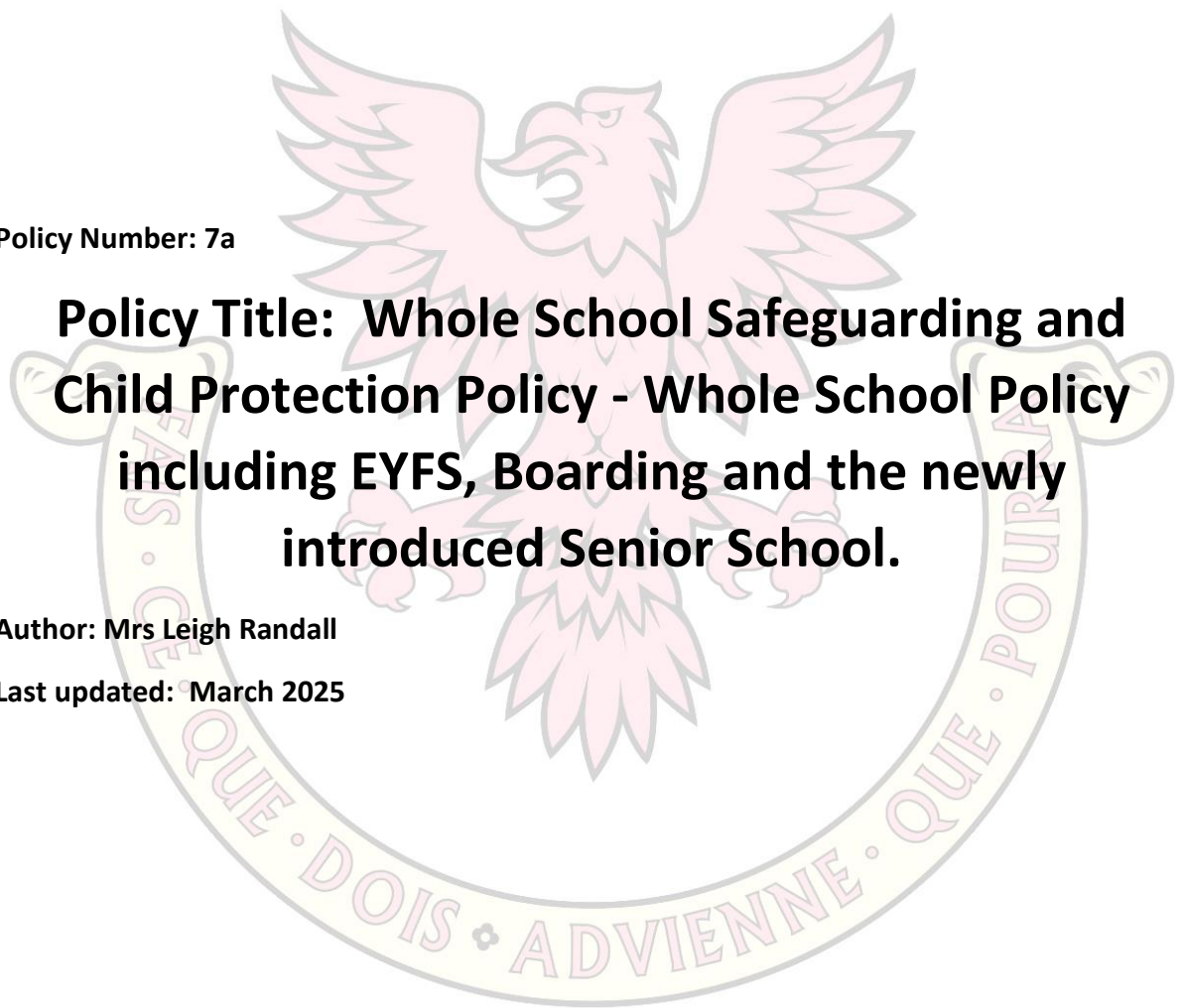


**Policy Number: 7a**

**Policy Title: Whole School Safeguarding and  
Child Protection Policy - Whole School Policy  
including EYFS, Boarding and the newly  
introduced Senior School.**

**Author: Mrs Leigh Randall**

**Last updated: March 2025**



## INTRODUCTION

Hall Grove is committed to safeguarding and promoting the welfare of children and young people (both on and offsite activities) and expects all members of its community to share this commitment. Within the context of 'Working Together to Safeguard Children' and 'Keeping Children Safe in Education', we take account of the need for children being healthy and staying safe and taking action to enable all children to have the best outcomes. The prime concern at all times must be the interests and safety of the pupils.

All staff (including ancillary, supply staff and volunteers) are aware of our Policy and we hold regular training to remind staff of the procedures to follow. It is available to all parents through the website. Staff should also refer to the Staff Handbook where details for a Staff Code of Conduct can be found. The policy will be reviewed regularly and will be updated and amended as necessary, and annually.

We follow the procedures and protocols adopted by the Surrey Safeguarding Children Partnership (SSCP). Sometimes, when there are concerns about a young person's welfare, we may need to share information and work in partnership with outside agencies. We will ensure that any concerns about our pupils are discussed with their parents/carers unless we have reason to believe that such a move would be contrary to the young person's welfare. The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children and protect the safety of children.

At Hall Grove we will assure the safety of our children by never walking by. We will be vigilant, active and will ensure our actions are guided by our Safeguarding Team.

## KEY EXTERNAL CONTACT DETAILS

<b>Local Authority Designated Officer (LADO) for Surrey Children's Services</b>	Contact for on call officer TEL: 0300 123 1650 (option 3) EMAIL: <a href="mailto:lado@surreycc.gov.uk">lado@surreycc.gov.uk</a> Or <a href="mailto:lado@surreycc.gcsx.gov.uk">lado@surreycc.gcsx.gov.uk</a> – for secure emails
<b>Surrey Children's Services</b>	TEL: 0300 123 1630 (Local Area contact for North West Surrey – Surrey Heath)
<b>Children's Single Point of Access (C-SPA)</b> (for all new referrals)	TEL: 0300 470 9100 EMAIL: <a href="mailto:cspa@surreycc.gov.uk">cspa@surreycc.gov.uk</a>

	<p>OUT OF HOURS EMERGENCY DUTY TEAM:</p> <p>TEL: 01483 517898</p>
<b>Support and Advice about Extremism</b>	<p><b>Police</b></p> <p>EMERGENCY: 999</p> <p>NON EMERGENCY NUMBER: 101</p> <p>Anti-terrorist Hotline 0800 789 321</p> <p><b>Department for Education</b></p> <p>NON EMERGENCY NUMBER: 020 7340 7264</p> <p>EMAIL: <a href="mailto:counter.extremism@education.gov.uk">counter.extremism@education.gov.uk</a></p>
<b>NSPCC whistleblowing advice line</b>	<p>ADDRESS: Weston House, 42 Curtain Road London EC2A 3NH</p> <p>TEL: 0800 028 0285</p> <p>EMAIL: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a></p>
<b>Disclosure and Barring Service</b>	<p>ADDRESS: PO Box 181, Darlington, DL1 9FA</p> <p>TEL: 01325 953795</p> <p>EMAIL: <a href="mailto:dbsdspatch@dbi.gsi.gov.uk">dbsdspatch@dbi.gsi.gov.uk</a></p>
<b>Teaching Regulation Agency</b>	<p>ADDRESS: Ground Floor South, Cheylesmore House, 5 Quinton Road, Coventry, CV1 2WT</p> <p>EMAIL: <a href="mailto:misconduct.teacher@education.gov.uk">misconduct.teacher@education.gov.uk</a></p>
<b>OFSTED Safeguarding Children</b>	<p>TEL: 0300 123 4666 (Monday to Friday from 8am to 6pm)</p> <p>EMAIL: <a href="mailto:Whistleblowing@ofsted.gov.uk">Whistleblowing@ofsted.gov.uk</a></p>

# KEY SCHOOL CONTACT DETAILS

<b>Principal and Proprietor</b>	<b>Mr Alastair Graham</b> TEL: 01276 470001 EMAIL: <a href="mailto:a.graham@hallgrove.co.uk">a.graham@hallgrove.co.uk</a>
<b>Headmaster</b>	<b>Mr Neil Tomlin</b> TEL: 01276 470019 EMAIL: <a href="mailto:n.tomlin@hallgrove.co.uk">n.tomlin@hallgrove.co.uk</a>
<b>Deputy Head Pastoral and Designated Safeguarding Lead (DSL, including EYFS)</b>	<b>Mrs Leigh Randall</b> TEL: 01276 470004 EMAIL: <a href="mailto:l.randall@hallgrove.co.uk">l.randall@hallgrove.co.uk</a>
<b>Deputy Designated Safeguarding Leads (including EYFS)</b>	<p><b>To contact DSL and all DDSLs:</b>  <a href="mailto:DSL@hallgrove.co.uk">DSL@hallgrove.co.uk</a></p> <p><b>Mr Neil Tomlin – Headmaster/DDSL</b>  TEL: 01276 470019  EMAIL: <a href="mailto:n.tomlin@hallgrove.co.uk">n.tomlin@hallgrove.co.uk</a></p> <p><b>Mr Tim Lewis – Deputy Headmaster/DDSL</b>  TEL: 01276 470007  EMAIL: <a href="mailto:t.lewis@hallgrove.co.uk">t.lewis@hallgrove.co.uk</a></p> <p><b>Mrs Laura Hopper – SENCO/DDSL</b>  TEL: 01276 470017  EMAIL: <a href="mailto:l.hopper@hallgrove.co.uk">l.hopper@hallgrove.co.uk</a></p> <p><b>Mr Chris Pilgrim – Head of Maths/DDSL</b>  TEL: 01276 473059  EMAIL: <a href="mailto:c.pilgrim@hallgrove.co.uk">c.pilgrim@hallgrove.co.uk</a></p> <p><b>Mrs Miranda Jackson – School Nurse/Staff Wellbeing Lead</b>  TEL: 01276 470005  EMAIL: <a href="mailto:m.jackson@hallgrove.co.uk">m.jackson@hallgrove.co.uk</a></p>

	<b>Mr Nick Roddis – Head of Boarding</b> TEL: 01276 470018 EMAIL: n.roddis@hallgrove.co.uk
<b>Designated staff for Looked After Children</b>	<b>Mrs Miranda Jackson</b>
<b>Independent listener</b>	<b>Mrs Gilly Harris</b> TEL: 07718883590

## POLICY STATEMENT

This policy applies to Hall Grove ("the School"), including its EYFS setting. This policy is reviewed and updated by the Deputy Head, Pastoral, Headmaster and Principal at least annually or when legislation updates are published. The policy is available on the School website.

This policy applies includes those in the newly introduced senior school years (Years 9, 10, and 11). Safeguarding arrangements have been reviewed and updated to ensure they are appropriate and effective for older pupils as well as younger children. This includes differentiated pastoral care, age-appropriate safeguarding education, and staff training specific to the needs of adolescents.

This policy has regard to the following guidance and advice:

- Keeping Children Safe In Education (September 2024) ('KCSIE')
  - Disqualification under the Childcare Act 2016
  - What to do if you're worried a child is being abused: advice for practitioners (March 2015)



- Working Together to Safeguard Children (December 2023)
  - Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers (July 2018)
- Revised Prevent Duty Guidance for England and Wales (April 2021)
  - The Prevent Duty: Departmental advice for schools and childminders (June 2015)
  - The use of social media for on-line radicalisation (July 2015)

This policy also takes into account the procedures and practice of Surrey County Council as part of the inter-agency safeguarding procedures set up by the Surrey Safeguarding Children Partnership.

All staff are required to read:

- Keeping Children Safe in Education (2024) (Part 1). Staff and school leaders who work directly with children are also required to read Annex B.
- Staff Code of Conduct
- Safeguarding and Child Protection Policy
- Discipline, Behaviour, Sanctions and Rewards Policy
- Our policy for Children Missing Education.

## CONCERNS ABOUT A CHILD

The School has a duty to consider at all times the best interests of the pupil and take action to enable all pupils to achieve the best outcomes. Safeguarding and promoting the welfare of children is **everyone's** responsibility.

At Hall Grove, we are committed to safeguarding children and young people, and we expect everyone who works in the school to share this commitment. Adults at Hall Grove take all welfare concerns seriously and encourage children to talk to us about anything that worries them. We will always act in the best interests of the child.

Staff should share any concerns they have about a child with the DSL. However, it should be remembered 'that sometimes children will not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful ... This should not prevent staff from having a professional curiosity and [speak] to the DSL'.

The School has arrangements for listening to children and providing early help. Mrs Gilly Harris acts as the school's Independent Listener (07718883590). She is a retired Deputy Head and DSL, who worked in this capacity at Hall Grove for many years.

## DEFINITIONS OF SAFEGUARDING AND TYPES AND SIGNS OF ABUSE

Safeguarding and promoting the welfare of children is defined as protecting children from maltreatment; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. 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 by another child or children. Abuse can be:

- physical abuse
- Emotional/verbal abuse
- sexual abuse; and/or
- neglect

Staff are referred to Appendix 1 of this policy for further detail of the types of abuse and possible signs of abuse.

It is important to consider wider environmental factors in a child's life that may be a threat to their safety and/or welfare. Children can be at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenager relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

### **PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD**

If staff suspect or hear an allegation or complaint of abuse or neglect from a child or any third party, they must follow the relevant procedure below. All staff should:

- listen carefully
- avoid asking leading questions
- reassure the individual that the allegation/complaint will be taken seriously and that they will be supported
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken.

All concerns, discussions and decisions (together with reasons) made under these procedures should be recorded in writing. The record should include the date, time and place of the conversation and detail of what was said and done by whom and in whose presence and signed by the person making it. Where the allegation relates to harmful sexual behaviours, if possible the disclosure should be managed with two members of staff present (preferably one of them being the Designated Safeguarding Lead ('DSL') or her deputy).

Where there is a safeguarding concern, the School will ensure the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. The School manages this by gaining an understanding of each individual pupil's wishes and feelings through discussion. Careful consideration will be taken to decide on the person selected to lead these discussions dependent upon the age of the pupil, their emotional stability and the nature of the situation. The School operates its processes with the best interests of the pupil at their heart. For this reason, our Section Heads have all completed safeguarding training.

Staff should share any concerns they have about a child with the DSL. However, it should be remembered that sometimes children will not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful. This should not prevent staff from having a professional curiosity and speak to the DSL.

Please refer to Appendix 5 (Flowchart for raising concerns about a child).

### **'Operation Encompass'**

Operation Encompass is a partnership between police and schools. It ensures that all incidents of domestic abuse are shared with school, not just those where an offence can be identified. The Key Adult (Miranda Jackson- DDSL) will be notified prior to the start of the next school day that the police have attended an incident of domestic abuse. This timely information sharing enables appropriate support to be provided for that child so that all interactions, from when the child first arrives at school, are of a positive nature.

### **Early Help**

All staff are expected to identify when a child may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

In the first instance, staff who consider that a pupil may benefit from early help should discuss this with the School's DSL. The DSL will consider the appropriate action to take in accordance with the Surrey Safeguarding Children Partnership referral threshold document. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's services if the pupil's situation does not appear to be improving.

### **What staff should do if they have concerns about a child**

If staff (including visiting staff and volunteers) have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action, although staff can make a direct referral to children's services care. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a child's situation does not appear to be improving, the DSL (or the person who made the referral) should press children's services for reconsideration. Staff should challenge any inaction and follow this up with the DSL and children's services as appropriate. All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing.

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

If staff (including visiting staff and volunteers) believe that a child is in immediate danger or at risk of harm, they should make an immediate referral to children's services and/or the Police if a crime has been committed. **Anyone** can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and children's services. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. Staff should challenge any inaction and follow this up with the DSL and children's services as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

The School's Local Safeguarding Children Board is Surrey Safeguarding Children Partnership (SSCP). A full copy of their local procedures can be found at <http://surreyscb.procedures.org.uk/>

One-to-one teaching (eg music and drama lessons) takes place in room with clear vision panels on the doors or in more public locations around the school site. Timetables are posted and staff are able to access them with ease.

### **What to do if a child has shared/received nude or semi-nude imagery**



If a child should disclose that they have shared or received inappropriate imagery, this should never be viewed, copied, printed, shared, stored or saved. The child should not be asked to download it. If a staff member has already viewed the imagery by accident, this should be reported to the DSL/DDSL. The imagery should not be deleted.

The child/children or young person(s) who are involved in the incident should not be asked to disclose information regarding the imagery. This is the responsibility of the DSL/DDSL.

Staff should not share information about the incident with other members of staff, the child/children it involves or their, or other, parents and/or carers.

Local safeguarding procedures will be followed, seeking advice where necessary.

The child/children involved should not be blamed or shamed, but it must be explained that the member of staff needs to report the incident, whilst the child/children will receive support and help from the DSL/DDSL.

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

Staff should follow the School's normal referral processes when there are concerns about children who may be at risk of being drawn into terrorism, as set out above. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call 999 or submit a referral form to C-SPA or call them directly on 0300 123 1650.

The School, in recognition that pupils may be at risk of being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with local partners, such as the Police) of the potential risk in the local area. Such risk assessments are discussed with the DSL and DDSLs to ensure the School's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised.

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

Whilst all staff should speak to one of the DSL team with regard to any concerns about FGM, teachers have a specific legal duty to report to the Police cases where they discover that an act of FGM appears to have been carried out on a girl under the age of 18. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with the DSL and involve children's services as appropriate.

Teachers are referred to Appendix 1 of this policy for the procedure to be followed where they suspect that a pupil may be at risk of FGM.

### **What staff should do if a child goes missing from education**

Children who go missing from education, particularly on repeat occasions, presents a potential indicator of abuse or neglect. The School's procedures for unauthorised absence and for dealing with children who go missing from education are set out in the school's 'Policy for dealing with a major incident or disaster, a missing child and a child who is not collected'. Further details can also be found at Appendix 1 of this policy.

We monitor attendance carefully and address poor or irregular attendance without delay.

We will always follow up with parents/carers when pupils are not at school. This means we need to have a least two up to date contacts numbers for parents/carers. Parents should remember to update the school as soon as possible if the numbers change.

The School will report to North West Surrey Inclusion Officer if a pupil fails to attend school regularly or has been absent from school without the School's permission for a continuous period of 10 school days or more.

### **What staff should do if they have concerns about another staff member**

If staff have concerns about another staff member, volunteer or any adult involved in the work of the School, they must inform the Headmaster and/or the Designated Safeguarding Lead without delay. If the Headmaster and DSL are both absent, they must see one of the Deputy DSLs. If the allegation concerns the Principal (Proprietor), Headmaster or DSL, then it must be made directly to the Duty LADO (Local Authority Designated Officer) at Surrey Children's Services without delay. In case of serious harm, the Police should be informed from the outset.

If a disclosure or suspicion of abuse involves a member of staff the DSL must still refer the matter to the LADO. The DSL will follow the guidelines as laid down by Surrey Safeguarding Children Partnership.

EYFS: The Head of Early Years or the DSL will inform Ofsted of allegations against people living or working at the premises, or of any other abuse alleged to have taken place on the premises as soon as practically possible and within 14 days at the latest.

### **Low Level Concerns about Staff Behaviour**

#### Allegations or concerns about an adult working in the school whether as a teacher, supply teacher, other staff, volunteers or contractors

At Hall Grove, we recognise the possibility that adults working in the School may harm children, including third party employees, volunteers, supply teachers and agency staff. Any concerns about the conduct of other adults in the school should be taken to the Headteacher without delay; any concerns about the Headteacher should go to the Principal who can be contacted by email (a.graham@hallgrove.co.uk).

Any concerns about the conduct of a member of staff, supply teachers, volunteers or contractors should be reported to the Headteacher.

Concerns may come from various sources; for example, a suspicion, complaint, or disclosure made by a child, parent or other adult within or outside of the organisation, or as a result of vetting checks undertaken.

The Headteacher has to decide whether the concern is an allegation or low-level concern. 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 for referral to the Local Authority Designated Officer (LADO) (see below).

#### Allegations

It is an allegation if the person has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or

- behaved or may have behaved in a way that indicates they may not be suitable to work with children (also includes behaviour outside the school).

Allegations should be reported to the LADO 'without delay'.

Before contacting the LADO, we will conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the School, or a combination of these.

#### Low-level Concerns

Concerns may be graded Low-level if the concern does not meet the criteria for an allegation; and the person has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Example behaviours include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

If the concern has been raised via a third party, the Headteacher should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Staff should be encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Low-level concerns should be recorded in writing, including:

- name of individual sharing their concerns
- details of the concern
- context in which the concern arose
- action taken

If the individual making a report wishes to remain anonymous, then that should be respected as far as reasonably possible.

Records must be kept confidential, held securely and comply with the Data Protection Act 2018. We will retain such information, until the individual leaves the School's employment.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO.



### **What staff should do if they have concerns about safeguarding practices in the school**

The School aims to ensure there is a culture of safety for raising concerns, and an attitude of 'it could happen here'. Where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding regimes, these should be raised in accordance with the School's whistleblowing procedures which can be found as an appendix to the Staff Handbook (see 'Staff Drive'/Handbooks and Appendices'). There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

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

### **ARRANGEMENTS FOR DEALING WITH CHILD-ON-CHILD ALLEGATIONS**

Child-on-child abuse is abuse by one or more pupils against another pupil. It can manifest itself in many ways and can include sending or receiving nude or semi-nude imagery, upskirting, sexual assault, gender-based issues and harmful sexual behaviours including sexual violence and sexual harassment. Abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours be dismissed as the same or "just having a laugh".

Abuse, including sexual abuse, sharing indecent images (consensually and non-consensually), and viewing or sharing pornography and other harmful content, may occur online via mobile and smart technology. When pupils use the school's network to access the internet, they are protected from inappropriate content by our filtering and monitoring systems which are regularly reviewed for their effectiveness. Our Online Safety policy, Social Media policy and Remote Learning Statement set out how we keep children safe, including when they are accessing online learning whilst out of school. Reference: UK Council for Internet Safety (UKCIS) Guidance.

The fact that a child or young person may be LGBTQ+ is not in itself an inherent risk factor for harm. However, these children may be targeted by other children. In some cases a child who is perceived to be LGBTQ+ (whether or not they in fact are) can be just as vulnerable as children who do identify as LGBTQ+. Risks can be compounded where these children lack a trusted adult with whom they can be open. We endeavour to overcome this by having every child in the school identify one or more trusted adults to whom they could go to share a concern or issue, including those with SEND or disabilities as they are vulnerable groups.

There are also different gender issues that can be prevalent when dealing with child-on-child abuse (i.e. girls being sexually touched/assaulted, incidents of sending or receiving nude or semi-nude imagery, or boys being subjected to initiation/hazing type violence).

The School recognises that children can be particularly vulnerable in residential settings and are alert to the potential for child-on-child abuse.

The School takes care to minimise the risk of child-on-child abuse through the pastoral care team, PSHE lessons, assemblies and early intervention to deal with incidents of bullying behaviour. Posters are displayed around the School to provide information about support available to children.



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

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from the Surrey Safeguarding Children Partnership (SSCP) on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator. If it is necessary for a pupil to be interviewed by the Police in relation to allegations of abuse, the School will ensure that, subject to the advice of the SSCB, parents are informed as soon as possible and that the pupils (both victim and perpetrator) involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from the SSCP and/ or the Police as appropriate.

Police may be informed of any harmful sexual behaviours including sexual violence and sexual harassment which are potentially criminal in nature. If the DSL decides to make a referral to children's services and/or make a report to the police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered. Pupils are not permitted to carry mobile phones during school or on school trips, both residential or day. This aims to reduce the likelihood of sending or receiving nude or semi-nude imagery and child-on-child abuse incidents. This topic is highlighted in e-safety talks to both staff and parents.

In the event of disclosures about child-on-child abuse, all children involved (both victim and perpetrator) will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by the Form Teacher and Pastoral Care Team, and support from external agencies will be sought, as appropriate. Victims will be reassured that they are being taken seriously and that they will be supported and kept safe.

When there has been a report of sexual violence, the DSL (or a deputy DSL) should make an immediate risk and needs assessment. Risk assessments will be recorded (either written or electronic) and kept under review. The DSL will consider the risks posed to all pupils and put adequate measures in place to protect them and keep them safe. This may include consideration of the proximity of the victim to the alleged perpetrator and considerations regarding shared classes, sharing school premises and school transport. Any response and action will, as always, have at the centre the best interests of the child. Children should never be made to feel ashamed or that they are creating a problem by reporting abuse, sexual violence or sexual harassment.

Particular care will be taken to address child on child abuse among older senior school pupils, which may present differently than in younger years. This includes, but is not limited to:

- Inappropriate sexualised behaviour
- Coercive relationships
- Harmful sexual behaviour
- Sexting and image sharing

Education, reporting, and support procedures will reflect the complexity of relationships and behaviours in older age groups. Staff will receive updated training to identify and respond effectively to such concerns.

We recognise that, in child-on-child incidents, the perpetrator may also have a safeguarding need and their behaviour may spark our professional curiosity to investigate further. We recognise that even if

there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported.

## **SEXUAL VIOLENCE/HARASSMENT**

### Confidentiality

Staff taking a report of sexual violence or harassment should never promise confidentiality as it is very likely that it will be in the best interests of the victim to seek guidance and advice from others in order to provide support and engage appropriate agencies.

If a victim asks us not to tell anyone about sexual violence or harassment, and does not give consent to share it, there are still circumstances in which staff may lawfully do so. Staff should seek advice from the DSL or another member of the DSL team, who will consider the following:

- parents or carers should normally be informed (unless this would put the victim at greater risk)
- the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care, and
- rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police.

Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

Ultimately, the DSL (or a DDSL) will have to balance the victim's wishes against their duty to protect the victim and other children.

If the DSL (or a DDSL) decide to go ahead and make a referral to local authority children's social care and/or a report to the police against the victim's wishes, this should be handled extremely carefully, the reasons should be explained to the victim and appropriate specialist support should be offered.

Additional information on confidentiality and information sharing is available at Safeguarding Practitioners Information Sharing Advice and NSPCC: Information sharing and confidentiality for practitioners.

### Anonymity

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, we should be aware of anonymity, witness support, and the criminal process in general so we can offer support and act appropriately. Relevant information can be found in: CPS: Safeguarding Children as Victims and Witnesses.

As a matter of effective safeguarding practice, we should do all we reasonably can to protect the anonymity of any children, victim and perpetrator, involved in any report of sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be put in place for the child(ren) involved. It is important to understanding intra-familial harms and identify any necessary support for siblings following incidents of sexual violence or sexual harassment.

We will also consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities. The principles described in Childnet's cyberbullying guidance could be helpful.

If such a situation arises, the DSL will advise staff accordingly.

### Risk Assessment

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

- the victim, especially their protection and support
- whether there may have been other victims
- the alleged perpetrator(s)
- all the other children, (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms, and
- the time and location of the incident, and any action required to make the location safer.

Risk assessments should be recorded (paper or electronic) and should be kept under review. At all times, the school or college should be actively considering the risks posed to all their pupils and students and put adequate measures in place to protect. It is not the role of schools and colleges to provide legal advice or support to victims, alleged perpetrators or parents in respect of a criminal justice process. Rather, schools and colleges should be aware of their own position and responsibilities to them and keep them safe.

The designated safeguarding lead (or a deputy) should ensure they are engaging with local authority children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. The above school or college risk assessment is not intended to replace the detailed assessments of expert professionals. Any such professional assessments should be used to inform the school or college approach to supporting and protecting their pupils and students and updating their own risk assessment.

### Action following a report of sexual violence and/or sexual harassment

#### What to consider

As set out above, sexual violence and sexual abuse can happen anywhere, and all staff working with children are advised to maintain an attitude of 'it could happen here'. Schools and colleges should be aware of and respond appropriately to all reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the school/college. The designated safeguarding lead (or a deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the initial response by the school or college.

#### **Important considerations will include:**

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's or college's duty and responsibilities to protect other children



- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed
- the ages of the children involved
- the developmental stages of the children involved
- any power imbalance between the children. For example, is/are the alleged perpetrator(s) significantly older, more mature, confident and well known social standing? Does the victim have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
- that sexual violence and sexual harassment can take place within intimate personal relationships between children
- importance of understanding intra familial harms and any necessary support for siblings following incidents
- are there ongoing risks to the victim, other children, adult students or school or college staff, and
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

As always when concerned about the welfare of a child, all staff should act in the best interests of the child. In all cases, schools and colleges should follow general safeguarding principles as set out throughout this guidance. Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted).

Further details of the range of actions and considerations for the DSL and the school following the report of sexual violence or sexual harassment are set out at Appendix 4 to this Policy.

## **SERIOUS VIOLENCE**

All staff should be aware of signs that a child is at risk from or is involved in serious violent crime. These may include a rise in school absence, a change in friendships or relationships with older individuals and groups, a significant decline in performance, self-harming behaviours or signs of unexplained injuries. Early intervention and support should be put in place, following advice from Surrey Safeguarding Children Partnership.

## **Mental Health and Wellbeing**

Staff should be aware that mental health issues 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/or neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, and education. Help and advice will be sought for children who require extra support.



If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by involving the Safeguarding Team. Pastoral support for the senior school will be overseen by the Deputy Head Pastoral and DSL. Age-specific mental health resources for the Senior school, mentoring opportunities, and PSHE topics appropriate for teenagers (e.g., consent, healthy relationships, substance misuse, and online safety) will be integrated into the school's wellbeing and safeguarding framework. The Senior Mental Health Lead is Leigh Randall ([l.randall@hallgrove.co.uk](mailto:l.randall@hallgrove.co.uk)).

## **ARRANGEMENTS FOR DEALING WITH ALLEGATIONS OF ABUSE AGAINST TEACHERS AND OTHER STAFF (INCLUDING THE HEADMASTER AND VOLUNTEERS)**

The School's procedures for managing allegations against staff who are currently working in the School follows Department for Education statutory guidance and Surrey Safeguarding Children Partnership arrangements and applies when staff (including volunteers) have (or are alleged to have):

- Behaved in a way that has harmed a pupil, or may have harmed a pupil;
- Possibly committed a criminal offence against or related to a pupil; or
- Behaved towards a pupil in a way that indicated that they would pose a risk of harm if they were to work regularly or closely with children

Allegations against a teacher who is no longer teaching should be referred to the Police. Historical (non-recent) allegations of abuse should also be referred to the Police.

The guidance to KCSIE (Part Four) will be followed where it is alleged that, whether inside or outside School, anyone working in the School, including third party employees, supply teachers and volunteers has:

- 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;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

If an allegation is made against anyone working with children in the School, the School should not undertake their own investigation of allegations without prior consultation with the Local Authority Designated Officer (LADO) or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, the School may discuss informally with the LADO on a no-names basis.

In cases involving Senior school pupils, the school will consider whether the matter requires a different level of intervention, referral, or support, especially where a concern has legal implications due to the age of those involved. The DSL will consult with external agencies such as children's services or the police as appropriate, in line with statutory guidance.

All allegations should be investigated as a priority to avoid any delay.

1. All allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is the Deputy Headmaster. The Headmaster will also be informed. Where the Deputy Headmaster is absent, reports should be made to DDSL. Where the Headmaster or Deputy Headmaster are the subject of the allegation or concern they must not be informed of the allegation prior to contact with LADO and a referral to the

LADO should be made immediately. However, staff may consider discussing any concerns with the DDSL and may make any referral via them. The Principal and sole proprietor of the school will be informed of any allegations against any staff member.

2. The case manager should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation, and agree a course of action including any involvement of the Police. (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, the case manager may involve the Police immediately.) All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The designated officer should be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria or that are made directly to the Police and/or children's services.

3. The case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action, unless there is an objection by children's services or the Police. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.

4. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place until the allegation is resolved. The case manager will give due weight to the views of the designated officer and KCSIE when making a decision about suspension. Where the individual is suspended, the case manager will ensure they know who their point of contact is in the School and shall provide them with their contact details.

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

6. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's services or the Police.

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

8. On conclusion of the case, the case manager should review the circumstances of the case with the designated officer to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future.

The School will make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered.

Allegations found to be malicious will be removed from the individual's personnel records. In all other circumstances, a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE*. A copy will only be provided to the individual concerned.

Allegations proven to be false, unsubstantiated or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the Headmaster will consider whether any disciplinary action is appropriate against a pupil who made it, or whether the Police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

### **CODE OF CONDUCT FOR STAFF**

The School's Code of Conduct for Staff can be found in the Staff Handbook within the Staff Drive, under 'Handbooks and appendices'. The aim of the Code of Conduct for Staff is to provide clear guidance about behaviour and actions so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil.

### **SAFER RECRUITMENT**

Hall Grove School is committed to safeguarding and promoting the welfare of all pupils in its care by having effective and robust safer recruitment practices to deter and prevent people who are unsuitable to work with children from applying for or securing employment or volunteering opportunities in school. As an employer, the school expects all staff and volunteers to share this commitment.

The School's Safer Recruitment policy, in conjunction with its Visitor Policy, is implemented by the Compliance Manager, Principal, Headmaster and Deputy Headmaster with the support of other members of staff when required. Its objectives are to help deter, reject or identify people who might abuse pupils or are otherwise unsuited to working with them by having appropriate procedures for appointing staff. We aim:

- to ensure compliance with all relevant legislation, recommendations and guidance including the statutory guidance published by the Department for Education (DfE), Keeping Children Safe in Education - September 2021 (KCSIE), the Prevent Duty Guidance for England and Wales 2015 (the Prevent Duty Guidance) and any guidance or code of practice published by the Disclosure and Barring Service (DBS); and
- to ensure that the school meets its commitment to safeguarding and promoting the welfare of children and young people by carrying out all necessary pre-employment checks.
- to ensure that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position;
- to ensure that all job applicants are considered equally and consistently;



- to ensure that no job applicant is treated unfairly on any grounds including race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age;
- to ensure that visiting speakers undergo relevant checks and that their talks are of educational value to our pupils and aligned to the ethos and values of the School as well as fundamental British values.

Mandatory induction training is provided to all new staff which includes;

- the Safeguarding and Child Protection policy;
- the Behaviour policy;
- the Staff Code of Conduct;
- the School's safeguarding response to children who go missing from education

Safeguarding continues after the recruitment process. Staff should feel comfortable raising concerns about another member of staff and should follow the procedure set out above for raising concerns about a member of staff's suitability to work with children, whether it be related to conduct inside or outside school and whether or not it relates to conduct with a child or an adult, eg. domestic abuse.

## **WHISTLEBLOWING**

Where there are concerns about the way that safeguarding is carried out in the school, staff should refer to the Whistleblowing Policy.

A whistleblowing disclosure must be about something that affects the general public such as:

- a criminal offence has been committed, is being committed or is likely to be committed
- a legal obligation has been breached
- there has been a miscarriage of justice
- the health or safety of any individual has been endangered
- the environment has been damaged
- information about any of the above has been concealed.

The NSPCC runs a whistleblowing helpline on behalf of the government, the number is 0808 800 5000.

## **MANAGEMENT OF SAFEGUARDING**

The School's DSL is Leigh Randall, Deputy Head Pastoral.

A number of other staff are fully trained to be Deputy DSLs (DDSLs) to whom reports should be made in the absence of the DSL. This ensures there is the required cover for the role at all times.

The DSL and DDSLs contact details can be found on the Key Contacts page at the start of this policy.

All staff undertake safeguarding training, including the Principal and the Headmaster, who are ultimately responsible for the health, safety and wellbeing of children in the school. The Principal has undertaken Safeguarding for Governors training (the school does not have a governing body).

The DSL's role is to take lead responsibility for safeguarding and child protection matters in the School, including online safety. The DSL's responsibility is to maintain an overview of safeguarding within the School, to open channels of communication with local statutory agencies, support staff



in carrying out their safeguarding duties and to monitor the effectiveness of the School's policies and procedures in practice. The DSL will ensure that safeguarding arrangements are tailored to meet the developmental and emotional needs of senior school pupils, including support around online safety, child on child abuse, mental health, and transition to adulthood.

The DSL works with DDSLs and the Headmaster to review and update the School's safeguarding policy and will maintain clear and accurate records of concerns raised and actions taken. Where a pupil leaves the School, the DSL will also ensure their child protection file is transferred to the new school (separately from the main pupil file) as soon as possible. The DSL will ensure secure transfer of files and obtain confirmation of receipt by completing a Child Protection File Transfer Form. The DSL works with others to ensure that the school's filtering and monitoring systems are functional and effective.

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

During term time, the DSL and/or DDSLs will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. For out of hours/out of term activities, staff are instructed to call the DSL directly.

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

Ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

## **TRAINING**

Induction and training are in line with advice from the Surrey Safeguarding Children Partnership.

### **All Staff**

All new staff will be provided with safeguarding training as part of their induction which includes:

- the child protection policy, including information about the identity and role of the DSL and DDSLs
- the Staff Code of Conduct which includes the School's whistleblowing procedure and acceptable use of IT, staff/pupil relationships and communications including the use of social media
- a copy *KCSIE* Part One (including annex)

All staff who work directly with children will also be required to read *KCSIE* Part One (including annex).

Copies of the above documents are provided to all staff during induction and sent electronically. (needs checking)

Temporary staff and volunteers are provided with a summary of who to contact in the event of concern for a child or concern regarding the actions of a staff member.

All staff are also required to:

- Read Part One of KCSIE and confirm that they have done so. Each time Part One of KCSIE is updated by the Department for Education, staff will be informed of the changes electronically.
- Understand key information contained in Part One of *KCSIE*. The School will ensure staff understanding by providing a questionnaire to be completed following training.
- Receive training in safeguarding and child protection regularly, in line with advice from the Surrey Safeguarding Children Partnership. Training will include online safety and harmful sexual behaviours including sexual violence and sexual harassment between children, including managing issues related to the sharing of nude or semi-nude images and videos. It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. The School provides these electronically and during staff meetings.

All staff working with senior school pupils will receive additional safeguarding training on:

- Adolescent development and behaviour
- Mental health challenges in older pupils
- Responding to disclosures from older pupils
- Managing safeguarding concerns that may involve more serious or nuanced issues

Training will ensure that staff are confident in recognising and responding to age-appropriate safeguarding concerns.

## DSL

The DSL receives updated child protection training at least every two years to provide her with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, record keeping and promoting a culture of listening to children, training in the Surrey Safeguarding Children Partnership's approach to *Prevent* duties. Further details of the required training content for the DSL are set out in Annex C of KCSIE.

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

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

## OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES

A review of the School's child protection policies takes place at least annually, including an update and review of the effectiveness of procedures and their implementation. The School draws on the expertise of staff, including the DDSs, in shaping the School's safeguarding arrangements and policies.

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

## THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES

### Teaching children how to keep safe

The Senior Management Team ensures that all pupils are taught about safeguarding themselves and others in an age-appropriate way, including online, through the curriculum and PSHE to help children to adjust their behaviours in order to reduce risks and build resilience, including to radicalisation. This includes teaching pupils about the safe use of electronic equipment and the internet and the risks posed by adults or young people who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults. Child-friendly safeguarding team posters are displayed around the school and there is a Childline awareness poster in the Medical Room next to a telephone which could be used by a child. (See Appendix 3 of this policy for the school's Prevent Strategy). Internet safety is an integral part of the School's ICT curriculum and is also embedded in PSHE.

The safeguarding curriculum will be extended to address topics relevant to Senior school pupils, including:

- Relationships and sex education (RSE)
- Consent and healthy relationships
- Sexual health and contraception
- Mental wellbeing and emotional resilience
- Online presence and reputation management

This content will comply with the statutory secondary education requirements and will be age-appropriate in delivery.

We are sensitive to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs and disabilities. Risk assessments for areas used by Senior school pupils will be reviewed to ensure supervision levels and security measures remain appropriate as students are granted increased independence (e.g., during unstructured time or transitions between activities).

### Filtering and Monitoring

The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online. These systems aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials online, reduce the risk of children being subjected to harmful online interaction with others, and help manage online behaviour that can increase a child's likelihood of, or causes, harm. Filtering refers to the technology preventing access to harmful or inappropriate content, whilst monitoring refers to the practical steps staff take to ensure harmful or inappropriate access is not made. Monitoring can include:

- Physical monitoring
- Live software monitoring
- Monitoring user logs
- Monitoring individual devices

We make sure that any school-issued devices used away from the school site are also subject to filtering and monitoring procedures.



Each year (at least) our Designated Safeguarding Lead, along with our IT team and a nominated DDSL, review our filtering and monitoring procedures to ensure that they effectively prevent access to harmful or inappropriate content. They also ensure that the systems we have in place to report any difficulties with the system are understood by all staff and reports are effectively managed.

All our staff undertake training to understand the risks of poor filtering and monitoring, and know how to share their concerns. All our staff have taken part in annual cybersecurity training.

The school recognises that senior school pupils may engage with online platforms in more independent and complex ways. Online safety education will therefore include age-specific risks such as:

- Image sharing and sexting
- Online grooming
- Social media influence and body image concerns
- Digital footprint awareness
- Exposure to harmful content or extremism

Appropriate filtering and monitoring systems will be reviewed in light of senior pupils' increased access to personal devices and online platforms.

Further detail of the School's approach to online safety can be found in the School's E-Safety Policy which also includes detail on the use of mobile technology in school and the School's IT arrangements to ensure that children are safe from terrorist and extremist material when accessing the internet through the School's systems. The School promotes the Schoolsmobile app as a similar measure to keep children safe on home devices.

### **Looked after children/children with a social worker**

We recognise that, when a child has a social worker, it is an indicator that the child is more at risk than most pupils. This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health. We take these needs into account when making plans to support pupils who have a social worker.

The Deputy Head Pastoral ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority, and is the designated member of staff who has responsibility for their welfare and progress.

### **Private Fostering**

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. A close family relative is defined as a "grandparent, brother, sister, uncle or aunt" and includes half-siblings and step-parents; it does not include great-aunts or uncles, great-grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start – not to do so is a criminal offence. Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject



to a private fostering arrangement. However, there is no duty for anyone to inform the school, including the parents, private fosterers or the local authority.

On admission, we will take steps to verify the relationship of the adults to the child who is being registered. If school staff subsequently become aware of private fostering arrangements, they should inform the DSL. The DSL will contact the child's family to ensure they are aware of their legal duty to inform the local authority. The DSL will inform the local authority on behalf of the school.

Privately fostered children are a potentially vulnerable group who should be monitored by the local authority. They may be affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

### **Arrangements for Visiting Speakers**

As part of curriculum delivery and enrichment, the School may invite guest speakers from the wider community to attend school to deliver material to pupils and/or their parents, recognising the benefit gained by pupils from speakers from all walks of life. The School's Visitor Policy includes details of the approach to visiting speakers. The School follows the government's Prevent Duty statutory guidance and wider safeguarding obligations in relation to visiting speakers. Risk assessments and safeguarding checks will be conducted prior to visiting speakers' arrival. These are authorised by the Headmaster.

## **EARLY YEARS PROVISION SAFEGUARDING ARRANGEMENTS**

### **Disqualification from working in childcare**

Where staff work in, or are involved in the management of, the School's early years or provision of care of pupils under the age of eight, the School will take steps to check whether those staff are disqualified under the Childcare Act 2006, including by association with others. This forms part of the School's safer recruitment practices.

The School records all checks of staff employed to work in or manage relevant childcare on the Single Central Register. This includes the date disqualification checks were completed.

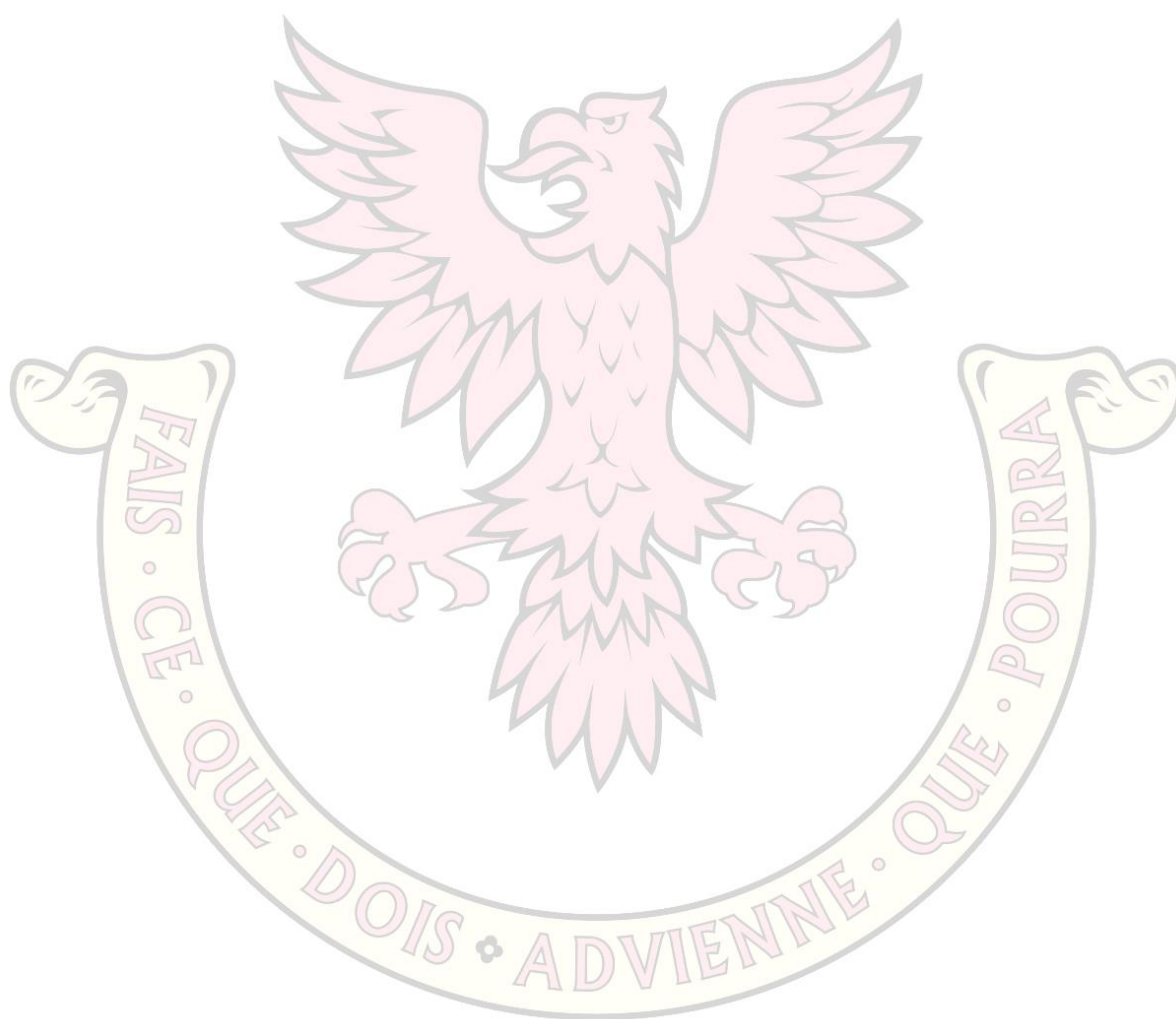
Where a member of staff is found to be disqualified, or if there is doubt over that issue then, pending resolution, the School will remove them from the work from which they are or may be disqualified. Suspension or dismissal will not be an automatic response; the School will consider if there is scope in principle to redeploy them with other age groups or in other work from which they are not disqualified, subject to assessing the risks and taking advice from the designated officer when appropriate.

### **Use of mobile phones and cameras**

The School's policy on the use of mobile phones and cameras in the setting can be found in the Code of Conduct section of the Staff Handbook and the Personal devices policy. Ideally, images will be captured on the school device by the Headmaster's wife rather than staff devices. However, personal mobile phones may be used to take photographs and short videos by staff (excluding EYFS, where they must not be used and Smart watches cannot be worn) but MUST be deleted from a personal device within 24 hours of the image being taken. Any images should be taken whilst in a public place.

### **Out of School Providers**

Out of school providers are responsible for their own safeguarding and child protection policies and procedures, but the school may refer any concerns they have about the provider to the local authority.



### **DSL for the EYFS**

The practitioner designated to take lead responsibility for safeguarding children in the EYFS settings is Leigh Randall, with the support of the Safeguarding Team. Laura Hopper (DDSL) is the main liaison between Early Years, Pre-Prep and the Safeguarding team. Chris Pilgrim leads on Online Safety and Attendance.

### **Duty to notify Ofsted**

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

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

### **Disqualification**

Staff who are disqualified may apply to Ofsted for a waiver of disqualification, unless they are barred from working with children.

### **CHILDREN WHO ARE GENDER QUESTIONING**

This is under government review and we will update the policy when guidance is issued.

Policy created September 2018 (MJ)  
Reviewed and updated annually  
March 2025 (LR)

## Appendix 1

### Signs and Types of Abuse

All school staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

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

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

**Sexual abuse:** Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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.

Sexual abuse may exhibit physical signs, or lead to a substantial behavioural change including precocity or withdrawal. Self-harm can also be an indicator.

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



**Specific safeguarding issues:** behaviours linked to drug taking, alcohol abuse, truanting and sexting put children in danger. Safeguarding issues can also manifest themselves via child-on-child abuse, such as bullying (including cyberbullying), 'banter', gender-based violence/sexual assaults and sexting. Safeguarding issues can also be linked to, for example, children missing education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse; female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; and trafficking.

**Child Sexual Exploitation and Child Criminal Exploitation:** are forms of sexual abuse where children are sexually or criminally exploited for money, power or status. It can be a one-off occurrence or might happen over time. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual or criminal activity for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity 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 or criminal exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of sexual and/or criminal exploitation:

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- 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.

CCE occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

"County Lines" is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas within the UK, using dedicated mobile phone lines or other forms of "deal line". Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

**Domestic abuse:** The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- (a) physical or sexual abuse;
- (b) violent or threatening behaviour;
- (c) controlling or coercive behaviour;

(d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and

(e) psychological, emotional or other abuse.

People are 'personally connected' when they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person.

(The definition can be found here: <https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted>)

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

**Operation Encompass:** Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate).

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

**FGM** comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It typically takes place between birth and around 15 years old; however, it is believed most cases happen between the ages of 5 and 8.

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their children out of school to visit an "at risk" country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM. Staff should not assume that FGM only happens outside the UK.

Risk factors for FGM include:

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE

- a visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

To give an example of indications that a girl has already been subjected to FGM:

- A pupil may have difficulty walking, sitting or standing and may even look uncomfortable, and may talk about pain or discomfort between her legs.
- A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.
- There may be prolonged or repeated absences from school and/or noticeable behaviour changes (e.g. withdrawal or depression) on the pupil's return.
- A pupil is reluctant to undergo medical examination
- A pupil may confide in a professional without being explicit about the problem due to embarrassment or fear.

**If staff have a concern that a pupil may be at risk of FGM, they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and Children's Services. If in any doubt, staff should speak to the DSL.**

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

To report FGM to the police, it is recommended that they make a report orally by calling 101, the single non-emergency number. Where there is a risk to life or likelihood of serious immediate harm, professionals should report the case immediately to the police, including dialling 999 if appropriate. In most cases reports should be made as soon as possible after a case is discovered, and best practice is for reports to be made by the close of the next working day. See

<https://safeguarding.link/fgmreporting> and  
<https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information/mandatory-reporting-of-female-genital-mutilation-procedural-information-accessible-version#reporting>

**Marriage and Civil Partnership Minimum Age:** The Marriage and Civil Partnership (Minimum Age) Act 2022 came into force in February 2023 means that 16 and 17 year olds will no longer be allowed to marry or enter a civil partnership, even if they have parental consent. Any concerns that students may be getting married should be referred to the DSL.

**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. For further information staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fm@fco.gov.uk](mailto:fm@fco.gov.uk).

**Radicalisation:** Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces, whether in this country or overseas.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular have become major factors in the radicalisation of young people. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a referral to the Channel programme.

**Special Educational Needs and/or Disabilities:** The school recognises the vulnerability of children with special educational needs and/or disabilities. Pupils with SEND may not outwardly shown signs of abuse and/or may have difficulties in communication about abuse or neglect.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying and child-on-child abuse without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

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

**LGBTQ+:** Children who are LGBTQ+ can be targeted by their peers. In some cases, a pupil who is perceived by their peers to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBT.

**Children Missing in Education:** The School's procedure for dealing with children who go missing can be found in the school's 'Policy for dealing with a major incident or disaster, a missing child and a child who is not collected'. This is located in the Staff Drive.

Staff follow the School's Attendance Policy in relation to absences and the Senior Attendance Champion is Chris Pilgrim. All unexplained absences will be followed up and attendance is reviewed periodically to identify trends and poor individual attendance.

In response to the guidance in Keeping Children Safe in Education (2024) the school has:

- Staff who understand what to do when children do not attend regularly



- Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
- Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
- Procedures to inform the local authority when we plan to take pupils off-roll when they:
  - a. leave school to be home educated
  - b. move away from the school's location
  - c. remain medically unfit beyond compulsory school age
  - d. are in custody for four months or more (and will not return to school afterwards); or
  - e. are permanently excluded

We will ensure that pupils who are expected to attend the school, but fail to take up the place will be referred to the local authority.

When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

The School shall inform the local authority of any pupil who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended). This will assist the local authority to:

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

School attendance registers are carefully monitored to identify any trends. The School will inform the local authority and the local authority where the child is normally resident of any pupil who fails to attend school regularly or has been absent without the School's permission for a continuous period of 10 school days or more.

Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare.

## Appendix 2

### Intimate Care

At Hall Grove we aim to meet the needs of all our children and promote their welfare. We recognise and assist children with intimate care where needed, and ensure that the children are treated with courtesy, dignity and respected at all times.

Intimate care can be defined as care tasks of an intimate nature, associated with bodily functions, body products and personal hygiene. Children are supported with their personal care: reminding children to go to the toilet, teaching them about personal hygiene and developing their independence. Staff work closely with parents to identify and ensure the child's needs are met.

Children attend PSHE (Personal, Social and Health Education) where personal safety and personal hygiene is delivered in a manner appropriate to their development level and degree of understanding.

Where a child has intimate care needs, a designated member of staff takes responsibility to provide their care. The needs of a child will be addressed on an individual basis. The child is encouraged to undertake as much of the procedure as possible for themselves. The toilets in Pre-Prep are generally used to attend to a child's needs. There is no lockable door to these toilets. However, a child will be taken to the Medical Room if further privacy is necessary.

All staff attending to a child's intimate care needs are DBS checked, have a high awareness of child protection issues, and undertake their duties in a professional manner at all times, observing best practice. If a child should become distressed or unhappy about being cared for by a particular member of staff, the matter will be looked into immediately.

There are blinds fitted on the Medical Room door and window. These will be used to maintain a child, parent or staff member's privacy when wanting to discuss a medical, pastoral or safeguarding issue.

## Appendix 3

### The Prevent Strategy and its implications for Hall Grove

The School's staff are mindful of the UK Government's Prevent Strategy which is now a key part of Safeguarding.

The Strategy is relevant in the school context in its aim to reduce youth radicalisation and to build community cohesion. The Hall Grove family is drawn from a diverse range of cultures and backgrounds. We have a special responsibility to promote British cultural values.

Particular contexts where awareness and sensitivity to this topic are shown at the school are:

- Assemblies
- Tutor Meetings
- PSHE lessons, SMSC education
- Religious Studies, History and Geography lessons
- The Performing and Visual Arts
- Safeguarding Policies
- Bullying Policies (including use of Internet)
- Internet Safety
- Visitor Screening

We try to be aware of situations where a child could become socially withdrawn from his/her peer group and become alienated from society. We are alert to possible bullying and to the risk of any inappropriate use of the Internet.

Possible signs of radicalisation may be:

- an individual isolating themselves from family and friends
- talking as if from a scripted speech
- unwilling to discuss their views
- a disrespectful attitude towards others
- increased anger
- increased secretiveness, especially around internet use

If there were clear indications that a child might become at risk to radicalisation, the DSL and/or DDSs will, as a matter of urgency, meet to discuss appropriate ways to help the child build resilience against harmful external influences.

Any concerns surrounding radicalisation or extremism can be discussed in confidence with Surrey Police Anti-terrorism team on 0800 789 321.

As in many aspects of school life, we cannot shape every outcome as a child grows up, but if we can help provide a secure and happy childhood for each individual we will have made a vital contribution.

## Appendix 4

### **Actions and Considerations following a report of Sexual Violence or Sexual Harassment**

#### Children sharing a classroom

##### Initial considerations when the report is made

Any report of sexual violence is likely to be traumatic for the victim. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

However, reports of rape and assault by penetration are likely to be especially difficult for the victim, and close proximity to the alleged perpetrator(s) is likely to be especially distressing. Whilst the school or college establishes the facts of the case and starts the process of liaising with local authority children's social care and the police, the alleged perpetrator(s) should be removed from any classes they share with the victim. The school or college should also carefully consider how best to keep the victim and alleged perpetrator(s) a reasonable distance apart on school or college premises (including during any before or after school-based activities) and on transport to and from the school or college, where appropriate. These actions are in the best interests of all children involved and should not be perceived to be a judgement on the guilt of the alleged perpetrator(s).

For other reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator(s) and considerations regarding shared classes, sharing school or college premises and school or college transport, should be considered immediately. In all cases, the initial report should be carefully evaluated, reflecting the considerations set out above in the policy. The wishes of the victim, the nature of the allegations and the protection of all children in the school or college will be especially important when considering any immediate actions.

##### Options to manage the report

It is important that schools and colleges consider every report on a case-by-case basis. When to inform the alleged perpetrator(s) will be a decision that should be carefully considered. Where a report is going to be made to local authority children's social care and/or the police, then, as a general rule, the DSL should speak to the local authority children's social care and the police and discuss next steps and how the alleged perpetrator(s) will be informed of the allegations. However, as per general safeguarding principles, this does not and should not stop the school or college taking immediate action to safeguard its children, where required.

There are four likely scenarios for schools and colleges to consider when managing any reports of sexual violence and/or sexual harassment. The four scenarios are:

#### 1. Manage internally.

In some cases of sexual harassment, for example, one-off incidents, the school or college may take the view that the children concerned are not in need of early help or that referrals to statutory services are not required, and that it would be appropriate to handle the incident internally, perhaps through utilising their behaviour policy and by providing pastoral support.

Whatever the response, it should be underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment, and it is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).



## 2. Early help.

In line with managing internally, the school or college may decide that the children involved do not require referral to statutory services but may benefit from early help. Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence.

It is particularly important that the DSL (and their DDSLs) know what the local early help process is and how and where to access support. Multi-agency early help will work best when placed alongside strong school or college policies, preventative education and engagement with parents and carers.

Schools and colleges, as relevant agencies, should be part of discussions with statutory safeguarding partners to agree the levels for the different types of assessment and services to be commissioned and delivered, as part of the local arrangements. Safeguarding partners should publish a local threshold document which includes the process for the local early help assessment and the type and level of early help services to be provided, and DSLs (and their DDSLs) will need to familiarise themselves with this document.

Early help and the option to manage a report internally do not need to be mutually exclusive: a school could manage internally and seek early help for both the victim and alleged perpetrator(s). Whatever the response, it should be under-pinned by the principle that there is zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.

All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

## 3. Referrals to local authority children's social care.

Where a child has been harmed, is at risk of harm, or is in immediate danger, schools and colleges should make a referral to local authority children's social care. At the point of referral to local authority children's social care, schools and colleges will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision should be made with the support of local authority children's social care.

If a referral is made, local authority children's social care will then make enquiries to determine whether any of the children involved are in need of protection or other services. Where statutory assessments are appropriate, the school or college (especially the DSL (or a DDSL)) should be working alongside, and cooperating with, the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator(s) and any other children that require support.

Schools and colleges should not wait for the outcome (or even the start) of a local authority children's social care investigation before protecting the victim and other children in the school or college. It will be important for the DSL (or a DDSL) to work closely with local authority children's social care (and other agencies as required) to ensure any actions the school or college takes do not jeopardise a statutory investigation. The risk assessment will help inform any decision. Consideration of safeguarding the victim, alleged perpetrator(s), any other children directly involved in the safeguarding report, and all children at the school or college should be immediate.

In some cases, local authority children's social care will review the evidence and decide that a statutory intervention is not appropriate. The school or college (generally led by the DSL (or a DDSL)) should be prepared to refer again if they believe the child remains in immediate danger or at risk of

harm or if circumstances change. If a statutory assessment is not appropriate, the DSL (or a DDSL) should consider other support mechanisms such as early help, specialist support and pastoral support.

Whatever the response, it should be under-pinned by the principle that there is a zero- tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.

All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

#### 4. Reporting to the Police.

Any report to the police will generally be in parallel with a referral to local authority children's social care (as above). It is important that the DSL (and their DDSLs) are clear about the local process for referrals and follow that process.

Where a report of rape, assault by penetration or sexual assault is made, the starting point is that this should be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator(s) is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach.

The following advice may help schools and colleges decide when to engage the Police and what to expect of them when they do:

When to call the police.

Where a report has been made to the police, the school or college should consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. They should also discuss the best way to protect the victim and their anonymity. At this stage, schools and colleges will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk. In circumstances where parents or carers have not been informed, it will be especially important that the school or college is supporting the child in any decision they take. This should be with the support of local authority children's social care and any appropriate specialist agencies.

All police forces in England have specialist units that investigate child abuse. The names and structures of these units are matters for local forces. It will be important that the designated safeguarding lead (and their deputies) are aware of their local arrangements.

In some cases, it may become clear very quickly that the police (for whatever reason) will not take further action. In such circumstances, it is important that the school or college continue to engage with specialist support for the victim and alleged perpetrator(s) as required.

Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator(s), it will be important for the DSL (or a DDSL) to work closely with the police (and other agencies as required), to ensure any actions the school or college take do not jeopardise the police investigation.

If schools or colleges have questions about the investigation, they should ask the police. The police will help and support the school or college as much as they can (within the constraints of any legal restrictions).

Whatever the response, it should be underpinned by the principle that there is a zero-tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.

All concerns, discussions, decisions and reasons for decisions should be recorded (written or electronic).

Considering bail conditions.

The police will consider what action to take to manage the assessed risk of harm. This could involve the use of police bail with conditions, prior to a suspect appearing in court, or court bail with or without conditions after the first appearance. Alternatively, the person suspected of an offence could be 'released under investigation' (RUI). People released under RUI can have no conditions attached to their release from custody and it is possible for a person on bail also to have no conditions.

Whatever arrangements are in place, the school or college will need to consider what additional measures may be necessary to manage any assessed risk of harm that may arise within their institution. Particular regard should be given to: the additional stress and trauma that might be caused to a victim within the institution; the potential for the suspected person to intimidate the victim or a witness; the need to ensure that any risk management measures strike a balance between management of risk and the rights of an unconvicted person (e.g. rights to privacy, family life, etc). Careful liaison with the police investigators should help to develop a balanced set of arrangements.

Managing any delays in the criminal process.

There may be delays in any case that is being progressed through the criminal justice system. Schools and colleges should not wait for the outcome (or even the start) of a police investigation before protecting the victim, alleged perpetrator(s) and other children in the school or college. The risk assessment will help inform any decision.

Considering any disciplinary action against the alleged perpetrator(s) whilst an investigation is ongoing is discussed below in the alleged perpetrator(s) section. Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator(s), it will be important for the DSL (or a DDSL) to work closely with the police (and other agencies as required), to ensure any actions the school or college take do not jeopardise the police investigation. 524. If schools or colleges have questions about the investigation, they should ask the police. The police will help and support the school or college as much as they can (within the constraints of any legal restrictions).

The end of the criminal process.

If a child is convicted or receives a caution for a sexual offence, the school or college should update its risk assessment, ensure relevant protections are in place for all the children at the school or college and, if it has not already, consider any suitable action in line with their behaviour policy. This process should include a review of the necessary actions to keep all parties safe and meet their needs.

If the perpetrator(s) remains in the same school or college as the victim, the school or college should be very clear as to their expectations regarding the perpetrator(s) now they have been convicted or cautioned. This could include expectations regarding their behaviour and any restrictions the school or college thinks are reasonable and proportionate with regard to the perpetrator(s)' timetable.



Any conviction (even with legal anonymity reporting restrictions) is potentially going to generate interest among other pupils or students in the school or college. It will be important that the school or college ensure both the victim and perpetrator(s) remain protected, especially from any bullying or harassment (including online).

Where cases are classified as “no further action” by the police or Crown Prosecution Service, or where there is a not guilty verdict, the school or college should continue to offer support to the victim and the alleged perpetrator(s) for as long as is necessary. A not guilty verdict or a decision not to progress with their case will likely be traumatic for the victim. The fact that an allegation cannot be substantiated or was withdrawn does not necessarily mean that it was unfounded. Schools and colleges should discuss any decisions with the victim in this light and continue to offer support. The alleged perpetrator(s) is/are also likely to require ongoing support for what will have likely been a difficult experience.

Unsubstantiated, unfounded, false or malicious reports.

As set out in paragraph 68 of Part one of KCSIE, all concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified, and addressed.

If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to local authority children’s social care may be appropriate.

If a report is shown to be deliberately invented or malicious, the school or college, should consider whether any disciplinary action is appropriate against the individual who made it as per their own behaviour policy.

#### Ongoing response.

Safeguarding and supporting the victim.

The following principles are based on effective safeguarding practice and should help shape any decisions regarding safeguarding and supporting the victim.

- The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim, if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim’s daily experience as normal as possible, so that the school or college is a safe space for them.
- Consider the age and the developmental stage of the victim, the nature of the allegation(s) and the potential risk of further abuse. Schools and colleges should be aware that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s).
- The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report.
- Consider the proportionality of the response. Support should be tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape.



- Schools and colleges should be aware that sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre (SARC). SARCs offer confidential and non-judgemental support to victims and survivors of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all children and adults, regardless of when the incident occurred.

- It will be important in all scenarios that decisions and actions are regularly reviewed and that relevant policies are updated to reflect lessons learnt. It is particularly important to look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, the school or college should decide on a course of action. Consideration should be given as to whether there are wider cultural issues within the school or college that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again.

Support can include:

- Early help and local authority children's social care as set out in Part one of this guidance.
- Children and Young People's Independent Sexual Violence Advisors (ChISVAs) provide emotional and practical support for victims of sexual violence. They are based within the specialist sexual violence sector and will help the victim understand what their options are and how the criminal justice process works if they have reported or are considering reporting to the police. ChISVAs will work in partnership with schools and colleges to ensure the best possible outcomes for the victim.
- Police and social care agencies can signpost to ChISVA services (where available) or referrals can be made directly to the ChISVA service by the young person or school or college. Contact details for ChISVAs can be found at Rape Crisis and The Survivors Trust.
- Child and young people's mental health services (CYPMHS) is used as a term for all services that work with children who have difficulties with their emotional or behavioural wellbeing. Services vary depending on local authority. Most CYPMHS have their own website, which will have information about access, referrals and contact numbers.
- The specialist sexual violence sector can provide therapeutic support for children who have experienced sexual violence. Contact Rape Crisis (England & Wales) or The Survivors Trust for details of local specialist organisations. The Male Survivors Partnership can provide details of services which specialise in supporting men and boys.
- NHS - Help after rape and sexual assault - NHS ([www.nhs.uk](http://www.nhs.uk)) provides a range of advice, help and support including advice about the risk of pregnancy, sexually transmitted infections (STI), reporting to the police and forensics.
- Rape and sexual assault referral centres services can be found at: Find Rape and sexual assault referral centres. Sexual assault referral centres (SARCs) offer medical, practical and emotional support. They have specially trained doctors, nurses and support workers. If children, young people, or their families are unsure which service to access, they should contact their GP or call the NHS on 111.
- Childline provides free and confidential advice for children and young people.
- Internet Watch Foundation works internationally to remove child sexual abuse online images and videos and offers a place for the public to report them anonymously.

- Childline / IWF: Remove a nude image shared online Report Remove is a free tool that allows children to report nude or sexual images and videos of themselves that they think might have been shared online, to see if they can be removed from the internet.

Victims may not disclose the whole picture immediately. They may be more comfortable providing information on a piecemeal basis. It is essential that dialogue is kept open and encouraged. When it is clear that ongoing support will be required, schools and colleges should ask the victim if they would find it helpful to have a designated trusted adult (for example, their form tutor or designated safeguarding lead) to talk to about their needs. The choice of any such adult should be the victim's (as far as is reasonably possible). Schools and colleges should respect and support this choice.

Children who have experienced sexual violence display a very wide range of responses to their experience, including in some cases clear signs of trauma, physical and emotional responses, or no overt signs at all. Schools should remain alert to the possible challenges of detecting those signs and show sensitivity to the needs of the child (e.g. about attendance in lessons) irrespective of how overt the child's distress is.

While schools and colleges should avoid any action that would have the effect of isolating the victim, in particular from supportive peer groups, there may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. This should be because the victim wants to, not because it makes it easier to manage the situation. If required, schools and colleges should provide a physical space for victims to withdraw to.

It may be necessary for schools and colleges to maintain arrangements to protect and support the victim for a long time. Schools and colleges should be prepared for this and should work with local authority children's social care and other agencies as required. It is therefore important that the DSL (or a DDSL) knows how and where to seek support.

It is important that the school or college do everything they reasonably can to protect the victim from bullying and harassment as a result of any report they have made. Whilst they should be given all the necessary support to remain in their school or college, if the trauma results in the victim being unable to do this, alternative provision or a move to another school or college should be considered to enable them to continue to receive suitable education. This should only be at the request of the victim (and following discussion with their parents or carers).

It is important that if the victim does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs. The DSL should take responsibility to ensure this happens (and should discuss with the victim and, where appropriate their parents or carers as to the most suitable way of doing this) as well as transferring the child protection file. Information sharing advice referenced at paragraphs 115-123 of KCSIE will help support this process.

Safeguarding and supporting the alleged perpetrator(s) and children and young people who have displayed harmful sexual behaviour:

The following principles are based on effective safeguarding practice and should help shape any decisions regarding safeguarding and supporting the alleged perpetrator(s):

- The school or college will have a difficult balancing act to consider. On one hand, they need to safeguard the victim (and the wider pupil/student body) and on the other hand provide the alleged perpetrator(s) with an education, safeguarding support as appropriate and implement any

disciplinary sanctions. Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary.

- Consider the age and the developmental stage of the alleged perpetrator(s), the nature of the allegations and frequency of allegations. Any child will likely experience stress as a result of being the subject of allegations and/or negative reactions by their peers to the allegations against them.
- Consider the proportionality of the response. Support (and sanctions) should be considered on a case-by-case basis. The alleged perpetrator(s) may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a risk of harm to other children. HSB in young children may be (and often are) a symptom of either their own abuse or exposure to abusive Maintained schools, academies and pupil referral units should follow the statutory guidance here. Independent schools and colleges should consider excluding as per their own policies. Hackett et al 2013 study of children and young people with harmful sexual behaviour suggests that two-thirds had experienced some kind of abuse or trauma.

Advice should be taken, as appropriate, from local authority children's social care, specialist sexual violence services and the police.

- The Lucy Faithfull Foundation has developed a HSB toolkit, which amongst other things, provides support, advice and information on how to prevent it, links to organisations and helplines, resources about HSB by children, internet safety, sexual development and preventing child sexual abuse.
- The NSPCC provides free and independent advice about HSB: NSPCC Learning: Protecting children from harmful sexual behaviour and NSPCC - Harmful sexual behaviour framework.
- Contextual Safeguarding Network – Beyond Referrals (Schools) provides a school self-assessment toolkit and guidance for addressing HSB in schools.
- StopItNow – Preventing harmful sexual behaviour in children - Stop It Now provides a guide for parents, carers and professionals to help everyone do their part in keeping children safe, they also run a free confidential helpline.

It is important that the perpetrator(s) is/are also given the correct support to try to stop them re-offending and to address any underlying trauma that may be causing this behaviour. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Advice on behaviour and discipline in schools is clear that teachers can discipline pupils whose conduct falls below the standard which could be reasonably expected of them. If the perpetrator(s) is to be excluded the decision must be lawful, reasonable and fair. Further information about exclusions can be found in statutory guidance for schools Exclusions from maintained schools, academies and PRUs.

School can be a significant protective factor for children who have displayed HSB, and continued access to school, with a comprehensive safeguarding management plan in place, is an important factor to consider before final decisions are made. It is important that if an alleged perpetrator does move to another educational institution (for any reason), that the new educational institution is made aware of any ongoing support needs and where appropriate, potential risks to other children and staff. The DSL should take responsibility to ensure this happens as well as transferring the child protection file.

Discipline and the alleged perpetrator(s) Schools:

With regard to the alleged perpetrator(s), advice on behaviour and discipline in schools is clear that teachers can discipline pupils whose conduct falls below the standard which could be reasonably



expected of them. Disciplinary action can be taken whilst other investigations by the police and/or local authority children's social care are ongoing. The fact that another body is investigating or has investigated an incident does not in itself prevent a school from coming to its own conclusion, on the balance of probabilities, about what happened, and imposing a penalty accordingly. This is a matter for the school and should be carefully considered on a case-by-case basis. The DSL (or a DDSL) should take a leading role.

The school should consider if, by taking any action, it would prejudice an investigation and/or any subsequent prosecution. Careful liaison with the police and/or local authority children's social care should help the school make a determination. It will also be important to consider whether there are circumstances that make it unreasonable or irrational for the school to reach its own view about what happened while an independent investigation is considering the same facts.

#### Discipline and support:

Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary. The school or college should be very clear as to what its approach is. On the one hand there is preventative or forward-looking action to safeguard the victim and/or the perpetrator(s), especially where there are concerns that a perpetrator themselves may have been a victim of abuse; and, on the other, there is disciplinary action to punish a perpetrator for their past conduct. The school or college should be very clear as to which category any action they are taking falls or whether it is really both and should ensure that the action complies with the law relating to each relevant category.

#### Working with parents and carers:

The school or college will, in most instances, engage with both the victim's and the alleged perpetrator's parents or carers when there has been a report of sexual violence (this might not be necessary or proportionate in the case of sexual harassment and should be considered on a case-by-case basis). The exception to this rule is if there is a reason to believe informing a parent or carer will put a child at additional risk. Schools and colleges should carefully consider what information they provide to the respective parents or carers about the other child involved and when they do so. In some cases, local authority children's social care and/or the police will have a very clear view and it will be important for the school or college to work with relevant agencies to ensure a consistent approach is taken to information sharing.

It is good practice for the school or college to meet the victim's parents or carers with the victim present to discuss what arrangements are being put in place to safeguard the victim and understand their wishes in terms of support they may need and how the report will be progressed.

It is also good practice for the school or college to meet with alleged perpetrator's parents or carers to discuss any arrangements that are being put into place that impact an alleged perpetrator, such as, for example, moving them out of classes with the victim and what this means for their education. The reason behind any decisions should be explained. Support for the alleged perpetrator should be discussed.

The DSL (or a DDSL) would generally attend any such meetings. Consideration to the attendance of other agencies should be considered on a case-by-case basis.

Clear behaviour policies and child protection policies, especially policies that set out the principles of how reports of sexual violence will be managed and how victims and alleged perpetrators are likely to be supported, that parents and carers have access to, will, in some cases, help manage what are inevitably very difficult conversations. Parents and carers may well struggle to cope with a report that their child has been the victim of a sexual assault or is alleged to have sexually assaulted



another child. Details of organisations that support parents are provided in Annex B of KCSIE. Schools and colleges should consider signposting parents and carers to this support.

#### Safeguarding other children:

Consideration should be given to supporting children (and adult students) who have witnessed sexual violence, especially rape and assault by penetration. Witnessing such an event is likely to be traumatic and support may be required.

Following any report of sexual violence or sexual harassment, it is likely that some children will take “sides”. The school or college should be doing all they can to ensure both the victim and alleged perpetrator(s), and any witnesses, are not being bullied or harassed. Social media is very likely to play a central role in the fall out from any incident or alleged incident. There is the potential for contact between victim and alleged perpetrator(s) and a very high likelihood that friends from either side could harass the victim or alleged perpetrator(s) online and/or become victims of harassment themselves. Specialist online safety support is discussed at page 110 of KCSIE.

School transport is a potentially vulnerable place for a victim or alleged perpetrator(s) following any incident or alleged incident. The school or college, as part of its risk assessment, should consider any additional potential support needs to keep all of their children safe.

A whole school or college approach to safeguarding, a culture that makes clear that there is a zero-tolerance approach to sexual violence and sexual harassment and that it is never acceptable, and it will not be tolerated, and a strong preventative education programme will help create an environment in which all children at the school or college are supportive and respectful of their peers when reports of sexual violence or sexual harassment are made.

It is important that schools and colleges keep their policies, processes, and curriculum under constant review to protect all their children. Reports of sexual violence and/or harassment (especially where there is evidence of patterns of behaviour) may point to environmental and or systemic problems that could and should be addressed by updating relevant policies, processes, or relevant parts of the curriculum. Alongside this, patterns identified in schools may also be reflective of the wider issues within a local area and it would be good practice to share emerging trends with safeguarding partners.

## Appendix 5

### FLOW CHART FOR RAISING SAFEGUARDING CONCERNS ABOUT A CHILD

