in order to determine whether there appears to be any foundation to the allegation. The School should not undertake their own investigation of the allegation(s) without prior consultation with the LADO or, in the most serious cases, the police, so as not to jeopardise statutory investigations.

When dealing with an allegation about a staff member, the School will apply common sense and judgment, deal with allegations quickly, fairly and consistently and will support the person subject to the allegation.

1. Allegations which appear to meet the above reporting criteria are to be reported straight away to the to Head (who will normally be the case manager). If an allegation is reported to the DSL, the DSL will keep the Head informed. Where the Head or DSL is absent or is the subject of the allegation, reports should be made to the Chair of Governors. Where the Head or DSL is the subject of the allegation, the Head or DSL must not be informed of the allegation prior to contact with the Chair of Governors and LADO. However, staff may consider discussing any concerns/allegations with the DSL and make any referral via them.

2. The case manager should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the

police. (Where the case manager deems there to be an immediate risk to children, there is evidence of a possible criminal offence, or it is an emergency, the case manager should contact Children's Social Care and as appropriate the Police immediately.) All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The LADO should be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria or that are made directly to the police and/or children's social care. The DSL is responsible for ensuring the child is not at risk.

3. Where the case manager is concerned about the welfare of other children in the community, or the member of staff's family, they will discuss these concerns with the LADO and make a risk assessment of the situation. It may be necessary for the LADO to make a referral to children's social care.

4. When to inform the individual who is the subject of the allegation will be considered on a case-by-case basis and with guidance from the LADO, and if appropriate, the police and/or children's social care. Subject to any objection, the case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.

5. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension from contact with children at the School or whether alternative arrangements should be put in place until the allegation is resolved. The following alternative arrangements should be considered by the case manager before suspending a member of staff:

   - redeployment within the School so that the individual does not have direct contact with the child or children concerned;
   - providing an assistant to be present when the individual has contact with children;
   - redeploying to alternative work in the School so the individual does not have unsupervised access to children;
   - moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes accounts of their views. It should be made making it clear that this is not a punishment and parents have been consulted; or,
   - temporarily redeploying the member of staff to another role in a different location, for example to an alternative school where available.

   These alternatives allow time for an informed decision regarding the suspension, this will, however, depend upon the nature of the allegation.

   Suspension should not be an automatic response when an allegation is reported. It should be considered only in cases where there is cause to suspect a child or other children at the School is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. The case manager will give due weight to the views of the LADO, *WT* and *KCSIE* when making a decision about suspension (including with respect

to considering alternatives). Where the individual is suspended, the case manager will confirm the decision within one working day, will ensure they know who their point of contact is in the School and shall provide them with their contact details. The case manager will also record the rationale and justification for the suspension, including what alternatives were considered and why they were rejected.

6. Where a member of boarding staff is suspended pending an investigation, the case manager will consider whether arrangements for alternative accommodation away from children should be made.

7. Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. The LADO will provide advice and guidance to the School to ensure that an appropriate investigation is carried out. In straightforward cases, the investigation should usually be undertaken by a senior member of staff at the School. Where there is lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed to undertake the investigation.

8. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the police. Parents and others will be made aware that there are restrictions on publishing information which may lead to the identification of the teacher subject to the allegation.

9. The case manager will monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process. The outcome of the investigation of an allegation will record whether it is substantiated (sufficient evidence to prove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it), malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive or cause harm to the person subject of the allegation) or unfounded (to reflect cases where there is no evidence or proper basis which supports the allegation being made).

10. Reviews are conducted at fortnightly or monthly intervals, depending on the complexity of the case. The first review will take place no later than four weeks after the initial assessment and subsequent review dates will be set at the review meeting.

11. The case manager will discuss with the LADO whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be

appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).

12. On conclusion of the case, the case manager should review the circumstances of the case with the LADO to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future. Learning lessons where the allegation is concluded to be either, unfounded, false, malicious or unsubstantiated, the case manager (and if they have been involved, the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

Where an individual is removed from regulated activity, or would have been removed had the individual not left, including when they are suspended, redeployed to work that is not regulated activity, are dismissed, or have resigned, and the individual has engaged in relevant conduct in relation to children and/or adults, and/or satisfied the harm test in relation to children and/or vulnerable adults, and/or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence, the School will make a referral to the DBS.

The School has a duty of care to its staff, and whilst the welfare of a child is paramount, the School must offer appropriate welfare support to the adult subject to the investigation and potentially their family. The School will also make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. Information will also not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

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

Allegations found to be malicious or false will be removed from the individual's personnel records unless the individual gives consent for retention of the information. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned. The information to be kept on file includes a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, a note of any action taken, decisions reached and the outcomes, and a declaration on whether the information will be referred to in any future reference. All records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer. Records should be reviewed at the end of the retention period in case it is necessary to keep it for longer. (NSPCC guidance 2023)

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the DSL should consider whether the child and/or the person who has made the allegation needs help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be

appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a pupil who made it in accordance with the School's Behaviour Policy; or whether the police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

In all cases where there are concerns or allegations of abuse, the School will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

Procedure for managing and allegations about supply teachers and contractors

The School's procedures for managing allegations against staff above also apply to staff not directly employed by the School, for example, supply teachers provided by an employment agency or business ('the agency'). The School will usually take the lead but agencies should be fully involved (because they have their own policies and procedures) and co-operate with any enquiries from the LADO, police and/or children's social care.

In no circumstances will the School decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The School will discuss with the agency (or agencies where the supply teacher is working across a number of schools) whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

The School will advise supply teachers being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School during the investigation.

When using an agency, the School should inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Where the agency dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left the School first, the School must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

DEALING WITH SAFEGUARDING CONCERNS AND ALLEGATIONS ABOUT ORGANISATIONS OR INDIVIDUALS USING SCHOOL PREMISES

The School may receive an allegation or concern relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children and/or vulnerable adults (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, the School will follow their Safeguarding and Child Protection Policy and procedures, including informing the LADO.

When services or activities at the School are provided under the direct supervision or management of school staff, this Policy will apply in relation to any safeguarding concerns or allegations. Where services or activities are not under the direct supervision or management of the School, the School will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and the School will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the School on these matters where appropriate. The School will expect, where appropriate, providers to fully comply with the DfE guidance *After school clubs, community activities, and tuition (safeguarding guidance for providers) (February 2026)* and will seek assurance in this regard.

The School has arrangements in place for the use of school premises for non-school activities including the availability of the DSL or DDSL and how they can be contacted.

DEALING WITH CONCERNS OR ALLEGATIONS (THAT DO NOT MEET THE HARM THRESHOLD)

A low-level concern is any concern that an adult working in or on behalf of the School may have acted in a way that:

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

A 'low-level' concern does not mean that it is insignificant. A concern may be a low-level concern, no matter how small, even if it does no more than give a sense of unease or a "nagging doubt". Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse (for example, grooming-type behaviours).

The School takes all concerns about safeguarding seriously and recognises that addressing even low-level concerns is important to create and embed a culture of openness, trust and transparency in which the School's values and expected behaviour of its staff are constantly lived, monitored and reinforced by all staff.

The School has a separate Low-Level Concerns Policy which enables all staff to share concerns – no matter how small – about their own or another member of staff's behaviour.

The School's Staff Code of Conduct can be found on the staff portal. The aim of the code of conduct is to provide clear guidance about the standards of appropriate behaviour and actions of its staff so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil. All staff are expected to comply with the standards contained within this code of conduct, at all times.

The procedure for sharing confidentially any such concerns is set out in the Staff Code of Conduct. The Head is the ultimate decision-maker in respect of all low-level concerns and all concerns shared with the DSL or DDSL will be shared with the Head for ultimate decision-making.

Staff must share all concerns with the Head without delay so that it can be recorded and dealt with appropriately, sensitively, and proportionately and in a timely manner. Where a low-level concern is raised about the Head, it should be referred to the Chair of Governors.

Staff are also encouraged to self-refer in the event that they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.

If a concern is raised by a third party, the Head will collect as much evidence as possible by speaking to the person who has raised the concern (if known), to the individual involved and any witnesses. The concern will be recorded in accordance with this policy, in the usual way.

The School will address unprofessional behaviour at an early stage and will support the individual to correct it.

All low-level concerns will be recorded in writing. The record will include details of the concern, the context within which the concern arose, and details of the action taken. The name of the reporting individual should also be included, unless they have asked to remain anonymous, which will be respected as far as reasonably possible. The records will be kept confidential, will be held securely and in compliance with the Data Protection Act 2018 and the UK GDPR, at all times. The information will be retained keeping records while the individual is employed and reviewing them when they leave.

Low-level concerns will not be included in references unless they relate to issues which would normally be disclosed, for example, misconduct or poor performance.

The School will also reflect on reported concerns in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or modified policies. Where a pattern is identified, the School will decide on a course of action, either through its disciplinary procedures, or, where the pattern moved from a concern to meeting the harms threshold, it will then follow the above procedure and refer the matter to the LADO.

Where a low-level concern relates to a person employed by a supply agency or a contractor, the individual's employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

If the School is in any doubt as to whether a low-level concern in fact meets the harm threshold, the Head will consult with the LADO and take a more collaborative decision-making approach.

SAFER RECRUITMENT

The School is committed to safer recruitment processes to create a culture that safeguards and promotes the welfare of children in the School whilst deterring and preventing people who are unsuitable to work with children from applying or securing employment, or volunteering opportunities, within the School. The School has and adheres to its Staff Recruitment (Safer Recruitment) Policy.

Members of the teaching and non-teaching staff at the School including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example:

- right to work checks,
- additional overseas checks (if necessary),
- verifying identity,
- taking up references,
- checking work history and confirming medical fitness for the role.
- For most appointments, an enhanced DBS check with "barred list" information will be appropriate.
- As part of due diligence for the shortlisting process, the School will also carry out an online search on shortlisted candidates which may help to identify any incidents or issues that have happened and are publicly available online, and which the School may want to explore at interview.

A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service.

Full details of the School's safer recruitment procedures for checking the suitability of staff, and volunteers to work with children and young people are set out in the School's Staff Recruitment Policy.

The school will ensure that all volunteers engaged in regulated activity and employed staff are subject to the required enhanced DBS and barred list checks in accordance with current statutory guidance.

The School's procedures for managing contractors attending the School site are recorded in the Staff Recruitment (Safer Recruitment) Policy

Prior to any contractors undertaking work at St Catherine's, the School will ensure that appropriate safeguarding checks and control measures are in place. This may include an Enhanced DBS check where the nature of the work, level of access to pupils, or degree of supervision requires it. Contractors who are supervised at all times, restricted from pupil areas, or working at times when pupils are not present may not require an Enhanced DBS check, provided all appropriate controls are in place.

Contractors are permitted to arrange these checks themselves via the DBS directly, third party providers or via the School.

All contractors must sign-in and out at the Facilities Office and wear St Catherine issue pink hi-visibility tabards which identify the Contractor as having permission to work on site.

MANAGEMENT OF SAFEGUARDING

Whilst the Head should ensure that the policies and procedures adopted, particularly those concerning referrals of cases of suspected abuse, exploitation and neglect, are understood and followed by all staff, and the Governors are ultimately responsible for ensuring staff are competent, supported and regularly reviewed in relation to safeguarding, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

The School's Designated Safeguarding Lead (DSL), who is a member of the Senior Leadership Team (SLT) is:

Mrs. Kirsty Meredith - Deputy Head (Pupils)
Contact details: kirsty.meredith@stcatherines.info **01483 899604**

The Deputy DSLs and the persons to whom reports should be made in the absence of the DSL are recorded below. The DSLs ensure there is the required cover for the role at all times:

Mrs. Denise Irons - Prep Deputy Head (Pastoral and Wellbeing)
Contact details: denise.irons@stcatherines.info **Tel: 01483 899745**

Miss. Emily Jefford - Prep School Deputy Head, Head of Pre-Prep (responsibility for EYFS)
Contact details: emily.jefford@stcatherines.info **01483 899667**

Mrs. Vic Alexander - Assistance Head (Systems and Processes)
Contact details: vic.alexander@stcatherines.info **01483 899651**

Availability
During term time, the DSL and DDSLs will always be available in person (during school hours) for staff in the School to discuss any safeguarding concerns. If a DSL or DDSL is not available in person, they can be contacted via the phone numbers on the Staff Portal. For out of hours/out of term activities, the rota of which DSL is on cover will be emailed to all staff and can also be found on the staff portal.

The DSL's role is to take lead responsibility for:

- safeguarding and child protection matters in the School
- maintaining an overview of safeguarding within the School, opening channels of communication with local statutory agencies,
- referring incidents to third parties (including the local authority children's services, the DBS, Channel and the police) where appropriate,
- supporting staff in carrying out their safeguarding duties and monitoring the effectiveness of the School's policies and procedures in practice.

The DSL will also take lead responsibility for:

- **online safety and understanding the filtering and monitoring** systems and processes the School has in place.
- works with the governors to review and update the School's Safeguarding and Child Protection Policy.

When a pupil leaves the School, including for in-year transfers:

- the DSL will also ensure their child protection file is transferred to the new school (separately from the main pupil file) as soon as possible and within 5 days for an in-year transfer or within the first 5 days of the start of a new term;
- the DSL will ensure secure transit and obtain confirmation of receipt;
- Electronic child protection records will be transferred securely and receipt obtained from the receiving school;
- In addition to the child protection file, the DSL should also consider if it would be appropriate to share any additional information with the new school in advance of a child leaving to help them put in place the right support to safeguard the child and to help the child thrive in the school.

The DSL **regularly reviews** the School's and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in the absence of action, directly to local children's services.

The DSL/or DDSL should liaise with:

- **the three safeguarding partners** and work with other agencies in line with *WT*. "*NPCC When to call the police: guidance for schools and colleges*" (npcc.police.uk) can assist the DSL/or DDSL understand when they should consider calling the police and what to expect when they do. If the School has questions about any police investigation, it will ask the police.
- **the senior mental health lead** and, Mental Health Support Teams as necessary.
- **local specialist support** is available to support all children involved in sexual violence and sexual harassment.

Full details of the DSL's role can be found at Annex B of *KCSIE*.

TRAINING

Induction and training are in line with advice from Surrey Safeguarding Children's Partnership. Training for EYFS staff is renewed every two years with annual refresher training during the two-year period.

All Staff

All new staff will be provided with induction training that includes:

- the Safeguarding and Child Protection Policy (including the policy and procedures to deal with child-on-child abuse);
- the role and identity of the DSL and any DDSLs

- the Behaviour Policy (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying);
- the Staff Code of Conduct including the School's Whistleblowing Policy and the acceptable use of technologies policy, staff/pupil relationships and communications including the use of social media; Low-Level Concerns Policy
- the safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods or children missing education;
- the Online Safety Policy, including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring;
- a copy of Part One of *KCSIE.*

Copies of the above documents are provided to all staff during induction.

- Temporary staff and volunteers are provided are requested to attend training in person, or to complete the TES Develop course.

All staff are also required to:

- Read at least Part one of KCSIE and confirm that they have done so. Each time Part one of KCSIE is updated by the Department for Education, staff will be updated on the changes via email and Staff Meetings.
- Understand key information contained in Part one of KCSIE. The School will ensure staff understanding by asking staff to complete TES Develop questionnaire and sharing their certificate with DSL.
- Receive training in safeguarding and child protection regularly, in line with advice from Surrey Safeguarding Children's Partnership. Training will include:
    - Online safety (including the expectations, applicable roles and responsibilities in relation to filtering and monitoring) and harmful sexual behaviours (including child-on-child sexual violence and harassment).
    - Prevent awareness training to equip staff to understand the factors that lead people to support terrorist ideologies or engage in terrorist related activity, be able to recognise susceptibility to terrorism and be aware of what action to take in response, including the School's internal Prevent arrangements.
    - Regular informal updates, at least termly, to provide them with relevant skills and knowledge to safeguard children effectively, including online. The School provides these via, for example emails and "hot topics" in staff meetings.

GOVERNOR SAFEGUARDING TRAINING

The governing body will ensure that all governors receive appropriate safeguarding and child protection (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the School are effective and support the delivery of a robust

whole school approach to safeguarding. Their training should be regularly updated. The Governing Body receives at least annual safeguarding assurance report from the DSL.

The governing body is aware of their obligations under the Human Rights Act 1998 (HRA), the Equality Act 2010, the Data Protection Act 2018, the UK GDPR, and their local multi-agency safeguarding arrangements. Under the Human Rights Act 1998, it is unlawful for the School to act in a way that is incompatible with the European Convention on Human Rights (ECHR) Convention. Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach conventions set out in the European Convention on Human Rights (ECHR) Convention. The Data Protection Act 2018 and the UK GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

In addition, the governing body complies with the DfE's Data Protection guidance for schools, ensuring school staff, governors know how to comply with data protection law, develop their data policies and processes, what staff and pupil data to keep and the importance of good practices for preventing personal data breaches.

DSL(s) TRAINING

The DSL receives updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes:

- local inter-agency working protocols,
- participation in child protection case conferences,
- supporting children in need,
- identifying children susceptible to radicalisation,
- record keeping and promoting a culture of listening to children,
- training in the three safeguarding partners' approach to *Prevent* duties,
- training in harmful sexual behaviours,
- in-depth training, including on extremist and terrorist ideologies,
- how to make referrals and how to work with Channel panels.

Further details of the required training content for the DSL are set out in Annex B of *KCSIE.*

In addition to their formal training, the DSL's knowledge and skills are updated at least annually and whenever significant safeguarding developments occur to keep up with any developments relevant to their role.

In particular, the School will support the DSL in developing their knowledge and skills to understand the views of children including to encourage a culture of listening to children and taking account of their wishes, as well as having an awareness of the difficulties children may face in approaching staff with a disclosure.

The DDSLs are trained to the same level as the DSL.

OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES

Caroline Good
Contact **c/o St. Catherine's School** diane.haefele@stcatherines.info **Tel: 01483 893363** is the Governor at board-level lead designated to take a lead in relation to responsibility for the safeguarding arrangements in the School.

- The School considers its obligation to review safeguarding practices a matter of its everyday concern.
- The School draws on the expertise of staff, including the DSL(s), in shaping the School's safeguarding arrangements and policies.
- The School's safeguarding policies and procedures should be transparent, clear, and easy to understand for staff, pupils, students, parents, and carers.
- A review of the School's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation, including lessons learnt.

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

THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES

Teaching children how to keep safe

The governing body ensures that all pupils are taught about safeguarding, including online safety, through the curriculum and PSHE to help children to adjust their behaviours, both inside and outside of School, in order to reduce risks and build resilience, including to radicalisation and extremism.

This includes teaching pupils about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults.
The School recognises that a "one size fits all" approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some children with SEND might be needed.

Internet safety (including when children are online at home) is an integral part of the School's ICT curriculum and is also embedded in the PSHE and Relationships Education and/or Relationships and Sex Education (RSE) curriculum. All pupils in U3-L5 (Years 7-11) take an annual Online Safety Alliance Qualification. All pupils in U3-L5 (Years 7-11) take an annual Online Safety Alliance Qualification.

Filtering and monitoring

The school maintains clear expectations regarding pupil and staff use of mobile phones and Smart devices. Risks including image sharing, online abuse, cyber bullying, sexual harassment, access to harmful content

and safeguarding concerns are considered in the school's wider online safety arrangements. Filtering and monitoring is a safeguarding responsibility as set out in the School's Online Safety Policy.

Ownership of filtering and monitoring systems at the School is held by:
- The Governor responsible for filtering and monitoring is the Safeguarding Governor
- Operational responsibility rests with Director of IT
- Safeguarding oversight rests with the DSL (Prep and Senior).

The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online when using the School's IT system. The School's systems are Palo Alto (application firewall and URL categorisation), Iboss Gateway (local URL Filtering and alerting) and Securly Filter (global filtering and alerting).

Such systems aim to reduce the risk of children being exposed to illegal, inappropriate or harmful materials online (content risk); reduce the risk of children being subjected to harmful online interaction with others including commercial advertising and grooming (contact risk); restrict access to online risks such as online gambling, phishing or financial scams (commerce risk); and help manage online behaviour that can increase a child's likelihood of, or causes, harm for example making, sending and receiving explicit images.

The School recognises however that children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G) which means that children may consensually and/or non-consensually share indecent images, sexually harass their peers via mobile and smart technology, and view and share pornography and other harmful content whilst at school undetected.

The School ensures compliance with the DfE's 'filtering and monitoring standards for schools' by;

- Identifying and assigning roles and responsibilities to manage filtering and monitoring systems.
- Governors will receive and review evidence of the effective of the filtering and monitoring systems at least annually, and the review will be formally recorded.
- Blocking harmful and inappropriate content without unreasonably impacting teaching and learning.
- Having effective monitoring strategies in place that meet our safeguarding needs.

Further detail of the Schools policy and procedures in relation to online safety can be found in the School's Online Safety Policy which also includes detail on the use of mobile and smart technology in School, including the School's management of the associated risks, and the School's filtering and monitoring arrangements to ensure that children are safe from harmful and inappropriate content, including terrorist and extremist material when accessing the internet through the School's systems.

The School will liaise with parents to reinforce the importance of children being safe online and the systems the School uses to filter and monitor online use. Parents/guardians and carers will be made aware of what their children are being asked to do online when undertaking remote learning, including the sites they will be asked to access and who from the School their child is going to be interacting with online.

Relationships Education and Sex Education (RSE)

See the separate Senior School RSE Policy and Prep School PSHE and RSHE Policy for further details.

Looked after children

The governing body ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority.

Kirsty Meredith is the designated member of staff who has responsibility for their welfare and progress. The School ensures that the designated member of staff receives appropriate training in order to carry out their role.

Arrangements for visiting speakers

The School recognises that outside speakers are an integral part of our education provision and allows them to encourage healthy debate and the opportunity to listen to different views and outlooks. In particular staff are encouraged to ensure diversity in the range of speakers invited into school.

The School's protocols for ensuring that any visiting speakers, whether invited by staff or pupils themselves, are suitable and appropriately supervised are detailed in the Visiting Speakers Policy.

Arrangements for use of school premises for non-school activities

When services or activities at the School are provided under the direct supervision or management of school staff, this Policy will apply in relation to any safeguarding concerns or allegations.

Where services or activities are not under the direct supervision or management of the School, the School will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and the School will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the School on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll.

The School will ensure that the DSL or DDSL can be contacted and/or is available at all times the school premises is in use, whether that activity is a school or non-school activity and regardless as to whether the children attending are on the school roll.

The DSL and DDSLs can be contacted in the evening and weekends, and the rota for DSL cover is available on the Staff Portal and is emailed to all staff.

The School will ensure that safeguarding requirements are included in any agreement for use of the school premises (such as a lease or hire agreement) as a condition of use and occupation of the premises and that failure to do so by the provider to comply with this will lead to termination of the agreement.

When considering the safeguarding arrangements any providers have in place the School will have regard to the DfE's non statutory guidance '*Keeping children safe in out-of-school settings' (February 2026)* and *'After school clubs, community activities, and tuition (safeguarding guidance for providers)' (February 2026)*.

The school will ensure effective liaison with any coach or external agency a pupil attends during the school day. They will also check attendance at said club / activity.

EARLY YEARS PROVISION SAFEGUARDING ARRANGEMENTS

(To be read in conjunction with the EYFS Policy)

1. EYFS safeguarding arrangements

The school is committed to safeguarding and promoting the welfare of all children, including children attending the Early Years Foundation Stage (EYFS). This section applies to children attending the school's Pre-School provision for children aged 3–4 and children in PPI (Reception).

The school's whole school safeguarding and child protection arrangements apply to all EYFS children and staff. This section sets out the additional arrangements and considerations that recognise the particular age, stage of development, communication needs and vulnerabilities of children in the EYFS.

The school will ensure that its EYFS provision meets the safeguarding and welfare requirements of the Early Years Foundation Stage Statutory Framework for group and school-based providers, alongside the requirements of Keeping Children Safe in Education (KCSIE), Working Together to Safeguard Children and the procedures of the relevant Local Safeguarding Partners.

The school does not maintain a separate EYFS safeguarding policy. The requirements of the EYFS are incorporated within this Whole School Safeguarding and Child Protection Policy and associated school policies and procedures.

All staff working within the EYFS are expected to understand and follow the school's safeguarding and child protection procedures and to remain alert to concerns about the safety and welfare of children both within the school and in their home and wider environment.

2. Designated Safeguarding Lead and EYFS responsibility

The school has appointed a Designated Safeguarding Lead (DSL) who has lead responsibility for safeguarding and child protection across the school, including the EYFS.

The practitioner designated to take lead responsibility for safeguarding children in the early years settings is:

Miss Emily Jefford (responsibility for EYFS)
Contact details: emily.jefford@stcatherines.info **01483 899667**

The DSL is responsible for liaison with children's social care, the Local Safeguarding Partners and other relevant agencies and has overall responsibility for safeguarding and child protection arrangements within the school.

Where an EYFS safeguarding lead or member of the EYFS team has a specific safeguarding responsibility, this operates under the leadership and oversight of the school DSL.

There are appropriate arrangements to ensure that a trained safeguarding lead is available whenever children are present. Where the DSL is unavailable, concerns must be reported to a Deputy DSL without delay.

All staff have a responsibility to identify and respond to safeguarding concerns. Staff must not assume that somebody else will take responsibility for reporting a concern.

3. Recognising safeguarding concerns in the EYFS

Young children may communicate their experiences and feelings differently from older children. They may have limited vocabulary, may not recognise that what is happening to them is abuse, or may communicate concerns through behaviour, play, drawings, changes in presentation or non-verbal communication.

EYFS practitioners therefore have an important role in identifying concerns at an early stage.

Staff will maintain professional curiosity and will consider changes or patterns in a child's:

- behaviour or emotional presentation;
- play;
- communication or language;
- relationships with adults or other children;
- physical presentation;
- toileting or personal-care behaviour;
- eating;
- attendance;
- mood or confidence;
- response to particular people, situations or environments;
- development or general wellbeing.

No single sign is necessarily evidence of abuse or neglect. Staff will consider the child's circumstances, any known vulnerabilities and the wider context of their life.

Staff must not dismiss concerning behaviour or changes in presentation simply because a child is very young or because there may be an apparently plausible explanation.

Where concerns arise, staff must follow the school's safeguarding reporting procedures immediately.

4. Listening to and communicating with young children

The school recognises that young children have a right to be listened to and taken seriously.

Staff will:

- listen carefully to children and take what they say seriously;
- provide developmentally appropriate opportunities for children to communicate their views and feelings;
- use language appropriate to the child's age, stage of development and communication needs;
- avoid leading questions when responding to a safeguarding concern;
- allow children time to communicate;
- avoid making promises of confidentiality;

- record concerns and disclosures accurately, including the child's own words wherever possible;
- report concerns promptly to the DSL.

A child does not need to make a verbal disclosure for a safeguarding concern to be identified. Staff will consider communication through behaviour, play, interactions and changes in presentation alongside verbal communication.

Children with SEND, communication difficulties, EAL or other additional needs may require particular consideration and appropriate support to enable them to communicate their wishes, feelings and experiences.

5. Action when there is a safeguarding concern

Where an EYFS practitioner has a concern about a child's safety or welfare, they must follow the school's safeguarding reporting procedure and inform the DSL immediately.

Staff should not investigate concerns themselves. They should listen, reassure and record, but should not ask leading or investigative questions.

The DSL will determine the appropriate response in accordance with the school's safeguarding procedures, local safeguarding arrangements and relevant statutory guidance.

Where there is an immediate risk of significant harm, the school will contact children's social care and/or the police without delay in accordance with local procedures.

The school will work with children's social care, health services, police and other agencies as appropriate and will contribute relevant information to assessments, child protection enquiries, child protection plans and other safeguarding processes.

Information will be shared lawfully and appropriately in accordance with safeguarding requirements. Safeguarding concerns will not be delayed because of uncertainty about information-sharing arrangements.

6. Family Help (Including Targeted Early Help)

The school recognises that early identification of emerging concerns and effective support can prevent difficulties from escalating and can improve outcomes for children and families.

EYFS staff are expected to remain alert to concerns affecting a child and to share safeguarding or welfare concerns with the DSL at the earliest opportunity. This includes concerns arising from circumstances at home, within the family or wider community, or elsewhere.

Where appropriate, the school will work in partnership with parents and carers, the local authority and relevant agencies to provide or contribute to Family Help, including targeted early help, and other appropriate support.

The school will consider the cumulative impact of concerns, including patterns of behaviour, attendance, presentation, family circumstances and other indicators of vulnerability. Staff will remain professionally curious where concerns persist, circumstances do not improve, or the support provided does not sufficiently reduce risk or meet the child's needs.

Where a child may benefit from additional support, the DSL will consider the most appropriate response, which may include support through the school's own pastoral or welfare arrangements, a Family Help

assessment, or referral to local authority children's social care where the level of need or risk requires statutory intervention.

The school will work with parents and carers wherever appropriate and safe to do so. However, where informing a parent or carer, or seeking their involvement, may place a child at additional risk of harm, the school will follow its safeguarding procedures, consult the DSL and, where appropriate, seek advice from or make a referral to children's social care before informing the parent or carer.

Information will be shared with relevant agencies where this is necessary and proportionate to safeguard and promote the welfare of a child, in accordance with statutory guidance, local safeguarding arrangements and the school's information-sharing procedures.

7. Attendance and unexplained absence

Attendance is monitored closely for all children in the EYFS.

The school will follow up unexplained or prolonged absence promptly and in accordance with its Attendance Policy and safeguarding procedures.

Where a child is absent without notification, staff will attempt to contact parents/carers and, where necessary, alternative emergency contacts.

The school will consider:

- the length and frequency of absence;
- patterns and changes in attendance;
- the child's vulnerability;
- the vulnerability of parents/carers;
- known family circumstances;
- previous safeguarding concerns; and
- whether the absence may indicate a wider welfare or safeguarding concern.

Where concerns remain, the DSL will consider whether a referral to children's social care or a police welfare check is appropriate in accordance with local procedures.

Attendance concerns will be considered alongside other safeguarding information and will not be viewed in isolation.

8. Early Years Recruitment

St Catherine's School has full regard for the statutory guidance Disqualification under the Childcare Act 2006 and ensures compliance with all associated requirements. The school will not knowingly employ or engage any individual in the management of or to work within, its childcare provision who is disqualified under this legislation. This includes all staff and volunteers working in the EYFS and in the School's Later Years Provision for children under the age of eight.

All prospective staff members will be informed of the disqualification requirements prior to employment, and the school will maintain records of all disqualification checks on the Single Central Register. The school will obtain a reference for any member of staff working in the Early Years Foundation Stage (including students and volunteers) before they are recruited. The school will not accept open references (to whom it may concern).

A reference will always be sought from the most recent employer where the applicant worked with children. If the applicant is not currently working with children, the school will seek a reference from the last employer where such work took place. If the applicant has never worked with children, a reference will be obtained from their current employer, training provider, or educational institution. The school will establish and document the reason for leaving the applicant's current or most recent post and will ensure that any safeguarding or conduct concerns are fully explored and satisfactorily resolved prior to confirming an appointment.

9. EYFS Volunteers

St Catherine's School recognises that, where volunteers are working within provision covered by the Early Years Foundation Stage (EYFS) framework, additional safeguarding requirements apply. Volunteers must not be permitted to begin working within the School's EYFS provision until the School has received and verified the volunteer's enhanced Disclosure and Barring Service (DBS) certificate, including barred list information.

The School will ensure that the required safeguarding and suitability checks are completed before an EYFS volunteer begins their role. Volunteers will not be permitted to work within the EYFS provision until the required checks have been satisfactorily completed. The School will maintain appropriate records of these checks in accordance with its Staff Recruitment (safer recruitment) Policy and safeguarding procedures.

10. Duty to notify Ofsted

The School will inform Ofsted of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided. For example, where the School is satisfied that a person working in a relevant setting falls within one of the disqualification criteria. Any significant event must be notified to Ofsted as soon as reasonably practicable, but at the latest within 14 days of the date the School became aware (or ought reasonably to have become aware) of it.

The School will notify Ofsted within 14 days of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere).

11. Early Years Staff Training

All Early Years Foundation Stage staff at St Catherine's School are trained in accordance with the requirements set out in Annex C of the Early Years Foundation Stage Statutory Framework. Training for all EYFS staff is renewed at least annually. All EYFS staff are supported to embed their learning through continuous supervision, mentoring, and reflective practice. This ensures that safeguarding knowledge is effectively translated into everyday practice and that staff remain confident in their ability to recognise and respond to concerns.

The Designated Safeguarding Lead undertakes training which fully meets the requirements outlined in Annex C of the Early Years Foundation Stage Statutory Framework. The DSL provides ongoing support, advice, and guidance to all EYFS practitioners in relation to safeguarding matters, both on a routine basis and in response to any specific safeguarding concern or incident as required.

12. Supervision of EYFS staff

The school provides appropriate supervision for staff who work with children and families and recognises that effective supervision supports a culture in which safeguarding concerns can be discussed openly and acted upon.

13. Key person arrangements

Children in Pre-School and Reception (PPI) are allocated a key person in accordance with EYFS requirements. The key person will develop a secure and positive relationship with the child and work in partnership with parents/carers. The key person will develop an understanding of the child's individual needs, development, behaviour, relationships and wellbeing and will contribute to the early identification of concerns. Key person arrangements do not replace the responsibility of all staff to identify and report safeguarding concerns.

14. Child-on-child behaviour and safeguarding

The school recognises that children can experience harm from other children, including within the EYFS.

In the EYFS, concerning behaviour between children must be considered in a developmentally appropriate way. This may include physical aggression, biting, hitting, kicking, persistent unwanted touching, bullying, coercive behaviour, inappropriate language or concerning sexualised behaviour.

The school will distinguish between behaviour that is developmentally expected and behaviour that may indicate a safeguarding concern.

Staff will not automatically dismiss harmful or concerning behaviour as simply "children being children". Where behaviour is unusual, persistent, harmful, coercive, sexualised, causes significant distress or appears outside what would reasonably be expected for the child's developmental stage, it will be discussed with the DSL.

The school will consider the needs and welfare of all children involved, including the child who has been harmed and the child whose behaviour has caused concern.

Appropriate support, intervention and safeguarding action will be taken in accordance with the circumstances and the school's Behaviour Policy and safeguarding procedures.

15. Physical intervention and behaviour management

The school promotes positive behaviour and emotional regulation and uses preventative and supportive approaches appropriate to young children.

Corporal punishment is prohibited.

Physical intervention will only be used where it is absolutely necessary, for example to prevent immediate danger of personal injury to a child or another person, or to manage behaviour where such intervention is necessary and lawful.

Any use of physical intervention will be recorded and reported in accordance with the school's policy and procedures. Parents/carers will be informed on the same day, or as soon as reasonably practicable.

Any repeated or unusual use of physical intervention will be reviewed by the appropriate member of the senior leadership team and, where relevant, the DSL.

16. Intimate care, toileting and personal care

The school recognises that young children may require support with toileting, changing and other forms of personal or intimate care. All intimate care will be undertaken in accordance with the school's Intimate Care procedures as detailed in the EYFS policy.

Children's privacy will be balanced with their safeguarding and support needs. Any concern arising from a child's response to intimate care, unusual behaviour, comments, injuries or changes in toileting behaviour will be reported to the DSL.

17. Mobile phones, cameras and electronic devices

Use of Mobile Phones, Cameras and Electronic Devices in the EYFS

- Personal mobile phones, smart watches capable of recording images or sound, tablets and other personal electronic devices must not be used in areas accessed by children.
- There are display notices in Pre-Prep prohibiting the use of mobile phones and cameras by parents and carers.
- Staff may only use their mobile phones in the Pre-Prep office, staffroom or an outside area out of the sight of pupils.
- Staff working within the EYFS classrooms must store their mobile phones in the Pre-Prep office or staffroom.
- Photographs taken for the purpose of recording an EYFS pupil or group of pupils participating in activities or celebrating their achievements must be taken on a school device and stored appropriately on the school system.
- Images are retained, stored and deleted in accordance with the School's Data Protection Policy, UK GDPR and the Data Protection Act 2018.

18. Online safety

The school recognises that children in the EYFS can be affected by online safeguarding concerns even though they are very young.

EYFS practitioners will remain alert to concerns that may arise from a child's use of digital devices, exposure to inappropriate content, online interactions or experiences within the home.

The school's filtering and monitoring arrangements apply to digital devices and systems used by EYFS children.

Staff will report concerns about online safety to the DSL in accordance with the school's safeguarding procedures.

The school will work with parents/carers to promote safe and age-appropriate use of technology and to support families where online activity may be affecting a child's wellbeing or safety.

Online and offline safeguarding concerns will be considered together rather than treated as separate issues.

19. Premises, supervision and security

The school will ensure that EYFS premises, equipment and outdoor areas are safe, secure and suitable for the age and needs of the children.

Children will be appropriately supervised at all times.

Children will normally be within sight and hearing of staff and will always be within sight or hearing of staff.

Particular attention will be given to safeguarding during:

- arrival and registration;
- departure and collection;
- transitions between activities and areas;
- outdoor learning and play;
- toileting and personal care;
- meals and snacks;
- trips and outings;
- movement around the school;
- periods when staffing arrangements change.

The school will take reasonable steps to prevent unauthorised persons entering the premises.

Visitors will follow the school's visitor procedures, including appropriate identification, signing-in and supervision arrangements.

20. Working with parents and carers

The school values positive and respectful relationships with parents and carers and recognises the important role they play in safeguarding their children.

EYFS practitioners will work in partnership with parents/carers wherever appropriate and will share relevant information about children's welfare, development and wellbeing.

However, safeguarding concerns will always take priority. The school will not delay a referral or other safeguarding action because parental consent has not been obtained where this would place a child at increased risk.

Where appropriate, parents/carers will be signposted to or supported to access Family Help, health services, children's social care or other relevant services.

21. Safeguarding culture within the EYFS

The school expects safeguarding to be embedded in everyday EYFS practice rather than treated as a separate responsibility.

All EYFS staff are expected to:

- know the children in their care well;
- develop secure and positive relationships;
- notice changes in behaviour and presentation;
- listen to children;
- maintain professional curiosity;
- challenge poor or unsafe practice;
- share concerns promptly;
- work effectively with parents/carers and other professionals;
- understand their safeguarding responsibilities; and
- contribute to a culture in which children are safe, valued, respected and able to communicate their wishes and feelings.

The school recognises that effective safeguarding in the EYFS depends upon strong relationships, careful observation, professional curiosity, appropriate supervision and effective information sharing.

The DSL, EYFS leadership and Senior Leadership Team will monitor the implementation of these arrangements and ensure that any learning from safeguarding incidents, concerns, complaints, audits or reviews is reflected in practice.

APPENDIX 1 – SIGNS AND TYPES OF ABUSE

All School staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap. Therefore staff should always be vigilant and always raise any concerns with the DSL (or DDSL).

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside of these environments. All staff, but especially the DSL and DDSL, should consider whether children are at risk of abuse or exploitation in situations outside the home. This is often referred to as "extra-familial harm." Extra-familial harm can occur in a range of extra-familial contexts, including in school, peer groups, or within community/public spaces, and/or online. Children may experience this type of harm from other children and/or from adults. Forms of extra-familial harm include exploitation by criminal and organised crime groups and individuals (such as county lines and financial exploitation), serious violence, modern slavery and trafficking, online harm, sexual exploitation, teenage relationship abuse, and the influences of extremism which could lead to radicalisation. Children of all ages can experience extra-familial harm.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues and should recognise that children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently online and in daily life. Staff should be aware that children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

In all cases, if staff are unsure, they should always speak to the DSL (or DDSL).

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

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve belittling a child and conveying 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, 'making fun' of what they say or how they communicate or persistent criticism. 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.

Sexual abuse: involves forcing, causing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual abuse also includes sexual violence and sexual harassment (see below) which can occur between two children of any sex (also known as child-on-child abuse). This can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault, and assault by penetration. Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.

Sexual harassment: is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes; or upskirting, and sharing of unwanted explicit content (for example displaying pictures, photos or drawings of a sexual nature); and online sexual harassment, which might include consensual or non-consensual sharing of sexual images and videos (often referred to as the sharing of nudes/semi-nudes, or sexting – see below); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

Sexual violence: refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration, sexual assault, and/or causing someone to engage in sexual activity without consent. Consent to sexual activity may be given to one sort of sexual activity, but not another, or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity, and each time activity occurs. A child under the age of 13 can never consent to any sexual activity. The age of consent is 16, and sexual intercourse without consent is rape.

Child-on-child sexual violence and/or harassment: Sexual violence and sexual harassment (as defined above) can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is more likely that girls will be the victims of sexual violence and harassment, and it is more likely that it will be perpetrated by boys. It can however occur between children of any sex. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Children who are victims of sexual violence and/or sexual harassment wherever it happens, will likely find the experience stressful and distressing. This

will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college.

Harmful sexual behaviour: problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour". Harmful sexual behaviour can occur online and/or face-to-face and can also occur simultaneously between the two. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' age difference, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

Sharing of nudes and/or semi-nudes: the sending or posting of nude or semi-nude images, videos, or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts and may include images or footage of more than one child or young person.

Alternative terms used by children and young people may include 'dick pics' or 'pics' or may be referred to by adults or professionals as 'youth produced/involved sexual imagery', 'indecent imagery', 'image based sexual abuse' or 'sexting'. Terms such as 'deep fakes' and 'deep nudes' may also be used by adults and young people to refer to digitally manipulated and AI-generated nudes and semi-nudes.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online or use artificial intelligence (AI) to generate a new nude or semi-nude image of a young person
- images created or shared are used to abuse or blackmail peers. Situations could include:
    - children and young people selling nudes or semi-nudes of others online
    - children and young people coercing a peer into sharing a nude or semi-nude to blackmail them for money, further images, or force them into illegal activity
    - children and young people hacking a peer's account to share images more widely without consent to publicly shame

- children and young people create and share a nude or semi-nude with an adult who has presented themselves as someone under the age of 18 to groom, sexually abuse or blackmail them.

For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The DDCMS / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" (February 2024) sets out the classification of incidents, and how each should be handled.

Upskirting: is a criminal offence and typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any sex can be a victim.

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance 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.

Serious violence: indicators which may signal that children are at risk from, or are involved with serious violent crime include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. This may also include carrying, threatening with or using weapons. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. All staff should be aware of the associated risks which increase the likelihood of involvement in serious violence (for example, having used drugs or alcohol in early adolescence, being a victim or perpetrator of violence, being male, frequent absence from school or permanently excluded from school, experienced child maltreatment or having been involved in offending) and understand the measures in place to manage these. All staff should report any concern involving weapon carrying to a DSL.

Specific safeguarding issues: behaviours linked to drug taking, alcohol abuse, unexplainable and/or persistent absences from education and sexting put children in danger. Safeguarding issues can also manifest themselves via child-on-child abuse, such as abuse within intimate partner relationships, bullying (including cyberbullying), gender-based violence/sexual assaults, sexting and upskirting. Safeguarding issues can also be linked to, for example, children being absent, repeatedly and/or for prolonged periods, children missing from education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse (including ostracism of families); female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; consensual and non-consensual sharing of nudes and semi-nudes; and trafficking.

Child sexual exploitation (CSE): CSE is a form of child sexual abuse (see above) which occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual activity. It may involve an exchange for something the victim needs or wants (for example, money, gifts or affection), and/or the financial advantage or increased status of the perpetrator or facilitator. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

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

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

The below CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends, and
- children who suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

The DfE has published guidance on this entitled "*Child sexual exploitation: guide for practitioners"*.

CSE may occur alone, or may overlap with CCE, and/or county lines, as well as other forms of abuse.

Child criminal exploitation (CCE): CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into taking part in any criminal activity. It may involve an exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (for the financial or other advantage (such as increased status) of the perpetrator or facilitator and/or through violence or the threat of violence. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

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

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, their vulnerability as victims is not always recognised by adults and professionals (especially when they are older children). It is important in these circumstances that the child perpetrator is also recognised as a victim.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts, money, or new possessions
- children who associate with other children involved in exploitation
- children who suffer from changes in emotional wellbeing
- children who misuse drugs and alcohol
- children who go missing for periods of time or regularly come home late, and
- children who regularly miss school or education or do not take part in education.

The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

CCE may occur alone, or may overlap with CSE, and/or county lines, as well as other forms of abuse.

Children who have been exploited will need additional support to help maintain them in education.

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

This activity can happen locally as well as across the UK – no specified distance of travel is required. Children and vulnerable adults exploited to sell drugs and move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes and care homes. Children are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the ways of identifying indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing (from school or home) and are subsequently found in areas away from their home;
- that have been the victim, perpetrator or alleged perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

Modern Slavery: Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour or financial exploitation. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the National Referral Mechanism is available in the statutory guidance "*Modern slavery: how to identify and support victims (May 2024)*".

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

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

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime without understanding the legal implications.

If there are concerns about a child in this area, the DSL (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the

National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre – NCSC.gov.uk.

Mental health: The School recognises that cumulative harm, trauma, abuse, neglect and exploitation can have long term effects on a young person's mental health, attendance, behaviour and educational outcomes. Staff will consider whether mental health concerns may indicate an underlying safeguarding concern. All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health challenge. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. This could include changes in behaviour, difficulty sleeping, withdrawing socially or not engaging with things they usually enjoy.

Where children have suffered abuse, exploitation and neglect, or potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, attendance and progress at school.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy, and speaking to the DSL or DDSL.

The DfE has published advice and guidance on *Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools*. In addition, Public Health England has produced a range of resources to support secondary and senior schoolteachers to promote positive health, wellbeing and resilience among young people including its guidance *Promoting Children and Young People's Emotional Health and Wellbeing*. Its resources include social media, forming positive relationships, smoking and alcohol.

So called 'honour based' abuse: encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.

Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the Multi-agency statutory guidance on FGM. To give an example of indications that a girl has already been subjected to FGM:

- A pupil may have difficulty walking, sitting, or standing and may even look uncomfortable.
- A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.
- There may be prolonged or repeated absences from School and/or noticeable behaviour changes (e.g. withdrawal or depression) on the pupil's return.
- A pupil is reluctant to undergo medical examination.

If staff have a concern that a pupil may be at risk of FGM, they should speak to the DSL or DDSL who will (where appropriate) activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and Children's Social Care.

There is a statutory duty on teachers to personally report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's social care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a pupil is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or it involves a pupil over 18, teachers should follow the School's local safeguarding procedures.

Further information can be found in the *Multi-agency statutory guidance on female genital mutilation and the FGM resource pack*, particularly section 13.

Forced marriage: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. 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. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found in the *Multi-agency guidelines: Handling cases of forced marriage (last updated April 2023)* Further information on forced marriage is available in guidance published on gov.uk and by the Forced Marriage Unit. School

staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.

Radicalisation: is the process of a person legitimising support for, or use of, terrorist violence.

Extremism is the vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces, whether in this country or overseas.

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

There is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern. However, it is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn to terrorism. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be susceptible and act proportionately, which may include making a Prevent referral.

Designated safeguarding leads and other senior leaders in colleges should familiarise themselves with the revised Prevent duty guidance: for England and Wales especially paragraphs 141-210, which are specifically concerned with education. Staff should contact the DSL or the DDSL, who should be aware of the local procedures in place, before making a Prevent referral.

In the event of a child leaving, the DSL should consider if it would be appropriate to share any information with the new school or college. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives at the new school.

Special educational needs and/or disabilities (SEND), or pupils with certain health conditions: Pupils with SEND or certain health conditions can face additional safeguarding challenges. These children may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect, or bullying.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children;

- the potential for children with SEND or certain health conditions being disproportionately impacted by behaviours such as peer group isolation or bullying (including prejudice-based bullying), without outwardly showing any signs;
- communication barriers and difficulties in managing or reporting these challenges;
- being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in School or the consequences of doing so.

Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL as appropriate.

Lesbian, gay, bisexual or gender questioning:

A child or young person being lesbian, gay or bisexual is not in itself an inherent risk factor for harm. However, they can sometimes be targeted by other children. In some cases, a pupil who is perceived by their peers to be lesbian, gay or bisexual (whether they are or not) can be just as vulnerable as children who are.

When supporting a gender questioning child, the School will take a cautious, evidence-informed and safeguarding-led approach, considering the child's individual circumstances, needs and welfare. Decisions will be made on a case-by-case basis and will involve the Designated Safeguarding Lead (DSL). The School will work in partnership with parents or carers, except in the very rare circumstances where involving them would place the child at risk of significant harm. The School will also take account of any relevant clinical advice and consider wider vulnerabilities, including the risk of bullying, social isolation, mental health needs, and any safeguarding concerns. Any request relating to social transition should be considered through a documented safeguarding assessment led by the DSL.

The School recognises that social transition may be a significant step for a child and, whilst it would not initiate action, it will give careful consideration to any request relating to changes in name, pronouns, appearance or other aspects of social transition, in accordance with the requirements and expectations set out in *Keeping Children Safe in Education 2026*. Any decisions will be child-centred, show regard to relevant clinical advice, mindful of the rights, safety and wellbeing of all pupils, and appropriately recorded and reviewed.

For Prep age children, this can often lead to a medical pathway and professionals with clinical training must be involved with the family before any decisions are made.

The School is aware that some children may have socially transitioned before joining the school and may be 'living in stealth'. In such instances, this should be referred to a member of the DSL team.

Risks can be compounded where children lack trusted adults with whom they can be open. The School endeavours to reduce barriers to seeking support and to create a culture in which all pupils feel able to speak out, share concerns and access help from trusted members of staff.

Domestic abuse: The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear, or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including but not limited to, psychological, sexual, physical, emotional, and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio- economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. This can be experienced through physical, sexual or emotional abuse, stalking or Criminal Exploitation. Sometimes young people do not have the experience to recognise that this abuse is taking place. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The Act's provisions, including the new definition, will be commenced over the coming months.

Domestic abuse can also be experienced as Child to Parent/Caregiver abuse, where children can cause harm to other family members.

Domestic Abuse may lead to other safeguarding concerns and should therefore be managed under this policy.

School staff can contact Operation Encompass on 0204 513 9990 (8 am to 1pm, Monday to Friday) for advice in respect of children who have experienced domestic abuse. It is statutory for police to inform school of an incident of Domestic Abuse that they have attended.

Homelessness: Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The School should be aware of potential indicators of homelessness including household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware or suspect that a pupil may be at risk of homelessness they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to the LADO where a child has been harmed or is at risk of harm, in accordance with this policy.

Children who are absent from school: A child being absent from school, particularly repeatedly and/or for prolonged periods, and children missing education is a potential indicator of a range of safeguarding issues such as abuse, neglect, sexual abuse, CSE and CCE. It can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so-called 'honour'-based abuse or risk of forced marriage. Staff must follow the School's procedures for dealing with children who are absent, particularly persistently or for prolonged periods. The School's procedure for dealing with children who are absent and/or missing can be found in the School's Registration Protocol/Missing Pupil Procedures. All unexplained absences will be followed up in accordance with this policy.
The School shall inform the local authority of any pupil who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of The School Attendance (Pupil Registration) (England) Regulations 2024. This will assist the local authority to:

a) fulfil its duty to identify children of compulsory school age who are missing from education; and
b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect, exploitation or radicalisation.

School attendance registers are monitored daily and analysed regularly to identify to any patterns, trends or emerging concerns. The School will follow up all unexplained absences on the first day of absence and work with parents, carers, the local authority and other relevant agencies where attendance causes concern. In accordance with Children Missing Education (2025) requirements, the School will notify the local authority (and the local authority where the child is ordinarily resident, where different) of any pupil who fails to attend regularly or has been absent without authorisation for a period of 10 school days or more. The School considers attendance concerns as a potential safeguarding issue and as such will be referred to the DSL / DDSL where appropriate.

Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare. The School's policy supports identification of abuse and provides preventative measures against the risk of the child being absent and/or becoming a child missing education in the future. This applies when issues are first emerging as well as where children are already known to the local authority children's social care and need a social worker.

Child abduction and community safety incidents: Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends, and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

Children and the court system: Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11 year olds and 12-17 year olds available on the gov.uk website.

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The School may refer some parents and carers to this service where appropriate.

Children with family members in prison: Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation, and poor mental health.

The Prison Service will undertake a child safeguarding enquiry with children's social care for all sentenced prisoners to identify any who present an ongoing risk to children from within custody. Prisons will also decide on the level of contact, if any, they will allow between a prisoner and a child based on a child contact risk assessment.

The National Information Centre on Children of Offenders (NICCO) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.