

# Child Protection and Safeguarding Policy

**1 September 2023**

This document is based on guidance from KCSIE 2023 and Working Together to Safeguard Children 2023 and adheres to the protocols set out by Surrey Safeguarding Children Partnership.

This policy will be amended if required with any future updates.

KCSIE highlights the importance of developing a safeguarding policy with all staff working with children within an education setting.

St Teresa's is part of Surrey Safeguarding Children Board.

Safeguarding Governor:  
Designated Safeguarding Lead

Mrs Sally Hayes  
Mrs Rachel Whitton (Senior)  
Mrs Helen Canning (Prep)  
Statutory Annual  
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<b>Content</b>	<b>Page</b>	<b>Content</b>	<b>Page</b>
Safeguarding Statement & Key personnel	<b>3</b>	Anti Bullying and Cyber Bullying	<b>49</b>
Key Personnel	<b>4</b>	Online Safety	<b>49</b>
Terminology	<b>6</b>	Cyber Crime	<b>50</b>
Introduction	<b>7</b>	Mental Health	<b>51</b>
Equalities Statement	<b>8</b>	Racist Incidents	<b>52</b>
Policy Aims	<b>9</b>	Radicalisation, Extremism and Terrorism	<b>52</b>
Policy Principles and Values	<b>9</b>	Domestic Abuse	<b>53</b>
Supporting Children	<b>10</b>	Child Sexual Exploitation	<b>54</b>
Professional Roles and responsibilities	<b>11</b>	Children Criminal Exploitation & Gangs	<b>55</b>
All staff	<b>12</b>	Serious Violence	<b>56</b>
Headmistress /Head Teacher	<b>14</b>	Modern Slavery	<b>56</b>
DSL & Deputy DSL	<b>15-18</b>	Sharing Nudes and Semi Nudes	<b>56</b>
Governing Body	<b>19</b>	FGM	<b>58</b>
Confidentiality, Sharing and with holding Information	<b>21</b>	Forced Marriage	<b>59</b>
Child Protection Procedures	<b>22</b>	Honour based Abuse	<b>59</b>
Child Protection Procedures Flowchart	<b>25</b>	One Chance Rule	<b>59</b>
Dealing with Disclosure	<b>26</b>	Private Fostering Arrangements	<b>60</b>
Allegations against staff and volunteers Working with Children	<b>28</b>	Looked After Children	<b>60</b>
What is Child Abuse	<b>30</b>	SEND Children or Health Issues	<b>61</b>
Forms of Abuse and Neglect	<b>31</b>	Children Missing Education (CME)	<b>61</b>
Indicators of Abuse and Neglect	<b>32</b>	Pupils Missing Out on Education (PMOOE)	<b>62</b>
Indicators of Neglect	<b>33</b>	Attendance and Behaviour	<b>63</b>
Emotional Abuse	<b>34</b>	Restrictive Physical Intervention	<b>63</b>
Indicators of Emotional Abuse	<b>34</b>	Whistleblowing	<b>64</b>
Physical Abuse	<b>35</b>	Child abduction and community safety incidences	<b>64</b>
Indicators of Physical Abuse	<b>35</b>	Children and the Court System	<b>65</b>
Sexual Abuse	<b>36</b>	Children with Family Members in Prison	<b>65</b>
Indicators of Sexual Abuse	<b>37</b>	Homelessness	<b>65</b>
Sexual violence & Sexual harassment between children in school.	<b>38</b>	Links with other policies	<b>66</b>
Child on Child	<b>38</b>	Further Advice on Safeguarding	<b>67</b>
Harmful Sexual Behaviour	<b>43</b>	Appendix one: Sexual Violence	<b>68</b>
Brook Traffic Light Tool	<b>44</b>	Contact Numbers	<b>70</b>
		Key External Contact details	<b>71</b>

## **Safeguarding Statement 2023**

### ***“Safeguarding is Everyone’s Business”***

St Teresa’s recognises its moral and statutory responsibility to safeguard and promote the welfare of all children. St Teresa’s is committed to acting in the best interests of the child.

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

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

All those who work within the St Teresa’s community need to know that “It could happen here”.

## **Key Personnel – Senior School**

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

Rachel Whitton (Deputy Head Pastoral and Mental Health Lead) 01372 452037  
[r.whitton@st-teresas.com](mailto:r.whitton@st-teresas.com) or [safeguarding@st-teresas.com](mailto:safeguarding@st-teresas.com)

### **Deputy DSL(s) are:**

Zoe Wragg (Acting Head of Boarding) 01372 452037  
[z.wragg@st-teresas.com](mailto:z.wragg@st-teresas.com)

Claire Pitchford (Assistant Head, Head of 6 Form) 01372 45203  
[c.pitchford@st-teresas.com](mailto:c.pitchford@st-teresas.com)

Sarah Papageorgiou (Lead Nurse) 01372 452037  
[s.papageorgiou@st-teresas.com](mailto:s.papageorgiou@st-teresas.com)

Dave Breeze (Head of Lower) 01372 452037  
[d.breeze@st-teresas.com](mailto:d.breeze@st-teresas.com)

### **The nominated child protection governor is:**

Mrs Sally Hayes [s.hayes@effinghamschools.org](mailto:s.hayes@effinghamschools.org)

### **The Headmistress is:**

Dr Claire McShane [c.mcshane@st-teresas.com](mailto:c.mcshane@st-teresas.com)

### **The Co-Chairs of Governors are:**

Mrs Annette Turner [a.turner@effinghamschools.org](mailto:a.turner@effinghamschools.org)

Mr Michael Henderson [m.henderson@effinghamschools.org](mailto:m.henderson@effinghamschools.org)

The team can also be contacted through the School Office.

## **Key Personnel – Prep School**

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

Helen Canning (Director of Pastoral, Mental Health Lead) 01372 453456 [h.canning@st-teresas.com](mailto:h.canning@st-teresas.com) or [prepsafeguarding@st-teresas.com](mailto:prepsafeguarding@st-teresas.com)

### **Deputy DSL(s) are:**

Denise Irons (Deputy Head) 01372 453456  
[d.iron@st-teresas.com](mailto:d.iron@st-teresas.com)

Sarah Conrad (Headteacher) 01372 453456  
[s.conrad@st-teresas.com](mailto:s.conrad@st-teresas.com)

Sarah Papageorgiou (Lead Nurse) 01372 452037  
[s.papageorgiou@st-teresas.com](mailto:s.papageorgiou@st-teresas.com)

### **The nominated child protection governor is:**

Mrs Sally Hayes [s.hayes@effinghamschools.org](mailto:s.hayes@effinghamschools.org)

### **The Head is:**

Sarah Conrad [s.conrad@st-teresas.com](mailto:s.conrad@st-teresas.com)

### **The Co-Chairs of Governors are:**

Mrs Annette Turner [a.turner@effinghamschools.org](mailto:a.turner@effinghamschools.org)

Mr Michael Henderson [m.henderson@effinghamschools.org](mailto:m.henderson@effinghamschools.org)

The team can also be contacted through the School Office.

## **Terminology**

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

- protecting children from maltreatment;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- 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 school, full or part time, temporary or permanent, in either a paid or a voluntary capacity.

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

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

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

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

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

**DSL** refers to Designated Safeguarding lead and 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 Regulations 2014 (Independent School Standards, the Non-Maintained Special School (England) regulations 2015 and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended).

All action taken by St Teresa's will be in accordance with statutory, national, and local guidance.

This includes:

- [Working Together to Safeguard Children \(2023\)](#) 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 \(KCSIE, 2023\)](#) 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.
- [Local Guidance from the Local Safeguarding Partnership: Surrey Safeguarding Children Partnership \(SSCP\) including SSCP Procedures.](#)
- [Prevent duty guidance 2023](#)
- [Online Safety Act 2023](#)

The Governing body takes seriously its responsibility under section 175/157 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure there are robust arrangements within our school to identify, assess, and support those children who are suffering harm or at risk of suffering harm.

This policy applies to all members of staff and governors in St Teresa's.

## Guidance and documents referred to in this policy

- [Surrey Safeguarding Children Partnership protocols, guidance and procedures](#)
- [Working Together to Safeguard Children 2023](#)
- [Keeping Children Safe in Education 2023 \(KCSIE\)](#)
- [Disqualification under the Childcare Act 2006 \(updated 2019\)](#)
- [FGM Act 2003 Mandatory Reporting Guidance 2020](#)
- ['What to do if you are worried a child is being abused' 2015](#)
- [Teacher Standards](#)
- [Information Sharing Advice for Practitioners](#)
- [The Equality Act 2010](#)
- [Guidance to Safer Working Practice 2022](#)
- [National Minimum Standards for Boarding Schools \(September 2022\)](#)
- [Sexual violence and sexual harassment between children in schools and colleges](#)
- [Surrey Education Services \(Education Safeguarding Team Resources Hub\)](#)
  - [SCC Safeguarding Children Missing Education \(CME\) and Educated Other Than at School \(EOTaS\)](#)
  - [SCC Touch and The Use Of Physical Intervention When Working With Children And Young People](#)

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

- Admissions and Attendance Register Procedures
- Attendance and Missing pupil Policy
- Behaviour Policy
- Children Missing from Education
- Health & Safety
- Learning Needs including SEND policy
- Online Safety
- Safer Recruitment Policy
- Staff Code of Conduct
- Whistleblowing

## **Equalities Statement**

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

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

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

Staff are aware of the additional barriers to recognising abuse and neglect in children with Special Educational Needs and Disabilities (SEND). This will be in line with our Special Educational Needs and Disability Policy.

St Teresa's also adheres to the principals of and promotes anti-oppressive practice in line of 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 staff with the framework to promote and safeguard the wellbeing of children and in doing so ensure they meet their statutory responsibilities.
- To ensure consistent good practice across the setting and ensure that safeguarding follows a whole setting approach.
- Clarifying safeguarding expectations for members of the setting's community, staff, Governing body, children, and their families.
- Contributing to the establishment of a safe, resilient, and robust safeguarding culture in the setting built on shared values; that 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.
- Supporting contextual safeguarding practice recognising that the setting's site can be a location where harm can occur.
- Setting expectations for developing knowledge and skills within the setting's community (staff, children, parents/carers) to the signs and indicators of safeguarding issues and how to respond to them.
- Early identification of need for vulnerable learners and provision of proportionate interventions to promote their welfare and safety.
- Working in partnership with children, parents/carers, and other agencies in the Surrey Safeguarding Children's Partnership, Early Help and the Police
- To enable the school to effectively contribute to Early Help, assessments of need and support for those children.

We comply with the [Disqualification under the Childcare Act 2006](#) guidance issued in August 2018.

## Policy Principles & Values

St Teresa's believes that the welfare of the child is paramount and that we will maintain an attitude of "It could happen here". We maintain a "zero tolerance" approach to sexual violence and sexual harassment.

This policy is based on the value that:

- Children have a right to feel safe and secure, they cannot learn effectively unless they do so.
- All children have a right to be protected from harm and abuse.
- All staff have a role in the prevention of harm and abuse and an equal responsibility to act immediately on any suspicion or disclosure that may indicate a child is at risk of harm, either in the school or in the community, taking into account contextual safeguarding, in accordance with statutory guidance.

St Teresa's acknowledges that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working to protect and safeguard children.

Whilst the school will work openly with parents/carers as far as possible, it reserves the right to contact social Care or the police, without notifying parents if this is believed to be in the child's best interests.

We will always act in the best interests of the child and ensure that our decisions around safeguarding take a child-centred and coordinated approach.

## **Supporting Children**

### **St Teresa's will support all children by:**

Providing a safe place and stability in the lives of children who have been abused or who are at risk of harm. The setting recognises that a child who is abused or witnesses abuse and/or violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth. Research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

Promoting a caring, safe and positive environment within St Teresa's. Encouraging self-esteem and self-assertiveness, through the curriculum and through positive relationships within the setting community.

Ensuring children are taught to understand and manage risk through Personal, Social, Health and Economic (PSHE) education and Relationship and Sex Education (RSE) and Health Education through all aspects of setting life, including staying safe online.

Responding sympathetically to any requests for time out to deal with distress and/or anxiety.

Ensuring children are made aware of and have access to details of helplines, counselling, or other avenues of external support.

Liaising and working in partnership with support services and agencies involved in early help and the safeguarding of children.

Notifying children's social care without delay if there is an immediate risk of significant harm.

Providing continued support to children about whom they have concerns and those who leave the setting by ensuring that information is shared confidentially with the child's new setting. The setting will ensure records are forwarded as a matter of priority and within statutory timescale.

The designated safeguarding lead will consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

St Teresa's recognises it plays a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection.

**St Teresa's will:**

Establish and maintain an ethos where children feel safe and secure, are encouraged to talk and are always listened to.

Include regular consultations with children e.g., through questionnaires, participation in anti-bullying activity, asking children to report whether they feel safe at the school.

Ensure that all children know they can access a trained adult at the school whom they can approach if they are worried or in difficulty.

Include safeguarding across the curriculum, including PSHE opportunities which equip children with the skills they need to keep themselves and others safe, including online and to know to whom they should turn to for help. It is also recognised that effective education will be 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.

Provide preventative education by creating a culture of zero tolerance for sexism, misogyny/Misandry, homophobia, biphobia and sexual violence and sexual harassment.

Ensure all staff are aware of the school's guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.

## **Professional expectations, roles, and responsibilities**

### **Role of the School**

St Teresa's will ensure that:

Details of the DSL and DDSL are available on the school website, our newsletter, notice board in reception and classroom.

The school operates safer recruitment procedures in line with KCSIE 2023 which includes statutory checks on the suitability of staff to work with children.

All staff receive information about the school's safeguarding arrangements, the safeguarding statement, staff behaviour policy (code of conduct), Safeguarding and Child Protection policy, the role and names of the Designated Safeguarding Lead (DSL) and their deputy Designated Safeguarding Lead (DDSL), and [Keeping children safe in education \(2023\)](#), part 1 or the condensed version of it in annex A. 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 which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) 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, monitoring and filtering systems and reporting concerns. The filtering and monitoring system is reviewed regularly as a stand alone feature of Safeguarding meetings.

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 the school website 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.

Provide a coordinated offer of early help when additional needs of children are identified and contribute to early help arrangements and inter-agency working and plans.

The lettings policy will seek to ensure the suitability of adults working with children on the setting site at any time and ensure that any groups who use the setting's premises have Safeguarding and Child Protection policies and procedures in place.

Community users organising activities for children are aware of the setting'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 in the school.

### **All Staff:**

All Staff have a key role to play in identifying concerns early and in providing help for children. Staff will maintain an attitude of "It could happen here" with regards to safeguarding and staff will understand that safeguarding is everyone's responsibility. The Effingham School Trust requires that all staff maintain a "Zero tolerance" approach to sexual violence and sexual harassment.

All staff need to read and understand Part 1 of statutory guidance KCSIE (2023). Those working directly with children will also read Annex B.

In addition to this, all staff will 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.

All staff know who and how to contact the DSL and DDSL, the Co-Chairs of Governors and the Governor responsible for safeguarding. They are aware of indicators of abuse and neglect, understanding that children can be at risk of harm inside and outside of the setting, inside and

outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

Staff are 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

Staff will provide a safe environment in which children can learn. They will establish and maintain an environment where children feel secure, are encouraged to talk and are listened to. Staff will also ensure that children know that there are adults in the school who they can approach if they are worried or have concerns.

All staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

They are also aware that only appropriately, trained professionals will attempt to make a diagnosis of a mental health problem. Staff are, however, well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. All staff must take immediate action if they have a mental health concern about a child that is also a safeguarding concern, following our Safeguarding and Child protection policy and procedures. Please refer to the St Teresa's Mental Health Protocol and the [Department for Education's Mental Health and Behaviour in schools](#) document.

Staff must:

- Plan opportunities within the curriculum for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe.
- Attend training in order to be aware of and alert to the signs of abuse and neglect.
- Know how to respond to a child who discloses harm or abuse following training of 'Working Together to Safeguard Children' (2023), and 'What to do if you are worried a child is being abused' (2015).
- Record their concerns on CPOMS, 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 2023, if the disclosure is an allegation against a member of staff, supply staff, volunteer or contactor.

- Report low-level concerns (as defined in KCSIE 2023) about any member of staff/supply staff/volunteer or contractor to the Headmistress/Headteacher or the schools' DSL. This would be used in circumstances which do not meet the harm threshold.
- 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.
- 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.
- 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.
- 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.

A member of staff who is approached by a child should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they 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.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

Staff must follow the procedures set out by the Surrey Safeguarding Children Partnership and take account of guidance issued by the Department for Education.

### **The Headmistress/Headteacher**

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

- The School fully contributes to inter-agency working in line with Working Together to Safeguard Children 2023 guidance.
- The Child Protection and Safeguarding Policy and procedures are implemented and followed by all staff.
- The School 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.
- The school staff have appropriate knowledge of KCSIE (2023) 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 the case. Comprehensive records of all allegations are kept.

- All staff are aware of the role of the designated safeguarding lead (DSL), including the identity of the DSL and any deputies.
- Sufficient time, training, support, funding, resources, including cover arrangements where necessary, is allocated to the DSL to carry out their role effectively. This includes the provision of advice and support to school staff on child welfare and child protection matters, to take part in strategy discussions/meetings and other inter-agency meetings and/or support other staff to do so; and to contribute to the assessment of children.
- Opportunities are provided for a co-ordinated offer of early help when additional needs of children are identified.
- Deputy DSLs 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.
- Pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.
- Allegations or concerns against staff are dealt with in accordance with guidance from the Department for Education (DfE), Surrey Safeguarding Children Partnership (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.
- Record "low level concerns" in cases which concern a member of staff/supply staff/contractor or a volunteer. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that will be respected as far as reasonably possible.

## **The Designated Safeguarding Lead**

(Duties are further outlined in KCSIE (2023, Annex C)

Details of the DSL and DDSL are available on the St Teresa's website, our newsletters and notice boards across the school.

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 and understanding the filtering and monitoring systems in place) in the school, this responsibility cannot be delegated.

- Have an “it could happen here” approach to safeguarding.
- Liaise with the local authority and work in partnership with other agencies in line with Working Together to Safeguard Children (2023).
- 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 Children’s Single Point of Access (C-SPA), and act as a point of contact and support for school staff. Requests for support should be made 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 or 03311435554 (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 07795 043842 or 01865 555618. The Department of Education 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 or a volunteer;
- Follow DfE and KCSIE 2023 guidance on ‘Child on Child Abuse’ when a concern is raised that there is an allegation of a pupil abusing another pupil within the school.
- 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 leadership 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.
- Encourage and promote a culture of listening to children and taking account of their wishes and feelings, amongst all staff.
- Ensure that the names of the DSL and DDSL, are clearly advertised, with a statement explaining the setting’s role in referring and monitoring cases of suspected abuse.
- Access training and support to ensure they have the knowledge and skills required to carry out the role.
- DSL training should be updated at least every two years and their knowledge and skills refreshed at regular intervals but at least annually.
- 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 conduct 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 School delivery concerning 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, behaviour leads, school health colleagues and the SENCO) 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 the setting; in particular understand the additional risks that children with SEND face online and the associated and appropriate support they require.
- Support the Head in "low level concerns" in cases which concern a member of staff/supply staff/contractor or a volunteer.
- Work with the Headmistress/Headteacher and relevant strategic leads, 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 (using CPOMS), 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. Where appropriate, orange dots are placed on pupils' files if there are safeguarding files on the child.
- 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.
- Ensure that a copy of the safeguarding/child protection file is retained, and that the new school setting acknowledges receipt of the original file.
- Ensure that where a child transfers to a 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 are able to effectively contribute when required to do so; where a report is required, this should be shared with the parents prior to the meeting.
- Report to the Headmistress/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 settings Safeguarding and Child Protection policy procedures, especially new and part-time staff.
- Ensure that in collaboration with the setting leadership and Governors, the Safeguarding and Child Protection Policy is reviewed annually, and the procedures and implementation are updated and reviewed regularly.
- Ensure that the 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 the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and leadership staff.
- 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 Headmistress/Headteacher and Co-Chair of Governors, the biennial (s157 s175) Statutory Audit for Safeguarding Arrangements and Termly Safeguarding Data Collections via PHEW to Surrey County Council.
- Follow DfE and KCSIE guidance on 'Child on Child Abuse' when a concern is raised that there is an allegation of a child abusing another child within the school/college.

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

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

- Be trained to the same standard as the Designated Safeguarding Lead 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, the Deputy DSL carries out the activities necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the DSL, the deputy will assume all of the functions above.

## **The Governing Body**

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

- There is a whole school approach to Safeguarding, involving everyone in the school and ensuring that safeguarding, and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- A nominated governor for safeguarding is identified.
- Governing bodies should ensure that all members receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the setting are effective and support the delivery of a robust whole setting approach to safeguarding. Training should be regularly updated.
- The child's wishes and feelings are considered when determining what action to take and what services to provide.
- The School has effective safeguarding policies and procedures including a Child Protection Policy, a Staff Code of Conduct, a Behaviour Policy and a response to children who go missing from education.
- Policies are consistent with Surrey Safeguarding Children Partnership (SSCP) and statutory requirements, are reviewed annually (as a minimum) and updated if needed, so that it is 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 the setting website.
- The SSCP is informed in line with local requirements about the discharge of duties via via the Biennial (s 157 s 175) Statutory Audit for Safeguarding Arrangements and Termly Safeguarding Data Collections via PHEW to Surrey County Council.
- Ensure recruitment, selection and induction follow safer recruitment practice including all appropriate checks. At least one member of the governing body has completed safer recruitment training to be repeated every five years.
- Staff have been trained appropriately and this is updated in line with guidance and all staff have read KCSIE (2023) part 1 and Annex B. Additionally, there are mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance.
- Ensure that, as part of the requirement for staff to undergo regular updated safeguarding training, including online safety and the requirement to ensure children are taught about safeguarding, is integrated, aligned, and considered as part of the whole setting safeguarding approach and wider staff training and curriculum planning.
- Consider the above training requirements, Governing body should have regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all children

- All staff including temporary staff and volunteers are provided with the school's child protection policy and if applicable the staff behaviour policy.
- Take a proportionate risk-based approach to the level of information that is provided to temporary staff, volunteers and contractors.
- The School has procedures for dealing with allegations of abuse against staff (including the Headmistress/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 2023.
- A member of the senior leadership team has been appointed by the Governing Body as the Designated Safeguarding Lead (DSL) who will take lead responsibility for safeguarding and child protection and that the role is explicit in the role holder's job description.
- On appointment, the DSL and deputy(s) undertake interagency training (SSCP Foundation Modules 1&2) and also initially undertake DSL 'New to Role' and 'Refresher' training every two years as well as attending DSL network events, to refresh knowledge and skills.
- Children are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through personal, social, health and economic education (PSHE) and relationships and sex education (RSE).
- The governors and school will regularly review the effectiveness of the application filters and monitoring systems are in place to safeguard children online.
- Ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.
- The School will comply with DfE and Surrey County Council policy guidance [Children Missing Education](#) and Education Other Than At School.
- The School will comply with regular data returns requested by the Local Authority, regarding all pupils, of statutory school age, attending alternative provision and/or on a reduced or modified timetable
- 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. Governing bodies and proprietors will ensure they have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.
- Ensure that safeguarding and child protection files are maintained as set out in KCSIE 2023 Annex C.
- Ensure section 128 checks are undertaken as defined in KCSIE 2023.
- Enhanced DBS checks (without barred list checks, unless the governor is also a volunteer at the school) are in place for all Governors.
- Any weaknesses in Safeguarding are remedied immediately.
- Ensure where the Governing body hire or rent out school or college facilities/premises to organisations or individuals (for example to community groups, sports associations, and

service providers to run community or extra-curricular activities) they should ensure that appropriate arrangements are in place to keep children safe.

## **Confidentiality, Sharing and Withholding Information**

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

Information will be shared with staff within St Teresa’s who ‘need to know’. Relevant staff have due regard to Data Protection 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 must be aware that they cannot promise a child to keep secrets which might compromise the child’s safety or wellbeing.

All staff will always endeavour to gain parent/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.

## **Child Protection Procedures: Reporting and responding to safeguarding concerns**

The following procedures apply to all staff working at St Teresa's and will be covered by training to enable staff to understand their role and responsibility. The aim of our procedures is to provide a robust framework which enables staff to take appropriate action when they are concerned that a child is being harmed or abused or is at risk of harm or abuse.

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

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

When making a Level 4 referral to CSPA, the school will endeavour to gain consent. However, it is important to note that at this level, parental consent is not required and will never be requested if it would put the child at greater risk of harm or impede a criminal investigation.

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

1. Make an initial record of the information related to the concern.
2. Report it to the DSL immediately. This could be by logging the incident on CPOMS and any written notes handed to the DSL for the child's file which must be signed and dated.
3. The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available.
4. Make an accurate record (which may be used in any subsequent court proceedings) as soon as possible and within 24 hours of the occurrence, of all that has happened, including details of:
  - Dates and times of their observations
  - Place the incident occurred
  - Who was present
  - Any context around the incident
  - Dates and times of any discussions in which they were involved.
  - Any injuries
  - Details of disclosure/concern given by the child / adult
  - Rationale for decision-making and action taken
  - Any actual words or phrases used by the child
  - Actions taken

5. The records must be signed and dated by the author or / equivalent on electronic based records. This must be shared with/handed to the DSL immediately.
6. In the absence of the DSL or their Deputy, staff must be prepared to refer directly to C-SPA (and the Police if appropriate) if there is the potential for immediate significant harm 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 must complete the following steps:**

1. Using the Effective Family Resilience of Levels of Need document, decide whether or not 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.
2. Normally the school 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.
3. If there are grounds to suspect a child is suffering, or is likely to suffer, significant harm or abuse the DSL must contact the C-SPA. By sending a [Request for Support Form](#) by secure email to: [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk) contact the C-SPA consultation line on 0300 470 9100 to discuss the concerns. If a child is in immediate danger and urgent protective action is required, the Police (dial 999) must be called. The DSL must also notify the C-SPA of the occurrence and what action has been taken.
4. If the DSL feels unsure about whether a referral is necessary, they can phone the C-SPA to discuss concerns
5. If there is not a risk of significant harm, the DSL will either actively monitor the situation or consider offering early help.
6. Where there are doubts or reservations about involving the child's family, the DSL should clarify with the C-SPA or the police whether the parents should be told about the referral and, if so, when and by whom. This is important in cases where the police may need to conduct a criminal investigation.
7. When a pupil is in need of urgent medical attention and there is suspicion of abuse the DSL or their Deputy should take the child to the accident and emergency unit at the nearest hospital, having first notified the C-SPA. The DSL should seek advice about what action

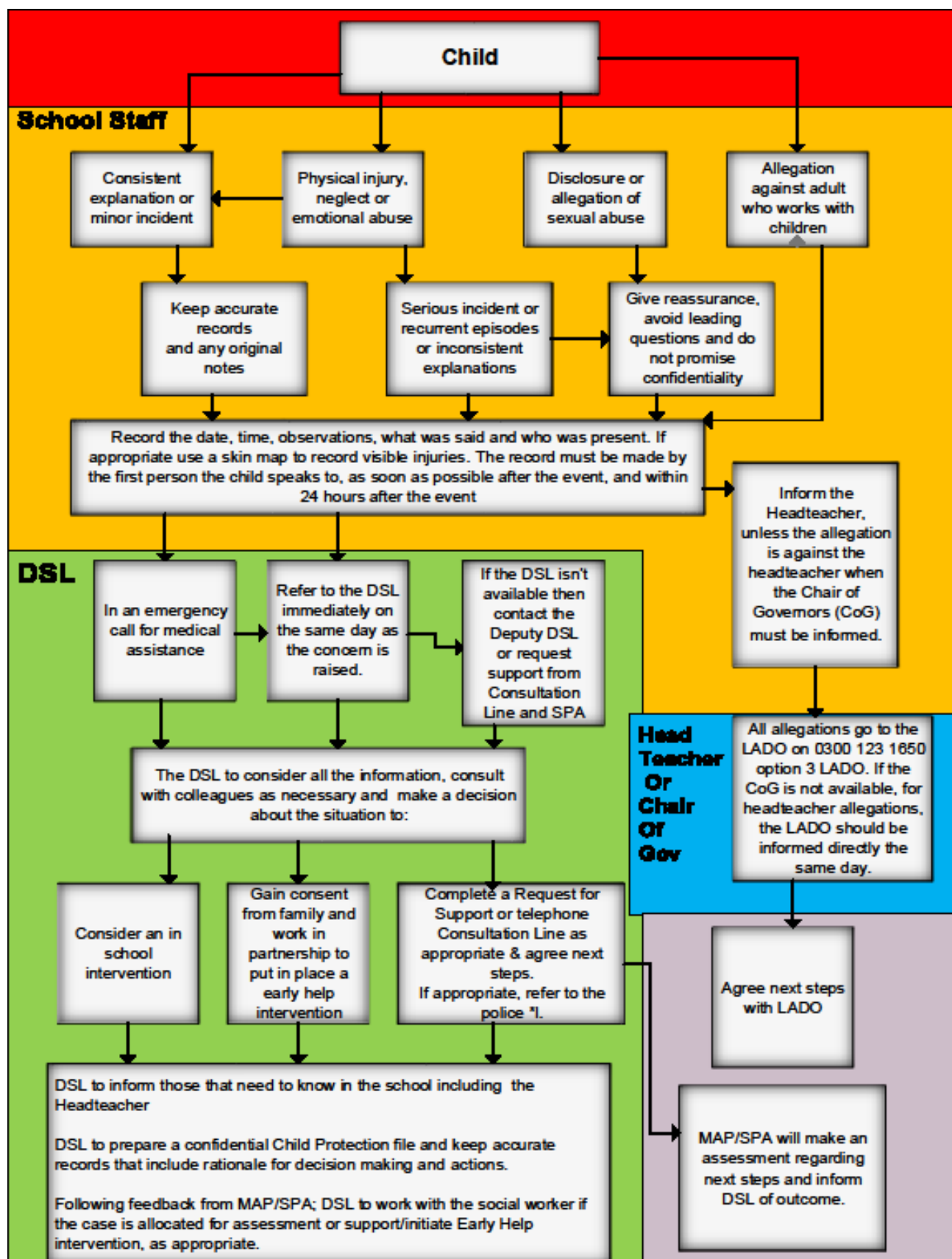
the C-SPA will take and about informing the parents, remembering that parents should normally be informed that a child requires urgent hospital attention.

8. 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:
  - a. Are informed by a girl under 18 that an act of FGM has been carried out on her; or
  - b. 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.



## Child Protection Procedures Flowchart



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

## Dealing with disclosures

### All staff

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

Additional consideration needs to be given to children with communication difficulties and 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.

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

### Guiding principles, the seven R's

#### 1. Receive

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

#### 2. Reassure

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

#### 3. Respond

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

#### 4. Report

- Share concerns with the DSL immediately
- If you are not able to contact your DSL or the Deputy DSL, and the child is at risk of immediate harm, contact the C-SPA or Police, as appropriate directly

- If you are dissatisfied with the level of response you receive following your concerns, you should press for re-consideration

## **5. Record**

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

## **6. Remember**

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

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

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

## **What happens next?**

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

If they have believe that the concerns that the disclosure has not been acted upon appropriately they should inform the Head or Safeguarding Governor or may contact the C-SPA for advice.

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

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

## **Safeguarding concerns and allegations made about a staff, including supply teachers, volunteers and contractors**

Surrey's LADO procedure will be followed where there is alleged that anyone working in the school that provides education for children under 18 years of age including supply staff, contractors and volunteer in a school, or another adult who works with children has:

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

The last bullet point above includes behaviour that may have happened outside of the school, that might make an individual unsuitable to work with children, this is known as transferable risk. This is known as the Harm threshold. If the allegation does not meet the threshold, the Low Level Concern Policy will be used.

In dealing with allegations or concerns against an adult, staff must without delay:

- Report any concerns to the Headmistress/Headteacher immediately
- If an allegation is made against the Headmistress/Head teacher concerns need to be raised with the Co-Chair of Governor as soon as possible. If the Co-Chair of Governor is not available, then the LADO should be contacted directly.
- There may be situations when the Headmistress/Headteacher, Chair of Governor will want to involve the Police immediately if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.
- Once an allegation has been received by the Headmistress/Head teacher, Co-Chair of Governors they will contact the LADO (as part of their mandatory duty) on 0300123 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 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 (2023) and the SSCP procedures.

All investigations will be recorded in writing and kept for the term of the independent enquiry. For all allegations, except those that are malicious or false, the following information will be kept on file for the person accused:

- Clear and comprehensive summary of the allegation
- Details of how the allegation was followed-up and resolved
- Notes of actions taken and decisions reached
- Whether the outcomes were substantiated, unsubstantiated or unfounded

- A copy provided for the person involved where agreed by social care and the police
- A declaration on whether the information will be referred to in any future reference

This will be kept until the accused has reached pension age or for 10 years from the date if the allegation is longer.

The school has a duty to consider making a referral to the Teaching Regulation Agency (TRA) where a teacher has been dismissed and a prohibition order may be appropriate.

The school is committed to report promptly to the DBS any person whose services are no longer used for regulated activity if they have caused harm or posed a risk of harm to a child.

In the unlikely event of using supply agency staff, if an allegation is made, the school will usually take the lead whilst keeping the supply agency fully informed. In no circumstances will Data Protection be allowed to stand in the way of safeguarding children.

Substantiated allegations from September 2021 will be included in references, provided the information is factual and does not include opinions.

If the outcome is ceasing to use the persons services (e.g. dismissal), a report to the DBS is required if the situation constitutes a criminal offence. The school will also consider making a referral to the Teaching Regulation Agency, where the teacher has been dismissed and a prohibition order may be appropriate.

Refer to the Allegations against Staff Policy located in the Staff handbook.

### **Concerns that do not meet the Harm Threshold (Low level concerns)**

The school has a culture in which all concerns about adults are shared responsibly with the right person. This enables an open and transparent culture and the early identification of concerning, problematic or inappropriate behaviour. It allows for the minimising the risk of abuse, ensures adults in school are clear about professional boundaries.

The term low-level concern does not mean that it is insignificant. A low level concern is any concern, no matter how small, or even if no more than causing a sense of unease of a 'nagging doubt'. To have a concern, the staff member would have acted in a way that:

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

Examples of this type of behaviour are:

- Being overly friendly with children
- Having favourites
- Taking photos of children on their mobile phones
- Engaging with children one to one, behind closed doors

- Using inappropriate sexualised, intimidating or offensive language

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

St Teresa's 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 Headmistress/Head teacher in a timely manner. If the Headmistress/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.

The Headmistress/Head Teacher should record all low level concerns including the following information:

- Details of the concern
- Context in which it arose
- Any evidence from the DSL
- A decision categorising the type of behaviour
- The action taken
- The rationale for decision and action taken
- The name of the individual sharing the concern

All records will be kept confidentially, secure and comply with the Data Protection Act 2018, and UK GDPR. They will be reviewed so that potential patterns can be identified. If a pattern is identified, the school will look at taking action through its' disciplinary procedures or if it meets the harm threshold, refer to the LADO. More details are available in KCSIE Part 4, 2022. Documentation will be kept until the 7 years after employment. Please refer to the Effingham Schools Low Level Concern Policy.

Consideration will be given on whether there are wider cultural issues within the school, that enable the behaviour to occur and where appropriate, policies could be revised or extra training delivered to minimise the risk of it happening again.

Refer to the Low Level Concern Policy located in the Staff handbook.

## **What is child abuse?**

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

## Forms of abuse and neglect

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. 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 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 or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

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

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

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)

- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate care-givers)
- ensure access to appropriate medical care or treatment

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

The school can use the Grade Care Profile 2 tool to support better identification and intervention in cases of neglect. The Surrey [Neglect Risk Assessment Tool](#) is available to provide a more detailed information regarding the assessment of neglect.

## **Indicators of abuse and Neglect**

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

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

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

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

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

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

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



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

Working in the Independent School setting, all staff are made aware of the signs of Affluent Neglect. Affluent Neglect refers to the neglect experienced by children in wealthy families. This can be more difficult to spot, as the kind of neglect experienced by children and young people in these circumstances is often emotional. Staff should alert the DSL should there be any concerns raised about pupils staying alone at home, or concerns over emotional neglect of a child.

St Teresa's use 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.

## **Indicators of neglect**

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

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

### **Physical indicators of neglect**

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

### **Behavioural indicators of neglect**

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

## **Emotional Abuse**

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

- Emotional abuse is difficult to define, identify/recognise and/or prove.
- Emotional abuse is chronic and cumulative and has a long-term impact.
- All kinds of abuse and neglect have emotional effects although emotional abuse can occur by itself.
- Children can be harmed by witnessing someone harming another person – as in domestic abuse.
- Most harm is produced in low warmth, high criticism homes, not from single incidents.
- It is sometimes possible to spot emotionally abusive behaviour from parents and carers to their children, by way that the adults are speaking to, or behaving towards children.

## **Indicators of emotional abuse**

### **Developmental issues**

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

### **Behaviour**

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

### **Social issues**

- Withdrawal from physical contact
- Withdrawal from social interaction
- Over-compliant behaviour
- Insecure, clinging behaviour
- Poor social relationships

### **Emotional responses**

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

### **Physical abuse**

Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. But accidental injuries normally occur on the bony prominences – e.g., knees, shins.

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

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

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

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

In the context of the school, it is normal to ask about a noticeable injury. Concern should be increased when:

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

You should be concerned if a child:

- is reluctant to have parents/carers contacted
- runs away or shows fear of going home
- is aggressive towards themselves or others
- flinches when approached or touched
- is reluctant to undress to change clothing for sport
- wears long sleeves during hot weather
- is unnaturally compliant in the presence of parents/carers.
- has a fear of medical help or attention
- admits to a punishment that appears excessive.

## **Sexual Abuse**

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

Sexual exploitation is seen as a separate category of sexual abuse. The [SSCP professional guidance](#) provides school staff with information regarding indicators of CSE (further information is found on page 46/47).

Characteristics of child sexual abuse:

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

Most people who sexually abuse children are men, but women and other children can commit sexual abuse too.

## Indicators of sexual abuse

### Physical observations:

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

### Behavioural observations:

- Sexual knowledge inappropriate for age
- Sexualised behaviour or affection inappropriate for age
- Sexually inappropriate behaviour
- Hinting at sexual activity
- Inexplicable decline in education progress
- Depression or other sudden apparent changes in personality as becoming insecure
- Lack of concentration, restlessness, aimlessness
- Socially isolated or withdrawn
- Overly compliant behaviour
- Acting out, aggressive behaviour
- Poor trust or fear concerning significant adults
- Regressive behaviour
- Onset of wetting, by day or night; nightmares
- Arriving early at school, leaving late, running away from home
- Suicide attempts, self-mutilation,
- Suddenly drawing sexually explicit pictures
- Eating disorders or sudden loss of appetite or compulsive eating
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Become worried about clothing being removed
- Trying to be 'ultra-good' or perfect; overreacting to criticism

# Sexual violence and sexual harassment between children in schools

## Child on Child Abuse

The many different forms of child-on-child abuse can take: bullying, online bullying, sexual violence, sexual harassment, physical abuse, upskirting, sexting (youth produced sexual images), initiations/hazing type violence and rituals.

Sexual violence and sexual harassment can occur between children of any age and sex. It can also 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, in all likelihood, adversely affect their education attainment as well as their emotional well-being. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are 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, students and school staff are supported and protected as appropriate.

All child on child abuse is unacceptable and will be taken seriously. It is recognised that it is more likely that girls will be victims and boys' perpetrators.

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).

St Teresa's is committed to providing a safe environment for pupils. Abuse is abuse and should never be tolerated or passed off as "banter" or "just having a laugh" or "part of growing up".

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

We recognise that children are capable of abusing other children and their peers and this will be dealt with under our child protection policy and in line with KCSiE (2023).

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

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

- 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.

## **Prevention**

St Teresa's takes a whole school approach to safeguarding & child protection by:

- Taking a whole school approach to Safeguarding and child protection.
- Provide training to staff
- Providing a clear set of values and standards, underpinned by the school's behaviour policy and pastoral support; and by a planned programme of evidence-based content delivered through the curriculum.
- Engaging with specialist support and interventions.

Responding robustly to reports of sexual violence and sexual harassment

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 sanctions.
- 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.

#### **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.

All staff must report any signs of possible sexual abuse to the DSL immediately.

#### **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.
- Ages of the children involved.
- 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.



- Importance of understanding intra familiar harms and any necessary support for siblings following incidents
- Ongoing risks to victim, other children, adults, pupils 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 Children's 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 on school premises and on transport where appropriate.

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

Where a criminal investigation into sexual assault leads to a conviction or caution, the school will, if it has not already, consider any suitable sanctions in light of their behaviour policy, which may include consideration of permanent exclusion. Where the perpetrator is going to remain at the school or college, the Headmistress/Head teacher should continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on school 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.

St Teresa's will take any disciplinary action against the alleged perpetrator in accordance with the school behaviour policy. We recognise that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.

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

St Teresa's 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, it 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 [Brook Traffic Light Tool](#) uses a traffic light system to categorise the sexual behaviours of young people and 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 school can work with other agencies to the same standardised criteria when making decisions and can protect children with a multi-agency approach.

The School 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.

# Brook sexual behaviours traffic light tool

## Behaviours: age 0 to 5

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

### What is a green behaviour?

Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability. They are reflective of natural curiosity, experimentation, consensual activities and positive choices

### What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

### Green behaviours

- holding or playing with own genitals
- attempting to touch or curiosity about other children's genitals
- attempting to touch or curiosity about breasts, bottoms or genitals of adults
- games e.g. mummies and daddies,
- doctors and nurses
- enjoying nakedness
- interest in body parts and what they do
- Curiosity about the differences between boys and girls

### What is an amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.

### What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

### Amber behaviours

- preoccupation with adult sexual behaviour
- pulling other children's pants down/skirts up/trousers down against their will
- talking about sex using adult slang
- preoccupation with touching the genitals of other people
- following others into toilets or changing rooms to look at them or touch them
- talking about sexual activities seen on TV/online

### What is a red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental, or power differences. They may pose a concern due to the activity type, frequency, duration or the context in which they occur

### What can you do?

Red behaviours indicate a need for immediate intervention and action.

### Red behaviours

- persistently touching the genitals of other children
- persistent attempts to touch the genitals of adults
- simulation of sexual activity in play
- sexual behaviour between young children involving penetration with objects
- forcing other children to engage in sexual play

This is intended to be used as a guide only. Please refer to the guidance tool at <https://www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool> for further information

Print date: 01/10/2015 - Brook has taken every care to ensure that the information contained in this publication is accurate and up-to-date at the time of being published. As information and knowledge is constantly changing, readers are strongly advised to use this information for up to one month from print date. Brook accepts no responsibility for difficulties that may arise as a result of an individual acting on the advice and recommendations it contains.

Brook sexual behaviours traffic light tool adapted from Family Planning Queensland. (2012). Traffic Lights guide to sexual behaviours. Brisbane: Family Planning Queensland, Australia.

# Behaviours: age 5 to 9 and 9 to 13

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

## What is a green behaviour?

Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability and reflective of natural curiosity, experimentation, consensual activities and positive choices

## What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

### Green behaviours 5-9

- feeling and touching own genitals
- curiosity about other children's genitals
- curiosity about sex and relationships, e.g. differences between boys and girls, how sex happens, where babies come from, same-sex relationships
- sense of privacy about bodies
- telling stories or asking questions using swear and slang words for parts of the body

### Green behaviours 9-13

- solitary masturbation
- use of sexual language including swear and slang words
- having girl/boyfriends who are of the same, opposite or any gender
- interest in popular culture, e.g. fashion, music, media, online games, chatting online
- need for privacy
- consensual kissing, hugging, holding hands with peers

## What is an amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.

## What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

### Amber behaviours 5-9

- questions about sexual activity which persist or are repeated frequently, despite an answer having been given
- sexual bullying face to face or through texts or online messaging
- engaging in mutual masturbation
- persistent sexual images and ideas in talk, play and art
- use of adult slang language to discuss sex

### Amber behaviours 9-13

- uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- verbal, physical or cyber/virtual sexual bullying involving sexual aggression
- LGBT (lesbian, gay, bisexual, transgender) targeted bullying
- exhibitionism, e.g. flashing or mooning
- giving out contact details online
- viewing pornographic material
- worrying about being pregnant or having STIs

## What is a red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental, or power differences. They may pose a concern due to the activity type, frequency, duration or the context in which they occur.

## What can you do?

Red behaviours indicate a need for immediate intervention and action.

### Red behaviours 5-9

- frequent masturbation in front of others
- sexual behaviour engaging significantly younger or less able children
- forcing other children to take part in sexual activities
- simulation of oral or penetrative sex
- sourcing pornographic material online

### Red behaviours 9-13

- exposing genitals or masturbating in public
- distributing naked or sexually provocative images of self or others
- sexually explicit talk with younger children
- sexual harassment
- arranging to meet with an online acquaintance in secret
- genital injury to self or others
- forcing other children of same age, younger or less able to take part in sexual activities
- sexual activity e.g. oral sex or intercourse
- presence of sexually transmitted infection (STI)
- evidence of pregnancy

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Brook sexual behaviours traffic light tool adapted from Family Planning Queensland. (2012). Traffic Lights guide to sexual behaviours. Brisbane: Family Planning Queensland, Australia.

## Behaviours: age 13 to 17

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

### What is a green behaviour?

Green behaviours reflect safe and healthy sexual development.

They are displayed between children or young people of similar age or developmental ability and reflective of natural curiosity, experimentation, consensual activities and positive choices

Amber behaviours have the potential to be outside of safe and healthy behaviour. activity type, frequency, duration or the context in which they occur

This is intended to be used as a guide only. Please refer to the guidance tool at <https://www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool> for further information

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They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.

### What can you do?

Red behaviours indicate a need for immediate intervention and action.

### What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

#### Green behaviours

- solitary masturbation
- sexually explicit conversations with peers
- obscenities and jokes within the current cultural norm
- interest in erotica/pornography
- use of internet/e-media to chat online
- having sexual or non-sexual relationships
- sexual activity including hugging, kissing, holding hands
- consenting oral and/or penetrative sex with others of the same or opposite gender who are of similar age and developmental ability
- choosing not to be sexually active

### What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

#### Amber behaviours

- accessing exploitative or violent pornography
- uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress,
- withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- concern about body image
- taking and sending naked or sexually provocative images of self or others
- single occurrence of peeping, exposing, mooning or obscene gestures
- giving out contact details online
- joining adult-only social networking sites and giving false personal information
- arranging a face to face meeting with an online contact alone

### What is a red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental, or power differences. They may pose a concern due to the

#### Red behaviours

- exposing genitals or masturbating in public
- preoccupation with sex, which interferes with daily function
- sexual degradation/humiliation of self or others
- attempting/forcing others to expose genitals
- sexually aggressive/exploitative behaviour
- sexually explicit talk with younger children
- sexual harassment
- non-consensual sexual activity
- use of/acceptance of power and control in sexual relationships
- genital injury to self or others
- sexual contact with others where there is a big difference in age or ability
- sexual activity with someone in authority and in a position of trust
- sexual activity with family members
- involvement in sexual exploitation and/or trafficking
- sexual contact with animals
- receipt of gifts or money in exchange for sex

### What is an amber behaviour?

## **Anti-Bullying/Cyberbullying**

St Teresa's policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. This can be found in the staff handbook on Firefly.

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

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

Risks can be compounded where children who are LGBTQ+ 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 Headmistress/Head teacher and the DSL will also consider child protection procedures.

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

LGBTQ+ 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 St Teresa's counter homophobic, biphobic and transphobic bullying and abuse.

## **Online Safety**

The School has an online safety policy which 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 school also has a clear policy on the use of mobile and smart technology(including wearable technology). Refer to the School Online Policy and Acceptable Use of IT policy.

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 increasingly use electronic equipment on a daily basis to access the internet, share and view content and images via social media sites such as Facebook, Twitter, Instagram, Snapchat and Voodoo and for online gaming. St Teresa's pupils have access to either their own device or a school device. Filters are put in place and pupil usage is monitored. Pupils in the Prep School are



not allowed to have mobile phones with them during the school day. Pupils who travel to school on the bus are permitted to bring tier mobile phone to school and hand them in to Reception or their class teacher on arrival. Yondr pouches are used for year 7-11 students, which prevents them using the device during the school day. 6<sup>th</sup> form pupils are allowed their phones.

Staff are able to monitor in real time what the pupils are doing on their machine using NetSupport. This software also records any internet view when “unsafe words” have been entered on their keyboard.

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

Pupils are taught about online safety throughout the curriculum and all staff receive online safety training, which is regularly updated. The St Teresa’s online safety co-ordinator is Mrs Rachel Whitton, Deputy Head (Pastoral).

Pupils, staff and parents are reminded regularly about e-safety (particularly sharing images and content online) and required to read, understand (through regular guidance) and sign an ICT Acceptable Use Policy within the first week of each academic year, so that everyone can take an active part in safeguarding children online. New pupils sign the Acceptable Use Policy as part of our admissions process.

All new staff have an IT induction and are briefed on safe use of their devices and social media conduct. Particularly ensuring their accounts are private and that our rules within the Code of Conduct for all staff and Guidance for Safer Working Practice are adhered to.

Staff are advised to turn off their 3G/4G/ 5G whilst on site to prevent any accidental data sharing happening.

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

## **Cybercrime**

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

### **Cyber-dependent crimes include;**

- unauthorised access to computers (illegal ‘hacking’), for example accessing a school’s computer network to look for test paper answers or change grades awarded;



- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the DSL/DDSL should consider referring into the Cyber Choices programme

Advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK

Security is in place to monitor students' online activities and staff have received training to identify inappropriate usage quickly.

## **Mental Health**

We recognise that St Teresa's has an important role to play in supporting the mental health and wellbeing of our pupils and that in some cases mental health problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is essential that staff are aware of how these children's experiences can affect their mental health, behaviour and education.

St Teresa's staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Staff have the ability to send concerns to the Pastoral team which allow concerns to be flagged early. All concerns should be entered on CPOMS so that the medical team can address them.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL.

Staff are given Mental Health Training and we have designated Mental Health First Aid Trained staff, as well as a part-time School Counsellor available for the children.

Further details can be found within the Mental Health Protocol.

## **Racist Incidents**

Racist incidents are acknowledged in this policy, the school's anti-bullying policy and prevent strategy. St Teresa's 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 in CPOMS.

## Radicalisation, Extremism and Terrorism

[The Prevent Duty for England and Wales \(2023\)](#) 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 'vocal or active opposition to fundamental values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.' We also include in our definition of extremism calls for the death of members of our armed forces.

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 School is clear that exploitation of vulnerable children and radicalisation should be viewed as a safeguarding concern and follows the Department for Education guidance for schools 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 be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL making a Prevent referral.

The DSL should report concerns that a child may be at risk of radicalisation or involvement in terrorism, use the [Prevent referral form](#) to refer cases by e-mail to [preventreferrals@surrey.pnn.police.uk](mailto:preventreferrals@surrey.pnn.police.uk). If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101 or 07795043842 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 (0800 0113764).

School 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 School Governors, the Head and the Designated Safeguarding Lead (DSL) will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessment may include,

due diligence checks for external speakers and private hire of facilities, anti-bullying policy and other issues specific to the school'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 [Managing Risk of Radicalisation in your Education Setting](#)

## **Domestic Abuse**

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

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

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.

St Teresa's 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 the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the 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.

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

All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside School or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies), 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.

St Teresa's 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. As a consequence, the child may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse. Children also rarely self-report CSE so staff must be particularly vigilant to potential indicators of risk.

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

### **Child Criminal Exploitation (CCE) & Gangs**

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.

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

## **Gangs**

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

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

Children can be particularly vulnerable to recruitment into gangs and involvement in gang violence. This vulnerability may be exacerbated by risk factors in an individual's background, including violence in the family, involvement of siblings in gangs, poor educational attainment, or poverty or mental health problems.

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

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

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

## **Serious Violence**

There are a number of indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include:

- increased absence from the setting
- 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 the setting which includes travelling to and from the setting.

## **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.

## **Sharing Nudes and Semi Nudes**

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

Sharing Nudes/Semi-Nudes refers to both images and videos where:

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

All incidents of this nature should be treated as a safeguarding concern and in line with the UKCCIS guidance Sharing nudes and semi-nudes: advice for education settings working with children and young people.

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

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

The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff must not view, copy, or print the images.

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

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

At any point in the process if there is concern a child has been harmed or is at risk of harm a request for support should be made to the C-SPA and/or the Police as appropriate.

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

- The incident involves an adult.
- There is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to SEND).
- What you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent.
- The imagery involves sexual acts.
- The imagery involves anyone aged 12 or under.
- There is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.

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

During the decision making the DSL will consider if:

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

- The children have been involved in incidents relating to youth produced sexual imagery previously.

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

The DSL will record all incidents of making, sharing and sending nudes and semi-nudes including the actions taken, rationale for actions and the outcome.

## **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 in school who are employed or engaged to carry out 'teaching work' at St Teresa's, whether or not they have qualified teacher status.

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

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

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

There should also be consideration of potential risk to other girls in the family and 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, including dialling 999 if appropriate. There are no circumstances in which a teacher or other member of staff should examine a girl.

## **Forced Marriage**

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

Forced marriage is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014. In addition, since February 2023, it is also a crime to cause a child to marry



before their eighteenth birthday, even if violence, threats or another form of coercion are not used. This applies to non-binding, unofficial 'marriages' as well as legal marriages.

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

Setting 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 020 7008 0151

## **“Honour”- based Abuse (HBA)**

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

Honour based abuse 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.

St Teresa's 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 who are placed in residential schools, children's homes or hospitals are not considered to be privately fostered.

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

The School 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 pupil 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 as a result of abuse and 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 SENCO. The setting 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, regardless of their circumstances, are entitled to an efficient, full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have.

The School recognises that children 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 or radicalisation, and becoming NEET (not in education, employment or training) later in life.

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

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

When removing a child's name, St Teresa's will notify the Local Authority of:

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

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

St Teresa's will:

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

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

Where parents 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. Further detail can be found in the Children Missing Education Policy.

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

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

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

The School will ensure that parents (and the local authority where the pupil has an EHCP) are given clear information about alternative provision placements and reduced or modified timetables: why, when, where, and how they will be reviewed.

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

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

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

The School Leadership Team will report to Governors of any formal direction of a pupil to alternative provision to improve behaviour. Senior Leadership Team will report to Governors of information regarding the use and effectiveness of the use of alternative provision and modified timetables.

### **Attendance and Behaviour**

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

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

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

## **Restrictive Physical Intervention**

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

Staff who are likely to need to use physical intervention will be appropriately trained 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 school will consider the risks, given the additional vulnerabilities of these children.

## **Whistle-blowing**

We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so. All staff, including temporary/supply staff and volunteers, should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the school's safeguarding arrangements.

If it becomes necessary to consult outside the school, staff:

- a) should speak in the first instance, to the Area Schools Officer or LADO in accordance with the Whistleblowing Policy.
- b) 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 the website link is as follows:

<https://secure.ethicspoint.eu/domain/media/en/gui/107090/index.html>

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).

Whistle-blowing regarding the Headmistress/Head teacher should be made to the Co-Chair of the Governing Body whose contact details are available to staff.

## **Child abduction and community safety incidents**

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

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence (for example, as they start walking to school on their own), it is important they are given practical advice on how to keep themselves safe.

Lessons on personal safety are given to pupils from Year 5 upwards. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers.

Further information is available at [www.actionagainstabduction.org](http://www.actionagainstabduction.org).

## **Children and the court system**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds. The guides explain each step of the process, support and special measures that are available.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers. If a staff member notices any changes in behaviour in these children, they must log it on Well-being Manager.

## **Children with family members in prison**

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children. If a staff member notices any changes in behaviour in these children, they must log it on Well-being Manager.

## **Homelessness**

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

Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis. In most cases, school staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis.

If a staff member notices any changes in behaviour in these children, they must log it on CPOMS.

## **Links with other school policies**

- Administration of medicines.
- Anti-bullying.
- Acceptable use of IT policy
- Collective worship Policy
- Complaints policy
- Curriculum Policy
- Equality Policy
- E-Safety, including staff use of mobile phones
- Health & Safety Policy
- Intimate Care
- Mental Health Protocol
- Misuse of Substances protocol
- Physical Intervention
- PSHE Handbook
- Prevent Strategy - Radicalisation and Extremism
- Risk Assessment
- Rewards, Sanctions and Behaviour Policy
- Relationships and Sex Education Policy
- School Attendance
- Safer Recruitment Policy

- Staff Behaviour Policy
- Whistleblowing



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

SSCP: [Surrey Safeguarding Children Partnership webpages](#)

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

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

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

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

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

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

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

Lucy Faithfull: [Lucy Faithfull Foundation webpages](#)

Neglate Toolkit: [Graded Care Profile 2](#)

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

# 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), and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of U18s is a criminal offence. [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people)
  - sharing of unwanted explicit content
  - 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.

## **APPENDIX TWO**

### **DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS MADE ABOUT STAFF INCLUDING SUPPLY TEACHERS, VOLUNTEERS AND CONTRACTORS.**

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

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

In this section reference to 'allegations' also covers concerns. Allegations that do not meet the above harm test should be dealt with using the Effingham Schools Trust's Low-Level Concern policy.

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

If an allegation is made against anyone working with children in the School, before contacting the LADO, the School will conduct a basic enquiry in line with local procedures to establish the facts in order to determine whether there appears to be any foundation to the allegation. The School should not undertake their own investigation of the allegation(s) without prior consultation with the LADO or, in the most serious cases, the police, so as not to jeopardise statutory investigations. In borderline cases, the School may discuss informally with the LADO on a no-names basis.

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

1. Allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is the Head of school or to the DSL. If an allegation is reported to the DSL, the DSL will keep the Head informed.

Where the Head or DSL is absent or is the subject of the allegation, reports should be made to one of the Co Chair of Governors. Where the Head is the subject of the allegation, the Head must not be informed of the allegation prior to contact with the Co Chair of Governors and LADO. However, staff may consider discussing any concerns/allegations with the DSL and make any referral via them.

2. The case manager should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the police. (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, or it is an emergency situation, the case manager should contact children's social care and as appropriate the police immediately.) All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The LADO should be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria or that are made directly to the police and/or children's social care. The DSL is responsible for ensuring the child is not at risk.
3. Where the case manager is concerned about the welfare of other children in the community, or the member of staff's family, they will discuss these concerns with the LADO and make a risk assessment of the situation. It may be necessary for the LADO to make a referral to children's social care.
4. When to inform the individual who is the subject of the allegation will be considered on a case by case basis and with guidance from the LADO, and if appropriate, the police and/or children's social care. Subject to any objection, the case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course of action. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.
5. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension from contact with children at the School or whether alternative arrangements should be put in place until the allegation is resolved. The following alternative arrangements should be considered by the case manager before suspending a member of staff:
  - redeployment within the School so that the individual does not have direct contact with the child or children concerned;
  - providing an assistant to be present when the individual has contact with children;
  - redeploying to alternative work in the School so the individual does not have unsupervised access to children;
  - moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes accounts of their views. It should be made on a case by case basis and is not a punishment and parents have been consulted; or,

- temporarily redeploying the member of staff to another role in a different location, for example to an alternative school where available.

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

Suspension should not be an automatic response when an allegation is reported. It should be considered only in cases where there is cause to suspect a child or other children at the School is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. The case manager will give due weight to the views of the LADO, *WT* and *KCS/E* when making a decision about suspension (including with respect to considering alternatives). Where the individual is suspended, the case manager will confirm the decision within one working day, and will ensure they know who their point of contact is in the School and shall provide them with their contact details. The case manager will also record the rationale and justification for the suspension, including what alternatives were considered and why they were rejected.

6. Where a member of boarding staff is suspended pending an investigation, the case manager will consider whether arrangements for alternative accommodation away from children should be made.
7. Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. The LADO will provide advice and guidance to the School to ensure that an appropriate investigation is carried out. In straightforward cases, the investigation should usually be undertaken by a senior member of staff at the School. Where there is lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed to undertake the investigation.
8. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the police. Parents and others will be made aware that there are restrictions on publishing information which may lead to the identification of the teacher subject to the allegation.
9. The case manager will monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process. The outcome of the investigation of an allegation will record whether it is substantiated (sufficient evidence to prove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it), malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive or cause harm to the person subject of the allegation) or unfounded (to reflect cases where there is no evidence or proper basis which supports the allegation being made).

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



11. The case manager will discuss with the LADO whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).
12. On conclusion of the case, the case manager should review the circumstances of the case with the LADO to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future. Learning lessons where the allegation is concluded to be either, unfounded, false, malicious or unsubstantiated, the case manager (and if they have been involved, the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

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

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

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

Allegations found to be malicious or false will be removed from the individual's personnel records unless the individual gives consent for retention of the information. In all other circumstances a written record will be made of the decision and retained on the individual's

personnel file in accordance with *KCSIE* and a copy will only be provided to the individual

concerned. The information to be kept on file includes a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, a note of any action taken, decisions reached and the outcomes, and a declaration on whether the information will be referred to in any future reference. Schools have an obligation to preserve records which contain information about allegations of sexual abuse for the duration of the inquiry in accordance with the guidelines of the Independent Inquiry into Child Sexual Abuse ("IICSA"). All other records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer.

Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a pupil who made it in accordance with the School's behaviour policy; or whether the police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

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

## **DEALING WITH SAFEGUARDING CONCERNS AND ALLEGATIONS ABOUT SUPPLY TEACHERS AND CONTRACTORS**

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

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

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

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

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

# Contact Numbers

## POLICE

999/112 (emergency)

101 (non-emergency)

## LADO

Phone: 0300 123 1650 option 3

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

## Early Help and MAP

Phone: 033 114 3554

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

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

## Surrey Children's Single Point of Access (C-SPA),

Email to [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk)

Link to forms: [Request for Support Form](#)

Phone 0300 470 9100

Out of hours phone: 01483 517898 (Emergency)

## PREVENT

Urgent: Police must be contacted by dialling 999.

To refer a case: [preventreferrals@surrey.pnn.police.uk](mailto:preventreferrals@surrey.pnn.police.uk) .

Further advice: 101 or 07795043842 and ask to speak to the Prevent Supervisor for Surrey

## DfE helpline

Non-emergency advice: 0800 0113764

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

## KEY EXTERNAL CONTACT DETAILS

<b>Local Authority Designated Officer</b>	LADO TEL: 0300 123 1650 option 3 EMAIL: <a href="mailto:LADO@surreycc.gov.uk">LADO@surreycc.gov.uk</a>
<b>Local Authority Children's Social Services</b>	TEL: 033 114 3554 EMAIL: <a href="mailto:earlyhelphub@surreycc.gov.uk">earlyhelphub@surreycc.gov.uk</a> <a href="mailto:childrensmap@surreycc.gov.uk">childrensmap@surreycc.gov.uk</a>  OUT OF HOURS EMERGENCY DUTY TEAM TEL: 01483 517898
<b>Multi-Agency Safeguarding Hub</b>	TEL: 0300 470 9100 EMAIL: <a href="mailto:cspa@surreycc.gov.uk">cspa@surreycc.gov.uk</a>
<b>Support and Advice about Extremism</b>	<b>Police</b> Prevent Supervisor for Surrey TEL: 01483 632982 EMERGENCY: 999 NON-EMERGENCY NUMBER: 101 EMAIL: <a href="mailto:preventreferrals@surrey.pnn.police.uk">preventreferrals@surrey.pnn.police.uk</a> .  <b>Department for Education</b> NON-EMERGENCY NUMBER: 020 7340 7264 EMAIL: <a href="mailto:counter.extremism@education.gov.uk">counter.extremism@education.gov.uk</a>
<b>NSPCC Whistleblowing Advice Line</b>	ADDRESS: Weston House 42 Curtain Road London EC2A 3NH TEL: 0800 028 0285 EMAIL: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
<b>NSPCC Report Abuse in Education Advice Line</b>	TEL: 0800 136 663 EMAIL: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
<b>Disclosure and Barring Service</b>	ADDRESS: DBS customer services PO Box 3961 Royal Wootton Bassett SN4 4HF TEL: 03000 200 190 EMAIL: customerservices@dbb.gov.uk

<b>Teaching Regulation Agency</b>	ADDRESS: Teacher Misconduct Ground Floor South Cheylesmore House 5 Quinton Road Coventry CV1 2WT TEL: 0207 593 5393 EMAIL: <a href="mailto:misconduct.teacher@education.gov.uk">misconduct.teacher@education.gov.uk</a>
<b>OFSTED Children</b>	<b>Safeguarding</b> TEL: 0300 123 4666 (Monday to Friday from 8am to 5pm) EMAIL: <a href="mailto:CIE@ofsted.gov.uk">CIE@ofsted.gov.uk</a>
<b>Independent Inspectorate</b>	<b>Schools</b> TEL: 0207 6000 100 EMAIL: <a href="mailto:concerns@isi.net">concerns@isi.net</a>