



# Newlands CofE School Federation



Roots to grow... wings to fly

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## Safeguarding Policy

Clandon CofE Primary School  
Shere CofE Infant School and Nursery

Safeguarding Governor: Helen Murray  
Designated Safeguarding Lead: Victoria Voller

Date adopted by Governors: Autumn 2022  
Date for review: Summer 2023

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**REVIEW: ANNUALLY**  
**COMMITTEE: SAFEGUARDING**  
**BASED ON SCC TEMPLATE POLICY**

# SAFEGUARDING POLICY

Reviewed: Autumn 2022	Next Review: Summer 2023	Committee: Safeguarding	Status: Statutory
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## Safeguarding Statement 2022

### ‘Safeguarding is Everyone’s Business’

The Newlands CofE Federation (the Federation) is a partnership of two small schools, Clandon CofE Primary School and Shere CofE Infant and Nursery School (the settings). For the purposes of this policy ‘settings’ will include The Wilderness Forest School.

At the Newlands CofE Federation we recognise our moral and statutory responsibility to safeguard and promote the welfare of all children. We make every effort to provide an environment in which children and adults feel safe, secure, valued, and respected, and feel confident to talk if they are worried, believing they will be effectively listened to.

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

### Key Personnel:

The Designated Safeguarding Lead (DSL) is Victoria Voller  
Contact details: [head@shere.surrey.sch.uk](mailto:head@shere.surrey.sch.uk)

The Deputy DSL at Clandon School is Stacey Reynolds  
Contact details: [sreynolds@clandon.surrey.sch.uk](mailto:sreynolds@clandon.surrey.sch.uk)

The Deputy DSL at Shere School is Kezia Matthews  
Contact details: [keziamatthews@shere.surrey.sch.uk](mailto:keziamatthews@shere.surrey.sch.uk)

The nominated Safeguarding Governor is Helen Murray  
Contact details: [helencmurray99@gmail.com](mailto:helencmurray99@gmail.com)

The Headteacher/Principal is Victoria Voller  
Contact details: [head@shere.surrey.sch.uk](mailto:head@shere.surrey.sch.uk)

The Chair of Governors is Marsha Walton  
Contact details: [marshawalton44@gmail.com](mailto:marshawalton44@gmail.com)

### Terminology:

Safeguarding and promoting the welfare of children is defined as:

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

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

Early help means providing support as soon as any needs emerge or are identified at any point in a child's life.

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

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

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

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

MAP refers to the Surrey Multi-Agency Partnership.

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

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

## Introduction:

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002 (as amended), the Education (Independent School Standards) Regulations 2014, the Non-Maintained Special Schools (England) Regulations 2015 and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended).

All action taken by the Federation will be in accordance with:

Statutory, national, and local guidance – this includes:

- [Working Together to Safeguard Children \(2018\)](#) which sets out the multi-agency working arrangements to safeguard and promote the welfare of children and young people and protect them from harm. In addition, it sets out the statutory roles and responsibilities of settings.
- ['What to do if you are Worried a Child is Being Abused' 2015 - Advice for Practitioners](#)
- [Keeping Children Safe in Education \(KCSIE, 2022\)](#) is statutory guidance issued by the Department for Education (DfE) which all schools and colleges must have regard to when carrying out their duties to safeguard and promote the welfare of children.

[Early Years Foundation Stage statutory framework \(2021\)](#) is statutory guidance which sets standards that school and childcare providers must meet for the learning, development, and care of children from birth to 5 years in Ofsted registered settings.

- [Local Guidance from the Local Safeguarding Partnership: Surrey Safeguarding Children Partnership \(SSCP\) including SSCP Procedures.](#)

This policy applies to all Federation staff and Governors.

Guidance and documents referred to in this policy:

- [Surrey Safeguarding Children Partnership protocols, guidance and procedures](#)
- [Working Together to Safeguard Children 2018](#)
- [Keeping children safe in education 2022](#)
- [Disqualification under the Childcare Act 2006 \(updated 2019\)](#)
- [FGM Act 2003 Mandatory Reporting Guidance 2015 \(updated January 2020\)](#)
- [‘What to do if you are worried a child is being abused’ 2015](#)
- [Teachers' standards](#)
- [Information sharing advice for safeguarding practitioners](#)
- [The Equality Act 2010](#)
- [Early years foundation stage \(EYFS\) statutory framework](#)
- SCC Safeguarding Children Missing Education (CME) and Educated Other Than at School (EOTaS) – available on [Surrey Education Services \(Education Safeguarding Team Resources Hub\)](#)
- SCC Touch and The Use Of Physical Intervention When Working With Children And Young People – available on [Surrey Education Services \(Education Safeguarding Team Resources Hub\)](#)

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

- Safer Recruitment and Selection Policy
- Whistleblowing Policy
- The Staff Code of Conduct
- Behaviour Policy
- Online Safety Policy
- Attendance Policy
- Health & Safety Policy
- Local School Context documents

## **Equalities Statement:**

With regards to safeguarding we will consider our duties under the [Equality Act 2010](#) and our general and specific duties under the [Public Sector Equality Duty](#).

General duties include:

- Eliminating discrimination, harassment, victimisation, and other conduct that is prohibited by the Equality Act 2010.
- Advancing equality of opportunity between people who share a protected characteristic and people who do not share it.
- Fostering good relations across all protected characteristics between people who share a protected characteristic and people who do not share it.

Details of our specific duties are published under the Federation equality statement and measurable objectives. These are available on our websites.

In line with our SEND Policy, Federation staff are aware of the additional barriers to recognising abuse and neglect in children with special education needs and disabilities.

The Federation also adheres to the principals of and promotes anti-oppressive practice in line with the [United Nations Convention of the Rights of the Child](#) and the [Human Rights Act 1998](#).

## Policy Aims:

The aims of these procedures are to:

- provide Federation staff and Governors with the framework to promote and safeguard the wellbeing of children and in doing so ensure they meet their statutory responsibilities.
- ensure consistent good practice across our settings so that safeguarding follows a consistent and effective Federation approach.
- clarify safeguarding expectations for members of our community, staff, Governing Body, children, and their families.
- contribute to the establishment of a safe, resilient, and robust safeguarding culture in our settings built on shared values; children are treated with respect and dignity, taught to treat each other and staff with respect, feel safe, have a voice, and are listened to.
- support contextual safeguarding practice recognising that our settings can be locations where harm can occur.
- set expectations for developing knowledge and skills within our communities, so that staff, children, parents/carers, and Governors are alert to the signs and indicators of safeguarding issues and know how to respond to them.
- facilitate early identification of need for vulnerable learners and provision of proportionate interventions to promote their welfare and safety.
- promote working in partnership with children, parents/carers, and other agencies in the Surrey Safeguarding Children's Partnership.

## Policy Principles and Values:

The Federation:

- believes that the welfare of the child is paramount and that all children have the right to be protected from harm and abuse.
- upholds the right of all children to feel safe and secure and understands that children cannot learn effectively unless they do so.
- maintains an attitude of "It could happen here" and understands that all staff have a role to play in the prevention of harm and abuse.
- expects all staff to share equal responsibility for safeguarding and to act immediately on any suspicion or disclosure that may indicate a child is at risk of harm, either within a setting or in the community, in accordance with statutory guidance.
- upholds a "zero-tolerance" approach to sexual violence and sexual harassment.
- engages in partnership working to protect and safeguard children.
- will work openly with parents/carers as far as possible but reserves the right to contact social care or the police, without notifying parents/carers if this is believed to be in the child's best interests.
- will always act in the best interests of the child ensuring that safeguarding decisions take a child-centred and coordinated approach.

## Supporting Children

### **Our Federation will support all children:**

The Federation recognises that our settings may provide a safe place and stability in the lives of children who have been abused or who are at risk of harm. Our settings play a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends, and an ethos of protection.

### **Through our ethos we will:**

- Promote a caring, safe, and positive environment within our settings.
- Establish and maintain an ethos where children feel safe and secure, are encouraged to talk, and are always listened to.
- Value and promote children's mental health and respond sympathetically to any requests for time out to deal with distress and/or anxiety.
- Provide preventative education by creating a culture of zero tolerance for sexism, misogyny, misandry, homophobia, biphobia and sexual violence and sexual harassment.

### **Through our curriculum we will:**

- Encourage self-esteem and self-assertiveness.
- Provide PSHE opportunities which equip children with the skills they need to keep themselves and other safe, including online.
- Inform children so that they know to whom they should turn to for help. For example, ensuring that all children know they can access a trained adult in the school whom they can approach if they are worried or in difficulty.
- We will ensure all content is sensitively tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special education needs or disabilities.
- Include regular consultations with children e.g. through questionnaires, participation in anti-bullying activity, asking children to report whether they feel safe in the school.
- Offer details of helplines, counselling, or other avenues of external support.

### **Through our safeguarding practices we will:**

- Liaise and work in partnership with other support services and agencies involved in early help and the safeguarding of children.
- Notify social care without delay if there is an immediate risk of significant harm.
- Provide continuing support to children about whom there have been concerns and who leave a setting by ensuring that information is shared confidentially with the child's new



setting. The Federation will ensure records are forwarded as a matter of priority and within statutory timescale.

## Professional expectations, roles, and responsibilities

### Role of Leaders, including Governors:

We will ensure that:

- safer recruitment procedures are practiced in line with KCSIE 2022 which includes statutory checks on the suitability of staff to work with children.
- all staff receive information about the Federation safeguarding arrangements including the Federation's safeguarding statement, the Staff Code of Conduct, this Safeguarding and Child Protection policy, the role and names of the Designated Safeguarding Lead (DSL) and their deputy Designated Safeguarding Lead (DDSL), the name and contact details of the Safeguarding Governor and the Chair of Governors.
- all staff will sign to say they have read and understood [Keeping Children Safe in Education 2022 part 1 and annex B](#). This applies to the Governing Body in relation to part 2 of the same guidance.
- all staff receive safeguarding and child protection training (including online safety) at induction in line with advice from [SSCP](#). Training is regularly updated as required, and at least annually to continue to provide them with relevant skills and knowledge to safeguard children effectively.
- all members of staff are trained in and receive regular updates in online safety and reporting concerns.
- all members of staff maintain a zero-tolerance approach to sexual violence and sexual harassment.
- all staff and Governors have regular safeguarding and child protection awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse.
- the Safeguarding and Child Protection Policy is made available via both school websites and a paper copy is available upon request for parents/carers.
- all parents/carers are made aware of the responsibilities of staff members with regard to safeguarding and child protection procedures
- the Federation provides a coordinated offer of early help when additional needs of children are identified and contributes to early help arrangements and inter-agency working and plans.
- the Federation's Lettings Policy will seek to ensure the suitability of adults working with children on our school sites, including the Wilderness Forest School site, at any time and ensure that any groups who use the Federation's premises have Safeguarding and Child Protection policies and procedures in place, and ensure that Community users

organising activities for children are aware of the Federation's Safeguarding and Child Protection Policy, guidelines, and procedures.

- the name of the designated members of staff for safeguarding and child protection, the DSL and DDSL(s), are clearly advertised at all school sites.
- ensure that only those trained to do so seek to diagnose mental health conditions.

## **Staff Responsibilities**

### **Ethos and Culture:**

All staff will:

- maintain an attitude of "It could happen here" with regards to safeguarding.
- understand that safeguarding is "everyone's responsibility".
- maintain a "zero-tolerance" approach to sexual violence and sexual harassment.
- provide a safe environment in which children can learn.
- establish and maintain an environment where children feel secure, are encouraged to talk, and are listened to.
- ensure children know that there are adults in our settings who they can approach if they are worried or have concerns.
- plan opportunities within the curriculum for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe.
- be mindful that the Teacher Standards states that teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

### **Professional Knowledge:**

All staff will:

- attend training to be aware of and alert to the signs of abuse and neglect.
- read and understand Part 1 of statutory guidance KCSIE (2022). Those working directly with children will also read Annex B. Staff will be required to sign to confirm this.
- be aware of the systems in place which support safeguarding including reading this Safeguarding and Child Protection Policy; the Behaviour Policy; the Staff Code of Conduct; safeguarding response to children who go missing from education; and the role of the DSL.
- know who the DSL, DDSL, the Chair of Governors and the Governor responsible for safeguarding are and be able to contact them.

- be aware of indicators of abuse and neglect understanding that children can be at risk of harm inside and outside of our schools, inside and outside of home and online.
- be aware that children may not feel ready or know how to tell someone they are being abused, exploited, or neglected, and/or they may not recognise these experiences as harmful. This could be due to their vulnerability, disability and/or sexual orientation or language barriers.

## Professional Curiosity:

All staff will:

- exercise professional curiosity and know what to look for, so that neglect and abuse are identified quickly and those in need receive help and/or protection promptly.
- if approached by a child, listen positively, and try to reassure them. Staff cannot promise complete confidentiality and should explain that they need to pass information to other professionals to help keep the child and/or other children safe. The degree of confidentiality should always be governed by the need to protect the child.
- know 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. Whilst staff are well placed to observe children day-to-day and can identify those whose might be experiencing a mental health issue, the Federation will ensure that only appropriately trained professionals will attempt to make a diagnosis of a mental health condition.
- take immediate action if they have a mental health concern about a child that is also a safeguarding concern, following the Federation's Safeguarding and Child Protection Policy and procedures.
- be able to identify vulnerable learners and take action to keep them safe. Information or concerns about learners will be shared with the DSL where it includes those:
  - who may need a social worker and may be experiencing abuse or neglect requiring mental health support
  - may benefit from early help
  - where there is a radicalisation concern
  - where a crime may have been committed
- understand early help and be prepared to identify and support children who may benefit from early help. Liaise with other agencies that support children and provide early help.

## Act:

All staff will:

- know how to respond to a child who discloses harm or abuse following training of 'Working Together to Safeguard Children' (2018), and 'What to do if you are worried a child is being abused' (2015).

- record their concerns if they are worried that a child is being abused and report these to the DSL immediately that day. If the DSL is not contactable immediately a DDSL should be informed.
- be prepared to refer directly to the Children's Single Point of Access (C-SPA), and the Police if appropriate, if there is a risk of significant harm and the DSL or their DDSL is not available.
- follow the allegations procedures, as set out in this policy and KCSIE 2022, if the disclosure is an allegation against a member of staff, supply staff, volunteer or contractor.
- report low-level concerns (as defined in KCSIE 2022) about any member of staff/supply staff/volunteer or contractor to the Executive Headteacher via email marked CONFIDENTIAL. Concerns about the Executive Headteacher should be directed to the Chair of Governors.
- provide support for children subject to early help, child in need or child protection and be involved where appropriate, in the implementation of individual plans to further safeguard vulnerable learners and understand their academic progress and attainment and maintain a culture of high aspirations for this cohort.
- notify the DSL or their DDSL of any child on a child protection plan or child in need plan who has unexplained absence.

## The Executive Headteacher

**In addition to the role and responsibilities of all staff the Executive Headteacher will ensure that:**

- the Federation fully contributes to inter-agency working in line with Working Together to Safeguard Children (2018) guidance.
- the Safeguarding and Child Protection Policy and procedures are implemented and followed by all staff.
- the Federation has appropriate policies in place that make it clear that sexual harassment, online sexual abuse, and sexual violence (including sexualised language) is unacceptable, with appropriate sanctions and support in place.
- Federation staff have appropriate knowledge of KCSIE (2022) part 5.
- All children are supported to report concerns about harmful sexual behaviour freely. That concerns are taken seriously and dealt with swiftly and appropriately, and children are confident that this is case. Comprehensive records of all allegations are kept.
- all staff are aware of the role of the DSL, including the identity of the DSL and any DDSLs.
- sufficient time, training, support, funding, resources, including cover arrangements where necessary, are allocated to the DSL to carry out their role effectively, including the provision of advice and support to staff on safeguarding and child protection

matters, to take part in strategy discussions/meetings and other inter-agency meetings and/or support other staff to do so; and to contribute to the assessment of children.

- opportunities are provided for a co-ordinated offer of early help when additional needs of children are identified.
- DDSLs are trained to the same standard as the DSL and the role is explicit in their job description.
- adequate and appropriate DSL cover arrangements are in place for any out of hours/out of term activities.
- where there is a safeguarding concern that the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- child-centred systems and processes are in place for children to express their views and give feedback.
- all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle-blowing procedures.
- children are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online
- allegations or concerns against staff and other adults are dealt with in accordance with guidance from the DfE, SSCP and Surrey County Council (SCC).
- statutory requirements are met to make a referral to the Disclosure and Barring Service and additionally, in the case of teaching staff, the Teacher Regulation Agency where they think an individual has engaged in conduct that harmed (or is likely to harm) a child; or if the person otherwise poses a risk of harm to a child.
- low-level concerns in cases which concern a member of staff/supply staff/contractor or a volunteer are recorded. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted. If the individual wishes to remain anonymous then that will be respected as far as reasonably possible.

## **The Designated Safeguarding Lead:**

(Duties are further outlined in KCSIE (2022, Annex C))

Details of the DSL and DDSL are available on each school website, in school newsletters, on school notice boards, in reception areas, staffrooms and classrooms.

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

- hold the lead responsibility for safeguarding and child protection (including online safety) across the Federation. This responsibility is not able to be delegated.

- liaise with the Surrey Country Council and work in partnership with other agencies in line with Working Together to Safeguard Children (2018).
- where necessary contact Surrey's Child Protection Consultation Line for advice and support (0300 470 9100 option 3).
- manage and submit a Request for Support Form for a child if there are concerns about suspected harm or abuse, to the C-SPA, and act as a point of contact and support for school staff. Requests for support should be sent securely by email to [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk) using the [Request for Support Form](#). Urgent referrals should be made by telephone 0300 470 9100 (and ask for the priority line).
- report concerns that a child may be at risk of radicalisation or involvement in terrorism, use the [Prevent referral form](#) to refer cases by e-mail to [preventreferrals@surrey.pnn.police.uk](mailto:preventreferrals@surrey.pnn.police.uk). If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101 or 01483 632982 and ask to speak to the Prevent Supervisor for Surrey. The DfE has also set up a dedicated telephone helpline for staff and Governors to raise concerns around Prevent (020 7340 7264).
- refer cases where a crime may have been committed to the Police as required. NB: NPCC- [When to call the police](#) should help DSLs understand when they should consider calling the Police and what to expect when they do.
- liaise with the "case manager" and Local Authority Designated Officer (LADO) for child protection concerns in cases which concern a member of staff/supply staff/contractor or a volunteer.
- follow relevant DfE guidance and KCSIE 2022 on 'Child on Child abuse' when a concern is raised that there is an allegation of a child abusing another child within the setting.
- when there has been a report of sexual violence, make an immediate risk and needs assessment. Additionally, where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis and will be put in place as required.
- be available during term time (during school hours) for staff in school to discuss any safeguarding concerns. Appropriate and adequate cover arrangements will be arranged by the DSL and the school leaders for any out of hours/term activities.
- act as a source of support and expertise in carrying out safeguarding duties for the whole school community.
- ensure that the names of the DSL and DDSL, are clearly advertised, with a statement explaining the school's role in referring and monitoring cases of suspected abuse.
- encourage and promote a culture of listening to children and taking account of their wishes and feelings, amongst all staff.
- access training and support to ensure they have the knowledge and skills required to carry out the role.

- have a secure working knowledge of SSCP procedures and understand the assessment process for providing early help and statutory intervention, in line with [Surrey's Effective Family Resilience levels of need document](#).
- have a clear understanding of access and referral to the local early help offer and will support and advise members of staff where early help intervention is appropriate.
- have a working knowledge of how Surrey Country Council conducts an initial child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- understand the lasting impact that adversity and trauma can have, including on the children's behaviour, mental health, and wellbeing, and what is needed in responding to this in promoting educational outcomes.
- understand and support the Federation's delivery with regards to the requirements of the Prevent duty and provide advice and guidance to staff on protecting children from radicalisation.
- liaise with school staff (especially pastoral support and the SENDCO) on matters of safety and safeguarding and consult Surrey's Effective Family Resilience document to inform decision making and liaison with relevant agencies.
- be alert to the specific needs of children in need, those with Special Educational Needs and Disability (SEND) and young carers.
- understand the risks associated with online activity and be confident that they have the up-to-date knowledge and capability to keep children safe whilst they are online at school: understand the additional risks that children with SEND face online and the associated and appropriate support they require.
- attend training at least every two years so that their knowledge and skills refreshed at regular intervals.
- work with the Executive Headteacher, Governors and School Leaders, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at the setting.
- keep up to date, detailed, accurate records (either written or using appropriate secure online software), that include all concerns about a child even if there is no need to make an immediate referral and record the rationale for decisions made and action taken.
- ensure that an indication of the existence of the additional safeguarding/child protection file is marked on the child's main file record.
- ensure that when a child transfers setting (including in-year), their safeguarding/child protection file is passed to the new setting as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. If the transit method requires that a copy of

the safeguarding/child protection file is retained until such a time that the new setting acknowledges receipt of the original file, the copy should be securely destroyed on confirmation of receipt.

- ensure that where a child transfers to a different setting and is on a child protection plan, child in need plan or is a child looked after, their information is passed to the new setting immediately and that the child's social worker is informed. In addition, consideration should be given to a multi-agency settings transition meeting if the case is complex or on-going.
- ensure that all appropriate staff members have a working knowledge and understanding of their role in case conferences, core groups and other multi-agency planning meetings, to ensure that they attend and can effectively contribute when required to do so; where a report is required, this should be shared with the parents prior to the meeting.
- report to the Executive Headteacher any significant issues for example, use of [Surrey's FaST Resolution Process](#) enquiries under section 47 of the Children Act 1989 and Police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the [Statutory guidance - PACE Code C 2019](#).
- ensure that the case holding social worker is informed of any child currently with a child protection plan who is absent without explanation.
- organise safeguarding and child protection induction, regularly updated training and a minimum of annual updates (including online safety) for all 'setting' staff, keep a record of attendance and address any absences.
- ensure each member of staff has access to, and understands, the Federation's Safeguarding and Child Protection policy procedures, especially new and part-time staff.
- Ensure, in collaboration with leaders including Governors, that this Safeguarding and Child Protection Policy is reviewed annually, and the procedures and implementation are updated and reviewed regularly.
- ensure that this Safeguarding and Child Protection Policy is available publicly and that parents/carers know that referrals about suspected abuse or neglect may be made and the role of the setting in this.
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- help promote educational outcomes by sharing with teachers and leadership staff information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing.
- establish and maintain links with the SSCP to make sure staff are aware of training opportunities and the latest policies on local safeguarding arrangements.



- contribute to and provide, with the Executive Headteacher and Chair of Governors, the biennial (s157 s175) Statutory Audit for Safeguarding Arrangements and Termly Safeguarding Data Collections via The Virtual College – ENABLE to Surrey County Council.

## The Deputy Designated Safeguarding Lead:

### **In addition to the role and responsibilities of all staff the DDSL will:**

- be trained to the same standard as the DSL and the role is explicit in their job description.
- provide support and capacity to the DSL in carrying out delegated activities of the DSL; however, the lead responsibility of the DSL cannot be delegated.
- in the absence of the DSL, carry out the activities necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the DSL the DDSL will assume all the functions of the DSL.

## The Governing Body

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

- there is a Federation wide approach to safeguarding, involving everyone in our settings and ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- the child's wishes and feelings are considered when determining what action to take and what services to provide.
- a nominated Governor for safeguarding is identified.
- a member of the senior leadership team has been appointed by the Governing Body as the DSL who will take lead responsibility for safeguarding and child protection and that the role is explicit in the role holder's job description.
- on appointment, the DSL and DDSL undertake interagency training (SSCP Foundation Modules 1 and 2) and initially undertake DSL 'New to Role' with 'Refresher' training at least every two years as well as attending DSL network events, to refresh knowledge and skills.
- appropriate safeguarding and child protection (including online) training occurs upon induction of new members. This training should equip Governors with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the setting are effective and support the delivery of a robust whole setting approach to safeguarding. Training should be regularly updated.

- the Federation has effective safeguarding policies and procedures including a Safeguarding and Child Protection Policy, a Staff Behaviour Policy or Code of Conduct, a Behaviour Policy and a response to children who go missing from education.
- policies are consistent with SSCP and statutory requirements, are reviewed annually (as a minimum) and updated if needed, so that they are kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt and that the Safeguarding and Child Protection policy is available on each school website.
- the SSCP is informed in line with local requirements about the discharge of duties via the Biennial (s 157 s 175) Statutory Audit for Safeguarding Arrangements and Termly Safeguarding Data Collections via The Virtual College – ENABLE to Surrey County Council.
- recruitment, selection, and induction follow safer recruitment practice including all appropriate checks.
- enhanced DBS checks (without barred list checks unless the Governor is also a volunteer at the setting) are in place for all Governors.
- section 128 checks are undertaken as defined in KCSIE 2022.
- staff have been trained appropriately and this is updated in line with guidance and all staff have read KCSIE (2022) part 1 and Annex B. Additionally, there are mechanisms in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance.
- the curriculum includes opportunities for children to learn about safeguarding, including online safety.
- members regularly review the effectiveness of filtering and monitoring systems in place to safeguard children online.
- members have due regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all children.
- all staff including temporary staff/supply staff, volunteers and contractors are provided with the setting's Safeguarding and Child Protection Policy and, if applicable, the Staff Code of Conduct.
- a proportionate risk-based approach is taken with regard to the level of information provided to temporary staff, volunteers, and contractors.
- the Federation has procedures for dealing with allegations of abuse against staff (including the Executive Headteacher), volunteers and against other children and that a referral is made to the DBS and/or the Teaching Regulation Agency (as applicable) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have, had they not resigned.
- policies and processes are in place to deal with concerns (including allegations) which do not meet the harm threshold or low-level concerns as defined in KCSIE 2022.

- the setting will comply with DfE and the Surrey County Council Policy Guidance for Safeguarding Children Missing Education and Education Other Than At School.
- clear systems and processes are in place for identifying possible mental health concerns, including routes to escalate and clear referral and accountability systems.
- safeguarding and child protection files are maintained as set out in KCSIE 2022 Annex C
- where the Governing Body hires or rents out school facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities), appropriate arrangements are in place to keep children safe.

## Confidentiality, Sharing and Withholding Information:

All matters relating to safeguarding and child protection will be treated as confidential and only shared as per the ['Information Sharing Advice for Practitioners' \(DfE 2018\) guidance](#). The setting will refer to the guidance in the [Data protection: toolkit for schools](#) to support setting with data protection activity, including compliance with General Data Protection Regulation (GDPR).

Information will be shared with staff within the Federation who 'need to know'.

Relevant staff have due regard to GDPR principles which allow them to share (and withhold) information.

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

All staff will always endeavour to gain parents'/carers' consent to refer a child to social care unless to do so could put the child at greater risk of harm or impede a criminal investigation.

## Reporting and responding to safeguarding concerns:

The following procedures apply to all Federation staff and will be covered in training to enable staff to understand their role and responsibility.

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

### Dealing with a concern:

Any member of staff who is approached by a child should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they need to pass information to other professionals to help keep the child and/or other children

safe. The degree of confidentiality should always be governed by the need to protect the child.

### **Guiding principles**

- Receive
- Reassure
- Respond
- Report
- Record
- Remember
- Review (by the DSL)

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

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

Additional consideration will be given to children with 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.

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

- make an initial record of the information related to the concern as soon as possible. This record should be made on CPOMS, unless this system is unavailable for any reason, when the record should be made on paper. This initial record should include details of:
  - date
  - time
  - place
  - who was present
  - context
  - details of the disclosure or concern using the child's words.
  - the demeanour and non-verbal behaviours of the child.
  - any injuries
  - rationale for decision making (DSL)
  - actions taken (DSL)

### **Report it to the DSL immediately. CPOMS will alert the DSL via email, additionally members of staff must tell the DSL that they have made a report.**

All staff should know who the DSL is and who to approach if the DSL is unavailable. In the absence of the DSL or DDSL, staff have the right and must be prepared to refer directly to

C-SPA (and the Police if appropriate) if there is the potential for immediate significant harm, or contact the consultation line at the C-SPA for support and advice.

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.

### **Following a report of concerns:**

The DSL will use the Effective Family Resilience of Levels of Need document to decide whether there are sufficient grounds for suspecting harm, in which case a request for support must be made to the C-SPA and the Police if it is appropriate.

The DSL or another member of staff, in consultation with the DSL, should try to discuss any concerns about a child's welfare with the parent/carer and, where possible, obtain their agreement before making a referral to the C-SPA. However, this should only be done when it will not place the child at increased risk or could impede a Police investigation. 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/carers should be told about the referral and, if so, when and by whom. This is important in cases where the Police may need to conduct a criminal investigation. The child's views should also be considered.

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

When a child needs urgent medical attention and there is suspicion of abuse the DSL should take the child to the accident and emergency unit at the nearest hospital, having first notified the C-SPA.

The DSL should seek advice about what action the C-SPA will take and about informing the parents/carers, remembering that parents/carers should normally be informed that a child requires urgent hospital attention.

The exception to this process will be in those cases of known FGM where there is a [mandatory reporting duty](#) for the teacher to report directly to the Police where they either:

- Are informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for the purposes connected with labour or birth.

The DSL should also be made aware.

### **What happens next?**

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

If they believe that the concern has not been acted upon appropriately, they should inform the Executive Headteacher or Safeguarding Governor or contact the C-SPA for advice.

## Safeguarding concerns and allegations made about staff, including supply teachers, volunteer and contractors

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

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

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

**In dealing with allegations or concerns against an adult, staff must without delay report any concerns to the Executive Headteacher immediately.**

If an allegation is made against the Executive Headteacher, the concerns need to be raised with the Chair of Governors as soon as possible. If the Chair of Governor is not available, then the LADO should be contacted directly.

There may be situations when the Executive Headteacher and/or Chair of Governors will want to involve the Police immediately, for example if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.

Once an allegation has been received by the Executive Headteacher and/or Chair of Governors they will contact the LADO (as part of their mandatory duty) on 0300 123 1650 option 3 LADO or Email: [LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk) immediately and before taking any action or investigation.

Following consultation with the LADO the Executive Headteacher and/or Chair of Governors will inform the parents/carers of the allegation unless there is a good reason not to.

In liaison with the LADO, the setting will determine how to proceed and, if necessary, the LADO will refer the matter to Social Care and/or the Police.

If the matter is investigated internally, the LADO will advise the setting to seek guidance in following procedures set out in part 4 of KCSIE (2022) and the SSCP procedures.

### **Low-level concerns**

The term low-level concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the setting 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 harm threshold or is otherwise not serious enough to consider a referral to the LADO.

The purpose of reporting low-level concerns is to create and embed a culture of openness, trust, and transparency in which the Federation's values and expected behaviour set out in the Staff Code of Conduct are lived, monitored, and reinforced constantly by all staff.

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

Reports should be made to the Executive Headteacher in a timely manner. If the Executive Headteacher has any doubt as to whether the information which has been shared about the individual as a low-level concern in fact meets the harm threshold, they will consult with the LADO.

## What is child abuse?

The following definitions are taken from Working Together to Safeguard Children (2018). In addition to these definitions, children can also be abused by being sexually exploited, experiencing honour-based violence, forced marriage or female genital mutilation. To support the local context, all staff have access to Surrey's [Effective Family Resilience and Levels of Need document](#).

### Forms of abuse and neglect

**Abuse: a form of maltreatment of a child.** Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the

exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

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

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

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

The Federation uses the [Graded Care Profile 2](#) tool to support better identification and intervention in cases of neglect. The Surrey [Neglect Risk Assessment Tool](#) is used to support with the initial identification of neglect.

Further information on indicators of abuse can be accessed via [NSPCC](#).

## **Sexual violence and sexual harassment between children in the setting(s):**

### **Child-on-Child Abuse:**

Sexual violence and sexual harassment can occur between children of any age and sex. It can occur through a single child or a group of children sexually assaulting or sexually harassing a single child or group of children.

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

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

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



- bullying (including cyberbullying, prejudice-based and discriminatory bullying) abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery) [UKCIS guidance: Sharing nudes and semi-nudes advice for education settings](#).
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

See appendix one for detailed definitions.

### **The Federation's Response to child-on-child abuse:**

The Newlands Federation believes that all children have a right to attend our settings and learn in a safe environment. Children should be free from harm by adults and other children in our settings.

We recognise that children can abuse other children and their peers and this will be dealt with under this Safeguarding and Child Protection Policy and in line with KCSIE (2022).

We are clear that sexual violence and sexual harassment is not acceptable.

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

- taking a Federation wide approach to child protection and safeguarding as outlined in this policy.
- responding robustly to reports of sexual violence and sexual harassment
- providing training to all staff.

- providing a clear set of school values that are underpinned by our behaviour policy.
- planning for providing a high quality, evidence-based curriculum which tackles issues of sexual harassment and sexual violence.
- providing high quality and timely pastoral support.
- making clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It will never be passed off as “banter”, “just having a laugh”, “a part of growing up” or “boys being boys”. We believe that failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and, in worst case scenarios, a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.
- recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports, it does not mean it is not happening, it may be the case that it is just not being reported.
- challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts, and genitalia, pulling down trousers, flicking bras and lifting up skirts, as we believe that dismissing or tolerating such behaviours risks normalising them.
- engaging with specialist support and interventions.

Children making any report of sexual violence or sexual harassment including “upskirting” (The Voyeurism Offences Act 2019) will be taken seriously, kept safe and be well supported.

If the report includes an online element staff will be mindful of the [Searching, screening and confiscation at school](#) guidance.

The key consideration is for staff not to view or forward illegal images of a child. The guidance provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection.

### **Risk Assessment:**

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

The risk assessment will consider:

- the victim, especially their protection and support.
- the alleged perpetrator, their support needs and any discipline action.
- all other children at the setting.
- the victim and the alleged perpetrator sharing classes and space at setting.

The risk assessment will be recorded and kept under review.

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

Support regarding risk assessments can be accessed from the [Surrey Education Services Education Safeguarding Team Resources Hub](#).

### **Action:**

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the setting should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

### **The DSL will consider:**

- the wishes of the victim.
- the nature of the incident including whether a crime has been committed and the harm caused.
- the ages of the children involved.
- the developmental stages of the children.
- any power imbalance between the children.
- any previous incidents.
- that sexual violence and sexual harassment can take place within intimate personal relationships between children.
- the importance of understanding intra-familial harms and any necessary support for siblings following incidents
- ongoing risks to victim, other children, adult students, or staff.
- other related issues or wider context.

### **Confidentiality:**

The victim may ask the setting not to tell anyone about the sexual violence or sexual harassment. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies. The DSL should consider:

- parents or carers should normally be informed (unless this would put the victim at greater risk)
- the basic safeguarding principle is: 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
- rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.

### **Options:**

- Manage internally
- Early help intervention
- Request for support to the C-SPA
- Report to the Police (generally in parallel with a request for support to the C-SPA)

All concerns, discussions, decisions, and reasons for decision will be recorded on CPOMS.

### **Ongoing Response:**

The DSL will manage each case individually and will ensure the risk assessment is reviewed regularly with relevant partner agencies, for example the Police and social care.

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, settings should be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately.

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

The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart at the setting(s) and on transport where appropriate.

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

Where a criminal investigation into sexual assault leads to a conviction or caution, the setting will, if it has not already, consider any suitable sanctions considering their behaviour policy, which may include consideration of permanent exclusion. Where the perpetrator is going to remain at the setting, the Executive Headteacher should continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on setting premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

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

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

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

The Federation will consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

The Federation recognises that children who have experienced sexual violence display a wide range of responses to their experiences including clear signs of trauma, physical and emotional responses, or no overt signs at all.

## **Physical Abuse**

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

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

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

## **Harmful Sexual Behaviour (HSB)**

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive, and violent. Problematic, abusive, and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. HSB can occur online and/or face-to-face and can also occur simultaneously between the two. HSB will be considered in a child protection context.

### **The Federation's response to HSB:**

The [Brook Traffic Light Tool](#) uses a traffic light system to categorise the sexual behaviours of children it can be used to help professionals:

- make decisions about safeguarding children and young people
- assess and respond appropriately to sexual behaviour in children and young people
- understand healthy sexual development and distinguish it from harmful behaviour

By categorising sexual behaviours, the Federation can work with other agencies to the same standardised criteria when making decisions and can protect children with a multi-agency approach.

The Federation recognises that it is vital that professionals agree on how behaviours should be categorised regardless of culture, faith, beliefs, and their own experiences or values.

## **Anti-Bullying/Cyberbullying**

Our Federation's policy on anti-bullying is set out in our Behaviour Policy which can be found on our websites. It includes measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying).

We keep a record of known bullying incidents which is shared with and analysed by the Governing body. All staff are aware that children with SEND and/or children who identify as Lesbian, Gay, Bisexual or Transgender (LGBT) are more susceptible to being bullied/victims of child abuse.

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

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

Our PSHE curriculum regularly provides opportunities for children to understand bullying is wrong, its impact and how to deal with it.

LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help settings counter homophobic, biphobic and transphobic bullying and abuse.

## Safety/Cybercrime

The Federation has an online safety policy which is available on our websites. Our policy empowers us to protect and educate pupils, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. The Federation also has a clear policy on the use of mobile and smart technology. This is also included in our Staff Code of Conduct.

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

Children are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated. The Federation's online safety co-ordinator is the Executive Headteacher.

The Federation will follow the guidance around [harmful online challenges and online hoaxes](#) when supporting children and sharing information with parents/carers.

Children with skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the DSL will consider a referral into the [Cyber Choices](#) programme.

This programme 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.

## Racist Incidents

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

## Radicalisation, Extremism and Terrorism

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

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

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious violence to a person/people; causes serious damage to property; or seriously interferes with 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.

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

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

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

The DSL should report concerns that a child may be at risk of radicalisation or involvement in terrorism. Use the [Prevent referral form](#) to refer cases by e-mail to [preventreferrals@surrey.pnn.police.uk](mailto:preventreferrals@surrey.pnn.police.uk). If the matter is urgent, then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101 or 01483 632982 and ask to speak to the Prevent Supervisor for Surrey. The DfE has also set up a dedicated telephone helpline for staff to raise concerns around Prevent (0207 340 7264).

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

Opportunities are provided in the curriculum to enable children to discuss issues of religion, ethnicity and culture and the setting follows the [Promoting fundamental British values through SMSC](#).

The Federation's Governing Body, the Executive Headteacher and the DSL will assess the level of risk within the setting and put actions in place to reduce that risk. Risk assessment may include due diligence checks for external speakers and private hire of facilities, anti-bullying policy and other issues specific to the setting's profile, community, and philosophy.

Although not a cause for concern on their own, possible indicators when taken into consideration alongside other factors or context may be a sign of being radicalised.

Further information and a list of such indicators can be found at [Radicalisation and Extremism - Examples and Behavioural Traits \(educateagainsthate.com\)](https://www.educateagainsthate.com).

## Domestic Abuse

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

[Domestic Abuse Act](#) 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 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 must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

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 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.

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



## Homelessness

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

## Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

### Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

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

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

All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside the setting and/or can occur between children outside of these environments. All staff, but especially the DSL, will consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

In all cases, if the DSL identifies any level of concern, the DSL should contact the C-SPA and if a child is in immediate danger the Police should be called on 999.

The Federation is aware that often a child is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. Therefore, the child may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse. Children also rarely self-report CSE so staff must be particularly vigilant to potential indicators of risk.

The Federation includes the risks of sexual exploitation in the PSHE and RSE curriculum.

## Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

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”. Children are exploited to move, store, and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

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.

Any concerns that a child is being or is at risk of being criminally exploited will be passed without delay to the DSL. The DSL will then contact the C-SPA and, if there is concern about a child’s immediate safety, the Police will be contacted on 999.

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

## Serious Violence

There are several indicators which may signal 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, or signs of assault or unexplained injuries
- unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Staff are aware that violence can often peak in the house just before and after the children attend school which includes travelling to and from school.

## Modern Slavery

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

## Female Genital Mutilation (FGM)

FGM is illegal in England and Wales under the FGM Act (2003). It is a form of child abuse and violence against women. [A mandatory reporting duty](#) requires teachers to report directly and immediately to the Police 101 where they either:

- Are informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for the purposes connected with labour or birth.

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

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

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

Concerns about FGM outside of the mandatory reporting duty should be reported using the Federation's Safeguarding and Child Protection procedures. Staff should be particularly alert to suspicions or concerns expressed by female children about going on a long holiday during the summer holiday.

There should also be consideration of potential risk to other girls in the family and the wider community. Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the Police by calling 999.

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

## Forced Marriage

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

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

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

Federation staff should never attempt to intervene directly as a setting or through a third party. Contact should be made with the C-SPA and/or the Forced Marriage Unit 200 7008 0151

## So-called 'Honour'-based abuse (HBA)

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

HBA might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion.
- want to get out of an arranged marriage; become involved with a boyfriend or girlfriend from a different culture or religion.
- want to get out of an arranged marriage.
- want to get out of a forced marriage
- wear clothes or take part in activities that might not be considered traditional within a particular culture

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

### One Chance Rule

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

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

## Private Fostering Arrangements

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

Looked After Children by the local authority or those who are placed in residential settings, children's homes or hospitals are not considered to be privately fostered.

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

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

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

## Looked After Children and Previously Looked After Children

The most common reason for children becoming looked after is because of abuse and/or neglect.

Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child and contact arrangements with birth parents or those with parental responsibility.

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

The designated teacher and Governor for looked after children will have the appropriate level of training to equip them with the knowledge and skills to undertake their role.

The designated teacher will work with Surrey's Head of Virtual School for both looked after children and previously looked after children.

## Children with special educational needs and disabilities or health issues

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

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

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

## Children Missing Education

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

The Federation recognises that children missing education, can be a vital warning sign of a range of safeguarding possibilities. They are also at significant risk of underachieving,

being victims of abuse and harm, exploitation, radicalisation, and not being in education, employment, or training (NEET) later in life.

Where possible, the Federation will hold more than one emergency contact number for each child.

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

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

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

The schools will:

- enter children on the admissions register on the first day on which the school has agreed, or has been notified, that the child will attend the school.
- notify Surrey County Council within five days of adding a child's name to the admission register. The notification must include all the details contained in the admission register for the new child.
- monitor each child's attendance through their daily register and follow Surrey County Council procedure in cases of unauthorised absence.
- remove a child's name from the admissions register on the date that the child leaves the school.
- the school will notify Surrey County Council when they are about to remove a child's name from the school register under any of the fifteen grounds listed in the regulations, no later than the date that the child's name is due to be removed.

Where parents/carers notify either school, in writing, of their intention to Electively Home Educate (EHE) the school will forward a copy of the letter to the Surrey County Council Inclusion Team.

Where parents/carers orally indicate that they intend to withdraw their child to EHE and no letter has been received, the school will not remove the child from roll and will notify the Inclusion Team at the earliest opportunity.

## **Pupils Missing Out on Education (PMOOE)**

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

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

The Federation will ensure that parents/carers, and the Local Authority where the child has an Education Health Care Plan (EHCP), are given clear information about alternative provision placements and reduced/modified timetables: why, when, where, and how they will be reviewed.

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

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

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

The Executive Headteacher will report to the Governing Body appropriate information regarding the use and effectiveness of alternative provision and modified/reduced timetables. The Governing Body will be informed of any formal direction of a child to alternative provision to improve behaviour.

## **Attendance and Behaviour**

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

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

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

## **Restrictive Physical Intervention**

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

Staff who are likely to need to use physical intervention will be appropriately trained in Crisis Prevention Institute (CPI) techniques.

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

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

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

## Whistleblowing

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

All staff, including temporary staff/supply staff and volunteers, should be aware of their duty to raise concerns, where they exist, about the management of safeguarding and child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the Federation's safeguarding arrangements.

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

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

[The NSPCC whistleblowing helpline](#) is also available for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about a way a concern is being handled by their school. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

Whistleblowing regarding the Executive Headteacher should be made to the Chair of the Governing Body whose contact details should be available to staff.

## Links with other setting policies:

- Administration of medicines.
- Allegations against staff.
- Anti-bullying
- Attendance
- Behaviour and Behaviour Principles Statement
- Complaints
- Designated Teacher for Children Looked After
- Equality Information and Objectives
- First Aid
- Health & Safety
- Intimate Care
- Online Safety



- Physical Intervention
- Relationships and Sex Education
- Safer Recruitment and Selection
- Staff Behaviour Code of Conduct
- Whistleblowing
- Sexual Violence and Sexual Harassment
- Supporting Pupils with Medical Conditions
- Visitor and Volunteer

## **Additional Resources**

[Surrey Safeguarding Children Partnership webpages](#)

[Surrey Education Services \(surreycc.gov.uk\)](#) – Education Safeguarding Resources Hub

[Graded Care Profile 2](#)

[NSPCC | The UK children's charity | NSPCC](#)

[CEOP ThinkuKnow webpages](#)

[Anti Bullying Alliance webpages](#)

[Childnet International](#)

[Safer Internet Centre webpages](#)

[Contextual Safeguarding Network webpages](#)

[Lucy Faithfull Foundation webpages](#)

## Appendix one:

### Sexual violence:

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

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

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

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

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

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

### What is consent?

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

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

Further information about consent can be found here: [Rape Crisis England & Wales - Sexual consent.](#)

### Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of the setting. When we

reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment.

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

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, and calling someone sexualised names
- sexual "jokes" or taunting
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes. Settings should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim.
- displaying pictures, photos, or drawings of a sexual nature
- upskirting (this is a criminal offence)
- online sexual harassment, which may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. Online sexual harassment may include:
  - consensual and non-consensual sharing of nude and semi-nude images and/or videos. (asking for and sharing nude photographs of U18s is a criminal offence).
  - sexualised online bullying
  - unwanted sexual comments and messages, including, on social media
  - sexual exploitation; coercion and threats, and
  - coercing others into sharing images of themselves or performing acts they're not comfortable with online.

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