DANES HILL SCHOOL

Safeguarding and Child Protection Policy and Procedures

This policy applies to the Prep School and Pre-Prep School, including EYFS

Date/term of last review:	September 2026
Author(s)	DSL
Review Body	SLT and SG consultant
Approval Body	Full Governing Body
Approval date	pending
Regulatory reference	Part 3: Welfare, health and safety of pupils and Part 4 Suitability of staff, Supply Saff and Proprietors Education (Independent School Standards) Regulations 2014 Keeping Children Safe in Education 2026 Working Together to Safeguard Children 2026 Children's Wellbeing and Schools Act 2026
Next review period	September 2027
Publishing route	SharePoint and School Website

Table of Contents

Key Personnel and Contact Details for Safeguarding at the School 3
Key External Agencies, Services and Professionals' Contact Details 4
1. Introduction 6
2. Definition 7
3. Legal Framework and Other Policies 7
4. Policy Statement, Principles and Aims 9
5. Roles and responsibilities in Managing Safeguarding and Child Protection 11
6. Good Practice Guidelines 13
7. Safer Recruitment 14
8 Training 15
9 'Community Early Help and Targeted Family Help' 17
10 Recognising Harm, Exploitation, Significant Harm and Abuse 19
11. Abuse of trust and inappropriate relationships.... 20
12. Child on Child Abuse, including harassment and violence 20
13 Other Safeguarding Issues 28
14 Children who may be particularly vulnerable.... 40
15 Children who are questioning their gender 42
16. Digital Safeguarding/Online Safety and Filtering and Monitoring.... 46
17 Health & Safety, Extended School Activities and Educational Visits 48
18 Photography, images and mobile phones 49
19. Regulations and safeguarding requirements relating to school premises 50
20. Pastoral and Safeguarding Education 52
21. Data Protection.... 53
22. Monitoring and review 53
Appendix 1 - Child Protection Procedures 55
Appendix 2 67
Appendix 3 79
Appendix 4 81
Appendix 5 85
Appendix 6 88
Appendix 7 89

Key Personnel and Contact Details for Safeguarding at the School

Safeguarding Role	Name	Position at School	Contact Details
Interim Designated Safeguarding Lead both sites (DSL)	Mr Colin Baty	Head	DSL@daneshillschool.co.uk 01372849289
Prep School Site			
Deputy DSLs	Mr James Harvey	Deputy Head Pastoral	jharvey@daneshillschool.co.uk 01372 849242
DDSL	Mrs Ruth Samson	Head of Pre-prep	rsamson@daneshillschool.co.uk 01372849284
DDSL	Mrs Abi James	Hed of Junior School	ajames@daneshillschool.co.uk
DDSL	Mrs Lucy Holden	Head of Upper School	lholden@daneshillschool.co.uk
DDSL	Mrs Debs Baty	Mental Health Lead	dbaty@daneshillschool.co.uk
DDSL	Mrs Anna Corbett	School Nurse	acorbett@daneshillschool.co.uk
DDSL	Ms Nicola Fraser	School Counselor	nfraser@daneshillschool.co.uk
DDSL	Mrs Georgie Smith	Head of EYFS	gsmith@daneshillschool.co.uk
Pre –Prep School - Bevendean Site			
Deputy DSL with DSL responsibility for EYFS and Pre-Prep	Mrs. Ruth Samson	Head of Pre-Prep/Deputy DSL with DSL responsibilities for EYFS and Pre-Prep	rsamson@daneshillschool.co.uk 01372849284
DDSL	Mrs Georgie Smith	Deputy DSL and Head of EYFS	gsmith@daneshillschool.co.uk 01372 842546
Governors			
Chair of Governors	Ms Lindsay Leslie-Miller	Interim Chair of Governors	chair@daneshillschool.co.uk 01372849 287
SafeguardingGovernor	Ms Samantha Price	Governor	sprice@daneshillschool.co.uk 01372 849288

DANES HILL SCHOOL

Safeguarding… is everyone's responsibility

Danes Hill School is committed to safeguarding and promoting the physical, mental, and emotional welfare of all pupils, both on and off school premises.
Safeguarding is the responsibility of all staff, pupils, parents, governors, and visitors.
Any concerns should be reported to the Designated Safeguarding Lead (DSL). If the DSL is unavailable, contact a Deputy Designated Safeguarding Lead (DDSL).
You can also contact Surrey Children's Social Care (C-SPA Single Point Access) on 0300 470 9100.

Mr Colin Baty
Head of School
Designated Safeguarding Lead
01372 849289
DSL@daneshillschool.co.uk

Mr James Harvey
Deputy Head Pastoral &
Deputy DSL
01372 849242
jharvey@daneshillschool.co.uk

Mrs Ruth Samson
Head of Pre-Prep &
Deputy DSL (Pre-Prep)
01372 849294
rsamson@daneshillschool.co.uk

For concerns about adults:

Mr Colin Baty
Head of School
Designated Safeguarding Lead
01372 849289
DSL@daneshillschool.co.uk

If you have a safeguarding concern about the behaviour or actions of an adult - this may include a member of staff, governor, volunteer, or visitor - please report it to the Head.
If the Head is unavailable, or if your concern involves the Head, you should contact the Chair of Governors, Lindsay Leslie-Milller, chair@daneshillschool.co.uk
If the concern relates to the Chair of Governors, it must be reported to the Local Authority Designated Officer (LADO) on 0300 123 1650 option 3 or email LADO@surreycc.gov.uk Emergency out of hours phone: 01483 517898.
You can also contact the LADO for advice about your concerns, if you wish to.

Key External Agencies, Services and Professionals' Contact Details

Children's Single Point of Access (SPA) Team (Surrey)	The Dakota Building, 11 de Havailland Drive, Weybridge, Surrey, KT13 0YP	cspa@surreycc.gov.uk 0300 470 9100 OPTION 5
Local Area Designated Officer (LADO)	c/o Fairmount House, Bull Hill, KingstonRoad, Leatherhead, Surrey, KT22 7AH	LADO@surreycc.gov.uk 0300 123 1650 OPTION 3
Police non-emergency point of contact		101
Surrey Child and Adolescent Mental Health Services (CAMHS)	North East/Epsom South Lodge, St Ebba's, Hook Road, Epsom, Surrey, KT19 8QJ	0300 222 5850
Surrey safeguarding strategic leadership group (local safeguarding partnership arrangements)	SSCP Team, Quadrant Court, 35 GuildfordRoad, Woking, Surrey, GU22 7QQ	partnership.team@surreycc.gov.uk
NSPCC	For concerns about a child	0808 800 5000
Childline	Childline helpline for under 18s	0800 11 11
Prevent Contacts		preventreferrals@surrey.pnn.police.uk DFE contact: 0207 008 0151
Forced Marriage Unit		fmu@fmy.gov.uk 0207 008 0151

1. Introduction

1.1 Section 87(1) of the Children Act 1989, Section 157 of the Education Act 2002 and the Education (Independent Schools Standards) (England) Regulations 2014 (as amended) require the proprietors of the School (the Governing Body) to have arrangements – which must have regard to any guidance issued by the Secretary of State – to safeguard and promote the welfare of pupils at the school.

1.2 Danes Hill School is committed to safeguarding and promoting the physical, mental and emotional welfare of every pupil, both inside and outside of the school premises. The school governing body and leadership implement a whole-school preventive approach to managing safeguarding concerns, ensuring that the wellbeing and safety of pupils is at the forefront of all action taken.

1.3 This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance. It will be achieved by:

- Ensuring that members of the governing board, the Head and staff understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse, and know to refer concerns to the DSL.
- Teaching pupils how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provisions for any pupil that has been subject to, or is at risk of abuse, neglect, or exploitation.
- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Ensuring that the Head and any new staff and volunteers are only appointed when all the appropriate checks have been satisfactorily completed.

1.4 The School and its staff form part of the wider safeguarding system for children. This system is described in Working Together to Safeguard Children (2026), which became statutory guidance. The School works with social care, the police, health services and other services, as and where appropriate, in accordance with our statutory responsibility, to promote the welfare of children and protect them from harm.

1.5 The Local Safeguarding Partnership is Surrey, and we will operate our safeguarding procedures in line with locally agreed multi-agency safeguarding arrangements put in place by our safeguarding partners.

1.6 It applies to all children up to the age of 18 years whether living with their families, in state care, or living independently, including adopted and looked-after children. Some parts of this guidance also apply to unborn children, recognising their vulnerabilities and the need for early, pre-birth assessment.

2. Definition

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

- providing help and support to meet the needs of children as soon as problems emerge.
- protecting children from maltreatment, whether that is within or outside the home, including online.
- preventing the 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

2.2 It is the responsibility of the School to safeguard and promote the welfare of children. Representatives of the whole-school community of pupils, parents, staff and governors will be involved in policy development and review. The School aims to involve all staff in shaping the school's safeguarding arrangements.

2.3 The Safeguarding and Child Protection Policy will be reviewed annually by the Governing Body, unless an incident or new legislation or guidance suggests the need for an earlier date of review. This policy (and all its appendices) is one of a series in the School's integrated safeguarding portfolio. This policy has been authorised by the Governing Body, is addressed to all members of staff (including the Head, all teaching and non-teaching staff, temporary part-time workers, support staff, contractors, volunteers and members of the Governing Body (hereafter 'staff'), is available to parents on request and is published on the School website. It applies wherever staff or volunteers are working with pupils even where this is away from the School, for example at an activity centre or on an educational visit.

3. Legal Framework and Other Policies

3.1 This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

A. Legislation

- Children Act 1989 and 2004
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Education Act 2002
- Safeguarding Vulnerable Groups Act 2006
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- Anti-social Behaviour, Crime and Policing Act 2014
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
  Information Sharing Duty to Safeguard Children and Young People 2026
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended

Entitlement) (Amendment) Regulations 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Marriage and Civil Partnership (Minimum Age) Act 2022
- Children's Wellbeing and Schools Act 2026

B. Statutory guidance

- Home Office (2023) 'Prevent duty guidance: Guidance for specified authorities in England and Wales'
- DfE (2026) 'Working Together to Safeguard Children 2026'
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- DfE (2026) 'Keeping children safe in education 2026'
- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2023) 'Channel Duty Guidance: Protecting people susceptible to radicalisation'
- Home Office and Foreign, Commonwealth and Development Office(2023) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'
- The Education (independent School Standards)-England Regulations 2014
- DfE (2024) 'Working Together to improve Attendance
- DfE (2025) 'RSHE Statutory Guidance' (in force from Sept 2026)
- Behaviour in Schools (2024) Advice for Headteachers and school staff
- Statutory Framework for the Early Years Foundation Stage (2026)
- DfE (2026) 'Restrictive interventions, including use of reasonable force, in schools'
- DfE (2025) 'Children Missing Education'
- DfE (2025) 'Digital and Technology Standards in schools and Colleges'
- Children's Wellbeing and Schools Act 2026

C. Non-statutory guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2017) 'Child sexual exploitation'
- DfE (2024) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE (2024) 'Meeting digital and technology standards in schools and colleges'
- Surrey Safeguarding Children Partnership Procedures Manual
- What to do if you are worried a child is being abused 2015

D. Other Policies

3.2 This policy operates in conjunction with the following policies and procedures:
- Safeguarding Children Missing from Education Policy
- Home Visits Policy
- Missing Child Policy and Procedures

- Prevent Duty Risk Assessment
- Anti-bullying Policy
- Behaviour and Rewards Policy
- Restrictive Interventions and Seclusion Policy
- Searching, Screening and Confiscation Policy
- Information Security Policy
- Online Safety Policy
- Mobile Phones Policy
- Information Security and IT Acceptable Use Policy for Staff
- IT Acceptable Use Policy for Pupils
- Overarching Data Protection Policy
- Information Records Management Policy
- Whistleblowing Policy
- Staff Recruitment Policy and Procedures
- Staff Code of Conduct
- Social, Emotional, Mental Health and Wellbeing Policy
- Inclusive Education and Equal Opportunities Policy
- School Attendance Policy
- Suicide Prevention Policy

4. Policy Statement, Principles and Aims

A. Policy Statement

4.1 The School recognises its moral and statutory responsibility to safeguard and promote the welfare of all children. We endeavour to provide a safe and welcoming environment where children are respected and valued and to always consider the best interests of the child. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. We operate within a culture of openness and recognise and accept that abuse can happen in any organisation.

B. Principles

4.2 The School is committed to safeguarding and promoting the welfare of children and young people and expects all staff to share this commitment and to create an open environment where staff and pupils feelable to raise concerns, where concerns will be listened to and where support services and other agencies are readily involved:

- The School will ensure that the welfare of children is given paramount consideration when developing and delivering all school activities;
- All children, regardless of age, gender, ability, culture, ethnicity, race, language, religion, beliefs,caste or disability or sexual identity, have equal rights to protection: to feel safe, secure, valued and respected, and feel confident, and know how to approach adults if they have any concerns. No child or group of children must be treated any less favourably than others in being able to access services which meet their particular needs;
- All staff, including the Head are responsible for safeguarding the welfare of children as

part of their professional duties;

- All staff have an equal responsibility to act, in accordance with this policy and procedures and Keeping Children Safe in Education 2026, on any suspicion, concern or disclosure that may suggest a child is in need of support services or is at risk of harm; the full version of Keeping Children Safe in Education is available to all staff via the Staff Intranet/SharePoint;
- A child's wishes or feelings will be taken into account when determining what action to take and what services to provide to protect them; children will be given the opportunity to express their views and give feedback wherever possible.
- The School is committed to operating safer recruitment procedures in compliance with relevant legislation and guidance and in accordance with the Staff Recruitment Policy and Procedure;
- All pupils and staff involved in child protection issues will receive appropriate support from the senior management of the school who will follow this policy guidance and statutory guidance in doing so.
- The School will work with other agencies wherever such work is needed to ensure adequate arrangements to identify, assess and support those children who are suffering significant harm or who may suffer significant harm without appropriate intervention. The School will work with Surrey Children's Services, the Police, the LADO, health and other services to promote the welfare of children and to protect them from harm. Keeping Children Safe in Education (2026) and subsequent updates requires all school staff to be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care.
- Where requested to do so, the School will allow access for Surrey Children's Services and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment. In addition, the School will comply with any request to supply home education information to the Local Safeguarding Partnership that is required in order for it to perform its functions (Keeping Children Safe in Education (2026) recommends a co-ordinating inter-agency meeting with parents/carers before a final decision on home-schooling for any child).
- Relationships, Sex and Health Education (RSHE) supports safeguarding through education on relationships, safety, and wellbeing.

C. Aims

4.3 Danes Hill aims to:

- Provide all staff, including the DSL, Deputy DSLs, volunteers and governors with the necessary information to enable them to meet their statutory responsibilities in order to promote and safeguard the wellbeing of children.
- Ensure consistent good practice across the school.
- Demonstrate the School's commitment with regard to safeguarding children;
- Prevent harm by:
    - (a) providing excellent pastoral care;
    - (b) ensuring that appropriate staff are properly recruited and trained
    - (c) teaching pupils, via Personal Development and a varied curriculum to identify, reduce and manage risks. This included educating pupils about the safe use of electronic equipment and access to the internet; and

    - (d) promoting an ethos where pupils feel safe, secure and able to talk.
- Raise the awareness of all staff of the need to safeguard children and of their responsibilities inidentifying and reporting possible cases, or supposed cases, of abuse including radicalisation, child sexual exploitation and online grooming and abuse.
- Emphasise the need for good levels of communication between all members of staff.

D. Equality Act 2010, Sports' Access and Social Transition

4.4 The School recognises that effective safeguarding is anti-discriminatory and anti-racist, and understands factors, including economic and social circumstances, ethnicity and disability, which can impact on children and families' lives. Staff are alert to the risk of adultification bias, where children, particularly Black children, may be perceived as older than they are, which can lead to their needs being poorly understood and opportunities to provide help being missed.

4.5 **Sports:** The Equality Act 2010 contains an exception to single-sex sport. As the children get older, some sports are typically played in single sex groups. This exception applies to participation in any sport or game, or activity of a competitive nature, where the physical stamina or physique of the average girl would put her at a disadvantage in competition with the average boy (or vice versa). This means that schools can separate children according to their biological sex in these circumstances without discriminating unlawfully against them on the basis of their sex.

4.6 Some sports may need to be played in single-sex groups from a certain age to ensure children's safety, and where this is the case there must be no exceptions. In other cases, schools or colleges may have adopted a policy of single-sex sports for reasons related to fairness.

4.7 Where there are no safety concerns and a child makes a request relating to how they participate, schools and colleges will need to consider the request in light of the advice on "considering requests for support with social transition". This means that the school or college would need to take into account all the relevant factors, including whether supporting social transition is overall in the best interests of the child, as well as considering the impact on other children and the aim of creating safe and fair environments for children to participate in PE. For further details on social transition and gender questioning, please see section 15 of this policy.

5. Roles and responsibilities in Managing Safeguarding and Child Protection

A. All Staff

5.1 All staff have a statutory responsibility to:

- Have read and understood at least Part One of Keeping Children Safe in Education 2026 and subsequent updates.
- Maintain an attitude of "it can happen here"
- Provide a safe environment in which children can learn.
- Keep an open dialogue and understanding, ensuring that pupils feel listened to and understood
- Have read and be familiar with this policy, the Staff Code of Conduct and whistleblowing

procedures and be aware of systems, policies and procedures within the School which support safeguarding, including the School's Behaviour and Rewards Policy and Procedures and the School's Missing Pupil Procedures.

- Be aware of the signs of abuse and neglect so that they are able to identify children who may be in need of extra help or who are suffering, or are likely to suffer, significant harm and in such circumstances to take appropriate action, working with other services as needed.
- Ask for support from and work with the DSL and, if required, to support social workers to take decisions about individual children.
- Receive regular safeguarding refresher training, at appropriate levels, as and when required, at least annually, to keep up with any relevant safeguarding and child protection developments. Thetraining will be in accordance with the Local Safeguarding Partnership's guidance and will include local inter-agency working principles.
- Make a direct referral to Children Social Care (CSC) and Police immediately if, at any point, there is a risk of immediate serious harm.
- Be aware of the local Family Help process and understand their role.
- To keep the school informed on an on-going basis of any information that might have implicationsfor the safeguarding of the children in the school, for example where their relationships and associations both within and outside the workplace (including online) may have implications for the safeguarding of children in School.

5.2 At Pre Prep, in line with the EYFS statutory framework, regular supervision and provision (SAP) meetings are held. These supervision meetings foster a culture of mutual support, teamwork and continuous improvement which encourages the confidential discussion of sensitive issues.

5.3 These meetings provide staff with opportunities to discuss any issues, identify solutions and receive coaching to improve their personal effectiveness. Children with any pastoral concerns are tracked and monitored weekly on an internal pastoral log which is reported to the DSL with responsibility for EYFS.

5.4 Each child in the EYFS is assigned a designated key person who ensures their well-being and promotes secure attachments.

5.5 Staff : child ratios for EYFS are maintained in accordance with the requirements set out in Section 3.30–3.32 of the EYFS statutory framework. Children are supervised appropriately at all times to ensure their safety, well-being, and the effective implementation of safeguarding practices. This includes periods of rest, sleep or whilst eating.

B. Designated Safeguarding Lead (and Deputy DSLs)

The DSL and Deputy DSLs lead on all child protection matters and inter-agency coordination. Their full responsibilities are set out in Appendix 4.

C. Head

5.6 The Head is responsible for:

- Ensuring that the policies and procedures adopted by the governing board, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff.
- Providing staff with the appropriate policies and information upon induction
  Please see Appendix 6 for a detailed list of Head's responsibilities.

D. Governing Body (GB)

5.7 The Governing Body (GB) is responsible for:

- Ensuring compliance with child protection statutory requirements.
- Taking seriously its responsibility to uphold the aims of the charity and its duty of care in promoting the welfare of children, ensuring their security and protecting them from harm.
- Expecting and analysing regular reporting from the DSL to ensure compliance with current legislation, good practice and to identify areas for improvement.
- Recognising that close liaison with the local authorities is also vital in order that appropriate supportand training can be given.
- Ensuring that staff members have the skills, knowledge and understanding to conduct their safeguarding duties.
- Ensuring that strict safer recruitment processes and induction are in place.
- Appointing a governor with safeguarding responsibilities, who complete its duties at a high level
- Being aware of their obligations under the Human Rights Act 1989, the Equality Act 2010, the Data Protection Act 2018, the GDPR and the local multi-agency safeguarding arrangements.

5.8 The role and responsibilities of the GB in the management of safeguarding are as detailed in Part 2 of Keeping Children Safe in Education and summarised in Appendix 5 of this document.

6. Good Practice Guidelines

6.1 All staff must behave responsibly and professionally in all dealings with children and specifically with pupils for whom they have a duty of care. All staff must follow the procedures set out in our separate policy entitled Staff Code of Conduct, which includes guidance on one-to-one teaching, staff/pupil relationships and communication via social media.

6.2 Staff should always avoid behaviour which might be misinterpreted by others, and report and record any incident with this potential.

6.3 To meet and maintain our responsibilities towards children, all members of the School community (Governors, staff, pupils and parents where appropriate) are expected to adhere to the following standards of good practice:

- Reading and understanding all of the School's safeguarding and guidance documents on wider safeguarding issues in addition to this policy, including: the Staff Code of Conduct, Anti-Bullying Policy, Attendance Policy, Behaviour and Rewards Policy, Physical Interventions and Restraint Policy, Searching, Screening and Confiscation Policy, Missing Pupil Policy and Procedure, Data Protection policies, SEND Policy, Whistleblowing Policy and the Information Security and IT Acceptable Use Policy;
- Treating all children with respect.
- Setting a good example by conducting ourselves appropriately.
- Involving children in decision-making which affects them, including regular communication with children and ensuring that children are and feel listened to e.g. through safety questionnaires, well-being surveys, participation in anti-bullying week, etc.
- Encouraging positive and safe behaviour among children.
- Being alert to changes in children's behaviour - maintain an attitude of 'it could happen here',

where safeguarding is concerned.

- Recognising that challenging behaviour may be an indicator of abuse.
- Asking the child's permission before doing anything for them which is of a physical nature (exceptwhere there is an urgent need to take action to protect them or to prevent them from harming others), such as assisting with dressing, physical support during PE or administering first aid.
- Maintaining appropriate standards of conversation and interaction with and between children and avoiding and discouraging the use of inappropriate sexualised or derogatory language.
- Ensuring that all children are encouraged to talk to adults in School about any concerns, no matter how small they are and ensure that children feel comfortable doing so; and
- Being aware that the personal and family circumstances and lifestyles of some children lead to an increased risk of neglect and/or abuse.
- Seeking to reassure any victim of abuse that they are being taken seriously and will be supported,without making the child feel ashamed or that they are creating a problem.
- Understanding that assessments of children should consider whether wider environmental or contextual factors are present in a child's life that are a threat to their safety and/or welfare (Contextual Safeguarding).

6.4 All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. All staff should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra- familial harms take variety of different forms and children can be vulnerable to multiple harms including (but not limited to) domestic abuse in their intimate relationships (teenage relationship abuse – including physical, sexual, emotional abuse and stalking), harassment, sexual exploitation, criminal exploitation (including financial exploitation), and serious youth violence.

7. Safer Recruitment

7.1 The School is committed to safer recruitment, ultimate responsibility which lies with the Governing Body.

7.2 The Head and the School's HR department are responsible for implementing these procedures in practice. The School makes appropriate checks on all staff, including through the identity check, right to work, enhanced Disclosure and Barring Services (DBS), Barred List checks, medical clearance and obtaining and following up thorough references. References to the Teacher Regulation Agency's Employer Access Service have been replaced with Check a Teacher's Record for such as the prohibition from teaching and S128 checks. The staff member, contractor or volunteer, in regulated activity, are not permitted to commence work until the full clearance is received. In rare circumstances a risk assessment and constant supervision may be put in place for staff or volunteers working with pupils in year 1 and older. *In line with the Early Years Foundation Stage Framework (2026), we are fully compliant with the 'supervision exemption' requirement for staff, trainees and volunteers to have an enhanced DBS with Barred List before they commence work.*

7.3 In addition to this, the Director of HR will be responsible for co-ordinating an online search as part of the necessary due diligence on the shortlisted candidates. Shortlisted candidates will be informed that online searches may be conducted as part of the recruitment process. This may help identify any incidents or issues that have happened, and are publicly available online, which the school might want to explore with the applicant at interview.

7.4 At least one member of the interview panel has received safer recruitment training and safeguarding questions are included.

7.5 Records of the safer recruitment checks are stored on the Single Central Register and available for inspection by ISI and the Secretary of State.

7.6 See the School's Staff Recruitment policy for further details which comply with part 3 of Keeping Children Safe in Education (September 2026), the Safeguarding Vulnerable Group Act (2006) and other relevant safeguarding recruitment guidance to ensure that no one is employed within, by or on behalf of the School who is unsuitable to work with children.

Starting with September 2026, the 'supervision exemption' has been removed in line with the Crime and Policing Bill Act 2026 and KCSIE 2026. The regulated activity criteria is replaced by a simplified frequency of more than 3 days in a 30-day period or overnight. This also applies to volunteers and trainee teachers' supervisors.

7.7 Volunteers are also to be treated as "staff" for the purpose of separate barred list checks, whilst awaiting the DBS check result.

7.8 Keeping Children Safe in Education (2026) emphasises the importance of ongoing beyond the recruitment process. Staff should feel comfortable discussing matters they believe may have safeguarding implications, including those observed or heard online.

7.9 The Information Commissioner has published guidance on employment records in The Information Commissioner Employment Practices Code, The Information Commissioner Employment Practices Code which provides some practical advice on record retention.

7.10 The School ensures compliance with the disqualification requirements under the Childcare Act 2006 for all EYFS staff."

7.11 Please refer to the Staff Recruitment Policy for further details.

8 Training

8.1 It is important that all staff (as defined in 3 above) have training to enable them to recognisethe possible signs of abuse and neglect and to know what to do if they have a concern.

8.2 New staff will receive training on appointment as part of their induction which is overseen by the DSL and which includes links or digital copies of:

- This policy;
- The Staff Code of Conduct
- Information Technology and IT Acceptable Use Policy (for staff)
- The Behaviour and Rewards Policy
- Searches, Screening and Confiscation Policy
- Restrictive Interventions and Seclusion Policy
- The Missing Pupil Policy and Procedure
- The identity and the role of the DSL and deputies
- Section One of Keeping Children Safe in Education

- Prevent online training
- A copy of What to do if you are worried a child is being abused
- The Whistleblowing Policy

8.3 Induction training will be completed before a member of staff or volunteer begins any work for the schoolthat involves contact with children.

8.4 All staff will be required to confirm they have read, understood and agreed to comply with the requirements outlined in these documents. Mechanisms to assist staff in understanding Keeping Children Safe in Education will include regular updates at staff meetings, spot checks by the DSL and the safeguarding Governor, quizzes, e-bulletins, referral flow charts,and safeguarding credit cards and more general support from the DSL and Deputy DSLs.

8.5 All staff will receive child protection training at appropriate levels, as and when required in accordance with the Surrey Safeguarding Children Partnership. This training will include advice on protecting children from radicalisation as well as online safety. Such training, when arranged, takes priority over all other commitments. It will be renewed as specified by the Local Safeguarding Partnership in frequency and content.

8.6 All staff receive regular safeguarding training, including updates on statutory guidance and local procedures, delivered through various formats including briefings, online modules, and practical exercises. See Staff Induction Checklist for full training content.

8.7 Restrictive/physical interventions training and safer recruitment training is arranged for selected staff, as deemed necessary by the DSL and Head/Deputy Head Pastoral.

8.8 Staff will receive updates and training in line with the 'Plan technology for your school' service and DfE's guidance on the use of generative AI in education to ensure appropriate filtering and monitoring practices are implemented and reviewed.

8.9 The DSL and Deputy DSLs will receive regular safeguarding training at appropriate levels, as and when required (at leastannually) to provide them with the knowledge and skills to carry out the role (see Appendix 5), including: training in inter-agency working; providing advice and support to staff on protecting children from radicalisation; participation in child protection case conferences; supporting children in need; record keeping and promoting a culture of listening to children, and safer recruitment . Such training, when arranged, takes priority over all other commitments. This training will be supplemented (at least annually) with additional training in specific safeguarding issues to allow them to understand and keep up with any developments relevant to their role.

8.10 In line with Section 3.35–3.39 of the EYFS Statutory Framework, the School ensures that at least one person with a current Paediatric First Aid (PFA) certificate is on the premises and available at all times when EYFS children are present, and that PFA training is regularly maintained, monitored, and recorded. The School Nurse and paediatric first aid trained staff are available on the Prep School and Pre-Prep School during the school opening hours. The School nurse is also in charge with ensuring the training records are up to date and the training is arranged in a timely manner.

8.11 Governors will receive annual safeguarding training during the regulatory/business meeting and either online training or workshops, as deemed appropriate by the DSL.

8.12 A register of face to face training attendance, online training and document reading records are maintained by the School's HR department, via an online platform (currently EveryHR).

8.13 RSHE staff receive safeguarding training, and disclosures during RSHE are handled in line with this policy.

9 'Community Early Help and Targeted Family Help'

9.1 Early help means supporting children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Where a child would benefit from coordinated targeted Family Help, an inter-agency assessment should be arranged. Chapter one of Working Together to Safeguard Children (2026) provides detailed guidance on the targeted Family Help process.

9.2 All staff should be aware of the targeted Family Help process and understand their role in it. This includes identifying emerging problems, liaising with the DSL, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking a targeted Family Help assessment.

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

- Is disabled and has specific additional needs.
- Has special educational needs (whether or not they have a statutory education, health and care plan).
- Experienced multiple suspensions and /or at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
- Is a young carer.
- Shows signs of being drawn into anti-social or criminal behaviour, including gang involvementand association with organised crime groups or county lines.
- Is frequently missing/goes missing from care or from home.
- Is misusing drugs or alcohol themselves.
- Is at risk of modern slavery, trafficking or exploitation.
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mentalhealth problems, domestic abuse or homelessness
- Has a family member in prison or is affected by parental offending.
- Has returned home to their family from care.
- Is showing early signs of abuse and/or neglect.
- Is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage
- Is at risk of being radicalised or exploited.
- Is a privately fostered child.
- Has a mental health need.
- Has unexplained and/or is persistently absent from education.
- Has certain health conditions.

9.4 Effective targeted Family Help relies upon local agencies working together to:

- Identify children and families who would benefit from targeted Family Help.
- Undertake an assessment of the need for targeted Family Help; and
- Provide targeted Family Help services to address the assessed needs of a child and their family whichfocuses on activity to significantly improve the outcomes for the child.

9.5 Where a child and family would benefit from coordinated support from more than one agency e.g. education, health, police, there should be an inter-agency targeted Family Help assessment. This should identify what help the child and family require to prevent needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989.

9.6 If targeted Family Help is appropriate and where they are not taking the lead, the DSL will support the member of staff liaising with other agencies and setting up inter-agency Family Help assessment as appropriate.

9.7 The targeted Family Help assessment will be undertaken by a lead professional who will provide support to the child of the family, act as an advocate on their behalf and coordinate the delivery of support services. The lead professional role may be undertaken by the DSL or a teacher (or a GP, family support worker, health visitor and/or special educational needs coordinator).

9.8 Decisions as to who performs this role will be taken on a case-by-case basis and will be informed by thechild and their family.

9.9 For a targeted Family Help assessment to be effective:

- It should be undertaken with the agreement of the child and their parents or carers and should involve the child and their family as well as all of the professionals who are working with them.
- A teacher (or other relevant professional) should be able to discuss concerns they may have about a child and family with a social worker in the local authority; and
- If parents and/or the child do not consent to a targeted Family Help assessment, then the lead professional should make a judgment as to whether, without help, the needs of the child will escalate. If so, a referral to children's social care may be necessary.

9.10 Effective targeted Family Help in a school setting involves the school (under the guidance of the DSL) providing high quality support, in cooperation with or coordinating other agencies as appropriate, to help address the assessed needs of the child and their family early, in order to significantly improve the outcomes for the child. It is hoped that in each case, this should improve the welfare of the relevant child. However, each case should be kept under constant review, and consideration should be given to a referral to children's social care if the child's situation does not appear to be improving.

9.11 The school will not limit its support to pupils affected by the above and will be mindful of a variety of additional circumstances in which pupils may benefit from targeted Family Help, for example, if they are:

- Bereaved.
- Viewing problematic or inappropriate online content or developing inappropriate relationships online.
- Have recently returned home to their family from care.

- Missing education, or are persistently absent from school, or not in receipt of full-time education.
- Has experienced multiple suspensions and/or is at risk of being permanently excluded

9.12 A summary of the Family Help provided in-house at Danes Hill is provided in Appendix 7.

10 Recognising Harm, Exploitation, Significant Harm and Abuse

10.1 To ensure that children are protected from harm, we need to understand what types of behaviour constitute abuse, neglect and exploitation. Abuse, neglect and exploitation are forms of maltreatment. Somebody (adult or child) may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to preventharm, for example by leaving a young or immature child home alone. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children. Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

10.2 There are four categories of abuse: **physical abuse, emotional abuse, sexual abuse and neglect**, as defined in Part One of Keeping Children Safe in Education as updated (September 2026) and reproduced in Appendix 2. Staff are aware that abuse, neglect and safeguarding issues are rarely standalone events and can be covered by one definition or label.

10.3 'Harm' - The Children Act 1989 defines harm as: *"Ill-treatment or the impairment of health or development".* 'Development' means physical, intellectual, emotional, social or behaviour development; 'health' means physical or mental health; and 'ill treatment' includes sexual abuse and forms of ill- treatment which are not physical. The definition of harm also includes *"impairment suffered by hearing orseeing the ill-treatment of another*".

10.4 'Significant Harm' - refers to the *"threshold that justifies compulsory intervention in family life in the best interests of children, and gives Local Authorities a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a child who is suffering or likely to suffer significant harm"*. The legislation does not define the line between 'harm' and 'significant harm'. Staff should give 'significant'its ordinary meaning (i.e. considerable, noteworthy or important). The child's particular characteristics alsoneed to be taken into consideration. For example, a child left home alone at the age of 3 could be at risk of significant harm, whereas a child aged 13 years may be less likely so. The test will be subjective to the particular circumstances.

10.5 Whether the harm is significant is determined by comparing the child's health and development with what could reasonably be expected from a similar child. For example, if a child is failing to meet developmental or physical milestones, it is necessary to determine whether this is the result of a lack of "good enough" parenting. There is no clearly defined criteria to judge whether harm meets the threshold of 'significant'—it can be the result of a traumatic event or a compilation of acute and long-standing events. As highlighted in Working Together to Safeguard Children, "Some children live in family and social circumstances where their health and development are neglected. For them, it is the corrosiveness of long-term emotional, physical or sexual abuse that causes impairment to the extent of constituting significant harm."

10.6 The following factors should be considered in understanding and identifying significant harm:

- The nature of harm, in terms of maltreatment or failure to provide adequate care.
- The impact on the child's health and development.
- The child's development within the context of their family and wider environment.
- Any special needs, such as a medical condition, communication impairment or disability, that may affect the child's development and care within the family, or which might obscure the existence of abuse.
- The capacity of parents to meet adequately the child's needs; and
- The wider and environmental family context.
- Misinformation, disinformation (including fake news) and conspiracy theories may constitute safeguarding harms and should be escalated appropriately if they pose a risk to a child's welfare.

11. Abuse of trust and inappropriate relationships

11.1 As a result of their knowledge, position and/or the authority invested in their role, all adults working withchildren and young people are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all staff have a responsibility to ensurethat an unequal balance of power is not used for personal advantage or gratification.

11.2 Staff should note that it is an offence (Sexual Offences Act 2003) for a person aged 18 or over and in a position of trust to (a) intentionally touch a child in a sexual way; (b) have a sexual relationship with a child, even if the relationship is consensual; (c) cause or incite a child to engage in sexual activity; (d) intentionally engage in sexual activity in the presence of a child; or (e) for the purposes of sexual gratification cause a child to watch a third person engaging in a sexual activity or look at an image or any person engaging in a sexual activity. A position of trust could arise even if the member of staff does not teach the child. A child for these purposes is a person under the age of 18.

12.Child on Child Abuse, including harassment and violence

12.1 The Governors, School Leadership Team, and all staff and volunteers at Danes Hill School (hereafter, 'the School') are committed to the prevention, early identification and appropriate management of child-on-child abuse (as defined below) both within and beyond the School.

12.2 All staff recognise that children are capable of abusing other children (including online).

12.3 In particular, we believe that in order to protect children, all schools should:

- Put in place measures to minimise the child-on-child abuse
- Put systems in place that are easily understood and accessible, for children to confidently report abuse, knowing their concerns will be treated seriously
- Be aware of the level and nature of risk to which their pupils are or may be exposed, and put in place a clear and comprehensive strategy which is tailored to their specific safeguarding context
- Take a contextual whole-school approach to preventing and responding to child-on-child abuse.
- Maintain an attitude of *'it could happen here'*;

- Act as though it is happening even when there are no specific reports.
- Take a zero-tolerance approach to sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of violence and conflict. Abuse must never be passed off as “banter”, “just having a laugh”, “part of growing up” or “boys being boys”
- Have a clear strategy in place as how victims and other children affected by child-on-child abuse will be supported
- Make reasonable adjustments for disabled children and young people to deal with particular disadvantages, such as bullying or child on child abuse.
- Recognise that girls are more likely to be victims and boys' perpetrators
- Have clear processes in place for reporting, recording, investigating child on child abuse

12.4 This section of the Safeguarding and Child Protection Policy:

- Sets out the School’s strategy for preventing, identifying and appropriately managing child-on-child abuse.
- Applies to all staff including Governors, members of the School Leadership Team, staff, volunteers, contractors, etc. It will be reviewed as may be required, at least annually, to ensure that it continually addresses the risks to which pupils are, or may be, exposed.
  A number of staff will be involved in eachannual review, which involves and is informed by an assessment of the impact and effectiveness of this policy over the previous year.
- Since September 2024 the term ‘victim’ and/or ‘alleged perpetrator’ may be used again in line with the KCSIE 2026 updates. This is because our School takes a safeguarding approach to all individuals involved in allegations of or concerns about child-on-child abuse, including those who are alleged to have been abused and those who are alleged to have abused their peers, in addition to any sanctioning work that may also be required for the latter. Research has shown that many children who present with harmful behaviour towards others, in the context of child-on-child abuse, are themselves vulnerable and may have been victimised by peers, parents or adults in the community prior to their abuse of peers.
- Uses the terms 'child' and 'children', which is defined for the purposes of this policy as a person aged under 18. We have nonetheless chosen not to restrict our approach to child-on-child abuse to children but instead to adopt a wider interpretation of our safeguarding responsibilities so that they apply to all pupils, regardless of age.
- Is compliant with the statutory guidance on child-on-child abuse as set out in Keeping Children Safe in Education (2026);
- Should, if relevant according to the concerns/allegations raised, be read in conjunction with the DfE's advice on Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (DfE's Advice) (2021), and any other advice and guidance referred to within it, as appropriate.

A. Definition of child-on-child abuse

- For these purposes, child-on-child abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children and within children's relationships (both intimate and non- intimate). Child-on-child abuse can take various forms, including:
  - bullying (including cyberbullying, prejudice-based and discriminatory bullying)
  - abuse in intimate personal relationships between children (also known as teenage relationship abuse),
  - physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm,
  - physical assault and harm, or the threat of harm with a weapon,

- harmful sexual behaviour, sexual violence and sexual harassment – which may include misogyny/misandry.
- consensual and non-consensual making or sharing of nudes and seminudes, including those generated using AI.
- 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,
- upskirting (which is a criminal offence), 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.

- Children's experiences of abuse and violence are rarely isolated events, and they can often be linked to other events that are happening in their lives and spaces in which they spend their time. Any response tochild-on-child abuse therefore needs to consider the range of possible types of child-on-child abuse set out above and capture the full context of children's experiences. This can be done by adopting a Contextual Safeguarding approach and by ensuring that our response to incidents of child-on-child abuse takes into account any potential complexity.

- RSHE supports prevention through education on consent, boundaries, and respectful behaviour.

B. Contextual Safeguarding

- Is an approach to safeguarding children that recognises their experiences of significant harm in extra-familial contexts, and seeks to include these contexts within prevention, identification, assessment and intervention safeguarding activities;
- Recognises that as children enter adolescence, they spend increasing amounts of time outside of the home in public environments (including on the internet) within which they may experience abuse; and
- Considers interventions to change the systems or social conditions of the environments in which abuse has occurred. For example, rather than move a child from a school, professionals could work with theSchool Leadership Team and student body to challenge harmful, gendered school cultures, thus improving the pre-existing school environment.

C. When does behaviour become problematic or abusive?

- All behaviour takes place on a spectrum. Understanding where a child's behaviour falls on a spectrum isessential to being able to respond appropriately to it.

D. Harmful sexual behaviours

- "Children's sexual behaviours exist on a wide continuum, from normal and developmentally expected to highly abnormal and abusive. All staff should recognise the importance of distinguishing between problematic and abusive sexual behaviour. Both problematic and abusive sexual behaviours are developmentally inappropriate and may cause developmental damage, a useful umbrella term is harmfulsexual behaviours or HSB." – NSPCC

- Harmful sexual behaviours are further defined as "Sexual behaviours expressed by children and young people that are developmentally inappropriate, may be harmful towards self or others, or be abusive towards another child, young person or adult."

- Simon Hackett has proposed the following continuum model to demonstrate the range of sexual

behaviours presented by children, which may be helpful when seeking to understand a pupil's sexual behaviour and deciding how to respond to it.

- Hackett's continuum relates exclusively to sexual behaviour and is not exhaustive. The Brook Sexual Behaviours Traffic Light Tool can also be very helpful in identifying sexual behaviours by children. Staff should always discuss any concerns with the DSL (or, in their absence, a Deputy DSL). Where an (alleged) incident involves a report of sexually harmful behaviour the DSL must be informed.

Normal	Inappropriate	Problematic	Abusive	Violent
• Developmentally expected • Socially acceptable • Consensual, mutual, reciprocal • Shared decision making	• Single instances of inappropriate sexual behaviour • Socially acceptable behaviour within peer group • Context for behaviour may be inappropriate • Generally consensual and reciprocal	• Problematic and concerning behaviour • Developmentally unusual and socially unexpected • No overt elements of victimisation • Consent issues may be unclear • May lack reciprocity or equal power • May include levels of compulsivity	• Victimising intent or outcome • Includes misuse of power • Coercion and force to ensure compliance • Intrusive • Informed consent lacking or not able to be freely given • May include elements of expressive violence	• Physically violent sexual abuse • Highly intrusive • Instrumental violence which is psychologically and/or sexually arousing to the child responsible for the behaviour • Sadism

NSPCC provides information on the sexual development and behaviour in children

E. Other behaviour

- When dealing with other alleged behaviour, which involves reports of, for example, emotional and/or physical abuse, staff can draw on aspects of Hackett's continuum to assess where the alleged behaviour falls on a spectrum and to decide how to respond. This could include, for example, whether it:

  - Is socially acceptable
  - Involves a single incident or has occurred over a period of time
  - Is socially acceptable within the peer group
  - Is problematic and concerning
  - Involves any overt elements of victimisation or discrimination e.g. related to race, gender, sexualorientation, physical, emotional, or intellectual vulnerability
  - Involves an element of coercion or pre-planning
  - Involves a power imbalance between the child/children allegedly responsible for the behaviour and the child/ children allegedly the subject of that power
  - Involves a misuse of power

F. Identifying child-on-child abuse

- All staff should be alert to the well-being of pupils and to signs of abuse, and should engage with these signs, as appropriate, to determine whether they are caused by child-on-child abuse. However, staff should be mindful of the fact that the way(s) in which children will disclose or present with behaviour(s) as a result of their experiences will differ.

- Signs that a child may be suffering from child-on-child abuse can also overlap with those indicating other types of abuse and can include (source: NSPCC):

    - Failing to attend school, disengaging from classes or struggling to carry out school related tasks tothe standard ordinarily expected.
    - Physical injuries.
    - Experiencing difficulties with mental health and/or emotional wellbeing.
    - Becoming withdrawn and/or shy; experiencing headaches, stomach aches, anxiety and/or panic attacks; suffering from nightmares or lack of sleep or sleeping too much.
    - Broader changes in behaviour including alcohol or substance misuse.
    - Changes in appearance and/or starting to act in a way that is not appropriate for the child's age.
    - Abusive behaviour towards others.

- Abuse affects children very differently. The above list is by no means exhaustive and the presence of one or more of these signs does not necessarily indicate abuse. The behaviour that children present with will depend on their particular circumstances. Rather than checking behaviour against a list, staff are trained to be alert to behaviour that might cause concerns, to think about what the behaviour might signify, to encourage children to share with them any underlying reasons for their behaviour, and, where appropriate, to engage with their parents/carers so that the cause(s) of their behaviour can be investigated.

- The power dynamic that can exist between children is also very important when identifying and responding to their behaviour: in all cases of child-on-child abuse, a power imbalance will exist withinthe relationship. This inequality will not necessarily be the result of an age gap between the child responsible for the abuse and the child being abused. It may, for example, be the result of their relative social or economic status. Equally, while children who abuse may have power over those who they areabusing, they may be simultaneously powerless to others.

- Any child can be vulnerable to child-on-child abuse due to the strength of peer influence during adolescence, and staff should be alert to signs of such abuse amongst all children. Individual and situational factors can increase a child's vulnerability to abuse by their peers. For example, an image of a child could be shared, following which they could become more vulnerable to child-on-child abusedue to how others now perceive them, regardless of any characteristics, which may be inherent in them and/or their family.

- Peer group dynamics can also play an important role in determining a child's vulnerability to such abuse. For example, children who are more likely to follow others and/or who are socially isolated from their peers may be more vulnerable to child-on-child abuse. Children who are questioning or exploringtheir sexuality may also be particularly vulnerable to abuse by their peers.

- Research suggests that child-on-child abuse may affect boys differently from girls, and that this difference may result from societal norms (particularly around power, control and the way in which femininity and masculinity are constructed) rather than biological make-up. Barriers to disclosure willalso be different. The School will regularly review gender dynamics of child-on-child abuse within its settings.

G. School culture and environment

- The School actively seeks to raise awareness of and prevent all forms of child-on-child abuse by: Educating all staff, pupils, and parents about this issue. This includes:

  - Training staff on the nature, prevalence and effect of child-on-child abuse, and how to prevent, identify and respond to it. This includes:
    - (a) Contextual Safeguarding
    - (b) the identification and classification ofspecific behaviours
    - (c) the importance of taking seriously all forms of child-on-child abuse (no matter how low level they may appear) and ensuring that no form of child-on-child abuse is ever dismissed as horseplay or teasing.

  - Educating children about the nature and prevalence of child-on-child abuse via Personal Development and the wider curriculum. Pupils are frequently told what to do if they witness or experience such abuse, the effect that it can have on those who experience it and the possible reasons for it, including vulnerability of those who inflict such abuse. Pupils are regularly informed about the School's approach to such issues,including its zero tolerance policy towards all forms of child-on-child abuse.

  - Engaging parents on this issue by:

    - Talking about it with parents, both in groups and one-to-one.
    - Asking parents what they perceive to be the risks facing their child and how they would like to seethe School address those risks.

  - Ensuring that all child-on-child abuse issues are fed back to the DSL so that they can identify andaddress any concerning trends and pupils who may be in need of additional support.
  - Challenging the attitudes that underlie such abuse (both inside and outside the classroom).
  - Working with staff, pupils and parents to address equality issues, to promote positive values, and toencourage a culture of tolerance and respect amongst all members of the School community.
  - Creating conditions in which our pupils can aspire to and realise safe and healthy relationships.
  - Creating a culture in which our pupils feel able and safe to share their concerns openly, in a non- judgmental environment, and have them listened to; and responding to cases of child-on-child abuse promptly and appropriately.

- The School actively engages with its local partners in relation to child-on-child abuse, and works closely with, for example, the Surrey Safeguarding Children Partnership, children's social care, the police and/or other relevant agencies, and other schools. The relationships the School has built with these partners are essential to ensuring that the School is ableto prevent, identify early and appropriately handle cases of child-on-child abuse.

H. Multi-agency working

They help the School to:

- develop a good awareness and understanding of the different referral pathways that operate in its localarea, as well as the preventative and support services which exist;
- ensure that our pupils are able to access the range of services and support they need quickly;
- support and help inform our local community's response to child-on-child abuse;
- to increase our awareness and understanding of any concerning trends and emerging risks in our local area to enable us to take preventative action to minimise the risk of these being experienced by our pupils.

- The School actively refers concerns/allegations of child-on-child abuse where necessary to the police and children's social care. This is particularly important because child-on-child abuse can be a complex issue, and even more so where wider safeguarding concerns exist.

- It is often not appropriate for one single agency (where the incident cannot be managed internally) to try to address the issue alone – it requires effective partnership working.

I. Information sharing

- The school recognises the importance of proactive information sharing between professionals, safeguarding partners and other agencies.Staff should share information pro-actively where it may assist in safeguarding or promoting the welfare of a pupil, identifying merging needs, facilitating targeted help and preventing harm.
-
- The School will have regard to Information Sharing to Safeguard Children and Young People (2026 Statutory Guidance), the updated section 16LA of the Children Act 2004, Working Together to Safeguard Children (2026) and Keeping Children Safe in Education (2026). Information sharing decisions will be lawful, necessary, relevant and proportionate

- Considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the pupil being placed at risk of harm.

- Staff members will be made aware that safeguarding partners may take legal action against them if they do not share specified information when a request is made for the purposes of safeguarding.
  Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of pupils. If staff members are in doubt about sharing information, they will speak to the DSL or deputy DSLs.

- Relevant information is shared with the subsequent school, the child moved to, within 5 days for an in-year transfer and within the first 5 days of the new term. The safeguarding information is transferred separately from the main school file. In some cases it is important that the new school received the information before the child has left Danes Hill School, to allow the new school to complete a risk assessment and liaise with other agencies, ensuring support is in place

when the child arrives.

- Staff must be aware that consent is not always required when sharing information for safeguarding and child protection reasons. They must focus on the legal basis for sharing and focus on the following aspects:

    - the relevance of the information to the safeguarding concern, welfare need or risk being assessed
    - whether the information is necessary for the recipient to fulfil their safeguarding responsibilities
    - whether the information is accurate, up to date and appropriately contextualised, and
    - whether the information being shared is proportionate to the identified risk or need.

- Professional judgement and proportionality should be used to ensure that the information shared is focused and proportionate. This may include summarising or omitting information which is not necessary for safeguarding purposes. But care should be taken not to omit information where it may be relevant to understanding or managing safeguarding risk.

- It is important that governing bodies and proprietors are aware that among other obligations, the data protection laws place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

- Governing bodies and proprietors should ensure relevant staff have due regard to the relevant data protection principles, including the Information Sharing to safeguard Children and Young people (2026 statutory guidance) and new information sharing duty, which allow them to share (and withhold) personal information, as provided for in the data protection laws. This includes:

    - being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as *'special category personal data'*,
    - providing a supportive environment where staff understand that safeguarding of children and individuals at risk is a recognised condition for processing special category personal data. Information may be shared without consent where there is a lawful basis to do so and where sharing is necessary, relevant and proportionate to safeguard or promote the welfare of a child. The School will comply with data protection legislation and may withhold personal information where disclosure would be likely to cause serious harm or where another statutory exemption applies.
    - Where in doubt schools should seek independent legal advice.

The School will be transparent with children and families about information sharing decisions wherever it is safe and appropriate to do so. Information may be shared without informing a child, parent or carer where doing so could place a child at risk of harm, prejudice a safeguarding enquiry, compromise the prevention or detection of crime, or otherwise be contrary to the child's best interests.

Careful consideration will be given to information sharing arrangements for children with SEND, recognising that vulnerabilities, communication needs and safeguarding risks may be experienced differently and may require additional context to be shared with relevant professional.

13 Other Safeguarding Issues

- All staff should have an awareness of safeguarding issues that often overlap and can put children at risk of harm (including but not limited to those listed below). The following behaviours and indicators can be signs that children are at risk:

    - drug taking and/or alcohol misuse
    - unexplainable and/or persistent absences from education
    - serious violence, criminal exploitation (including that linked to county lines), radicalisation, and
    - consensual and non-consensual making or sharing of nudes or semi- nudes

- Expert and professional organisations provide up-to-date guidance and practical support on specific safeguarding issues. For example NSPCC offers information for schools on the TES website and also at http://www.nspcc.org.uk Staff can also access broad government guidance on the issues listed below viathe GOV.UK website: Criminal Exploitation of Children and Vulnerable Adults

- Further support for school staff in relation to pupils with SEND and deaf/disables pupils is available from https://learning.nspcc.org.uk/safeguarding-child-protection-schools/safeguarding-children-with-special-educational-needs-and-disabilities-send

child sexual exploitation (CSE)	gangs and youth violence
bullying including cyberbullying	gender-based violence/violence against women and girls
domestic abuse	mental health
drugs	trafficking
fabricated or induced illness	teenage relationship abuse
faith abuse	

Non-Governmental Organisation (NGO) advice is also available regarding other safeguarding issues, as follows:

Eating disorders

Self-harm

A. Children Missing from Education

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

- All staff should be aware that children being absent from school, particularly repeatedly and/or for prolonged periods, and children missing education, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse or neglect including pupil trafficking, sexual

abuse and sexual exploitation.

- All staff are informed of the separate procedures to be used for searching for, and if necessary, reporting, any pupil missing from school as well as the school's attendance policy and procedures.

- These procedures are informed by the Pan London Child Protection Procedures and have regard to relevant statutory guidance in respect of School attendance (November 2016); children missing from home or care (January 2014); Children Missing Education (September 2016) and Working Together to Improve School Attendance (September 2026). In particular, the School, via the DSL, will report to the Local Authority and to the Police, any instance of a pupil going missing in circumstances that meet the threshold for such a report to be made.

- Please see the School's separate Attendance Policy and Safeguarding Children Missing Education Policy for further details.

These procedures include:

- safeguarding responses to children who go missing from education, particularly on repeat occasions, which help identify the risk of abuse and neglect and which help to prevent the risks of the child going missing in future.
- The requirement to:
    - record any incident, the action taken, and the reasons given by the pupil for being missing.
    - notify the local authority when the school is about to remove or add a pupil from or to the school admission register at a non- standard transition point.
    - to make reasonable enquiries to establish the whereabouts of a child jointly with the local authority, before deleting the pupil's name from the register if the deletion is under regulation 8(1)(h), namely that the child has been continuously absent from the school for a period of twenty school days or more.

- All staff are aware of their roles to protect children from going missing in education. It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage.

- Please see the Safeguarding Children Missing Education Policy and the Home Visits Policy for further guidance.

B. Alternative Provision

- Where a school places a pupil with an alternative provision provider, it continues to be responsible for the safeguarding of that pupil and should be satisfied that the placement meets the pupil's needs.

- The cohort of pupils in Alternative Provision often have complex needs, it is important that governing bodies and proprietors of these settings are aware of the additional risk of harm that their pupils may be vulnerable to. Schools should obtain written information from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at their establishment (i.e. those checks that schools would otherwise perform on their own staff). This includes written confirmation that the alternative provider will inform the commissioning

school of any arrangements that may put the child at risk (i.e. staff changes), so that the commissioning school can ensure itself that appropriate safeguarding checks have been carried out on new staff.

- Schools should always know where a child is based during school hours. This includes having records of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. They should regularly review the alternative provision placements they make and they must be informed of any staff changes in advance. Reviews should be frequent enough (at least half termly) to provide assurance that the child is regularly attending and the placement continues to be safe and meets the child's needs. Where safeguarding concerns arise, the placement should be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed.

- The department has issued two pieces of statutory guidance to which commissioners of Alternative Provision should have regard:

  Alternative Provision DFE statutory guidance,
  Education for children with health needs who cannot attend school - GOV.UK (www.gov.uk) – DFE statutory guidance.
  National standards for non-school alternative provision

C. So Called 'Honour based' Abuse

- So-called 'honour-based' abuse (HBA), formerly known as 'honour-based' violence (HBV) encompasses crimes that have been committed to protect or defend the honour of the family and/orthe community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts, staff should speak to the DSL. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

- There is a range of potential indicators that a child may be at risk of HBA. Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found on pages 38-41 of the Multi agency statutory guidance on FGM (pages 59-61 focus on the role of schools and colleges) and pages 13-14 of the Multi-agency guidelines: Handling case of forcedmarriage.

- If staff have a concern regarding a child that might be at risk of HBA they should activate local safeguarding procedures, using existing national and local protocols for multi- agency liaison with police and children's social care.

D. Female Genital Mutilation (FGM)

- Professionals in all agencies, and individuals and groups in relevant communities, need to be alert tothe possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present it could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM.

- Staff should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Warning signs that FGM may be about to take place include knowing both that the family belongs to a community in which FGM is practised and is making preparations for the child to take a holiday, arranging vaccinations or planning absence from school.

- The child may also talk about a special procedure/ceremony that is going to take place. Indicators that FGM may already have occurred include prolonged absence from school or other activities with noticeable behaviour change on return, possibly with bladder or menstrual problems. Some teachers have described how children find it difficult to sit still and look uncomfortable, or may complain about pain between their legs, or talk of something somebody did to them that they are not allowed to talk about.

- There is a mandatory reporting duty for all teachers in respect of FGM. Where a member of staff discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a girl who is aged under 18, he or she must personally report it to the police. Those failing to report such cases to the police will face disciplinary sanctions. A mandatory reporting duty requires teachers to report 'known' cases of FGM in under 18s.

E. Forced Marriage

- Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

- The Forced Marriage Unit has published Multi-agency guidelines, with pages 32-36 focusing on the roleof schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: fmu@fco.gov.uk.

F. Preventing Radicalisation

- This section of the KCSIE remains under review following the publication of the new definition of extremism in March 2024, as "the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces".

- The referral procedures set out in this policy also apply where there are concerns about children who may have been drawn into terrorism.

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

- In accordance with the Department for Education Statutory Guidance updated 2024: Prevent Duty, the School recognises its duty to have due regard to the need to prevent pupils from being

drawn into terrorism and adopts appropriate protocols to minimise the risk. The DSL is the designated Prevent Duty person responsible for co-ordinating action within the School and liaising with other agencies.

- Although the School assesses the risk to be low at present, the School will implement prevention measures such as applying appropriate restrictions to internet sites likely to promote terrorist and extremist materials, discussing these dangers with pupils when appropriate in suitable forums, and undertaking Prevent awareness staff training periodically to ensure that staff are able to identify pupils at risk and know how to intervene. Intervention will involve following the safeguarding procedures and referring cases by e-mail to preventreferrals@surrey.pnn.police.uk following the Prevent referral process and use the Prevent referral form. If the matter is urgent then Police must be contacted by dialing 999.

- In cases where further advice from the Police is sought dial 101 or 01483 *632982* and speak to the Prevent Supervisor for Surrey. The Department for Education have a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).

- The DSL will also assess and manage appropriately any risks identified in the vicinity of the School, including those posed by any visiting speakers, and will maintain a record of all visiting speakers, whowill always be checked as suitable before being permitted to visit the School. The School will work in partnership with relevant members of the Local Safeguarding Partnership over such matters; the levelof risk will determine the most appropriate referral. Further information is available from the government Channel guidance on radicalisation. Templates for completing such risk assessments can be found here: Prevent duty: risk assessment templates – GOV.UK (www.gov.uk).

- There is no single way of identifying an individual who is likely to be vulnerable to being drawn into terrorism. It can happen in many ways and settings. Specific background factors may contribute to vulnerabilities which are often combined with specific influences such as family, friends or online and with specific needs for which an extremist group may appear to provide an answer. The internet and use of social media in particular, has become a major factor in the radicalisation of young people. Factors that may have a bearing on someone becoming vulnerable include, but are not limited to:

    - peer pressure,
    - influence from other people or via the internet,
    - bullying, crime against them or their involvement in crime,
    - antisocial behaviour,
    - family tensions,
    - race/hate crime,
    - lack of self-esteem or identity and
    - personal or political grievances.

G. Child Criminal Exploitation (CCE), Child Sexual Exploitation (CSE) and Serious Violence

- Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage ofan imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. This can be committed or facilitated by an organised network or gang, and victims may identify as part of this group. Whilst age may be the most obvious imbalance, the power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources. In some

cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups. Indicators of exploitation and the nature of exploitation may vary between boys and girls.

- CCE might 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. Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victimsis not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.
-

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.

- An organised network is characterised by two or more individuals (whether identified or not) who are known to (or associated with) one another and are known to be involved in or to facilitate the sexual exploitation of children. Being involved in Being involved in the sexual exploitation of children includes introducing them to other individuals for the purpose of exploitation, trafficking a child for the purpose of sexual exploitation, taking payment for sexual activities with a child or allowing their property to be used for sexual activities with a child.

- CSE is a form of sexual abuse where children are sexually exploited for money, power or status. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuadedor forced into exchanging sexual activity for money, drugs, gifts, affection or status. It can affect any child, including those old enough to legally consent to sex. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity, or what they believe to be genuine romantic relationship, with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online.

- A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops.

- Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse. Some of the following signs may be indicators of sexual exploitation:

    - Children who appear with unexplained gifts or new possessions.
    - Children who associate with other young people involved in exploitation.
    - Children who have older boyfriends or girlfriends.
    - Children who suffer from sexually transmitted infections or become pregnant.
    - Children who suffer from changes in emotional well-being.

- Children who misuse drugs and alcohol.
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or do not take part in education.

- Any concerns that a child is being or is at risk of being sexually exploited should be passed without delay to the DSL. The School is aware that a child may not be able to recognise the coercive nature of the abuse and may not see themselves as a victim. Consequently, the child may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other victim of abuse.

- Resources for education settings | CSA Centre and Preventing Child Sexual Exploitation | The Children's Society. are helping schools identify and respond when they have concerns of child sexual abuse or behaviour. https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners.

- The Lucy Faithfull Foundation developed d 'Shore Space platform, providing confidential support for young people concerned about their own or others' sexual thoughts and behaviours, regardless of whether this is related to CSE or not.

Serious violence is a continuing safeguarding concern. It may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation. Staff should report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the designated safeguarding lead (or a deputy). The designated safeguarding lead should assess the risk to both the individual pupil and others in the school, considering wider information or concerns, and take appropriate action. Depending on the risk, they should put in place a safety and support plan, and where relevant, consider action to de-escalate peer conflict.

Schools play a key role in protecting children from violence, safeguarding victims, as well as those who may be at risk of, or are involved in committing violence (who may also be victims themselves). Staff should be alert to signs that 20 a child may be at risk of or involved in serious violence. These risks are higher for children with disrupted education (e.g. suspensions, permanent exclusions, time in alternative provision) or a history of offending. Schools should also try to be alert to when children might be at highest risk around the school day (for example, immediately after school)

Early, evidence-based support for those considered at risk, as well as at critical points when concerns emerge, is vital. This includes access to trusted adults, social and emotional skill support, and, where available, targeted interventions such as mentoring or therapeutic support (practical guidance on evidenced support is available from the Youth Endowment Fund (YEF) (the "what works" centre for preventing violence

H. Private Fostering and Kinship Care

- Children being *privately fostered* are required by law to be seen by a social worker. If a member of staff or volunteer becomes aware that a pupil may be in a private fostering arrangement, where a child under the age of 16 (or 18 if disabled) is provided with care and accommodation by someone to whom they are not related in that person's home, they should raise this in the first instance with the DSL. The DSL will then notify Children's Services who will check that the arrangements are suitable and safe for the child.

- *Kinship care* - When a child lives full-time or most of the time with a relative, friend or connected person and that person provides most or all of the child's care. It does not include parents, foster carers with no prior connection to the child, or anyone caring in a professional capacity. Kinship care arrangements can be formal (through legal orders or kinship fostering) or informal (family or friends caring without a formal agreement in place)

I. Domestic Abuse

- The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.

- 'Domestic abuse' defined by the Act includes:

  Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abusebetween those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass but is not limited to: psychological, physical, sexual, financial and emotional.

- All children can witness and be adversely affected by domestic abuse in the context of their home lifewhere domestic abuse occurs between family members. Exposure to domestic abuse and/or violence and seeing, hearing or experiencing 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. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

- Practitioners also need to recognise, engage, and work with parents and carers who are unwilling or unable to engage with services such as those experiencing abusive behaviour within their own intimate relationships, which may include coercive or controlling behaviour, teenage relationship abuse and 'honour' abuse including forced marriage and female genital mutilation, or abuse related to faith or belief such as allegations of demonic possession.

- Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as teenage relationship abuse.

- The School is registered with operation Encompass: this is a system which ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the DSL) in school before the child or children arrive at school the following day. Refuge runs the National Domestic Abuse Helpline which can be called free of charge and in confidence 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones.

- Staff should be aware of the indicators, which may signal that children are at risk from, or are involved with serious violent crime.

- These may include: increased absence from school, a change in friendships or relationships with olderindividuals or groups, a significant decline in performance, signs of self-harm or a significant change inwellbeing, 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. Risk factors that increase the likelihood of

involvement in serious violence include:

- being male
- Drug and/or alcohol use
- frequent absence/exclusion from school
- having experienced child maltreatment
- having been involved in offending.

J. Sexual Violence and Sexual Harassment

- Please refer to Appendix 1 -Child Protection Procedures within this document for full detail on child-on-child abuse. Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, likely, adversely affect theireducational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap,they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBTQ+ children are at greater risk. Staff should be aware of the importance of:

  - Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
  - Danes Hill School has a zero-tolerance approach to abuse.
  - Not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”,“just having a laugh” or “boys being boys”; and
  - Challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

- It is important that staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. 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: s/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. (Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone’s bottom/breasts/genitalia without consent, can still constitute sexual assault.)

- **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. (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.

- **Sexual Harassment:** this means 'unwanted conduct of a sexual nature' that can occur online and offline.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 (it has to be considered when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; 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 making or sharing of nude and semi-nude images and videos (a criminal offence)
        - sharing of unwanted explicit content
        - upskirting (which is a criminal offence)
        - sexualised online bullying
        - unwanted sexual comments and messages, including, on social media; and
        - sexual exploitation; coercion and threats

K. Mental Health

- All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood.

- This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

- 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 or a DDSL. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed

to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs which education staff are well placed to recognise. These could include:

- significant changes in behaviour,
- ongoing difficulty sleeping,
- withdrawing from social situations,
- not wanting to do things they usually like, and
- physical signs of self-harm or neglecting themselves.

- Not every child who exhibits these behaviours is suicidal or has a mental health concern. However, by identifying these and other potential warning signs, education staff can identify children who may be struggling with their mental health and contemplating suicide and offer support and vital early intervention. Schools and colleges should ensure that any interventions they offer are evidenced as safe and effective and appropriate for the need and phase of education

- Danes Hill School recognises that it has an important role to play in supporting the mental health and wellbeing of our pupils. The School has clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

- The School accesses a range of advice to help identify and help children in need of extra mental healthsupport; this includes working with external agencies. More information can be found in the School's Social, Emotional, Mental Health and Wellbeing Policy and in the Suicide Prevention Policy.

If staff feel that a child is in danger, they should call 999 or arrange for them to be taken to A&E immediately by a parent/carer or other suitable person. If a child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option

L. 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); by strangers.

- Other community safety incidents in the vicinity of the school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversations. The School informs the parents promptly if any information about local incidents is shared by the local police with the exception of those marked as confidential.

- Pupils are encouraged to build confidence and abilities throughout the Personal Development and wider curriculum. Further information is available at www.actionagainstabduction.org and www.clevernevergoes.org.

M. 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. The Children and Family Court Advisory Support Service (Cafcass), guides for young people 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 add 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.

N. Cybercrime

- Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen offline but are enabled at scale and speed online) or 'cyber dependent' (crimes that can be committed only by using a computer and can include:
  - Unauthorised access to computers (illegal hacking)
  - 'Denial of service' (DoS or DDoS) attacks or 'booting'
  - Making, supplying or obtaining malicious software such as viruses, spyware, ransomware, botnets and Remote Access Trojans.

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

- If there are any concerns in this area, staff are required to inform the designated safeguarding lead (or deputy) and should consider referring into the Cyber Choices programme. Further advice can be sought from the National Cyber Security Centre.

- The Cyber security standards for schools and colleges were developed to help them improve their resilience against cyber-attacks.

O. Homelessness

- Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL and Deputy DSLs are advised to refer families to the Local Housing Authority, so they can raise 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 the property.

- If the child has been harmed or is at risk of being harmed, a separate referral into local authority children's social care must be done. Further information is available via the Homeless Reduction Act Factsheets.

A. Modern Slavery and the National Referral Mechanism (NRM)

- 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.

- Further information on the signs that someone might be a victim of modern slavery, the support available and how to refer them to NRM is available in the statutory guidance Modern Slavery: how to identify and support victims.

14 Children who may be particularly vulnerable

14.1 Some children may be at increased risk of significant harm as a result of neglect and/or physical, sexualor emotional abuse. See Appendix 2 for details about the types and signs of abuse.

14.2 Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abusehappens, or who have a high level of tolerance in respect of neglect.

14.3 To ensure that all of our children receive equal protection, we will give special consideration and attention to children who are particularly vulnerable: see Appendix 1 for a list of factors that may makea child particularly vulnerable to abuse.

14.4 Special consideration and attention includes monitoring through the pastoral systems of the School:

- Each child has a form teacher who is responsible for their day-to-day wellbeing and pastoral care.
- The system is strengthened by Heads of Year and Heads of Section who also support the pupils and thestaff team. The school nurses and the School Counsellor also pay a key role. The pastoral care system is overseen by the Deputy Head Pastoral who is also a DDSL.
- Weekly meetings are held where the welfare of pupils of concern or in need is actively monitored and discussions held to guide the actions taken, including managing referrals. The concerns file for the individual pupils is updated as new information arises. The DSL liaises with CSC regarding involvementof outside support agencies.
- Special consideration will also extend to the provision of safeguarding information, resources and support services in community languages and accessible formats. It may also include, as necessary, theappointment of an appropriately trained and informed teacher to promote the educational achievement of any child who is 'looked after' or who is otherwise considered in need of such support.Where a member of staff is placed in a position of working with a 'looked after' child, they will be provided with all necessary information, including: the child's status, up-to-date assessment information from the relevant Local Authority, the most recent care plan, contact arrangements with parents, care arrangements and delegated authority to carers and information available to the DSL.

Young carers
Schools and colleges should be alert to the needs of young carers, recognising that caring responsibilities can impact on their attendance, attainment, behaviour and wellbeing. Early identification is essential to ensure young carers receive support at the right time and by the appropriate services including additional support from external partners, or local authority and health services.

Children with special educational needs, disabilities
Children with special educational needs or disabilities (SEND) or certain medical or physical health

conditions can face additional safeguarding challenges both online and offline. Governing bodies and proprietors should ensure their child protection policy reflects the fact that additional barriers can exist when recognising abuse, neglect and exploitation in this group of children. 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, • communication barriers and difficulties in managing or reporting these challenges risks that they do not understand that what is happening to them is abuse,
- the need for intimate care or that these children are isolated from others,
- that these children are more likely to be dependent on adults for care, and • these children may have issues over cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

Any reports of abuse involving children with SEND will therefore require close liaison with the designated safeguarding lead (or a deputy) and the special educational needs coordinator (SENCO) or the named person with oversight for SEND in a college.

Schools and colleges should consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place. Further information can be found in the departments:

• SEND Code of Practice 0 to 25 years, and
• Supporting Pupils at School with Medical Conditions.

And from specialist organisations such as:

• The Special Educational Needs and Disabilities Information and Support Services (SENDIASS). SENDIASS offer information, advice and support for parents and carers of children and young people with SEND.
• Mencap - Represents people with learning disabilities, with specific advice and information for people who work with children and young people, and
• NSPCC - Safeguarding children with special educational needs and disabilities (SEND) and NSPCC - Safeguarding child protection/deaf and disabled children and young people.

Children with medical conditions

The fact that there has been an incident relating to the management of a child or young person's medical condition (including allergies) would not in and of itself warrant a referral to local safeguarding partners. A safeguarding referral would only be needed where an incident highlighted concern that the child or young person might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family unit because of their medical condition. This might occur where relevant information about a child or young person's medical condition is not provided to a school, college or setting, or where they are repeatedly sent without essential medication, thereby putting the individual at risk. Further information is provided in our statutory guidance on supporting Pupils at School with Medical Conditions and Allergy safety in schools. Statutory guidance about the support that pupils with medical conditions and allergies should receive at school.

Children who are lesbian , gay or bisexual

A child or young person being lesbian, gay, or bisexual is not in itself a risk factor for harm; however, they can sometimes be vulnerable to discriminatory bullying. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are. Schools and colleges should consider how to address vulnerabilities such as the risk of bullying and take steps to prevent it, including putting appropriate sanctions in place.

15 Children who are questioning their gender

15.1 In recent years, nationally, we have seen a significant increase in the number of children who are questioning the way they feel about being a boy or a girl, including the physical attributes of their sex and the related ways in which they fit into society.

15.2 It is not for schools and colleges to initiate any action in this area; this guidance is focused on circumstances where a child or their parent has raised a request relating to social transition to which a school or college is responding.

15.3 Schools and colleges should keep in mind that it is common for children to engage in activities that are less typically associated with their sex. For example, at primary school age, girls may play with trucks, or boys may dress in clothes that are perceived as feminine. Sometimes young children also go through a period of questioning their gender but for the majority this will not continue into adulthood, while a small proportion may continue to question their gender and this feeling may intensify into puberty.

15.4 At Danes Hill School, we take time to understand the thoughts and feelings of children who are questioning their gender and should be appropriately professionally curious about the full range of the child's experiences. Schools and colleges should remain aware of the potential vulnerabilities of children who are questioning their gender, including the possibility of complex mental health and psychosocial needs, for example relating to relationships with family, peers or their broader social environment, including discriminatory bullying. Bullying is never tolerated at Danes Hill School

15.5 We know that bullying has a detrimental impact on young people's mental health and their ability to thrive at school and college. Bullying can affect a child's attainment and wellbeing. We are clear that all forms of bullying, for whatever reason, are unacceptable. Schools and colleges must take a strong, proactive stand against all forms of bullying, and schools and colleges should tackle bullying at the earliest opportunity to prevent it from escalating.

Considering requests for support with social transition

15.6 Schools and colleges should not initiate any action regarding social transition; this guidance applies where a child or their parent has requested that the school make changes or put support in place in order to facilitate the child presenting as the opposite biological sex ("social transition"). Members of staff should not adopt any changes relating to social transition unless a decision has been made by a school and a child's parents or carers have been involved as set out in this guidance.

15.7 When considering any request for support with social transition, schools and colleges should ensure that their decision-making process is documented and records are kept.

15.8 In making decisions about supporting social transition, schools and colleges must comply with their distinct but interacting obligations under safeguarding legislation and equality and human rights law, ensuring that any assessment of discrimination is informed by their evaluation of the welfare and best interests of the child and other children.

15.9 Schools and colleges should make decisions in line with the following principles and ensure that their decision-making process is documented and records are kept:

15.10 We recognise our duty to safeguard and promote the welfare of all children, and we would always consider how best to fulfil our duty towards a child who is questioning their gender, as well as their peers, ensuring that any agreed course of action takes account of the impact on all of those affected.

15.11 This means that the first step when considering a child's request for support with social transition will be to consider what is in the best interests of the child and other children, and a decision relating to social transition may not be the same as a child's wishes.

15.12 The School will work with parents or carers to determine what is in the best interests of the child as well as considering any clinical evidence or advice and seeking any additional non-clinical professional advice where relevant (for example from the SENCO), including involving the designated safeguarding lead.

15.13 The School will consider everything that could be affecting a child, including whether they have any wider health issues or neurodiversity. In considering the best interests of children, the School should also take into account the principle below on taking a careful approach.

15.14 Schools should be particularly conscious of safeguarding concerns relating to primary aged children. Previous case reviews shows that children who socially transition before puberty – and those who transition prior to receiving clinical advice – are more likely to proceed to a medical pathway than those who do not. Schools should also keep in mind that some children who socially transition before puberty will be "living in stealth" meaning other pupils and/or staff may be unaware of their biological sex, and schools should be aware of related safeguarding concerns as in the section below on living in stealth. Parents and carers should be actively involved and their views treated with importance

15.15 Parents and carers have the leading role in the lives of their children, and this area should be no exception. Therefore, where a child who is questioning their gender asks for support from a school or college, schools and colleges should engage parents/carers as a matter of priority. It is important that the views of the child's parents or carers should carry great weight and be properly considered. However, in the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them, the school or college should involve their DSL to determine which action is needed to safeguard the child, before the parents are contacted or any decision is made.

15.16 The outcomes for children and adolescents are best if they have a supportive relationship with their families and, in the vast majority of cases, we would work with the parents/carers to establish what is best for the child. Involving a child's parents/carers in this way will enable schools and colleges to promote a child's wellbeing and protect them from harm.

15.17 Schools and colleges should explore how best to support these conversations, including offering a staff member to be present or to speak to parents or carers on the child's behalf.

15.18 The advice above applies in cases where a child has requested support with social transition. In cases where a child confides in a member of staff about their feelings but does not ask the school or college to make changes to how they are treated, there is no reason to break any confidence unless there is a related safeguarding risk. Schools and colleges should follow their usual procedures where a conversation with a child raises concerns about the child's wellbeing or safety, including involving parents or carers where appropriate. Accommodating social transition is an active intervention so schools and colleges should take a very careful approach

15.19 Schools and colleges should take a very careful approach in relation to social transition and should be viewed as an active intervention that may have significant effects on the child or young person in terms of their psychological functioning and longer-term outcomes.

15.20 Primary schools should exercise particular caution, and we would expect support for full social transition to be agreed very rarely. Schools should keep in mind the emphasis in the Cass Review on early clinical involvement when families are considering social transition for pre-pubertal children, including how to support their children in a non-directive way, whilst also keeping options open and flexible. The Cass Review emphasised that clinical involvement in the decision-making process should include advising on the risks and benefits of social transition as a planned intervention, referencing best available evidence. This is not a role that can be undertaken by staff without appropriate clinical training. The Cass Review acknowledges that older children will generally have greater agency to make their own decisions. Maintaining flexibility and keeping children's options open will help to avoid a child feeling they are under pressure to commit to a potentially irrevocable pathway when they are young.

15.21 Schools and colleges should comply with obligations under the Equality Act and Human Rights Act when considering requests for support with social transition

15.22 As well as complying with their safeguarding obligations as above, schools and colleges must also comply with their duties under the Equality Act 2010 and the Human Rights Act 1998.

15.23 In line with the responsibilities of schools and colleges to adhere to the highest standards of safeguarding for the children and young people in their care, alongside obligations under the School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014, schools must not allow pupils into toilets, changing rooms, or boarding or residential accommodation designated for the opposite sex, with no exceptions.

15.24 Similarly, where schools have implemented single-sex sports as being necessary for safety reasons, there should be no exceptions and pupils must not be allowed to participate in sports designated for the opposite sex.

15.25 In relation to other policies, the school or college will need to consider whether the policy will place a child who is questioning their gender (and other gender-questioning children) at a disadvantage relative to other children. Schools and colleges should consider this both when developing the policy itself and when considering requests to be exempt from such policies. Where the rule or policy does place a gender-questioning child (and other gender questioning children) at a disadvantage compared with those who are not gender-questioning, the school or college should consider the following:

- (1) Does the policy have a legitimate aim? For example, safeguarding or fairness in sport.
- (2) Is the policy a proportionate means of achieving that legitimate aim? This will involve

considering:

- whether there is another way of achieving the same aim. Might a policy be adopted or an exception made that still achieves that aim?
- the impact of the rule, or of making an exception (or not making an exception) on the child themselves and anyone else affected? The school or college should balance the impact of agreeing the child's request against the impact of refusing their request, taking into account all the relevant factors. This will include taking into account the school or college's judgment about whether supporting social transition is in the child's best interests and the best interests of other children, as above.

Discussing constraints

15.26 When discussing requests with children, schools and colleges to which part 6 of the Equality Act applies should take time to sensitively explain the constraints on social transition set out in this guidance. This includes schools explaining that supporting any degree of social transition will not include allowing access to toilets, changing rooms or boarding or residential accommodation designated for the opposite sex, and will not include allowing children to join PE classes designated for the opposite sex where there are safety reasons for single sex PE.

15.27 The school or college should also make sure that children and their families are aware that while the school or college will appropriately sanction any cases of bullying or harassment, and take a strong stand against bullying, the school or college must also be conscious of the rights of pupils and staff in relation to their religion or belief. However, schools and colleges supporting social transition might consider discussing options with pupils and staff such as using names instead of pronouns.

Reviews

15.28 The circumstances of a case and/or the needs of a child may change over time. For example, it may become known that there are safeguarding issues that were not previously apparent (including where a young child is 'living in stealth' - see below), or that a decision has placed an unsustainable pressure on a school or college's resources. In such cases, the school may need to review their original decision taking into account the factors set out above, including involving the child's parents or carers. In deciding whether to review a decision, the school or college should involve their designated safeguarding lead immediately. As well as revisiting decisions at appropriate points, schools and colleges will in particular want to consider whether previous decisions taken prior to this guidance coming into force remain appropriate, taking into account the impact of making any changes on the child in question and considering the principle above about involving parents or carers.

Correct information

15.29 Having the correct information about a child is important in the context of schools and colleges fulfilling their safeguarding duties, and they should make sure all relevant staff are aware of a child's biological sex in all cases. Schools and colleges are legally required to record a child's biological sex accurately wherever it is recorded.

Children living in stealth

15.30 Schools and colleges should be particularly conscious of the vulnerabilities of children who have fully socially transitioned from an early age and may be living in stealth (that is, school or college friends/staff may be unaware of their biological sex). The Cass Review emphasised that these children are likely to approach puberty in a fearful and anxious state. Schools and colleges should involve the

designated safeguarding lead in these cases.

Support for children who wish to de-transition

15.31 There may be circumstances where a child wants to fully or partially reverse a request that has previously been agreed. The Cass Review highlighted the importance of maintaining flexibility and keeping options open for children who have socially transitioned and recommended that support should be provided to children who wish to de-transition. Schools and colleges should work closely with parents or carers and relevant experts to ensure that children in this position are supported.

16. Digital Safeguarding/Online Safety and Filtering and Monitoring

A. Purpose and Commitment

16.1 Danes Hill School recognises that digital technologies offer many opportunities but also present significant safeguarding risks. The School is committed to protecting pupils from online harm and misuse of technology, in line with Keeping Children Safe in Education (KCSIE 2026), the EYFS Framework, and the DfE's statutory and non-statutory digital safety guidance.

B. Categories and areas of online safety risk

16.2 **Content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories.

16.3 **Contact:** being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adult posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

16.4 Conduct: online behaviour that increases the likelihood of, or causes, harm: for example, making, sending and receiving explicit images, including those generated using AI and online bullying, and commerce: risks such as gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils or staff are at risk, please report it to the Anti-Phishing Working Group.

C. Scope

16.5 This section covers:

- Online safety education
- Filtering and monitoring responsibilities
- Use of digital devices and social media
- Youth-produced sexual imagery ("sexting")
- Online elements of child-on-child abuse

D. Key Principles

1. Online Safety Education

   Pupils are taught how to stay safe online through Personal Development, digital learning,

RSHE, and across the curriculum. Topics include:

- Safe and responsible internet use
- Cyberbullying
- Grooming, radicalisation, and exploitation
- Managing online relationships
- Online reputation and digital footprint
- How to report concerns

2. Staff Responsibilities

All staff:

- Receive annual training on online safety and child-on-child abuse (including its online forms).
- Are aware of filtering and monitoring arrangements and know how to escalate concerns.
- Must maintain appropriate boundaries online (see Staff Code of Conduct).

3. Filtering, Monitoring and Devices

The school ensures that:

- All school-owned devices and networks are subject to robust filtering and monitoring.
- Monitoring alerts are reviewed regularly and escalated as needed.
- Staff understand their responsibilities in relation to supervising online activity.

Staff receive updates in line with the DfE's Plan Technology for Your School service and Guidance on the Use of Generative AI in Education.

- The School's Safe Use of AI Policy details the measures in place to ensure the safe use of AI in school.
- The online resources from the Chiltern Learning Trust and Chartered College of Teaching, help schools manage the use of AI safely and effectively.

4. Youth-Produced Sexual Imagery (Making and Sharing of Nudes and Semi-Nudes)

The School follows the DfE's 2024 guidance: Making or sharing nudes and semi-nudes: advice for education settings working with children and young people. DfE guidance on how to respond to an incident are detailed in the Sharing nudes and semi-nudes: how to respond to an incident (overview) March 2024

When handling incidents:

- The DSL (or deputy) takes the lead.
- No devices are viewed without the guidance of the DSL.
- The School avoids criminalising pupils unnecessarily.
- Support is provided for both the sender and any affected peers.

5. Online Child-on-Child Abuse

- Online abuse can include:
  - Sexting or image-based abuse
  - Sexual harassment or bullying in chats

- Abusive content sharing
- Coercive relationships or digital threats

- Staff are trained to recognise signs of online abuse and understand that these issues often overlap with in-person safeguarding concerns.
- Staff receive annual Cyber security, online safety and filtering and monitoring training. They are also required to sign the IT Acceptable Use Agreement and are made aware that school monitors all the online activity.

The DSL/Online Safety Lead in charge with filtering and monitoring, with support from the Head of Digital strategy and the IT Manager must ensure that a review of the filtering and monitoring systems' effectiveness is carried out at least once every academic year. They should include checks that filtering is working appropriately on all internet-connected devices in all relevant locations, and a record should be kept of these checks. These reports must be shared with the Governing Body for review.

E. Supporting Pupils and Parents

- Online safety guidance is shared with parents through workshops, newsletters, and the School website.
- Pupils are encouraged to report concerns and understand how to seek support inside and outside of school (e.g. via Childline).

F. Linked Policies

- Digital Safety Policy
- Mobile Phones Policy
- Behaviour and Rewards Policy
- Restrictive Interventions and Seclusion
- Searching, Screening and Confiscation Policy
- Staff Code of Conduct
- Information Security and IT Acceptable Use Policy
- Safe Use of AI Policy
- IT Acceptable Use Policy (Pupils)

G. Resources

360 safe website
LGfL online safety audit
UKCIS external visitors guidance
Cyber security standards for schools and colleges
Online safety in schools and colleges: questions from the governing board

17 Health & Safety, Extended School Activities and Educational Visits

17.1 The School's Health & Safety and Educational Visits procedures are set out in separate documents, and reflect the consideration given to the protection of our children both physically within the School environment and away from the School when undertaking School trips and visits.

17.2 Where extended school activities are provided by and managed by the school, our own Safeguarding and Child Protection Policy and procedures apply. Where other organisations provide services or activities on our site the member of the School's staff responsible for arranging the services or activities will check that the service or activity providers have appropriate procedures in place, including relevant risk assessments and safer recruitment procedures.

17.3 When children attend off-site activities, including those abroad on school trips, we will check that effective child protection arrangements are in place. All staff are bound by the school's Educational Visits Policy when arranging and organising off-site trips.

17.4 In light of learning from the Southbank International School Serious Case Review, the DSL closely monitors the conduct of pupils and staff on trips and pupils, trip leaders and assistant leaders are actively asked for feedback following every trip that involves an overnight stay.

18 Photography, images and mobile phones

18.1 In line with the Mobile phones in schools guidance and the Mobile Phone Policy, *Danes Hill School is a mobile –free environment*, where pupils do not have access to their mobile phone throughout the day, including the lessons, the time between the lessons, breaktime and lunchtime. These requirements extend to fixtures, educational visits and on whilst on the school transport.

18.2 The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have appropriate safeguards in place. To protect children, we will:

- Seek their and their parents' consent for photographs to be taken or published (for example, onour website or in newspapers or publications);
- When photographs of pupils are published, we use only the child's first name with an image
- unless parents have consented for the pupil's full name to appear next to the image;
- Ensure that children are appropriately dressed;
- Encourage children to tell us if they are worried about any photographs that are taken of them.

18.3 Further guidance for staff on the taking and storing of photographs and images of pupils is contained in the Staff Code of Conduct.

18.4 From time-to-time professional photographers are invited into the School to take group photographs or pictures of significant events; any professional photographers hired by the School will be subject toappropriate vetting checks.

18.5 CCTV is located around the School but is not installed in classrooms, changing rooms or toilet areas. Allsurveillance within the School is overseen by the IT Manager, supported from the Data Protection Lead and DSL, when required.

18.6 Photographs, digital images or videos of pupils may be taken by parents and family members, either on the School site or when pupils are involved in organised activities off site. Parents and family members are welcome to take photographs or videos of school events which may include images of other pupils. To respect the privacy of others and in some cases for protection purposes, these images should not be made publicly available on social networking sites or on other public areas of

the internet. Parents should not take photographs of their child or fellow pupils in the swimming pool or changing rooms. If the behaviour of an adult capturing images seems unusual or the pupil appears to be worried by someone taking photographs of them, staff will act to challenge the adult (where they feel safe and confident to do so) and report the matter to the DSL as soon as possible, and in as much detail as possible, to allow the concern to be followed up. The police will be informed in cases of serious concern.

18.7 Staff are responsible for ensuring that their mobile phones and any electronic devices with imaging and sharing capabilities do not hold inappropriate or illegal content. At Pre-Prep, all staff mobiles and any electronic devices with imaging and sharing capabilities must be turned off and kept away from children. Phones can only be checked at breaktimes. All adults, including parents and visitors who attend the Pre-Prep site are made aware that mobile phones and any electronic devices with imaging and sharing capabilities are not used in the presence of children and no images should be recorded by parents in the EYFS.

19. Regulations and safeguarding requirements relating to school premises

19.1 School premises: The School will take all practicable steps to ensure that School premises are as secureas circumstances permit, with fenced sites and appropriate vetting in place.

19.2 Identification badges: All Governors and members of staff, including volunteers will receive an ID badgewith the title 'Governor', 'staff', or '(vetted) volunteer' (as appropriate), which must be clearlydisplayed and worn at all times whilst on the School premises.

19.3 The School operates an electronic sign-in and out system for all visitors, requiring them to register their full name and the member of staff or pupil they are visiting; parents attending sports fixtures or school productions are exempt from this requirement. The screen will display a Safeguarding Screen which asks guests to tick a button that they have understood the safeguarding terms, and where to find more information. Guests will receive a lanyard after signing in. If they are not DBS checked with the school, they will receive a red lanyard, showing staff and pupils alike, that these guests are not DBS checked and will always be escorted by a staff member. Contractors who are vetted and added to the Single Central Register, will receive a green lanyard, showing their contractor status. These visitors do not need to be escorted. Reception and site staff are trained to politely challenge people who are not wearing a lanyard or to check with HR if they are not certain the person is vetted.

A. Use of School Premises for Non-School Activities

19.4 Where the governing board hires or rents out school facilities or the school premises to organisations or individuals, e.g. for providers to run community or extracurricular activities, it will ensure that appropriate safeguarding arrangements are in place to keep pupils safe. The school will refer to the DfE Out of school settings safeguarding guidance for providers.https://assets.publishing.service.gov.uk/media/6509558022a783000d43e81f/After-school_clubs__community_activities_and_tuition_safeguarding_guidance_for_providers.pdf.

19.5 Where the governing board provides the activities under the direct supervision or management of school staff, child protection arrangements will apply. Where activities are provided separately by another body, this may not be the case; therefore, the governing board will seek assurance that

the body concerned has appropriate safeguarding and child protection policies and procedures in place, including inspecting these as needed. The governing board will ensure safeguarding requirements are included in any transfer of control agreement, i.e. a lease or hire agreement, as a condition of use and occupation of the premises.

B. Extracurricular activities and clubs

19.6 External bodies that host extracurricular activities and clubs at the school, e.g. charities or companies, will work in collaboration with the school to effectively safeguard pupils and adhere to local safeguarding arrangements.

19.7 Staff and volunteers running extracurricular activities and clubs are aware of their safeguarding responsibilities and promote the welfare of pupils. Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to CSCS or the police, if necessary.

C. School facilities, including toilets, changing rooms and showers

19.8 The School does not allow children into toilets designated for the opposite biological sex. This includes where the School is responding to a request to support any degree of social transition for children who are questioning their gender.

19.9 Schools must provide separate toilets for boys and girls aged 8 and over (apart from where individual toilets are in a room that can be locked from the inside, intended for use by one pupil at a time). This is required by the School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014.

19.10 Therefore, if a gender-questioning child does not want to use the toilet designated for their biological sex, schools and colleges should consider whether they can provide an alternative toilet facility, for example self-contained individual toilets, without compromising the provision of single-sex facilities. These alternative arrangements should not compromise the safety, comfort, privacy or dignity of the child, or of any other children. In this case, a clear record of these situations is kept, ensuring they are communicated appropriately, and reviewed regularly.

19.11 Where the School provides mixed-sex toilets in addition to single sex toilets, they should assess safeguarding risks and plan accordingly, for example, mixed-sex toilets should be in individual, lockable rooms and open directly onto public areas (e.g. a corridor).

19.12 Schools must not allow a child, aged 11 years or older at the start of the school year, to undress in front of a child of the opposite biological sex.

19.13 The changing accommodation and showers must be suitable for the pupils they are provided for, having regard to their ages, numbers, and sex and any special requirements they may have and is informed by the school's safeguarding obligations. When responding to a request to support any degree of social transition, a school must not allow a child access to changing rooms designated for the opposite sex.

19.14 If a gender-questioning child does not want to use the changing rooms and showers designated for their sex, schools and colleges should consider whether they can provide an alternative changing or washing facility without compromising the provision of single-sex facilities. This could be a fully enclosed room – for use by one child at a time that can be secured from the inside – or by allowing access to facilities at an alternative time. These alternative arrangements should not

compromise the safety, comfort, privacy or dignity of the child or of any other children. A clear record of these situations must be kept.

20. Pastoral and Safeguarding Education

20.1 The School promotes the welfare of children through the Assembly Programme, Personal Development curriculum, the ICT curriculum and parents' forums. Pupils are taught how to keep themselves safe and build resilience (including building resilience to radicalisation). Pupils are given the information to avoid situations and persons, including over the internet and mobile technology, which/who could lead them into harm. Further details of safeguarding education in the curriculum at Danes Hill School are recorded in summary documents.

20.2 At Pre-Prep, Safeguarding is taught (in a planned component of the curriculum) through the curriculum and Personal Development and personal, social and emotional development in the EYFS.

20.3 From September 2026, RSHE forms a statutory part of the School's safeguarding responsibilities, supporting pupils to understand risks, build healthy relationships, and stay safe both offline and online. Danes Hill School will:

- Deliver RSHE in an age-appropriate, inclusive and safeguarding-aligned way, covering the statutory content as outlined in the DfE revised RSHE guidance for teaching from September 2026.
- Share all RSHE materials with parents and remove any contractual restrictions preventing parental access.
- Ensure RSHE staff are trained in safeguarding and work closely with the DSL to identify concerns.

20.4 Through RSHE, staff are supporting children to develop the skills that form the building blocks of all positive relationships, such as:

- healthy and respectful relationships,
- boundaries, consent and kindness in relationships,
- stereotyping, prejudice and equality,
- body confidence and self-esteem,
- how to recognise and report concerns about an abusive relationship, including coercive and controlling behaviour,
- the concepts of, and laws relating to all forms of sexual harassment, and abuse, and how to access support,
- what constitutes sexual harassment and sexual violence and why these are always unacceptable, emphasising that it is never the fault of the person experiencing it, and
- understanding online harms such as sharing images, the prevalence of deepfakes, pornography and misogynistic influencers and when and where to seek help.

20.5 The department has produced a one-stop hub for teachers which can be accessed here: Teaching about relationships, sex and health – GOV.UK. This includes teacher training modules on the RSHE topics and non-statutory implementation guidance.

20.6 This section is reviewed annually to ensure alignment with national guidance and safeguarding practice.

20.7 The following resources may also help schools and colleges understand and teach about safeguarding:

- DfE advice for schools: Teaching online safety in schools,
- The Oak National Academy have produced classroom resources to support teaching of the updated curriculum: Free, time-saving teacher resources | Oak National Academy,
- UK Council for Internet Safety (UKCIS)38 guidance: Education for a connected world
- UKCIS guidance: Sharing nudes and semi-nudes: advice for education settings working with children and young people,
- The UKCIS external visitors guidance will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors,
- National Crime Agency's CEOP Education Programme: Protecting children and young people from online child sexual abuse through education. Including PSHE Association accredited lesson plans and resources aligned to the RSHE curriculum, regular e-bulletins on new and emerging threats and training for professionals on online child sexual abuse,
- Public Health England: Every Mind Matters, and
- Harmful online challenges and online hoaxes - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support.

21. Data Protection

21.1 The proprietor and governing body are aware that among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. The DfE Data Protection guidance for schools provide further guidance on the good practice for preventing personal data breaches.

22. Monitoring and review

22.1 Any child protection incidents at the school will be followed by a review of the safeguarding procedureswithin by the DSL and DDSLs directly involved with the incident within the School. Where an incident involves a member of staff and meets the threshold for LADO involvement, the LADO will be asked to assist in this review to determine whether any improvements can be made to the School's procedures.

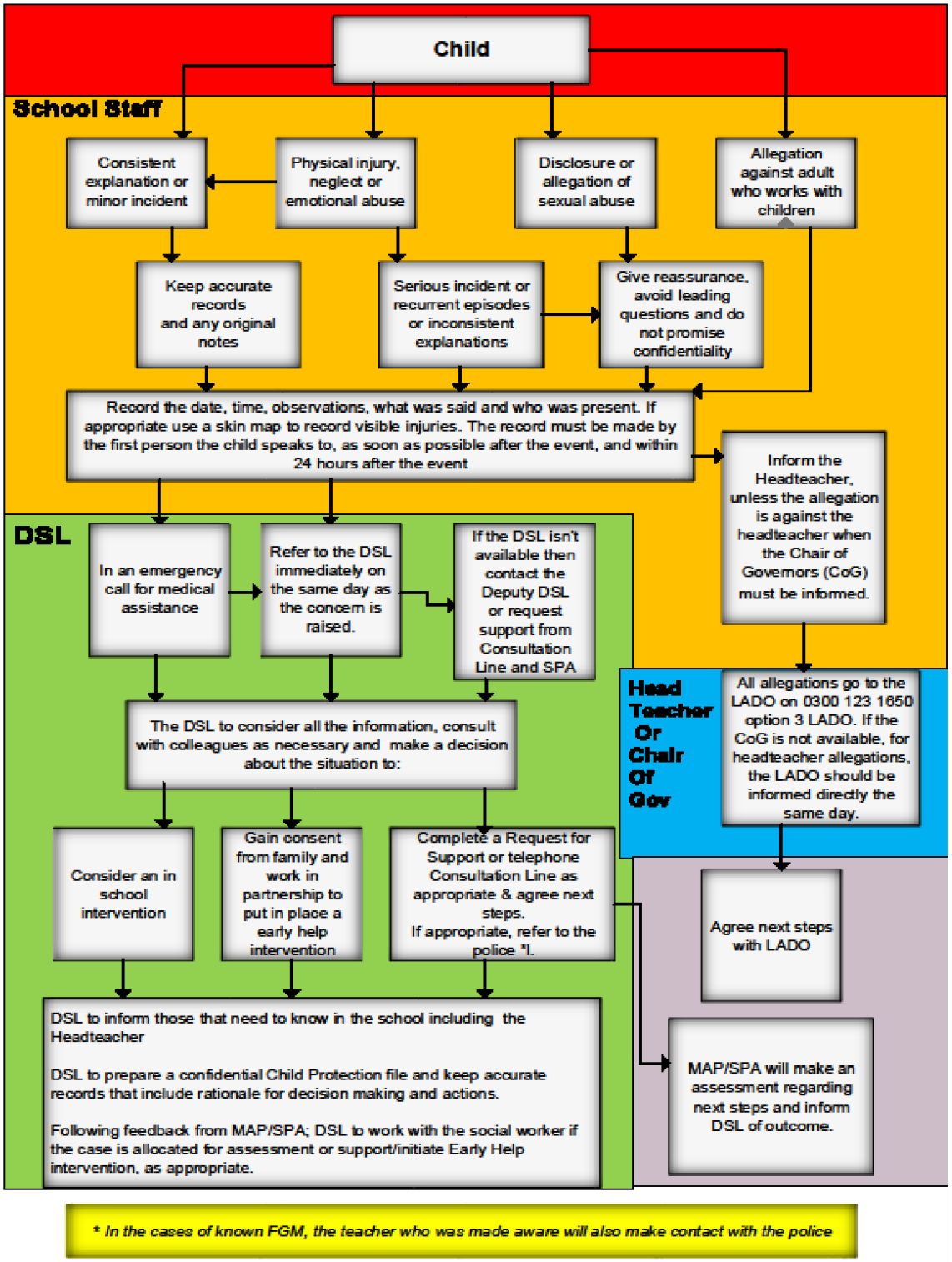
22.2 In addition, the DSL will ensure that this policy is reviewed annually, and its procedures and implementation are updated and reviewed regularly, working with the Governors as necessary. Any deficiencies or weaknesses in regard to child protection arrangements at any time will be remedied without delay and a report made to the Governing Body.

22.3 The Governors will undertake an annual review of this policy and its procedures including good cooperation with local agencies and of the efficiency with which the relevant duties have been discharged. The annual review and any changes to the policy will be signed off by the GB at a full meeting, where the review will be discussed and discussion minuted.

22.4 All staff will be regularly reviewed on their own safeguarding practices and given opportunities to discuss concerns they may have about welfare and safeguarding matters.

22.5 A Whistleblowing Policy is in place and read by staff on an annual basis, enabling them to report any concerns with the safeguarding or other procedures.

Appendix 1 - Child Protection Procedures



Child Protection Procedures

It is important that a child at risk or in need receives the right help at the right time to address risks and prevent issues escalating. It is therefore important that all staff understand their responsibility to: identify, act on and refer the early signs of abuse and neglect; keep clear written records; listen to the views of the child; reassess concerns when situations do not improve; share information quickly and challenge inaction. All staff at the School are expected to comply with statutory guidance Working Together to Safeguard Children (2026) unless exceptional circumstances arise. In particular, staff are expected to appreciate that effective safeguarding systemsare those where:

The pupil's needs are paramount, and the needs and wishes of each child should be put first, so that every child receives the support they need before a problem escalates.
All staff who come into contact with pupils and families are alert to their needs and any risks ofharm that individual abusers, or potential abusers, may pose to children.
All staff share appropriate information in a timely way and can discuss any concerns about an individual child with colleagues and local authority children's social care.
Appropriately qualified, experienced staff are able to use their expert judgement to put the pupil's needs at the heart of the safeguarding system so that the right solution can be found for each individual pupil.
All professionals contribute to whatever actions are needed to safeguard and promote a child's welfare and take part in regularly reviewing the outcomes for the child against specific plans and outcomes.

What to do if you suspect a child is at risk of significant harm

If a member of staff is concerned that a pupil may be suffering significant harm or is at risk of significant harm (see definitions provided in section 10 of the policy above), the matter should be referred to theDSL, or Deputy DSLs in the DSLs absence, as soon as possible. ***If a child is in immediate danger or is at risk of harm a referral should be made to Children's Social Care (CSC) immediately, or in an emergency,dial 999 and request the appropriate emergency service. Anyone can make such a referral.***

There will be occasions when you suspect that a child may be at serious risk, but you have no 'real' evidence. The child's behaviour may have changed, their art or written work could be concerning, or you may have noticed other physical but inconclusive signs. In these circumstances, you should try to give the child the opportunity to talk. The signs you have noticed may be due to a variety of factors and it is fine to ask the child if they are alright or if you can help in any way.

Use CPOMS to record these early concerns and inform the DSL immediately. If the child does begin to reveal that they are being harmed or is at risk of significant harm you should follow the advice in section 2 below: 'If a child discloses information to you'.

If a child discloses information to you

It takes a lot of courage for a child to disclose that they are being neglected and/or abused. They mayfeel ashamed, particularly if the abuse is sexual, their abuser may have threatened what will happen if they tell, they may have lost all trust in adults, or they may believe, or have been told, that the abuse is their own fault.

If a child talks to you about any risks to their safety or well-being you will need to let them know that you must pass the information on – you are not allowed to keep secrets or promise confidentiality as this may ultimately not be in the best interests of the child. The point at which you make the child aware of this is a matter for professional judgment. If you jump in immediately the child may think thatyou do not want to listen; if you leave it till the very end of the conversation, the child may feel that you have misled them into

revealing more than they would have otherwise.

During your conversation with the child:

- Allow them to speak freely;
- Remain calm and do not over-react – the child may stop talking if they feel they are upsetting you;
- If the report includes an online element, be aware of searching screening and confiscation advice (for schools) and UKCIS advice on making or sharing of nudes or semi-nudes (for schools and colleges). The key consideration is for staff not to view or forward illegal images of a child but to confiscate any device which they believe (with good reason) to have any such images stored on it, and pass the device immediately to the DSL;
- Give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me';
- Do not be afraid of silences – remember how hard this must be for the child;
- Under no circumstances ask investigative or leading questions – such as how many times this has happened, whether it happens to siblings too, or what does the child's mother think about all this;
- At an appropriate time tell the child that in order to help them you must pass the information on;
- Do not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused;
- Avoid admonishing the child for not disclosing earlier. Saying 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' may be your way of being supportive but the child may interpret it that they have done something wrong;
- Tell the child what will happen next. The child may agree to go with you to see the DSL;
- Otherwise let them know that someone will come to see them before the end of the day;

Follow the procedure outlined below:

Taking action: advice for staff

- Write up your conversation as soon as possible on CPOMS and inform the DSL or one of the DDSLs;
- Know that you have a professional responsibility to manage the requirement to maintain an appropriate level of confidentiality whilst at the same time liaising with relevant professionals such as the designated safeguarding lead and children's social care. Take advice as necessary from the DSL if you are unsure about anyone with whom you should/should not be sharing information; Seek support if you feel distressed.

Taking action: advice for staff

Key points to remember for taking action are:

- In an emergency take the action necessary to help the child, for example, call 999;
- Report your concern to the DSL as soon as possible, unless it involves an allegation against a member of staff or volunteer in which case the procedures in Appendix 2 should be followed;
- If the DSL is not available, ensure the information is shared with the deputy DSL (or in their absence, with the most senior person in the school) that day
- If there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately (and within one working day). See paragraph 6 below;
- Do not start your own investigation;
- Share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family;
- Complete and submit a Child Protection Record of Concern as an entry on CPOMS and seek support for yourself if you are distressed.

Reporting directly to child protection agencies

If staff members have any concerns (as opposed to a child being in immediate danger (see below) about a child, they should raise these with the DSL or a Deputy DSL. The DSL should usually help decide whether a referral to Children's Social Care, universal services, and community based Early Help or the targeted early help level of Family Help (see section 9 of policy) or other support is appropriate, which must be done in accordance with the referral thresholds set by the Local Safeguarding Partnership.

Notifications must be made, even if the names of child victims are not yet known.
If a referral to Children's Social Care is appropriate in most instances the DSL should make it. However,anyone can make a referral and if for any reason a staff member thinks a referral is appropriate and one has not been made, they can and should consider making a referral themselves.

If after a referral the child's situation does not appear to be improving the DSL (or the person that made the referral) should press for re-consideration to ensure their concerns have been addressed, and most importantly the child's situation improves.

If, a child is in immediate danger or is at risk of harm a referral should be made to Children's Social Care and/or the police immediately (and within one working day). Anybody can make a referral.

Under these circumstances, you (or, if necessary, the most senior person in the school that you can find to help you) should contact the **Surrey Single Point of Access team** at Weybridge in the first instance for advice on how to refer (you may be referred to another Local Authority SPA or C-SPA team) reachable on
0300 470 9100 OPTION 1

The SPA team will require basic information from you such as:

Your name
Address
Details of the child that you have concerns about.

This information is taken to help the specialist safeguarding team make enquiries and contact you again if necessary. Information you supply is held in the strictest of confidence and not disclosed to any party; including those connected to the child you have concerns about. If anyone other than the DSL makes the referral, they should inform the DSL as soon as possible. The local authority should make a decision within one working day of a referral being made about what course of action they are taking and should let the referrer know the outcome. Staff should follow up on a referral should that information not be forthcoming.

If after a referral the child's situation does not appear to be improving the DSL (or the person that made the referral) should press for re-consideration to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

If targeted Family Help is appropriate, the DSL should support the staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate. If community early help and or other support is appropriate, the case should be kept under constant review and consideration given to a referral to children's social care if the child's situation does not appear to be improving.

Other ways to report your concerns:
Call the local specialist Police Child Abuse Investigation Team (CAIT) on 020 8 247 6331. NSPCC – for help if you are unsure whether to report your concerns. Call 0808 800 5000 to speak in confidence or text

anonymously to 88858.

Notifying Parents

The School will normally seek to discuss any concerns about a child with their parents. This must be handled sensitively, and the DSL will normally make contact with the parent in the event of a concern, suspicion or disclosure.

However, if the School believes that notifying parents could increase the risk to the child or exacerbate the problem, then advice will first be sought from CSC. If the allegation involves a member of staff, the parents will be informed as appropriate, but the staff member's identity and details of the investigation will only be disclosed in accordance with the LADO or police's permission and governing laws.

For the avoidance of doubt, referrals to CSC or the LADO do not require parental consent. Staff must act in in the best interests of the child, even if this means making a referral against the parents' wishes.

Action by the DSL – referral to CSC

The DSL (or in their absence, the Deputy DSL) will make a referral to CSC immediately if it is believed that a child has suffered or is at risk of suffering significant harm.

In situations where a pupil is not at risk of suffering significant harm but is instead in need of community Early Help or additional support from one or more agencies (referred to as a 'child in need'), the DSL will still liaise with CSC in accordance with inter agency procedures and, depending on their advice, will complete an Family Help Assessment or engage with any other approach offered by CSC (e.g. 'Team around the Child') to ensure assessment/referral of the pupil and/or his parents for appropriate social care services.

Many School pupils are resident in other LA; in these cases, a CAF form or details of other local approaches (e.g. 'Team around the Child') will be obtained by contacting local children's services team for the borough of residence.

If the initial referral is made by telephone, the DSL will confirm the referral in writing to the CSC within24 hours. If no response or acknowledgment is received within one working days, the DSL will contact the CSC again.

The local authority should make a decision, within one working day of a referral being made, about the type of response that is required and should let the DSL know the outcome. This will include determining whether:

- The child requires immediate protection and urgent action is required;
- Whether the child is in need, and should be assessed under section 17;
- There is reasonable cause to suspect the child is suffering, or likely to suffer, significant harm, and whether enquiries must be made and the child assessed under section 47;
- Any services are required by the child and family and what type of services; and
- Further specialist assessments are required in order to help the local authority to decide what further action to take.

The DSL will follow up if this information is not forthcoming.
Referrals following an allegation against a member of staff or volunteer will be dealt with in accordance with the procedures set out in Appendix 2.

Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside the school. All staff, but especially the DSL will consider the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

Responding to concerns or allegations of child-on-child abuse

It is essential that all concerns/allegations of child-on-child abuse are handled sensitively, appropriately and promptly. The way in which they are responded to can have a significant impact on our School culture and environment.

Any response should:

- Include a thorough investigation of the concerns/allegations and the wider context in which they may have occurred (as appropriate);
- Treat all children involved as being at potential risk - while the child allegedly responsible for the abuse may pose a significant risk of harm to other children, they may also have considerable unmet needs and be at risk of harm themselves. The School will ensure a safeguarding response is in place for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it, and additional sanctioning work may be required for the latter;
- Take into account: that the abuse may indicate wider safeguarding concerns for any of the children involved, and consider and address the effect of wider socio-cultural context such as the child's/children's peer group (both within and outside the School); family; the School environment; their experience(s) of crime and victimisation in the local community; and the child/children's online presence. Consider what changes may need to be made to these contexts to address the child's/children's needs and to mitigate risk; and
- The potential complexity of child-on-child abuse and of children´s experiences and consider the interplay between power, choice and consent. While children may appear to be making choices, if those choices are limited, they are not consenting;
- The views of the child/children affected. Unless it is considered unsafe to do so (for example, where a referral needs to be made immediately), the DSL will usually discuss the proposed action with the child/children and their parents and obtain consent to any referral before it is made.

- The DSL will manage the child/children's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so.

- What should you do if you suspect either that a child may be at risk of or experiencing abuse by their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s)?

- If a pupil is in immediate danger, or at risk of significant harm, a referral to children's social care and/or the police should be made immediately. Anyone can make a referral. Where referrals are not made by the DSL (or a Deputy DSL), the DSL should be informed as soon as possible that a referral has been made.

- If a member of staff thinks for whatever reason that a child may be at risk of or experiencing abuseby their peer(s), or that a child may be at risk of abusing or may be abusing their peer(s), they should discuss their concern with the DSL without delay so that a course of action can be agreed.

- If a child speaks to a member of staff about child-on-child abuse that they have witnessed or are a

part of, the member of staff should listen to the child and use open language that demonstrates understanding rather than judgement.

- The DSL will discuss the concerns or allegations with the member of staff who has reported them and will, where necessary, take any immediate steps to ensure the safety of the child/all children affected.

- DSLs will use their professional judgement to determine whether it is appropriate for the alleged behaviour to be to be dealt with internally and, if so, whether any external specialist support is required. In borderline cases the DSL will consult with children's social care and/or any other external agencies on a no-names basis to determine the most appropriate response. Where the DSL considers or suspects that the behaviour in question might be abusive or violent on a spectrum(as opposed to inappropriate or problematic), the DSL will contact CSC immediately.

- The DSL will discuss the allegations/concerns with CSC and agree on a course of action, which may include:

  A - Manage internally vie the School's pastoral support processes with help from external specialists where appropriate and possible, including considering where doing so does not place the child at additional risk, whether the designated safeguarding lead (or a deputy) should inform parents or carers to further support the child's wellbeing.

  B – Undertake/contribute to an inter-agency Family Help assessment, with targeted Family Help services provided to address the assessed needs of a child/children and their family

  C – Refer child/children to children's social care for a section 17 and/or 47 statutory assessment, for example as the child could be in need or is suffering, or likely to suffer harm. The DSL will report alleged criminal behaviour to the Police, if applicable.

Individual risk and needs assessment

Where there is an incident of child-on-child abuse, the School will carry out a robust risk and needs assessment in respect of each child affected by the abuse. These risk assessments will:

- Assess and address the nature and level of risks that are posed and/or faced by the child;
- Engage the child's parents and draw upon local services and agencies to ensure that the child'sneeds are met in the long term.
- Consider whether any targeted interventions are needed to address the underlying attitudesor behaviour of any child; and
- Be reviewed at regular intervals in light of the child's on-going needs to ensure that real progress is being made which benefits the child.

If at any stage the child's needs escalate, the DSL (or Deputy DSL) will refer the situation to CSCagain to determine the appropriate course of action.

Disciplinary action

The School will consider whether disciplinary action may be appropriate for any child/children involved – any such action should address the abuse, the causes of it, and attitudes underlying it.Disciplinary action may sometimes be appropriate, including:

- to ensure that the child/children take(s) responsibility for and realise(s) the seriousness of their behaviour;
- to demonstrate to the child/children and others that child-on-child abuse can never be tolerated; and
- to ensure the safety and wellbeing of other children.

However, these considerations will be balanced against the child's/children's own potential unmet needs and any safeguarding concerns. Before deciding on appropriate action, the School will always consider its duty to safeguard all children from harm; the underlying reasons for a child's behaviour;any unmet needs, or harm or abuse suffered by the child; the risk that the child may pose to other children; and the severity of the child-on-child abuse and the causes of it.

The School will, where appropriate, consider the potential benefit, as well as challenge, of using exclusion as a response, and not as an intervention, recognising that even if this is ultimately deemed to be necessary, some of the measures referred to in this policy may still be required.

Expulsion will usually only be considered as a last resort and only where necessary to ensure the safety and well-being of the other children in the School. Disciplinary interventions alone are rarely able to solve issues of child-on-child abuse, and the School will always consider the wider actions that may need to be taken, and any lessons that may need to be learnt going forwards, asset out above and below.

On-going proactive work to a contextual whole-school approach

The School's response to concerns/allegations of child-on-child abuse forms part of on-going proactive work by the School to embed best practice and take a contextual whole-school approachto such abuse. As such the School's response can become part of its wider prevention work.

In addition, the School will review the context in which any incident of child-on-child abuse occurred in the School, the local community in which the School is based, and the wider physical and online environment, including consideration of the following questions:

- what protective factors and influences exist within the School (such as positive peer influences, examples were child-on-child abuse has been challenged etc.) and how can the School bolster these?
- How (if at all) did the School's physical environment contribute to the abuse, and how can the School address this going forwards, for example by improving the School's safety, security and supervision?
- Did wider gender norms, equality issues and/or societal attitudes contribute to the abuse?
- What was the relationship between the abuse and the cultural norms between staff and pupils, and how can these be addressed going forwards?
- Does the abuse indicate a need for staff training on, for example, underlying attitudes, a particular issue or the handling of particular types of abuse?
- How have similar cases been managed in the past and what effect has this had;
- Does the case or any identified trends highlight areas for development in the way in which the School works with children to raise their awareness of and/or prevent child-on-child abuse, including by way of the School's Personal Development curriculum and lessons that address poor attitudes or behaviour such as gender and equalities work?
- Are there any lessons to be learnt about the way in which the School engages with parents to address child on child abuse issues?
- Are there underlying issues that affect other schools in the area and is there a need for a multi-agency response; Does this case highlight a need to work with certain children to build their confidence and teach them how to identify and manage abusive behaviour?
- And were there opportunities to intervene earlier or differently and/or to address common themes

amongst the behaviour of other children in the School?

Answers to these questions are developed into an action plan that is reviewed on a regular basis by the School Leadership Team and the DSL.

Children with harmful behaviour
There will be occasions when a child's (or children's) behaviour warrants a response under child protection rather than anti-bullying procedures. All such instances must be reported to the DSL and will be dealt with in accordance with the procedures above. Where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, the DSL will refer the abuse to external agencies, including, as necessary, the police, and CSC services in accordance with the procedures in this policy.

The management of children and young people with harmful behaviour (including sexually harmful behaviour) can be complex and the School will work with other relevant agencies to maintain the safety of the whole school community. Young people who display such behaviour may be victims of abuse themselves and the child protection procedures will be followed for both victim and perpetrator – i.e. all children involved will be treated as being "at risk".

A pupil (or pupils) against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from CSC on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the pupil or pupils accused of abuse.

If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of CSC, the pupil's parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult.

Complaints about staff and poor or unsafe practice

All complaints and concerns will be considered carefully by the School and appropriate action will be taken.

Safeguarding complaints

Where parental, staff or pupil complaints raise safeguarding concerns about a member of staff, the person to whom the complaint has been made must follow the procedure for referral of concerns setout at Appendix 2 below.

Complaints by parents or pupils

The School's complaints procedure will normally be followed where a parent raises a concern about poor practice or wrongdoing by staff in the workplace. The complaints procedure is available to all parents and staff via the School Policies page of the school's website.

Every pupil should feel able to raise concerns with any member of staff whom they feel they can trust.Staff who hear about concerns, suspicions or allegations from a pupil must relay the concerns immediately and appropriately to the relevant person – usually this will be to the Head, (the DSL), or in the case of safeguarding concerns, in accordance with the procedure set out at Appendix 2 below.

Complaints by staff and Low-Level Concerns

Complaints from staff involving wrongdoing in the workplace are dealt with under the school's

Whistleblowing and/or Grievance procedures. The School's staff procedures are available via the staff SharePoint.

As part of our whole school approach to safeguarding we wish to promote an open and transparent culture in which all concerns about all adults working on behalf of the school (including trainee teachers, supply teachers, volunteers and contractors) are dealt with promptly and appropriately. Creating a culture in which all concerns are shared responsibly and with the right person, and recorded and dealt with appropriately, is critical.

There are procedures in place to make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned. This is a legal duty and failure to refer when the criteria are met is a criminal offence.

Where a teacher's employer, including an 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 first, they must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency). Details about how to make a referral to the Teaching Regulation Agency can be found on GOV.UK

There may be occasions where something occurs which is out of the ordinary and which causes a member of staff to have doubts about the behaviour of another adult towards a pupil or another childor concerns about how their own behaviour might be misinterpreted. It is important that any concerns,or incidents which might give rise to concerns about the conduct of staff, are reported to the Head, however minor.

A concern of this nature should be reported as a 'Low-level concern' via online submission on the CPOMS Staff Safe. These will be reviewed by the Head and the DSL. The term 'Low-Level Concern' does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold of harm. A Low-Level Concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the Staff Code of Conduct.

A low-level concern may also be made by a member of staff to identify situations where events or behaviour (of themselves or colleagues) may need explanation – for example a member of teaching staff with a child at the school who has another child stay the night at their home, as part of a playdate with their own child.

Low-level concerns are submitted via CPOMS Staff Safe. A link to this system is available from the staff landing page and all staff have received training on how to access it.

Examples of possible low-level concerns include, but are not limited to:

- Situations where staff members may inadvertently cross professional boundaries with students or colleagues.
- Displaying favouritism towards a particular student without clear evidence of harm.
- Engaging with students on personal social media accounts without clear professional purpose.
- Staff having close personal relationships with students (e.g., through playdates) that may raise concerns.
- Repeated instances of not following established school protocols or guidelines.
- Inappropriate or unclear communication that causes discomfort or unease.
- Behaviours that, while not harmful, may be perceived as overly familiar or inappropriate.
- Instances where staff may use their position for personal gain without clear evidence of harm.
- Personal relationships or financial interests that might conflict with professional responsibilities.
- Instances where staff members fail to report incidents or concerns promptly.

- Issues related to the physical environment or minor safety concerns that do not reach the threshold of harm.
- Situations where staff may struggle to maintain appropriate professional boundaries.
- Repeated failure to attend mandatory safeguarding or professional development training.
- Attendance at social events involving students in a way that may raise concerns.

Whistleblowing

Staff should feel able to raise concerns about poor or unsafe practice and potential failures in the School's safeguarding regime. The Whistleblowing Policy, which is reflected in staff training and the Staff Code of Conduct, is in place for such concerns to be raised with the School Leadership Team (SLT)and/or Governing Body (GB), via the Chair of Governors. Where a staff member feels unable to raise an issue with the SLT or Chair of Governors or feels that their genuine concerns are not being addressed, other whistleblowing channels are opento them. These are outlined in the Whistleblowing Policy and the staff Code of Conduct. No member of staff will suffer a detriment or be disciplined for raising a genuine concern about unsafe practice.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. 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.

Staff should also follow the whistleblowing and low-level concerns procedures if an allegation is received about an individual or an organisation concerning incidents that happen when the school's premises are being used by external providers or by individuals and organisations contracted by the school.

Confidentiality and sharing information

Confidentiality is defined as *'something which is spoken or given in private, entrusted with another's secret affairs'.*
All staff will understand that child protection issues warrant a high level of confidentiality, not only outof respect for the child and staff involved but also to ensure that being released into the public domain does not compromise evidence.

Staff must not promise absolute confidentiality to a pupil and will always act in the best interests of the pupil. Staff should only discuss concerns with the DSL , the Deputy DSLs or Head or Chair of Governors (if there is a safeguarding allegation regarding a member of staff or volunteer). That professional will then decide who else needs to have the information and they will disseminate the information on a 'need-to-know' basis.

The School will co-operate with police and CSC to ensure that all relevant information is shared for the purposes of child protection investigations under section 47 of the Children Act 1989 in accordance with the requirements of Working together to safeguard children (2023). In particular, fears about sharing information must not be allowed to stand in the way of the need to promote the welfare,and protect the safety, of children.

The storing and processing of personal information about pupils is governed by the Data Protection Act (DPA) 2018 and the General Data Protection Regulations - see the Data Protection Policy in the Staff intranet. Those staff who need to share 'special category personal data' should be aware that the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition. This allows practitioners to share information without consent, if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk. In practice, the sharing of

such information will normally be restricted to the DSL, Deputy DSLs or other nominated members of the School's Pastoral Management Team.

Resources:
Information Sharing: advice for practitioners providing safeguarding services.
Multi-agency information sharing: Tier 1 template data sharing agreement
Multi-agency information sharing: Tier 2 template data sharing agreement

Where allegations have been made against staff, the School will consult with the LADO and, where appropriate, the police and CSC to agree the information that should be disclosed and to whom. The reporting restrictions applicable to such matters will be observed.

Written records and other written information will be stored securely on CPOMS where all records are protected by 2 factor authentication and only made available to relevant individuals depending on the required level of confidentiality.

Related safeguarding portfolio policies and procedures

All related policies and procedures are available via the Staff SharePoint. Those available to parents are on the policies pages of the website.

Appendix 2

Types and signs of 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 (e.g. via the internet). They may be abused by an adult or adults, or another child or children.

Factors which may make a child particularly vulnerable to abuse include:

- Showing signs of abuse/neglect;
- living in an identified domestic abuse situation;
- is a young carer;
- is showing signs of engaging in anti-social or criminal behaviour;
- affected by known parental substance misuse;
  affected by (a) parent(s) suffering with mental health problems or living in chaotic, neglectful and unsupportive home situations;
- asylum seekers;
- living away from home;
- vulnerable to being bullied, or engaging in bullying;
- living in temporary accommodation;
- living transient lifestyles;
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality;
- involved directly or indirectly in prostitution or child trafficking;
- do not have English as a first language;
- 'Looked After' Children (LACs) or children in care or who have returned home to their family from care.

Thisincludes those who are subject to a care order or temporarily classed as looked after on a planned basis for short breaks or respite care. NB 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. See LAC policy for further details.

Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges (whether or not they have a statutory education, health and care plan). Additional barriers can exist when recognising abuse and neglect in this group of children. This can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's

disability without further exploration;

- children with SEN and disabilities can be disproportionally impacted by things like bullying- without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

Knowing what to look for is vital to the early identification of abuse and neglect. If staff members are unsure, they should always speak to the DSL or Deputy DSL. In exceptional circumstances, such as in emergency or a genuine concern that appropriate action has not been taken, staff members can speak directly to CSC. Staff members working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.

LGBTQ+ pupils

The fact that a pupil may be LGBTQ+ is not in itself an inherent risk factor for harm; however, staff will be aware that LGBTQ+ pupils can be targeted by other individuals. Staff will also be aware that, in some cases, a pupil who is perceived by others to be LGBTQ+ (whether they are or not) can be just as vulnerable as pupils who identify as LGBTQ+.

Staff will also be aware that the risks to these pupils can be compounded when they do not have a trusted adult with whom they can speak openly with. Staff will endeavour to reduce the additional barriers faced by these pupils and provide a safe space for them to speak out and share any concerns they have.

Pupils requiring mental health support

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

Abuse

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults oranother child or children.

Physical abuse

Physical abuse may involve hitting, shaking, biting, hair-pulling, 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 (this used to be called Munchausen's Syndrome by Proxy but is now more usually referred to as fabricated or induced illness).

Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only as far as they meet the needs of another person. It may include verbal abuse, such as persistent criticism, belittling, or name calling, as well as not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve 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.
Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.

Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. 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

Sexual abuse

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 penetration with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non- contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse . Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and staff should be aware of it and report any concerns promptly to DSL.

Neglect

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

Keeping Children Safe in Education also recognises the following as specific safeguarding issues: Child sexual exploitation (CSE) See section 13G of the Safeguarding Policy for the definition of CSE.

Signs in the Child:

Physical signs of Physical Abuse

There is not one sign to look out for that will prove that a child is being physically abused. But if a child often has injuries, there seems to be a pattern, or the explanation does not match the injury then this should be investigated. Signs of physical abuse can include:

- injuries to parts of the body where accidents are unlikely, such as thighs, back, abdomen;
- respiratory problems from drowning, suffocation or poisoning;
- untreated or inadequately treated injuries;
- bruising which looks like hand or finger marks;
- cigarette burns, human bites; or
- scarring, scalds and burns.

Aside from direct physical contact, physical abuse can also be caused when a parent or caregiver fabricates the symptoms of or deliberately induces ill health in a child.

Physical Signs of Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The

activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non- contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Signs of sexual abuse displayed by children may include:

- Pregnancy
- Sexually transmitted infection
- pain/itching/bleeding/bruising/discharge to the genital area/anus;
- urinary infections/sexually transmitted diseases;
- difficulty walking or sitting; and
- persistent sore throats;

Physical Signs of Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs. This is likely to result in the serious impairment of the child's health or development. Signs of possible neglect include:

- the child seems underweight or is very small for their age;
- they are poorly clothed, with inadequate protection from the weather;
- they are often absent from school for no apparent reason; or
- they are regularly left alone, or in charge of younger brothers or sisters.

Signs of Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. It may involve conveying to a child that they are worthless or unloved or inadequate. It may include deliberately silencing children or ‘making fun’ of what they say. It may feature age or developmentally inappropriate expectations being imposed on children; seeing or hearing theill-treatment of another; serious bullying (including cyberbullying), or the exploitation or corruption ofchildren. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. Signs of emotional abuse tend to be behavioural rather than physical (see below).

Behavioural Signs of Abuse and Neglect

If a child is being abused, their behaviour may change in a number of ways. For example, theymay:

- behave aggressively or be disruptive, act out, demand attention and require more discipline than other children;
- become angry or disinterested and/or show little creativity;
- seem frightened of certain adults;
- become sad, withdrawn or depressed;
- have trouble sleeping;
- become sexually active at a young age;

- exhibit inappropriate sexual knowledge for their age or sexualised behaviour in their play with other children;
- refuse to change for gym or participate in physical activities;
- develop eating disorders;
- self-harm;
- refuse to attend school or run away from home;
- lack confidence or have low self-esteem; or
- use drugs or alcohol.

Signs in the behaviour of the parent or other responsible adult:

- unrealistic expectations of the child i.e. demands a level of academic or physical performance of which they are not capable;
- offers conflicting or unconvincing explanation of any injuries to the child;
- appears indifferent to or overtly rejects the child;
- denies existence of or blames the child for the child's problems at home or at school;
- sees and describes the child as entirely worthless, burdensome or in another negative light;
- refuses offers of help for the child's problems; or
- is isolated physically/emotionally.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed. It is very important that you report your concerns – you do not need ‘absolute proof’ that the child is at risk.

Procedures to be followed in the event of an allegation against a member of staff or volunteer of abuse

The DFE has issued statutory guidance which all schools and local authorities must follow when a potential child protection allegation is made against a member of staff (including supply and trainee staff) or volunteer. The guidance is contained within Part 4 of the Keeping Children Safe in Education (as updated for September 2026). It is expected that all staff and Governors involved in the management of allegations of abuse made against a member of staff or volunteer will comply at all times with the statutory guidance.

The School's Procedures

The School's procedures for dealing with allegations made against staff or volunteers will be used where a member of staff has any safeguarding concerns about another member of staff or a volunteer, including wherethe member of staff/volunteer is alleged to have:

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

This procedure relates to members of staff (including supply staff) who are currently working in the School regardless of whether the School is where the abuse is alleged to have taken place. In the particular case of supply or trainee staff, it should be noted that the school will usually take the lead in any investigation because supply agencies do not have direct access to children or other school staff, so they will not generally be able to collect the facts or liaise with the LADO.

Allegations against former members of staff or volunteers who are no longer working at the School will be referred to the police. Historical allegations of abuse will also be referred to the police. Where the school has information to indicate that the former staff member is working with children in another location or in potential cases of complex abuse (e.g. where there is more than one perpetrator) this should also be reportedto the LADO in that location and to the senior management of the school where that member of staff is currently working.

If an allegation is made against a member of staff or volunteer, the School’s priority will be to achieve a quickresolution of that allegation in a fair and consistent way that provides effective protection for any child involved and at the same time supports the person who is the subject of the allegation. All such allegations must be dealt with as a priority without delay.

Contact details for the Local Authority Designated Officer 0300123 1650 - option 3
Email: **LADO@surreycc.gov.uk**

The following definitions are to be used when determining the outcome of allegation investigations:

a) **Substantiated**: there is sufficient evidence to prove the allegation;
b) **False**: there is sufficient evidence to disprove the allegation;
c) **Malicious**: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.
d) **Unsubstantiated**: this is not the same as a false allegation. It means that there is insufficient evidence to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
e) **Unfounded**: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Reporting an allegation against staff or volunteers

Lower-level concerns should be notified via online submission on CPOMS Staff Safe. Low-level concerns are regularly reviewed by the Head and the DSL. If the DSL, or the Head is the subject of the concern, the procedure below for more serious concerns should be followed.

All allegations, complaints, concerns or suspicions against staff (including supply staff) or volunteers, including any made against the DSL or Deputy DSLs, should be reported directly to the Head, or in their absence to the Chair of Governors, unless that person is the subject of the concern (in which case see below).

All allegations, complaints, concerns or suspicions about the Head should be reported to the Chair of Governors without the Head being informed.

All allegations, complaints, concerns or suspicions about the Chair of Governors should be reported to the LADO without the Chair of Governors or the Head being informed. The LADO may choose to appoint a 'case manager'.

The Head or Chair of Governors (or Vice Chair), as appropriate, (the 'case manager') will immediately (and within one working day) discuss all allegations or suspicions of abuse with the local authority designated officer(LADO) and will not investigate the matter further before speaking to the LADO.

Borderline cases will be discussed without identifying individuals in the first instance and following discussions the LADO will judge whether or not an allegation or concern indicates possible abuse. The LADO and the case manager will decide in the circumstances what further steps should be taken. This could involve informing parents. In the most serious cases the police will be informed.

The LADO's contact details can be found above. All discussions with the LADO will be recorded in writing.

In a strategy discussion or the initial evaluation of the case, the case manager should share all relevant information they have about the person who is the subject of the allegation, and about the alleged victim(s).

The initial sharing of information and evaluation by the appropriate agencies may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern; in which case this decision and a justification for it should be recorded by both the case manager and the LADO, and agreementreached on what information should be put in writing to the individual concerned and by whom.

The case manager should then consider with the LADO what action should follow both in respect of the

individual and those who made the initial allegation.

If, at any point, there is a risk of immediate serious harm to a child a referral should be made to CSC immediately (and within one working day). Any member of staff can make a referral.

Disclosure of information

Where the LADO advises that a strategy discussion is needed, or police or CSC services need to be involved, the case manager will not speak to the accused person or the parents or carers until those agencies have consulted and have agreed what information can be disclosed.

Subject to the above:

- the case manager will inform the accused person as soon as possible after consulting the LADO and will provide as much information as possible at that time.
- the Parents or carers of the child[ren] involved will be informed of the allegation as soon as possible if theydo not already know of it. They will also be kept informed of the progress of the case and the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannotnormally be disclosed, but the parents or carers of the child should be told the outcome in confidence.

The reporting restrictions preventing the identification of a teacher who is the subject of such an allegation incertain circumstances will be observed and, where necessary, parents and carers will be made aware of the prohibition on reporting or publishing allegations about teachers. If parents or carers express a wish to apply to the court to have reporting restrictions removed, they will be told to seek legal advice.

The case manager should take advice from the LADO, police and children's social care services to agree thefollowing:

- who needs to know and, importantly, exactly what information can be shared;
- how to manage speculation, leaks and gossip;
- what, if any information can be reasonably given to the wider community to reduce speculation; and
- how to manage press interest if and when it should arise.

Where the police are involved, wherever possible the case manager will ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the employer disciplinary process. This should be done as their investigation proceeds and will enable the police to share relevant information without delay at the conclusion of their investigation or any court case.

Action to be taken against the accused

The School has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. Individuals will be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless external agencies object to this. The individual concerned will be advised to contact their trade union representative, if they have one, or a colleague for support. They will also be given access to welfare counselling and medical advice. They will alsobe given clear instructions about the need for confidentiality and their responsibility to avoid any contact with any pupils or families involved in the investigation.

The case manager will appoint a named representative to keep the member of staff informed of the progressof the case and to consider what other support might be appropriate. If the member of staff is suspended, they will also be kept up to date with current work-related issues.

Where an investigation by the police or CSC is unnecessary, the LADO will discuss the steps to be taken with the case manager. The appropriate action will depend on the nature and circumstances of the allegation andwill range from taking no further action to a disciplinary process leading to dismissal, or a decision not to use the person's services in the future.

It may be necessary to undertake further enquiries to determine the appropriate action. If so, the LADO will discuss with the case manager how and by whom the investigation will be undertaken. The appropriate person will usually be a senior member of staff, but in some instances, it may be appropriate to appoint an independent investigator as advised by the Surrey Safeguarding Children Board.

Suspension

Suspension will not be an automatic response to an allegation and will only be considered in a case where:

a) there is cause to suspect a child or other children at the School is or are at risk of significant harm
b) the allegation is so serious that it might be grounds for dismissal or
c) it is necessary for a fair investigation to be carried out.

If the case manager is concerned about the welfare of other children in the community or the teacher's family,those concerns should be reported to the designated officer(s), children's social care or the police as required. But suspension is highly unlikely to be justified based on such concerns alone.

All options other than suspension will be considered before taking that step. Consideration will be given to whether the result that would be achieved by suspension could be obtained by alternative arrangements, forexample, redeployment either within or outside of the School or providing an assistant when the individual has contact with children. The School will give due weight to the views of the LADO when making a decision about suspension.

A member of staff will only be suspended if there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification will be recorded, and the member of staff notified of those reasonsin writing within one working day. Appropriate support will be provided for the suspended individual and contact details provided. Social contact with colleagues and friends should not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

Criminal proceedings

The School will consult with the LADO following the conclusion of a criminal investigation or prosecution as to whether any further action, including disciplinary action, is appropriate and if so, how to proceed. The optionswill depend on the circumstances of the case, including the result of the police investigation or trial and the standards of proof applicable.

Return to work

If it is decided that the person who has been suspended should return to work, the School will consider howbest to facilitate this, for example, arranging a phased return and / or the provision of a mentor to

provide assistance and support in the short term. The School will also consider how to manage the contact with the child[ren] who made the allegation.

DBS and TRA Referrals and ceasing to use staff

There is a legal duty to refer to the DBS anyone who has:

1.Engaged in 'relevant conduct':

Relevant conduct in relation to children is conduct which:

a) Endangers a child or is likely to endanger a child
b) If repeated against or in relation to a child, would endanger a child or would be likely to endanger them
c) Involves sexual material relating to children (including possession of such material)
d) Involves sexually explicit images depicting violence against a person (including possession of such images),if it appears to DBS that the conduct is inappropriate
e) Is of a sexual nature involving a child, if it appears to DBS that the conduct is inappropriate.

A person's conduct endangers a child if they:

a) Harm a child
b) Cause a child to be harmed
c) Put a child at risk of harm
d) Attempt to harm a child, or
e) Incite another to harm a child
f) Satisfied the 'harm test' (i.e. no action or inaction occurred but the present risk that it could was significant), or
g) Received a caution or conviction for a 'relevant offence' (a list of these offences is available on the DBS website or call the helpline for advice).

2.Satisfied the harm test;

There are occasions where a person may not have engaged in relevant conduct but there are still serious concerns which satisfy the harm test.

To satisfy the harm test there needs to be credible evidence of a risk of harm to children. For a case to be considered as a risk of harm, there must be tangible evidence rather than a "feeling" that a person represents a risk to children. For example, a teacher who confides in their head teacher that they are sexually attracted to children (but who had not engaged in 'relevant conduct') would satisfy the harm test.

3.Received a caution or conviction for a relevant offence;

and that individual has been removed from working (paid or unpaid) in regulated activity or would havebeen removed had they not left.

Referrals should be made as soon as possible after the resignation or removal of the individual.

Failure to make a Referral to the DBS in such circumstances constitutes an offence.

If the School ceases to use the services of a member of staff or volunteer because they are unsuitable to workwith children, a settlement/compromise agreement will not be used and a referral to the Disclosure

and Barring Service will be made as soon as possible if the criteria are met – see above – as per the guidance published by the DBS.

If the accused person resigns or ceases to provide his / her services, this will not prevent child protection allegations being followed up in accordance with this policy and the statutory guidance. A referral to the Disclosure and Barring Service (DBS) will be made as soon as possible, if the criteria are met – see above – as per the guidance published by the DBS. THE LADO, police and relevant agencies should be involved for a full investigation of the facts, even if the staff member, agency staff, trainee or volunteer has been suspended, dismissed or has resigned before the investigation commenced.

Staff should be aware that the DBS has statutory authority to bar a person from working inregulated activity with children and/or vulnerable adults in the UK.

Where a teacher is dismissed (or would have been dismissed had they not resigned) for misconduct, separateconsideration will be given as to whether a referral to the Teaching Regulation Agency (TRA) should be made,as per the flow chart that appears in the guidance published by the TRA. For information, the reasons for theTRA to consider whether a prohibition order might be appropriate are: 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'.

In cases where the School is made aware that the Secretary of State has made an interim prohibition order inrespect of an individual who works at the school, immediate action will be taken to ensure the individual doesnot carry out work in contravention of the order, i.e. pending the findings of the TRA investigation, the individual must not carry out teaching work and must therefore be suspended.

Any such incidents will be followed by a review of the safeguarding procedures within the School, with a report being presented to the Governors without delay.

Timescales

All allegations must be dealt with as a priority so as to avoid any delay. Where it is clear immediately that theallegation is unsubstantiated or malicious, the case should be resolved within one week. It is expected that most cases of allegations of abuse against staff will be resolved within one month with exceptional cases beingcompleted within 12 months. If the nature of the allegation does not require formal disciplinary action, the Head should instigate appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, as far as possible it should be held within 15 working days.

Unsubstantiated, false or malicious allegations

Where an allegation by a pupil is shown to have been deliberately invented or malicious, the Head will considerwhether to take disciplinary action in accordance with the School's behaviour and discipline policy.

Where a parent has made a deliberately invented or malicious allegation the Head will consider whether to require that parent to withdraw their child or children from the school on the basis that they have treated theschool or a member of staff unreasonably.

Whether or not the person making the allegation is a pupil or a parent (or other member of the public), the school reserves the right to contact the police or CSC to determine whether any action might be appropriate.

Record keeping and references

Details of all allegations found to be malicious will be removed from personnel records.

A clear and comprehensive summary of any allegations made against a member of staff, and all details leadingto and including a resolution, and a note of any actions taken and decisions reached will be kept on the confidential personnel file and will be retained until the accused has reached normal pension age or for a period of 10 years if that is longer. However, where an issue or concern relating to a member of staff and thesafeguarding of children has been identified, records of any concerns, suspicions or investigations will be kept for 75 years. Such records will provide clarification in cases where future DBS checks reveal information fromthe police about an allegation that did not result in a criminal conviction and will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time.

The School will provide information regarding a substantiated allegation for the purposes of future references and DBS disclosures in accordance with the School's safer recruitment procedures. In cases where allegationsare found to be false, malicious or unsubstantiated, reference will not be made in employer references.

Learning lessons

At the conclusion of a case in which an allegation is substantiated, the LADO should review the circumstancesof the case with the case manager to determine whether there are any improvements to be made to the School’s procedures or practice to help prevent similar events in the future.

This should include issues arising from the decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified.

Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. TheLADO and case manager should consider how future investigations of a similar nature could be carried out without suspending the individual.

Appendix 3

Child on Child Abuse References

Child-on-Child Appendix A – Further Resources Child-on-Child abuse statistics

- The crime survey data from 2013:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/214970/sex ualoffending-overview-jan-2013.pdf

This includes information around sexual violence; and street-based violence perpetrated by young men.

- The Centre for Social Justice:
http://www.centreforsocialjustice.org.uk/core/wp-content/uploads/2016/11/ Bullying-RT/Report-1.pdf

This 2016 roundtable report looks at how the education sector can best support children who self-exclude due to bullying. It sets out a number of important statistics.

- Parliament publication:
https://publications.parliament.uk/pa/cm201617/cmselect/cmwomeq/91/9105.htm

This 2016 publication examines the scale and impact of sexual harassment and sexual violencein schools.

Identifying, assessing and responding to behaviour

The following links are designed to help professionals working with children to identify,categorise and respond appropriately to sexual behaviours by children:

- NSPCC's and Research in Practice's Harmful Sexual Behaviour Framework:
https://learning.nspcc.org.uk/research-resources/harmful-sexual-behaviour-hsb-framework-audit
, which contains the continuum model proposed by Simon Hackett (2010), and provides schools with information about what to expect from local partnerships.

- NSPCC guidance on the stages of normal sexual behaviour
https://learning.nspcc.org.uk/child-health-development/sexual-behaviour

- NSPCC How to prevent harmful sexual behaviour in children | NSPCC Learning

- Brook Sexual Behaviours Traffic Light Tool: https://www.brook.org.uk/education/sexual-behaviours-traffic-light-tool/

Child exploitation disruption toolkit

- County lines and criminal exploitation toolkit

Educating staff and children

- Serious Youth Violence – Home Office 'This is abuse campaign for schools': https://www.gov.uk/government/publications/this-is-abuse-summary-report

- New youth produced imagery guidance: https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people

- Anti-bullying guidance: https://assets.publishing.service.gov.uk/media/625ee64cd3bf7f6004339db8/Preventing_and_tackling_bullying_advice.pdf

- Cyber bullying: https://www.childnet.com/resources/cyberbullying-guidance-for-schools/

- The role of schools in preventing, and responding to, child-on-child abuse: https://www.farrer.co.uk/globalassets/clients-and-sectors/safeguarding/addressing-child-on-child-abuse.pdf

- Tender works with schools providing educational programmes for children and staff trainingaimed at preventing domestic abuse and sexual violence and promoting healthy relationshipsbased on equality and respect: http://tender.org.uk/

- Childnet: https://www.childnet.com/resources/pshe-toolkit/

Support and interventions

- The charity, the Lucy Faithful Foundation (LFF), provides services to agencies working with children and their families – for those with problematic sexual behaviour on the internet andin the 'real world': https://www.lucyfaithfull.org.uk/resources/

LFF also provides information for parents and carers of children: https://www.lucyfaithfull.org.uk/resources/

- Red Balloon Learning Centres: http://www.redballoonlearner.org/

- Leap Confronting Conflict: http://www.leapconfrontingconflict.org.uk/

- Barnardo's: https://www.barnardos.org.uk/get-support/services/seen-sexual-exploitation-ends-now

General

- Contextual Safeguarding Practitioners' Network: www.contextualsafeguarding.org.uk

Appendix 4

DSL and Deputy DSL Responsibilities

The broad areas of responsibility for the DSL are as follows and taken from Keeping Children Safe in Education:

Managing referrals

The designated safeguarding lead is expected to:

- Refer cases of suspected abuse to the local authority children's social care as required;
- Support staff who make referrals to local authority children's social care;
- Refer cases to the Channel programme where there is a radicalisation concern as required;
- Support staff who make referrals to the Channel programme;
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- Refer cases where a crime may have been committed to the Police as required.

NB Local authorities should share the fact a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this informationunder existing duties on both local authorities and schools to safeguarding and promote the welfare of children.

Work with others

- Refer all cases of suspected abuse to the local authority Children's Social Care and:
    - o The Local Authority Designated Officer (LADO) for child protection concerns (all cases whichconcern a staff member);
    - o Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to achild) and/or
    - o Police (cases where a crime may have been committed or where guidance indicates that liaisonwith the police is advisable (see Keeping Children Safe in Education -and NSPCC guidance on when to call the police).

- Liaise with the Head, as appropriate, to inform them of safeguarding issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- As required, liaise with the "case manager" (as per Part four of Keeping Children Safe in Education) and the designated officer(s) at thelocal authority for child protection concerns (all cases which concern a staff member);
- Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies. Act as a source of support, advice and expertise for staff.

Training requirements: DSL and Deputy DSL

The DSLs and Deputy DSLs will receive regular training, at appropriate intervals, as and when required, to provide them with the skills and knowledge required to carry out the role and to keep up with any developments relevant to their role.

The DSL and Deputy DSLs should undertake Prevent awareness training and also training in assessing and managing risks and managing reports and/or disclosures of sexual violence and sexual harassment.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might bevia e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role in order that they can:

- Understand the assessment process for providing Family Help and intervention, for example through locallyagreed common and shared assessment processes such as Family Help assessments;
- Have a working knowledge of locally agreed procedures for child protection and inter-agency working, in particular how local authorities conduct a 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;
- Ensure each member of staff has access to and understands the School's Safeguarding and Child Protection Policy and procedures and the Staff Code of Conduct especially new and part time staff;
- Be alert to and support the specific needs of children in need, those with special educational needs andyoung carers;
- Be able to keep detailed, accurate, secure written records of concerns and referrals;
- Understand and support the school with regards to the requirements of the Prevent duty and be able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at schoolor college;
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- Obtain access to resources and attend any relevant or refresher training courses; and
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them.

Raising Awareness

The DSL will ensure the School's policies are known, understood and used appropriately:

- Ensure the School's Safeguarding and Child Protection Policy and Staff Code of Conduct are reviewed annually, and that procedures and implementation are updated and reviewed regularly in light of changes inlocal procedures and national statutory requirements and guidance, and work with the Governing Body regarding this.
- Ensure the Safeguarding and Child Protection Policy, including low –level concerns and the Whistleblowing Policy are available publicly (through the School website) and parents know referrals about suspected abuse or neglect must be madeand the role of the School in this.
- Link with the Local Safeguarding Partnership to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

In addition to the above responsibilities as set out in Keeping Children Safe in Education, the DSL will:

- Ensure that all staff have received the required training and have confirmed that they have read and understood this policy, the Staff Code of Conduct which includes detail of additional safeguarding

arrangements where staff engage in one-to-one teaching and meetings with pupils, and Part One of Keeping Children Safe in Education,and that they know who the DSL and Deputy DSLs are;

- Ensure that all staff are re-trained as and when required and that an accurate record of staff attendance ofinduction and refresher training is maintained.
- Notify CSC if a child with a child protection plan is absent for more than two days without explanation.
- Consider how children may be taught about safeguarding, including online, through teaching and learningopportunities, as part of providing a broad and balanced curriculum, for example through Information and Communications Technology (ICT), Personal, Social and Health Education (PSHE) and/or Sex and Relationships Education (SRE).
- Ensure appropriate safeguarding responses are in place and are implemented to deal with pupils who gomissing from the School, in particular any pupils who go missing on repeat occasions. The School has a separate Missing Pupil Procedure.
- Ensure an understanding of expectations, roles and responsibilities around your setting's filtering and monitoring system.
- Understand safer recruitment procedures and processes and be able to apply them as a member of an appointment panel.
- Promote educational outcomes by sharing the information about the welfare, safeguarding and childrenprotection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff.
    - Where children need a social worker, this should inform decisions about safeguarding (for example,responding to unauthorized absence or missing education where there are known safeguarding risks)and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Child Protection Files

- Where children leave the School, ensure their child protection file is copied for any new school or collegeas 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 to allow the new school or college to have support in place for when the child arrives. .
- The Child Protection file should be transferred separately from the main pupil file, [and that the child's social worker is informed], ensuring secure transit and that confirmation of receipt is obtained.
- In addition to the child protection file, consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the newschool or college to continue supporting victims of abuse and have that support in place for when the child arrives
- When a new pupil, who has a child protection file, joins the school, ensure key staff such as deputy DSLs and the rest of the safeguarding team are aware, as required.

Previously Looked After Children (Care Leavers)

- Designated safeguarding leads should also have details of the local authority Personal Advisor appointed to guide and support any child who is a care leaver and should liaise with them as necessary regarding any issues of concern affecting the care leaver.

Availability

- During term time the designated safeguarding lead (or a deputy) will always be available (during school hours) for staff in the school to discuss any safeguarding concerns.
- A confidential shared mailbox is in place in case of DSL illness, leave or other exceptional

circumstances, ensuring that that safeguarding concerns are received, monitored, and acted upon without delay. Any deputy (or deputies) should be trained to the same standard as the designated safeguarding lead. Whilst generally speaking the designated safeguarding lead (or deputy) is expected to be available in person, though in exceptional circumstances availability via phone and or Teams or other such mediums isacceptable.

- The designated safeguarding lead will ensure adequate and appropriate cover arrangements for any out ofhours/out of term activities.

Deputy DSLs

- The deputy DSLs will be trained to the same standard as the DSLs. In the absence of the DSL, the functions of the DSL will be carried out by the deputy DSL. In this policy, reference to the DSL includes the deputy DSLwhere the DSL is unavailable.

Appendix 5

Responsibilities of the Governing Body (GB) in the management of safeguarding

The GB will ensure that it (and, as appropriate, the School's leadership team and all staff) comply(/ies) with all requirements outlined in Part two of Keeping Children Safe in Education 2026, including that:

- There are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare.
- There is an effective and statutorily compliant child protection policy and procedures in place, together with a Staff Code of Conduct (which should include acceptable use of technologies, staff/pupil relationshipsand communications including the use of social media) and that these are provided to all staff (including, asand where necessary, to temporary staff and volunteers, based on a proportional risk-based approach) on induction;
- DSLs (and deputies) are appointed and that they have the appropriate authority and the time, funding,training, resources and support to fulfil the role and responsibilities as outlined in Appendix 4;
- The School contributes to inter-agency working in line with statutory guidance Working Together to Safeguard Children (2026) through effective implementation of the child protection policy and procedures and good cooperation with local agencies;
- The School's safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the Local Safeguarding Partnership.
- A member of the Governing Body is nominated by the full Governing Body, 'the nominated child protection governor for the school' ('board level lead') to:

    - have oversight of child protection matters, including monitoring of the School's legal duty to refer to the Disclosure and Barring Service;
    - liaise with the local authority and/or partner agencies on issues of child protection and
    - instigate and oversee the annual review of this policy, which will include formal terms of reference, incorporating best practice and/or independent corroboration and inspection of records.
- The School has statutorily compliant procedures for dealing with allegations of abuse made against members of staff including allegations made against the Head
- The School also has procedures in place to handle allegations against other children;
- The School has appropriate procedures in place to keep looked after children safe. In particular, that:

    - Appropriate staff have the information they need in relation to a child's looked-after legal status and contactarrangements with birth parents or those with parental responsibility.
    - They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her.
    - The designated safeguarding lead should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

- The School operates safer recruitment policies and procedures that include the requirement for at least
- one member of a recruitment panel to have undertaken safer recruitment training and for appropriate
- checks to be made in line with national guidance (see part three of Keeping Children Safe in Education and the School's Safer Recruitment
- policy and handbook).

- The school operates an effective training strategy that ensures all staff, including the Head and the governors, receive child protection training, with refresher training at appropriate levels, as and whenrequired (at least annually) in accordance with the Local Safeguarding Partnership's guidance.
- The DSL and deputy receive refresher training at appropriate levels, as and when required (at least annually).
- An annual review of safeguarding is instigated, carried out and approved and that the minutes of Governing Body meetings record in detail the relevant discussion and actions taken in carrying out and approving their annual review of safeguarding.
- Where necessary, an appropriately trained and informed teacher is appointed to promote the educational achievement of any child who is 'looked after'
- Appropriate safeguarding responses are in place to deal with pupils who go missing from the School (see Missing Pupil Procedure), in particular any pupils who go missing on repeat occasions to help identify the riskof abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future.
- Where there is a safeguarding concern, the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place for children to express their views and give feedback and any systems and processes should operate with the best interests of the child at their heart.
- Any serious incident that has resulted or could result in a significant loss of funds or a significant risk to the School's property, work, beneficiaries or reputation is reported to the Charity Commission immediately, including any suspicions, allegations or incidents of abuse or mistreatment of vulnerable beneficiaries. In particular, if:

    - there has been an incident where the beneficiaries have been or are being abused or mistreated while under the care of the School or by someone connected with the School such as a Governor, member of staff or volunteer;
    - there has been an incident where someone has been abused or mistreated, and this is connected with the activities of the School;
    - allegations have been made that such an incident may have happened, regardless of when the alleged abuse or mistreatment took place there are grounds to suspect that such an incident mayhave occurred;
    - See more at: http://www.charitycommission.gov.uk/how-to-complain/complain-about-a-charity/guidance-for-trustees/

The Governing Body recognises:

- its responsibility to ensure that Governors receive appropriate training and information so that they areequipped with the knowledge and skills to fulfil their functions.
- the importance of information sharing between professionals and local agencies as detailed in Working Together to Safeguard Children and Information Sharing Duty- statutory guidance for safeguarding organisations and their practitionersrotection Act 2018 places duties on organisations and individuals to process personal information fairly and lawfully, it is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.
- Although inter agency working and information sharing are vital in identifying and tackling all forms of abuse, it is clear they are especially important to identify and prevent child sexual exploitation.
- Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges.The GB will ensure the child protection policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children.

This can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the
- child's disability without further exploration;
- children with SEN and disabilities can be disproportionally impacted by things like bullying- withoutoutwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

- Its responsibility to assist all staff in taking responsibility for safeguarding as part of an overarching approach. Its responsibility to ensure children are taught about safeguarding, including online, through teaching and learning opportunities, as part of a broad and balanced curriculum.
- The expertise staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis. Opportunity will therefore be provided for all staff, particularly those with safeguarding experience, to contribute to and shape safeguarding arrangements and child protection policy.
- Its responsibility to ensure that the Child Protection policy reflects the different gender issues that can be prevalent when dealing with child-on-child abuse.
- Its responsibility to ensure sexting and the School's approach to it is reflected in the child protection policy.
- Its responsibility to ensure that the safeguarding arrangements take into account the procedures and practice of the Local Authority a part of the inter-agency safeguarding procedures set up by the Local Safeguarding Partnership. This includes understanding and reflecting local protocols for assessment and the LA's threshold document along with supplying information as requested by the Local Safeguarding Partnership.
- That the department for education has published detailed advice to support Schools in the case of a report of child-on-child sexual violence or sexual harassment. This advice includes:
- what sexual violence and sexual harassment look like,
- important context to be aware of,
- related legal responsibilities for schools and colleges and
  advice on a whole school approach to preventing child on child, including sexual violence and sexual harassment.

Appendix 6

Head's responsibilities in the management of safeguarding

- Ensure that the safeguarding and child protection policy and procedures adopted by the GB, particularly concerning referrals of cases of suspected abuse and neglect, are implemented and followed by all staff;
- Allocate sufficient time and resources to enable the DSL and deputy to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings;
- Ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively. Reporting wrongdoing by staff in the workplace will be dealt with in accordance with the school's Whistle Blowing procedures disciplinary procedures, and/or the procedures set out in this policy as appropriate;
- Ensure that children's safety and welfare is addressed through the curriculum;
- Receive the required child protection training and training in order to understand safer recruitment procedures and processes and be able to apply them as a member of an appointment panel and to deal with allegations made against members of staff and volunteers.

Appendix 7

Targeted Family Help provided

All staff should be aware of the process for community-based Family Help assessments :

- The criteria, including the level of need, for when a case should be referred to Family Help support and services provided:
    - Targeted early help level (under sections 10 and 11 of the Children Act 2004), and
    - Statutory services delivered under section 17 of the Children Act 1989 (children in need, including how this applies for disabled children)

- The criteria, including the level of need, for when a case should be referred to local authority children's social care for assessment and for statutory services under Section 47 of the Children Act 1989 (reasonable cause to suspect a child is suffering or likely to suffer significant harm):
    - Section 31 of the Children Act 1989 (care and supervision orders), and
    - Section 20 of the Children Act 1989 (duty to accommodate a child)
    - and clear procedures and processes for cases relating to:
        - the abuse, neglect, and exploitation of children
        - children managed within the youth secure estate
        - disabled children

The following measures and interventions are in place at Danes Hill:

- A minimum of two form times a day when pupils are in contact with a Form Tutor, e.g.
- Registration and Form Time. These times must be the same for all pupils.
- Pupils know how to ask for help anonymously or through a trusted adult (Via noticeboards, Welfare boxes, Personal Development lessons).
- Personal Development curriculum explores emotions and strategies to develop positive relationships.
- Weekly briefing for all staff allows opportunity for discussion regarding any pupil who may be in need of additional support.
- Weekly Safeguarding Team meetings discusses pupil at risk and is able to draw on knowledge from DSL to signpost to external agencies or make referrals to CSC.
- From Tutor meetings allow pastoral leads to collate and track information on vulnerable pupils.
- Counsellor referrals can be suggested by any member of staff and are approved through the DSL.
- Counsellor is able to refer more complex cases to specialist services and professional contacts. This allows Counsellor to be freed up to assess new cases
- British School Values are celebrated each week in assembly and Form Time.
- MHFA - selected pastoral members of school will be trained in youth mental health.
- Mental Health Week, Anti-Bullying Week, Safer Internet Day are celebrated through guest speakers and a series of assemblies and follow-up Form Time sessions.