St Hilary's Safeguarding and Child Protection Policy

2026-2027

This document is based on Keeping Children Safe in Education 2026 and Working Together to Safeguard Children 2026.

St Hilary's fully recognises the contribution it needs to make when protecting and supporting children at the school. All staff, including volunteers, believe that our school should provide a caring, positive, safe and stimulating environment, which promotes the social, physical and moral development of each child. This policy is designed to provide a comprehensive coverage of the key issues involved: definition, explanation and identification, procedure and support. This policy applies equally to EYFS, Pre-Prep and Prep as taught at St Hilary's, as well as the Wrap Around Care provisions.

We actively promote democracy, the rule of the law, individual liberty and respect those with different faiths and beliefs. These are fundamental British Values which underpin all that we offer, as does our School Motto 'Not for oneself but for all.'

Designated Safeguarding Lead: Mr Mark Parton

Safeguarding Governor: Mr Luke Michael

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Safeguarding Statement 2026

‘Safeguarding is Everyone’s Business’

‘It could happen here’

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children.

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

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

Key Personnel

Designated Safeguarding Lead (DSL) is: Mr Mark Parton
Contact details: mparton@sthilarysschool.com
Tel: 01483 416551 ext. 213

Deputy DSL(s) are:
Contact details:
Mrs Julia Ranger jranger@sthilarysschool.com
Miss Louise Robins (EYFS) lrobins@sthilarysschool.com

The nominated Safeguarding Governor is: Mr Luke Michael
Contact details: lmichael@reeds.surrey.sch.uk

The Headmaster is: Mr Duncan Sinclair
Contact details:dsinclair@sthilarysschool.com

The Chair of Governors is: Mrs Jackie Alliss
Contact details: j.alliss@saintedmunds.co.uk

Terminology

Safeguarding and promoting the welfare of children is defined as:

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

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

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

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

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

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

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

MAP refers to the Surrey Multi-Agency Partnership.

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

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

Introduction

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

All action taken by St Hilary's School will be in accordance with:

Statutory, national, and local guidance – this includes:

- Working Together to Safeguard Children 2026, which sets out the arrangements for multi-agency working to safeguard and promote the welfare of children, and the statutory roles and responsibilities of relevant organisations and practitioners.

- 'What to do if you are Worried a Child is Being Abused' 2015 - Advice for Practitioners

- Keeping Children Safe in Education (KCSIE, 2026) is statutory guidance issued by the Department for Education (DfE) which all schools and colleges must have regard to when carrying out their duties to safeguard and promote the welfare of children.

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

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

This policy applies to all members of staff and Governors in the school.

Guidance and documents referred to in this policy:

- Surrey Safeguarding Children Partnership protocols, guidance and procedures
- Working Together to Safeguard Children 2026
- Keeping Children Safe in Education 2026
- Disqualification under the Childcare Act 2006 (updated 2019)
- FGM Act 2003 Mandatory Reporting Guidance 2015 (updated January 2020)
- 'What to do if you are worried a child is being abused' 2015
- Teachers' standards
- Information sharing advice for safeguarding practitioners
- The Equality Act 2010
- Early years foundation stage (EYFS) statutory framework
- SCC Safeguarding Children Missing Education (CME) and Educated Other Than at School (EOTaS)
- Surrey County Council Touch and The Use Of Physical Intervention When Working With Children And Young People

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

- Recruitment and Selection
- Whistleblowing

- Code of Conduct
- Behaviour
- E-Safety/Online Safety
- Attendance
- Health & Safety
- Mental Health Wellbeing Policy
- Intimate Care Policy

Equalities Statement

With regard to safeguarding we will consider our duties under the Equality Act 2010 and our general and specific duties under the Public Sector Equality Duty. General duties include:

Eliminate discrimination, harassment, victimisation, and other conduct that is prohibited by the Equality Act 2010.

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

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

Details of our specific duties are published in the St Hilary's 'Equality, Diversity and Inclusivity Policy.' This is available on our website https://www.sthilarysschool.com/About-St-Hilary%e2%80%99s/Policies.aspx

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

St Hilary's also adheres to the principles of and promotes anti-oppressive practice in line with the United Nations Convention of the Rights of the Child and the Human Rights Act 1998.

Sport, Premises and Single-Sex Facilities

The school will ensure that sport is safe, fair and inclusive. Where physical strength, stamina or physique makes sex relevant to safety or competitive fairness, participation may be organised by biological sex in accordance with the Equality Act 2010. Requests relating to participation will be considered individually, with safeguarding, fairness, the child's best interests and the rights and safety of others taken into account.

The school will comply with the Education (Independent School Standards) Regulations 2014 and other applicable premises requirements. Separate toilets will be provided for boys and girls aged eight and over, except where a self-contained toilet is intended for use by one pupil at a time and can be locked from the inside. Pupils will not use toilets designated for the opposite biological sex. Where appropriate, an alternative self-contained facility may be offered without compromising anyone's safety, comfort, privacy or dignity.

For pupils aged 11 or over at the start of the school year, changing and shower arrangements will not require a pupil to undress in front of a pupil of the opposite biological sex. A pupil will not use changing rooms designated for the opposite sex. Any alternative arrangement will be risk assessed, clearly recorded, appropriately communicated and regularly reviewed.

Policy Aims

The aims of these procedures are:

- To provide staff with the framework to promote and safeguard the wellbeing of children and in doing so ensure they meet their statutory responsibilities.
- To ensure consistent good practice across the school and ensure that safeguarding follows a whole school approach.
- Clarifying safeguarding expectations for members of the school's community, staff, Governing body, children, and their families.
- Contributing to the establishment of a safe, resilient, and robust safeguarding culture in the school built on shared values; that children are treated with respect and dignity, taught to treat each other and staff with respect, feel safe, have a voice and are listened to.
- Supporting contextual safeguarding practice recognising that the school's site can be a location where harm can occur.
- Setting expectations for developing knowledge and skills across the school community (staff, children and parents/carers), including recognising indicators of safeguarding concerns and knowing how to respond.
- Early identification of need for vulnerable learners and provision of proportionate interventions to promote their welfare and safety.
- Working in partnership with children, parents/carers, and other agencies in the Surrey Safeguarding Children's Partnership.

Policy Principles and Values

- The welfare of the child is paramount.
- Maintain an attitude of "It could happen here".
- Maintain a "zero-tolerance" approach to sexual violence and sexual harassment.
- Children have a right to feel safe and secure, they cannot learn effectively unless they do so.
- All children have a right to be protected from harm and abuse.
- All staff have a role in the prevention of harm and abuse and an equal responsibility to act immediately on any suspicion or disclosure that may indicate a child is at risk of harm, either in the school or in the community, considering contextual safeguarding, in accordance with statutory guidance.
- We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working to protect and safeguard children.
- Whilst the school will work openly with parents/carers as far as possible, it reserves the right to contact social care or the police, without notifying parents/carers if this is believed to be in the child's best interests.
- We will always act in the best interests of the child and ensure that our decisions around safeguarding take a child-centred and coordinated approach.

Supporting Children

The school will support all children by:

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

Promoting a caring, safe and positive environment within the school.

Encouraging self-esteem and self-assertiveness, through the curriculum and through positive relationships within the school community.

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

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

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

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

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

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

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

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

The school will:

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

Include regular consultations with children e.g. through questionnaires, participation in anti-bullying anti-misogyny and anti-racism activities, asking children to report whether they feel safe in the school and taking steps to encourage incident reporting by children.

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

Include safeguarding across the curriculum, including PSHE opportunities which equip children with the skills they need to keep themselves and others safe, including online and to know to whom they should turn to for help. It is also recognised that effective education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special education needs or disabilities.

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

https://www.sthilarysschool.com/About-St-Hilary%e2%80%99s/Missions,-Values,-Aims-and-Ethos.aspx

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

Professional expectations, roles, and responsibilities

Role of the school

The school will ensure that:

Details of the DSL and DDSL are available on the school website, notices in reception and across the school.

The school operates safer recruitment procedures in line with KCSIE 2026 which includes statutory checks on the suitability of staff to work with children.

All staff receive information about the school's safeguarding arrangements, safeguarding statement, Staff Behaviour Policy (Code of Conduct), Safeguarding and Child Protection Policy, the role and identity of the Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Leads (DDSLs), and Keeping Children Safe in Education 2026. All staff, including those who do not work directly with children, must read Part One in full. The Part One overview is a complementary quick-reference document and does not replace Part One. Governors and the proprietor will also read and understand Part Two.

All staff receive safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction in line with advice from SSCP. Training is regularly updated as required, and at least annually to continue to provide them with relevant skills and knowledge to safeguard children effectively.

All members of staff are trained in and receive regular updates in online safety and reporting concerns.

All members of staff maintain a zero-tolerance approach to sexual violence and sexual harassment.

All staff and Governors have regular safeguarding and child protection awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse.

The Safeguarding and Child Protection Policy is made available via the school website and a paper copy is available upon request for parents/carers.

All parents/carers are made aware of the responsibilities of staff members with regard to safeguarding and child protection procedures.

Provide or coordinate appropriate universal services, community-based early help and, where specific concerns within a family require coordinated support, targeted early help through Family Help. The school will contribute to assessments, plans and inter-agency working.

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

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

The name of the designated members of staff for safeguarding and child protection, the DSL and DDSL(s), are clearly advertised in the school.

All Staff will:

Maintain an attitude of "It could happen here" with regard to safeguarding.

Understand that safeguarding is "everyone's responsibility".

Maintain a "zero-tolerance" approach to sexual violence and sexual harassment.

Read and understand Part One of KCSIE 2026 in full. The Part One overview may be used as a complementary quick reference, but it does not replace Part One.

In addition to this all staff will be aware of the systems in place which support safeguarding including reading this Safeguarding and Child Protection Policy; the Behaviour Policy; the Staff Behaviour Policy (code of conduct); safeguarding response to children who go missing from education; and the role of the DSL.

Know who and how to contact the DSL and DDSL, the Chair of Governors and the Governor responsible for safeguarding.

Be aware of indicators of abuse, neglect and exploitation understanding that children can be at risk of harm inside and outside of the school, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse, neglect and exploitation so that staff are able to identify cases of children who may need help or protection.

Be able to identify vulnerable learners and act to keep them safe. Information or concerns about learners will be shared with the DSL where it includes those:

- who may need a social worker and may be experiencing abuse, neglect or exploitation
- requiring mental health support
- may benefit from early help
- where there is a radicalisation concern
- where a crime may have been committed

Provide a safe environment in which children can learn.

Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to.

Ensure children know that there are adults in the school who they can approach if they are worried or have concerns.

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

Ensure only appropriately trained professionals attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Take immediate action where a child's mental health concern is also a safeguarding concern. Warning signs may include significant changes in behaviour, persistent sleep difficulties, social withdrawal, loss of interest, self-neglect, self-harm, eating difficulties or suicidal thoughts. The concern must be reported to the DSL or a deputy. If the child is in immediate danger, staff will call 999 or arrange immediate attendance at A&E with a parent/carer or other suitable adult; urgent non-emergency mental health help may be sought through NHS 111.

Plan opportunities within the curriculum for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe.

Attend training in order to be aware of and alert to the signs of abuse, neglect and exploitation.

Know how to respond to a child who discloses harm or abuse, in accordance with Working Together to Safeguard Children 2026, KCSIE 2026 and What to do if you are worried a child is being abused (2015).

Record their concerns if they are worried that a child is being abused and report these to the DSL immediately that day, as well as recording on C-POMS. If the DSL is not contactable immediately a DDSL should be informed.

Be prepared to refer directly to the Children's Single Point of Access (C-SPA), and the Police if appropriate, if there is a risk of significant harm and the DSL or their DDSL is not available.

Follow the allegations procedures, as set out in this policy and KCSIE 2026, if the disclosure is an allegation against a member of staff, supply staff, volunteer or contractor.

Report low-level concerns (as defined in KCSIE 2026) about any member of staff/supply staff/volunteer or contractor to the Headmaster in line with Surrey LADO guidance. If it is about the Headmaster, to the Chair of Governors if not comfortable to the DSL.

Provide support for children subject to early help, child in need or child protection and be involved where appropriate, in the implementation of individual plans to further safeguard vulnerable learners and understand their academic progress and attainment and maintain a culture of high aspirations for this cohort.

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

Notify the DSL or their DDSLs of any child on a child protection plan or child in need plan who has unexplained absence.

Understand early help and be prepared to identify and support children who may benefit from early help. Liaise with other agencies that support children and provide early help.

Be aware that children may not feel ready or know how to tell someone they are being abused, exploited, or neglected, and/or they may not recognise these experiences as harmful. This could be due to their vulnerability, disability and/or sexual orientation or language barriers.

Be mindful that the Teacher Standards states that teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

The Headmaster:

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

The school fully contributes to inter-agency working in line with Working Together to Safeguard Children (2023) guidance.

The Safeguarding and Child Protection Policy and procedures are implemented and followed by all staff.

That the school has appropriate policies in place that make it clear that sexual harassment, online sexual abuse and sexual violence (including sexualised language) is unacceptable, with appropriate sanctions and support in place.

That the school's staff have appropriate knowledge of KCSIE (2026) part 5.

That all children are supported to report concerns about harmful sexual behaviour freely. That concerns are taken seriously and dealt with swiftly and appropriately, and children are confident that this is the case. Comprehensive records of all allegations are kept.

All staff are aware of the role of the DSL, including the identity of the DSL and any DDSL's.

Sufficient time, training, support, funding, resources, including cover arrangements where necessary, is allocated to the DSL to carry out their role effectively, including the provision of advice and support to school staff on safeguarding and child protection matters, to take part in strategy discussions/meetings and other inter-agency meetings and/or support other staff to do so; and to contribute to the assessment of children.

Opportunities are provided for a co-ordinated offer of early help when additional needs of children are identified.

That DDSLs are trained to the same standard as the DSL and the role is explicit in their job description.

Adequate and appropriate DSL cover arrangements are in place for any out of hours/out of term activities.

Where there is a safeguarding concern that the child's wishes and feelings are considered when determining what action to take and what services to provide.

Child-centred systems and processes are in place for children to express their views and give feedback.

All staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle-blowing procedures.

Children are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.

That allegations or concerns against staff and other adults are dealt with in accordance with guidance from the DfE, SSCP and Surrey County Council (SCC).

That statutory requirements are met to make a referral to the Disclosure and Barring Service and additionally in the case of teaching staff the Teacher Regulation Agency where they think an individual has engaged in conduct that harmed (or is likely to harm) a child; or if the person otherwise poses a risk of harm to a child.

Record low-level concerns in cases which concern a member of staff/supply staff/contractor or a volunteer. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that will be respected as far as reasonably possible.

The Designated Safeguarding Lead:

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

Hold the lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems in place) in the school, this responsibility is not able to be delegated.

Liaise with the Surrey County Council and work in partnership with other agencies in line with Working Together to Safeguard Children (2023).

Where necessary contact Surrey's Child Protection Consultation Line for advice and support (0300 470 9100 option 3).

Manage and submit a Request for Support Form for a child if there are concerns about suspected harm or abuse, to the C-SPA, and act as a point of contact and support for school staff. Requests for support should be sent securely by email to cspa@surreycc.gov.uk using the Request for Support Form urgent referrals should be made by telephone 0300 470 9100 or 03311 435554.

Report concerns that a child may be at risk of radicalisation or involvement in terrorism, use the Prevent referral form to refer cases by e-mail to preventreferrals@surrey.pnn.police.uk . If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101 or 07795 043842 or 01865 555618 and ask to speak to the Prevent Supervisor for Surrey. The DfE has also set up a dedicated telephone helpline for staff and Governors to raise concerns around Prevent (020 7340 7264).

Refer cases where a crime may have been committed to the Police as required. NB: NPCC- When to call the police should help DSLs understand when they should consider calling the Police and what to expect when they do.

Liaise with the "case manager" and Local Authority Designated Officer (LADO) for child protection concerns in cases which concern a member of staff/supply staff/contractor or a volunteer.

Follow relevant DfE guidance and KCSIE 2026 on 'Child on Child abuse' when a concern is raised that there is an allegation of a child abusing another child within the school.

When there has been a report of sexual violence, make an immediate risk and needs assessment. Additionally, where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis and will be put in place as required.

Be available during term time, during school hours, for staff to discuss safeguarding concerns. The DSL and school leadership will maintain clear, reliable and known cover arrangements whenever the DSL is unavailable, including for illness, leave and out-of-hours or out-of-term activities. Concerns must be received, monitored and acted upon without delay; the school may use a confidential shared safeguarding mailbox or an equivalent secure system to support continuity.

Act as a source of support and expertise in carrying out safeguarding duties for the whole school community.

Ensure that the names of the DSL and DDSL, are clearly advertised, with a statement explaining the school's role in referring and monitoring cases of suspected abuse.

Encourage and promote a culture of listening to children and taking account of their wishes and feelings, amongst all staff.

Access training and support to ensure they have the knowledge and skills required to carry out the role.

Have a secure working knowledge of SSCP procedures and understand local assessment processes for universal and community-based early help, targeted Family Help and statutory intervention, in line with Surrey's Continuum of Support.

Understand how to access universal and community-based early help and how to refer to targeted Family Help, supporting and advising staff whenever either route is appropriate.

Have a working knowledge of how Surrey County Council conduct an initial child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.

Understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes.

Understand and support the school's delivery with regard to the requirements of the Prevent duty and provide advice and guidance to staff on protecting children from radicalisation.

Liaise with school staff (especially pastoral support, behaviour leads, schools health colleagues and the SENCO) on matters of safety and safeguarding and consult Surrey's Continuum of Need Matrix document to inform decision making and liaison with relevant agencies.

Be alert to the specific needs of children in need, those with Special Educational Needs and Disability (SEND) and young carers.

Understand the risks associated with online activity and be confident that they have the up-to-date knowledge and capability to keep children safe while they are online at the school; in particular understand the additional risks that children with SEND face online and the associated and appropriate support they require.

DSL training should be updated at least every two years and their knowledge and skills refreshed at regular intervals but at least annually.

Work with the Headmaster and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at the school.

The DSL will ensure that child protection records are clear, factual, up to date and securely stored. Records will distinguish observed concerns, professional opinion and historic information, and will include a comprehensive summary of the concern, follow-up, resolution, actions, decisions, outcomes and the rationale for decisions, including decisions not to refer.

Ensure that an indication of the existence of the additional safeguarding/child protection file is marked on the child's main file record.

Ensure that safeguarding information is transferred, reviewed and acted upon promptly at every transition point. When a pupil leaves, the child protection file will be transferred separately from the main pupil file, securely and as soon as possible: within five days for an in-year transfer or within the first five days of a new term. Confirmation of receipt will be obtained. The transferring school will provide a clear, structured summary identifying current concerns, relevant historic context, ongoing support needs and, where appropriate, risks to others. The receiving school will ensure that an appropriately trained person reviews the information promptly and seeks clarification where necessary. Safeguarding information will be used to support, and never to disadvantage, the child.

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

Ensure that where a child transfers to a school and is on a child protection plan, child in need plan or is a child looked after, their information is passed to the new school immediately and that the child's social worker is informed. In addition, consideration should be given to a multi-agency schools transition meeting if the case is complex or on-going.

Ensure that all appropriate staff members have a working knowledge and understanding of their role in case conferences, core groups and other multi-agency planning meetings, to ensure that they attend and are able to effectively contribute when required to do so; where a report is required, this should be shared with the parents prior to the meeting.

Report to the Headmaster any significant issues for example, use of Surrey's FaST Resolution Process enquiries under section 47 of the Children Act 1989 and Police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.

Ensure that the case holding social worker is informed of any child currently with a child protection plan who is absent without explanation.

Organise safeguarding and child protection induction, regularly updated training and a minimum of annual updates (including online safety) for all school staff, keep a record of attendance and address any absences.

Ensure each member of staff has access to, and understands, the school's Safeguarding and Child Protection policy procedures, especially new and part-time staff.

Ensure that in collaboration with the school leadership and Governors, the Safeguarding and Child Protection Policy is reviewed annually, and the procedures and implementation are updated and reviewed regularly.

Ensure that the Safeguarding and Child Protection Policy is available publicly and that parents/carers know that referrals about suspected abuse, neglect or exploitation may be made and the role of the school in this.

Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.

Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and leadership staff.

Establish and maintain links with the SSCP to make sure staff are aware of training opportunities and the latest policies on local safeguarding arrangements.

Contribute to and provide, with the Headmaster and Chair of Governors, the biennial (s157 s175) Statutory Audit for Safeguarding Arrangements and Termly Safeguarding Data Collections via PHEW to Surrey County Council.

(Duties are further outlined in KCSIE 2026, Annex B.)

The Deputy Designated Safeguarding Lead(s):

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

Be trained to the same standard as the DSL and the role is explicit in their job description.

Provide support and capacity to the DSL in carrying out delegated activities of the DSL; however, the lead responsibility of the DSL cannot be delegated.

In the absence of the DSL, carry out the activities necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the DSL the DDSL will assume all of the functions of the DSL.

The Governing Body:

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

There is a whole school approach to safeguarding, involving everyone in the school and ensuring that safeguarding, and child protection are at the forefront and underpin all relevant aspects of process and policy development.

A nominated governor for safeguarding is identified.

Governing bodies should ensure that all members receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the school are effective and support the delivery of a robust whole school approach to safeguarding. Training should be regularly updated.

The child's wishes and feelings are considered when determining what action to take and what services to provide.

The school has effective safeguarding policies and procedures including a Safeguarding and Child Protection Policy, a Staff Behaviour Policy or Code of Conduct, a Behaviour Policy and a response to children who go missing from education.

Policies are consistent with SSCP and statutory requirements and are reviewed at least annually, and more frequently where legislation, statutory guidance, local arrangements or lessons learned require change. The Governing Body ensures that all governors and staff receive appropriate safeguarding and child protection training, and that all staff read Part One of KCSIE 2026 in full.

The SSCP is informed in line with local requirements about the discharge of duties via the Biennial (s 157 s 175) Statutory Audit for Safeguarding Arrangements and Termly Safeguarding Data Collections via PHEW to Surrey County Council.

Ensure recruitment, selection and induction follow safer recruitment practice including all appropriate checks.

The Governing Body will ensure that safer-recruitment arrangements reflect the Crime and Policing Act 2026. The previous supervision exemption from regulated activity has been removed. A volunteer whose role involves teaching, training, instructing or supervising children on more than three days in any 30-day period, or overnight, is in regulated activity and requires the appropriate enhanced DBS check with children's barred-list information. In EYFS provision, staff and volunteers will not begin work until the school has received the required enhanced DBS certificate, including barred-list information.

Staff receive appropriate training, updated in line with guidance. All staff, including those who do not work directly with children, read Part One of KCSIE 2026 in full, and mechanisms are in place to help them understand and discharge their responsibilities.

Ensure that, as part of the requirement for staff to undergo regular updated safeguarding training, including online safety and the requirement to ensure children are taught about safeguarding, is integrated, aligned, and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning.

Considering the above training requirements, Governing Bodies should have regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all children.

All staff including temporary staff/supply staff, volunteers and contractors are provided with the school's Safeguarding and Child Protection policy and if applicable the staff behaviour policy.

Take a proportionate risk-based approach to the level of information that is provided to temporary staff, volunteers and contractors.

The school has procedures in place for dealing with allegations against all staff (including the Headmaster), volunteers and contractors and that a referral is made to the DBS and/or the Teaching Regulation Agency (as applicable) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have, had they not resigned.

Policies and processes are in place to deal with concerns (including allegations) which do not meet the harm threshold or low-level concerns as defined in KCSIE 2026.

A member of the senior leadership team has been appointed by the Governing Body as the DSL who will take lead responsibility for safeguarding and child protection and that the role is explicit in the role holder's job description.

That on appointment, the DSL and DDSL initially undertake DSL 'New to Role' with 'Refresher' training at least every two years as well as attending DSL network events, to refresh knowledge and skills.

Children are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through PSHE and RSE.

Alongside the school, Governors will regularly review the effectiveness of filtering and monitoring systems in place to safeguard children online.

Ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.

The school will comply with DfE and the Surrey County Council Policy Guidance for Safeguarding Children Missing Education and Education Other Than at School.

Clear systems and processes are in place for identifying possible mental health concerns, including routes to escalate and clear referral and accountability systems.

Ensure that safeguarding and child protection files are maintained in accordance with KCSIE 2026, including the DSL responsibilities set out in Annex B.

Enhanced DBS checks (without barred list checks unless the governor is also a volunteer at the school) are in place for all Governors.

Ensure section 128 checks are undertaken as defined in KCSIE 2026.

Ensure where Governing Bodies hire or rent out school or college facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) they should ensure that appropriate arrangements are in place to keep children safe.

Confidentiality, Sharing and Withholding Information

All matters relating to safeguarding and child protection will be treated as confidential and only shared as per the 'Information sharing: advice for practitioners providing safeguarding services' guidance. The school will refer to the guidance in the Data protection: toolkit for schools to support the school with data protection activity, including compliance with General Data Protection Regulation (GDPR).

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

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

All staff have a professional responsibility to share information when necessary to safeguard children. The Data Protection Act 2018, UK GDPR and Data (Use and Access) Act 2025 do not prevent appropriate information sharing for safeguarding purposes, and concerns about data protection must not stand in the way of protecting a child. Where confidential information is shared digitally with an authorised third party, including the local authority or police, St Hilary's will use an approved secure and encrypted method, such as Egress.

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

Reporting and responding to safeguarding concerns

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

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

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

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

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

Make an initial record of the information related to the concern as soon as possible.

(Cause for Concern Form) including details of:

- Date
- Time
- Place
- Who was present
- Context
- Details of disclosure/concern (using the child's words)
- Demeanour/non-verbal behaviours of the child
- Child's voice
- Any injuries (using a body map to record these)
- Rationale for decision making
- Actions taken

Report it to the DSL immediately. This also needs to be recorded on CPOMS

The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available and DDSL should be consulted.

The records must be signed and dated by the author or / equivalent on electronic based records.

In the absence of the DSL or DDSL, all staff must be prepared to and know how to refer directly to C-SPA (and the Police if appropriate) if there is the potential for immediate significant harm or contact the consultation line at the C-SPA for support and advice.

Following a report of concerns the DSL must:

Use the Continuum of Support for Children and Families in Surrey and Continuum of Support Matrix to decide whether or not there are sufficient grounds for suspecting harm, in which case a request for support must be made to the C-SPA and the Police if it is appropriate.

The school should try to discuss any concerns about a child's welfare with the parent/carer and where possible obtain their agreement before making a referral to the C-SPA. However, this should only be done when:

- it will not place the child at increased risk
- or sexual/organised abuse is suspected
- or the fabrication of an illness is suspected
- or where the discussion could impede a Police investigation or Social Work enquiry

Where there are doubts or reservations about involving the child's family, the DSL should clarify with the C-SPA or the Police whether the parents/carers should be told about the referral and, if so, when and by whom. This is important in cases where the Police may need to conduct a criminal investigation. The child's views should also be considered.

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

When a child needs urgent medical attention and there is suspicion of abuse the DSL should take the child to the accident and emergency unit at the nearest hospital, having first notified the C-SPA. The DSL should seek advice about what action the C-SPA will take and about informing the parents/carers, remembering that parents/carers should normally be informed that a child requires urgent hospital attention.

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

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

The DSL should also be made aware.

Dealing with safeguarding concerns

All staff:

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

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

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

Guiding principles:

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

What happens next?

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

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

Safeguarding Concerns and Allegations about Staff, Supply Teachers, Trainee Teachers, Volunteers and Contractors

Surrey's LADO procedure will be followed where it is alleged that a member of staff, supply teacher, trainee teacher, volunteer, contractor or other adult working with children has:

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

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

The school may also receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities).

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

Report any concerns to the DSL if a safeguarding matter, or the Headmaster otherwise, immediately.

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

There may be situations when the Headmaster, Chair of Governors or Safeguarding Lead will want to involve the Police immediately if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.

Once an allegation has been received by the Headmaster, Chair of Governors or Safeguarding Lead, they will contact the LADO (as part of their mandatory duty) on 0300123 1650 option 3 LADO or Email: LADO@surreycc.gov.uk immediately and before taking any action or investigation.

Following consultation with the LADO inform the parents/carers of the allegation unless there is a good reason not to.

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

If the matter is investigated internally, the LADO will advise the school to seek guidance in following procedures set out in part 4 of KCSIE (2025) and the SSCP procedures.

Low-level concerns

The term “low-level concern” does not mean that a concern is insignificant. It is any concern, however small and even if no more than a sense of unease or a “nagging doubt”, that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the Staff Behaviour Policy, including inappropriate conduct outside work, but does not meet the harm threshold or is otherwise not serious enough to merit referral to the LADO. The Headmaster will consider whether the concern meets the harm threshold and whether advice from, or a referral to, the LADO is required.

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

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

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

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

What is child abuse?

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

Forms of abuse and neglect

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

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

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

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

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

medical care or treatment; or provide suitable education. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

The Surrey Neglect Risk Assessment Tool is used to support with the initial identification of neglect.

Further information on indicators of abuse can be accessed via NSPCC.

Sexual Violence, Harmful Sexual Behaviour and Sexual Harassment between Children

Child-on-Child Abuse

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

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

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

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying) abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')

- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
  making or sharing nude or semi-nude images or videos, whether consensual or non-consensual, including content that has been digitally altered or generated using artificial intelligence. Every such incident requires a safeguarding response;
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and

- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

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

We recognise that children can abuse other children and that child-on-child abuse is preventable. It is a safeguarding issue for both the victim and the alleged perpetrator, who may also have unmet or safeguarding needs. Abuse may occur inside or outside school and online, and may include serious physical harm or threats involving weapons. Reports will be managed under this policy and Part Five of KCSIE 2026.

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

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

- making clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It will never be passed off as "banter", "just having a laugh", "a part of growing up" or "boys being boys". We believe that failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.

- recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported.
- challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. As we believe that dismissing or tolerating such behaviours risks normalising them.

Prevention

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

Responding robustly to reports of sexual violence and sexual harassment

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

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

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

Risk Assessment

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

The risk assessment will consider;

- The victim, especially their protection and support.
- The alleged perpetrator, their support needs and any sanctions.
- All other children at the school.
- The victim and the alleged perpetrator sharing classes and space at school.
- The risk assessment will be recorded and kept under review.

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

Action:

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

The DSL will consider:

- The wishes of the victim.
- The nature of the incident including whether a crime has been committed and the harm caused.
- Ages of the children involved.
- Developmental stages of the children.
- Any power imbalance between the children.
- Any previous incidents.
- That sexual violence and sexual harassment can take place within intimate personal relationships between children.
- Importance of understanding intra familiar harms and any necessary support for siblings following incidents
- Ongoing risks to victim, other children, adult students, or staff.
- Other related issues or wider context.

Confidentiality:

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

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

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

Options:

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

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

Ongoing Response:

- The DSL will manage each case individually and will ensure the risk assessment is reviewed regularly with relevant partner agencies, for example the Police and social care.
- Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, schools should be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately.
- Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim.
- The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart on the school premises and on transport where appropriate.
- Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the school will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and may lead to the view that allowing the perpetrator to remain in the same school would seriously harm the education or welfare of the victim (and potentially themselves and other children).
- Where a criminal investigation into sexual assault leads to a conviction or caution, the school will, if it has not already, consider any suitable sanctions in light of their behaviour policy, which may include consideration of permanent exclusion. Where the perpetrator is going to remain at the school, the Headmaster should continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on school premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.
- The victim, alleged perpetrator and any other children and adults affected will receive appropriate support and safeguards on a case-by-case basis.
- The school will take any disciplinary action against the alleged perpetrator in accordance with the school behaviour policy.
- The school recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.
- The school will consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.
- The school recognises that children who have experienced sexual violence display a wide range of responses to their experiences including clear signs of trauma, physical and emotional responses, or no overt signs at all.

Physical Abuse

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

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

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

Harmful Sexual Behaviour (HSB)

Children's sexual behaviour exists on a progressive continuum, from developmentally expected behaviour through inappropriate and problematic behaviour to abusive and violent harmful sexual behaviour (HSB). HSB may occur face to face, online or across both environments. The school will respond proportionately, using professional assessment and considering the safety, welfare and support needs of all children involved.

The school's response to HSB:

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

- Make decisions about safeguarding children and young people.
- Assess and respond appropriately to sexual behaviour in children and young people.
- Understand healthy sexual development and distinguish it from harmful behaviour.

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

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

Anti-Bullying/Cyberbullying

Our school's policy on anti-bullying includes measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying).

All staff understand that children with SEND, children who are lesbian, gay or bisexual, children perceived to be lesbian, gay or bisexual, and children who are questioning their gender may face additional vulnerability to discriminatory bullying or abuse. These characteristics are not in themselves safeguarding risks.

The school will take proactive steps to prevent and respond to discriminatory bullying, provide trusted adults and safe opportunities for children to share concerns, and consider each child's wishes, feelings, safety and wider circumstances.

Where a child or parent raises a request relating to social transition, the school will not initiate action. It will take time to understand the child's thoughts and feelings, remain professionally curious about the full range of the child's experiences and possible mental-health or psychosocial needs, involve parents unless doing so would place the child at risk, and consider safeguarding, the child's best interests, equality duties and the rights and safety of other pupils. Decisions and risk assessments will be recorded and reviewed.

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

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

Relationships Education and PSHE will challenge stereotypes and discriminatory bullying in an age-appropriate way. Staff will follow the separate requirements in this policy relating to sport, toilets, changing rooms and showers.

Safety/Cybercrime

The school has an online safety policy which empowers us to protect and educate pupils, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

Online risks are considered through the four Cs: content (including harmful or inappropriate material, misinformation, disinformation and conspiracy theories); contact (including harmful interaction with other users or generative-AI applications that simulate interaction); conduct (including bullying and making, sending or receiving explicit images, including AI-generated imagery); and commerce (including gambling, inappropriate advertising, phishing and financial scams).

The school will assess the safeguarding, ethical, data-protection and intellectual-property risks of any teacher-facing or pupil-facing generative AI. Its use will follow DfE guidance, the school's AI and Online Safety policies, age restrictions, appropriate supervision and the school's filtering and monitoring arrangements. Staff will treat digitally altered or wholly AI-generated nude or semi-nude content, including deepfakes or "deep nudes", as a safeguarding concern.

The school is a mobile-phone-free environment for pupils by default. Pupils will not have access to mobile phones during the school day, including lessons, movement between lessons, breaktimes and lunchtimes, except where the Headmaster has authorised a specific individual exception. The school's mobile-phone arrangements are set out in the relevant Behaviour and Online Safety policies.

The SLT member responsible for filtering and monitoring, supported by the DSL and IT support, will review the effectiveness of filtering and monitoring at least once each academic year. Checks will cover all internet-connected devices in all relevant locations, and a record will be retained. The review will consider pupils' ages, needs and vulnerabilities and will ensure that harmful content is blocked without unreasonably restricting teaching and learning.

Children are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated. The school's online safety co-ordinators are Mr James South, Mr Mark Parton and Mr Scott Mansell, and Mr Luke Michael as Safeguarding Governor.

The school will follow the guidance around harmful online challenges and online hoaxes when supporting children and sharing information with parents/carers.

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

This programme aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Racist Incidents

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

Radicalisation, Extremism and Terrorism

Prevent duty guidance: England and Wales (2023) under section 26 of the Counter Terrorism and Security Act 2015 places a duty on education and other children's services to have due regard to the need to prevent people from being drawn into terrorism.

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

Radicalisation refers to 'the process of a person legitimising support for, or use of, terrorist violence'.

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

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

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

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

The DSL should report concerns that a child may be at risk of radicalisation or involvement in terrorism, use the Prevent referral form to refer cases by e-mail to preventreferrals@surrey.pnn.police.uk .

If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101

To speak to the Prevent Supervisor for Surrey call 07795043842

There is a dedicated telephone helpline 0800 0113764 for staff and Governors to raise concerns around Prevent.

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

Opportunities are provided in the curriculum to enable children to discuss issues of religion, ethnicity and culture and the school follows the Promoting fundamental British values through SMSC.

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

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

Further information and a list of such indicators can be found at Managing Risk of Radicalisation in your Education school

Domestic Abuse

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

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

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

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

Homelessness

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

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

Child sexual exploitation (CSE) and child criminal exploitation (CCE) involve an individual, group or organised network taking advantage of a power imbalance to coerce, manipulate or deceive a child into sexual or criminal activity. Exploitation may involve an exchange for something the child needs or wants, financial advantage or increased status for the perpetrator, violence or threats. It may constitute modern slavery. Children may identify as belonging to the exploiting group, and a child may be criminalised for actions undertaken under coercion. Most child sexual abuse is committed by someone known to the victim.

Child Sexual Exploitation (CSE)

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

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

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

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

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

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

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

Child Criminal Exploitation (CCE)

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

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". Children are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt.

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

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

Serious Violence

Serious violence may include physical assault, carrying, threatening with or using weapons, often in the context of peer conflict, bullying or criminal exploitation. Staff must report immediately to the DSL or a deputy any concern that a child is carrying or using a weapon, or expressing an intention to do so. Indicators may include:

- increased absence from the school;
- a change in friendships or relationships with older individuals or groups;
- a significant decline in performance;
- signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries;
- Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

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

Modern Slavery

Modern slavery includes human trafficking, slavery, servitude and forced or compulsory labour. Exploitation may be sexual, criminal or financial and can include forced labour, forced criminality and organ removal. Where staff identify a potential victim, the DSL will consider both a child-protection referral and the appropriate referral under the National Referral Mechanism, in accordance with statutory guidance.

Female Genital Mutilation (FGM)

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

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

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

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

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

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

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

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

Forced Marriage

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

Forced marriage is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014. In addition, since February 2023, it is also a crime to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. This applies to non-binding, unofficial 'marriages' as well as legal marriages.

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

school staff should never attempt to intervene directly as a school or through a third party. Contact should be made with the C-SPA and/or the Forced Marriage Unit 020 7008 0151.

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

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

HBA might be committed against people who:

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

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

One Chance Rule

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

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

Private Fostering Arrangements

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

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

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

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

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

Children Requiring Mental Health Support

The school has an important role in promoting good mental wellbeing, identifying concerns early, providing safe and evidence-based early support, and liaising with or referring to specialist services where needed. Only appropriately trained professionals will diagnose mental-health conditions. The DSL will consider informing parents or carers where support is needed, provided that doing so would not place the child at additional risk, and will liaise with the school's mental-health lead and relevant external services.

Young Carers

The school will be alert to children who provide care for a family member. Caring responsibilities can affect attendance, attainment, behaviour and wellbeing. Early identification is essential; the DSL and pastoral team will ensure that young carers receive timely support from school and, where appropriate, external partners, local authority services and health services.

Looked After Children and Previously Looked After Children

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

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

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously

looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

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

Children with Special Educational Needs and Disabilities or Health Issues

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

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

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

Additional barriers may include a child not understanding that what is happening is abuse, increased dependence on adults for care, intimate-care needs, isolation from others, and difficulty distinguishing fact from fiction in online content or understanding the consequences of repeating online content or behaviours.

Safeguarding Children with Medical Conditions

A medical incident or allergy-related issue does not automatically require a safeguarding referral. A referral will be considered where the incident suggests that a child may be at increased risk of neglect, abuse or exploitation because of a medical condition—for example, where essential information is withheld or a child is repeatedly sent to school without essential medication, placing the child at risk.

Children Absent from Education

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

The school recognises that when children are absent from education, this can be a vital warning sign of a range of safeguarding possibilities. They are also at significant risk of underachieving, being victims of abuse and harm, exploitation, radicalisation, and not being in education, employment or training (NEET) later in life.

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

The school will maintain admission and attendance registers and manage additions and deletions in accordance with the School Attendance (Pupil Registration) (England) Regulations 2024 and current DfE attendance guidance.

When adding or removing a pupil's name, the school will provide Surrey County Council with the information required by the 2024 Regulations within the applicable timescale, including the pupil's details, parent or carer contact details, destination and the applicable ground for deletion where relevant.

Where a pupil's whereabouts or destination are not known, the school will make reasonable enquiries with Surrey County Council and relevant agencies before deletion from the admission register, and will follow local children-missing-education procedures.

The school will:

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

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

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

Pupils Missing Out on Education (PMOOE)

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

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

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

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

The school will monitor and track children attending alternative provision to ensure that the provision meets the needs of the child. The school continues to be responsible for the safeguarding of that pupil. The school will obtain written

confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment.

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

The school leadership will report to Governors, information regarding the use and effectiveness of alternative provision and modified/reduced timetables. The school will also report to Governors any formal direction of a child to alternative provision to improve behaviour.

Attendance and Behaviour

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

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

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

Restrictive Physical Intervention

Restrictive intervention, including reasonable force, will be used only when lawful, necessary and proportionate, and only for the minimum time and with the minimum force required. Staff will consider prevention and de-escalation first, the circumstances and risks presented, and the additional vulnerability of pupils with SEND, mental-health needs or medical conditions. The decision and incident will be recorded, parents informed where appropriate, and the pupil offered support and an opportunity to explain their experience. The school will review incidents and patterns to reduce recurrence.

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

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

Whistleblowing

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

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

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

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

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

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

Links with other school policies

Administration of medicines.

Anti-bullying.

Behaviour Policy

Child Exploitation

Curriculum Policy

Equality Policy

E-Safety, including staff use of mobile phones

Health & Safety

Intimate Care

Parental Concerns/Complaints.

Physical Intervention

PSHE

Recruitment and Selection

Risk Assessment

School Attendance

Relationships and Sex Education

Staff Behaviour Policy / Code of Conduct

Teaching and Learning

Whistleblowing

Mental Health/Wellbeing

Additional Resources

Surrey Safeguarding Children Partnership webpages

Continuum of Support for children and families living in Surrey

Surrey Education Services (surreycc.gov.uk) – Education Safeguarding Resources Hub

Graded Care Profile 2

NSPCC | The UK children's charity | NSPCC

CEOP Education

Anti Bullying Alliance webpages

Childnet International

Safer Internet Centre webpages

Contextual Safeguarding Network webpages

Lucy Faithfull Foundation webpages

Appendix one:

Sexual violence

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

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

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

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

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

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

What is consent?

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

• a child under the age of 13 can never consent to any sexual activity

• the age of consent is 16

• sexual intercourse without consent is rape.

Further information about consent can be found here: Rape Crisis England & Wales - Sexual consent.

Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of the school. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

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

• sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names

• sexual "jokes" or taunting

• physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes. schools should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim.

• displaying pictures, photos or drawings of a sexual nature

• upskirting (this is a criminal offence), and

• online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

- making or sharing nude or semi-nude images or videos, whether consensual or non-consensual, including content that has been digitally altered or generated using artificial intelligence. Every such incident requires a safeguarding response;
- sharing of unwanted explicit content
- sexualised online bullying
- unwanted sexual comments and messages, including, on social media
- sexual exploitation; coercion and threats, and
- coercing others into sharing images of themselves or performing acts they're not comfortable with online.

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

AUTHOR: DSL, Mark Parton (Deputy Head)

READ & APPROVED BY: The Headmaster, Governors and St Hilary's Senior Leadership Team.

READ & SHARED: with all staff at St Hilary's School.

RATIFIED BY: The Safeguarding Governor.

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