



## Child Protection and Safeguarding Policy September 2023

### Table of Contents

1. Statement.....	3
2. Introduction .....	3
3. Terminology .....	4
4. Policy Principles and Values .....	4
5. Policy Aims .....	4
6. Supporting Children.....	5
7. Prevention/Protection.....	5
8. Safe College, Safe staff .....	6
9. Roles and Responsibilities .....	7
All College Staff: .....	7
The Head: .....	8
The Designated Safeguarding Lead: .....	9
The Deputy Designated Safeguarding Lead(s): .....	11
All members of The Governing Body: .....	11
10. Confidentiality and Sharing Information .....	13
11. Child Protection Procedures .....	13
12. Dealing with disclosures .....	15
13. Safeguarding concerns and Allegations against Adults Working with Children .....	16
14. Low Level Concerns.....	17
15. What is Child Abuse? .....	19
16. Indicators of Abuse – Neglect:.....	20
17. Indicators of Abuse – Emotional Abuse: .....	22
18. Indicators of Abuse – Physical Abuse: .....	22
19. Indicators of Abuse – Sexual Abuse: .....	22
20. Sexual Violence and Sexual Harassment between Children in Schools – Child on Child Abuse: .....	23
21. Child on Child Abuse.....	26
22. Anti-Bullying/Cyberbullying .....	31
23. Online Safety.....	31

24.	Racist Incidents .....	32
25.	Radicalisation and Extremism.....	32
26.	Domestic Abuse .....	34
27.	Child Sexual Exploitation (CSE) .....	34
28.	Child Criminal Exploitation & Gangs .....	35
29.	Sharing nudes and Semi-Nudes: .....	36
30.	Female Genital Mutilation (FGM) .....	37
31.	Forced Marriage .....	38
32.	So Called 'Honour'-based Abuse.....	38
33.	Private Fostering Arrangements .....	39
34.	Looked After Children .....	39
35.	Children Missing Education .....	39
36.	Attendance and Behaviour .....	40
37.	Physical intervention .....	40
38.	Whistle-blowing.....	41
39.	Complaints .....	41
40.	Health & safety .....	41
41.	Guardians .....	41
42.	Contact Information .....	42
	Appendix 1: Child Protection Flowchart .....	44
	Appendix 2: Human Rights Act.....	44

## 1. Statement

*The College recognises that all adults, including governors, teachers and support staff, whether full-time, part-time or temporary, employed or volunteer, have a full and active part to play in protecting our pupils from harm, and that children's welfare is always of paramount concern. The College should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child. In considering abuse, all staff are encouraged to be alert to the fact that "it could happen here".*

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Chairman of Governors:	Alex Russell
Safeguarding Governor:	Mr John Hay
Deputy Safeguarding Governor:	Mrs Tania Botting
Designated Safeguarding Lead:	Mr Chris Filbey 07584 681 276 dsl@epsomcollege.org.uk
Deputy DSLs:	Ms Marisa Bosa (Deputy Head Pastoral), Mr Paul Williams (Second Master), Mr Rod Wycherley (English Dept.), Mrs Leah Skipper (Assistant Head: Lower School), Mr Ed Lance (Assistant Head: Futures and Progressions), Mrs Lynsey Buhagiar (Housemistress Murrell), Mr Nick Russell (Assistant Head: Senior School)
Status & Review Cycle:	Statutory Annual

## 2. Introduction

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Acts 2002, 2006 and 2011, the Human Rights Act 1998, the Equality Act 2010, and in line with government publications: 'Working Together to Safeguard Children' December 2023, 'What to do if You are Worried a Child is Being Abused' 2015, *Prevent Duty Guidance* 2023 and "Information sharing" HM Government July 2023. The guidance reflects 'Keeping Children Safe in Education' DfE September 2023 and associated guidance, Surrey Children's Safeguarding Partnership (SSCP) Child Protection Procedures, and the National Minimum Standards for Boarding Schools.

The Board of Governors takes seriously its responsibility under section 175/157 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within Epsom College, to identify, assess, and support those children who are suffering, or are likely to suffer harm, and to provide support to those with additional needs.

This policy applies to all members of staff and governors at the College.

### 3. Terminology

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

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

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

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

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

**Child(ren)** in this context includes all pupils at Epsom College, including those who may turn 19 during their time at the school; however, the policy will extend to visiting children and pupils from other establishments. Where a pupil is over the age of 18, or turns 19 during their time at the College, we understand that concerns may need to be referred to the Local Safeguarding Adult Board rather than, or in addition to, the Surrey Safeguarding Children's Partnership (SSCP).

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

**(Local Authority) 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 Multiagency Partnership

**C-SPA** refers to the Surrey Children's Single Point of Access for all concerns and services for children living in Surrey, and for consultation by Surrey education establishments.

### 4. Policy Principles and Values

- The welfare of the child is paramount;
- To maintain an attitude of "It could happen here";
- 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 College or in the community, taking into account 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 College will work openly with parents as far as possible, it reserves the right to contact Social Care or the police, without notifying parents if this is believed to be in the child's best interests.

### 5. Policy Aims

- To demonstrate the College's commitment with regard to safeguarding and child protection to pupils, parents and other partners;

- To raise the awareness of all teaching and non-teaching staff of their responsibilities to safeguard children through identifying and reporting possible cases of abuse.
- To enable the College to effectively contribute to Early Help, assessments of need and support for those children;
- To provide robust College systems and procedures that are followed by all members of the school community in cases of suspected abuse;
- To develop and promote effective working relationships with other agencies, in particular Early Help providers, the Police, Health and Social Care;
- To ensure that all staff working within the College who have access to children have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory DBS check (according to KCSIE guidance), and a single central record is kept for audit.
- We comply with the Disqualification under the Childcare Act 2006 guidance issued in August 2018.

## 6. Supporting Children

- We recognise that the College may provide a safe place and the only stability in the lives of children who have been abused or who are at risk of harm;
- We recognise 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;
- We accept that 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;
- The College will support all children;
- We will promote a caring, safe and positive environment within the College;
- We will encourage self-esteem and self-assertiveness, through the curriculum and through positive relationships within the College community;
- We will ensure children are taught to understand and manage risk through personal, social, health and economic education (PSHE – known as Personal and Social Development, or PSD, at the College) and Relationship and Sex Education (RSE) and through all aspects of school life. This includes online safety;
- We will respond sympathetically to any requests for time out to deal with distress and anxiety;
- We offer counselling, details of helplines, or other avenues of external support;
- We will liaise and work in partnership with other support services and agencies involved in Early Help and the safeguarding of children;
- We will notify Social Care immediately if there is a significant concern, and we will monitor progress where a referral has been made using the SSCB Escalation Policy if necessary;
- We will provide continuing support to a child about whom there have been concerns who leaves the school by ensuring that information is shared under confidential cover to the child's new setting and ensure the school medical records are forwarded as a matter of priority and within statutory timescales;

## 7. Prevention/Protection

We recognise that the College 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 College will:

- Establish and maintain an ethos where children feel safe and secure, are encouraged to talk and are always listened to;
- Include regular consultation with children e.g. through questionnaires, surveys, interaction with tutors and other pastoral staff;

- Ensure that all children know there is, and can access, an adult in the College whom they can approach if they are worried or in difficulty;
- Include safeguarding across the curriculum, including PSD, opportunities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help;
- Ensure all staff are aware of, and follow, the College's guidance for expected staff behaviour, including their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.

## **8. Safe College, Safe staff**

We will ensure that:

- The College operates a safer recruitment procedure that includes statutory checks on staff suitability to work with children;
- All staff, at induction, receive information about the College's safeguarding arrangements, the College's Child Protection Policy, Staff Behaviour Policy (Code of Conduct), the Safeguarding Response to Children who are absent from education, the role and names of the Designated Safeguarding Lead and their deputies, and Keeping Children Safe in Education Part One and Annex A – September 2023. They have to sign to say they have read and understood these;
- All staff receive basic awareness safeguarding and child protection training which is regularly updated and receive updates (for example, via email, e-bulletins and at INSET), as required, but at least annually;
- All members of staff are trained in and receive regular updates in online safety and reporting concerns. This also includes an understanding of the expectations, roles and responsibilities in relation to filtering and monitoring;
- All members of staff maintain a zero-tolerance approach to sexual violence and sexual harassment;
- All staff and governors have regular child protection awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse, and governors are made aware of their responsibilities in Part 2 of the statutory guidance Keeping Children Safe in Education;
- All staff will be given a copy of Part 1 and Annex B of Keeping Children Safe in Education 2023 and will sign to say they have read and understood it. This applies to the Governing Body in relation to Annex A of the same guidance.
- The Child Protection Policy is made available via the College website and that parents/carers are made aware of this policy;
- All parents/carers are made aware of the responsibilities of staff members with regard to child protection procedures through the publication of the Child Protection Policy and reference to it on the College's website;
- We provide a coordinated offer of Early Help when additional needs of children are identified and contribute to early help arrangements and inter-agency working and plans;
- Our lettings policy will seek to ensure the suitability of adults working with children on school sites at any time and ensure that any groups who use the school premises have child protection policies and procedures in place;
- Community users organising activities for children are aware of the College's Child Protection Policy, guidelines and procedures;
- The names of the Designated Safeguarding Lead and Deputies are clearly advertised in the College with a statement explaining the College's role in referring and monitoring cases of suspected harm and abuse.

## 9. Roles and Responsibilities

### All College Staff:

All staff have a key role to play in identifying concerns early and in providing help for children. To achieve this they will:

- Provide a safe environment in which children can learn;
- Maintain an attitude of “it could happen here” with regards to safeguarding
- Understand that safeguarding is “everyone’s responsibility”
- Maintain a “zero-tolerance” approach to sexual violence and sexual harassment
- 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 College who they can approach if they are worried or have concerns, as well as having access to the Childline number;
- Ensure 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;
- Only appropriately trained professionals will 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;
- Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff are aware of how these children’s experiences, can impact on their mental health, behaviour and education;
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action will be taken, following our Child Protection Policy and procedures, and reporting to the Designated Safeguarding Lead or a deputy;
- Plan opportunities within the curriculum for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe;
- All staff are responsible for pupils online safety, including understanding the filtering and monitoring processes and the DSLs responsibilities in regards to this;
- Attend training in order to be aware of and alert to the signs of abuse and neglect;
- Know how to respond to a pupil who discloses harm or abuse;
- Record their concerns if they are worried that a child is being abused and report these to the DSL immediately that day. If the DSL is not contactable immediately a Deputy DSL should be informed;
- Be prepared to refer directly to the Children’s Single Point of Access (C-SPA) and the police if appropriate. We understand that we have a pivotal role to play in multi-agency safeguarding arrangements. All staff and governors ensure that the school or college contributes to multi-agency working in line with statutory guidance Working Together to Safeguard Children, if there is a risk of significant harm and the DSL or their Deputy is not available.
- Report low-level concerns (as defined in KCSIE 2023) about any member of staff/supply staff or contractor to the DSL (or deputy) and where a low-level concern is raised about SLT, the DSL, or a Deputy, it will be shared with the Head;
- Follow the allegations procedures (page 14) if the disclosure is an allegation against a member of staff;
- Follow the procedures set out by the Surrey Safeguarding Children’s Partnership and take account of guidance issued by the Department for Education;
- Provide support for children subject to Early Help, Child in Need or Child Protection that is in keeping with their plan;
- Treat information with confidentiality but never promising to “keep a secret”;

- Notify the DSL or their Deputy of any child on a child protection plan or child in need plan who has unexplained absence;
- Have an understanding of early help and be prepared to identify and support children who may benefit from early help;
- Will identify children who may benefit from early help, liaising with the DSL in the first instance (options may include managing support for the child internally via the school's pastoral support process or an early help assessment). In some circumstances it may be appropriate for a member of staff to act as the Lead Professional in early help cases;
- Liaise with other agencies that support pupils and provide early help;
- Know who the DSL and Deputy DSLs are and know how to contact them;
- Have an awareness of the role of the DSL, the College's Child Protection Policy, Behaviour Policy and Staff Code of Conduct, and procedures relating to the safeguarding response for children who are absent from education;
- 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;
- Assist the Governors and Head in fulfilling their safeguarding responsibilities set out in legislation and statutory guidance.

### **The Head:**

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

- The College fully contributes to inter-agency working in line with "Working Together to Safeguard Children" - HM Government 2023 guidance;
- The Child Protection and Safeguarding Policy and procedures are implemented and followed by all staff;
- All staff are aware of the role of the Designated Safeguarding Lead (DSL), including the identity of the DSL and deputies;
- 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 College staff on child welfare and child protection matters, to take part in strategy discussions/meetings and other inter-agency meetings and/or support other staff to do so; and to contribute to the assessment of children;
- That the College 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 staff have an appropriate knowledge of Keeping Children Safe in Education - Part 5 (September 2023);
- That online safety training is included in staff safeguarding and child protection training;
- They have an understand that they have a duty to review the child protection and safeguarding policy, including online safety, annually, and to make sure the procedures and implementation are reviewed regularly;
- 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. And that comprehensive records of all allegations are kept;
- Provide opportunities for a co-ordinated offer of early help when additional needs of children are identified;
- Ensure Deputy DSLs are trained to the same standard as the DSL and the role is explicit in their job description;



- With the DSL, ensure adequate and appropriate cover arrangements are in place for any out of hours/out of term activities;
- Where there is a safeguarding concern that the child's wishes and feelings are taken into account when determining what action to take and what services to provide;
- Child-centred systems and processes are in place for children to express their views and give feedback;
- All staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle-blowing procedures;
- That pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online;
- Ensure that allegations or concerns against staff are dealt with in accordance with guidance from Department for Education (DfE), and the Surrey Safeguarding Children Partnership (SSCP);
- Ensure 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.

### **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 and processes in place) in the College, this responsibility is not able to be delegated;
- Liaise with children's social care, and work in partnership with other agencies through the Surrey Children's Safeguarding Partnership in line with "Working Together to Safeguard Children" - HM Government 2023;
- Make use of the Surrey Schools and Early Years Child Protection Consultation line 0300 470 9100 (option 3) where advice is required regarding making a referral;
- Will manage and submit a referral for a child if there are concerns about suspected harm or abuse, to the Children's Single Point of Access (C-SPA) or relevant referral point for the child's home address, and act as a point of contact and support for college staff. Referrals should be made safe and securely by email to [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk) using the [Request for Support Form](#) (RFS); urgent referrals should be made by telephone 0300 470 9100;
- Report concerns that a pupil may be at risk of radicalisation or involvement in terrorism, following the [Prevent referral process](#) and use the Prevent referral form to refer cases by e-mail to [preventreferrals@surrey.pnn.police.uk](mailto:preventreferrals@surrey.pnn.police.uk). If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101 or 01483 632982 and ask to speak to the Prevent Supervisor for Surrey;
- Will refer cases where a crime may have been committed to the Police as required;
- Will liaise with the "case manager" and Local Authority "Designated Officer" for child protection concerns in cases which concern a member of staff or a volunteer; and refer cases where a person is dismissed or left service due to risk/harm to a child to the Disclosure and Barring Service and Teaching Regulation Agency, as required;
- 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;
- Will follow DfE and KCSIE guidance on 'Child-on-Child Abuse' when a concern is raised that there is an allegation of a pupil abusing another pupil within the school (see pages 23-26);

- Follow KCSIE and DfE guidance contained in Sexual violence and sexual harassment between children in schools and colleges 2021 and be confident as to what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support when required.
- 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 any safeguarding concerns. Appropriate and adequate cover arrangements will be arranged by the DSL and the College leadership for any out of hours/term activities;
- Act as a source of support and expertise in carrying out safeguarding duties for the whole College community;
- Will encourage and promote a culture of listening to children and taking account of their wishes and feelings, amongst all staff;
- Will access training and support to ensure they have the knowledge and skills required to carry out the role. DSL training should be updated at least every two years and their knowledge and skills refreshed at regular intervals;
- Will have a secure working knowledge of SSCP procedures and understands the assessment process for providing early help and statutory intervention, including the local authority levels of need criteria and referral arrangements;
- Will have a clear understanding of access and referral to the local early help offer and will support and advise members of staff where early help intervention is appropriate;
- Will understand and support the College delivery with regards to the requirements of the Prevent Duty and provide advice and guidance to staff on protecting children from radicalisation;
- Will liaise with staff (especially the Housemasters/Housemistresses, the Medical Centre and the Director of Academic Support) on matters of safety and safeguarding and consult the SSCP Levels of Need document to inform decision making and liaison with relevant agencies;
- Will be alert to the specific needs of children in need, those with SEND and young carers;
- Will understand the risks associated with online activity and be confident that they have the up to date knowledge and capability to keep children safe whilst they are online at college; in particular understand the additional risks that children with SEND face online and the associated and appropriate support they require;
- Will keep detailed, accurate records (either written or using appropriate secure online software) that include all concerns about a child even if there is no need to make an immediate referral and the rationale for decisions made and action taken;
- Will ensure that an indication of the existence of the additional child protection file is marked on the pupil college file record;
- Will ensure that when a pupil transfers from the College (including in-year), their child protection file is passed to the new school as soon as possible, and within statutory timescales (separately from the main pupil file and ensuring secure transit) and that confirmation of receipt is received;
- Will ensure that where a pupil transfers school and is on a child protection 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;
- Will ensure that a copy of the Child Protection file is retained until such a time that the new school acknowledges receipt of the original file. The copy should then be securely destroyed, although a decision may be made in complex or ongoing cases for the college to retain its own notes and decisions log confidentially, until that child's 25<sup>th</sup> birthday, lest a request should be made later on for information;
- Will 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;

- Will report to the Head any significant issues for example, use of the [SCSP multi-agency escalation procedures](#), enquiries under section 47 of the Children Act 1989 and police investigations;
- Will ensure that the case holding Social Worker is informed of any child currently with a child protection plan who is absent without explanation;
- Will ensure that all staff sign to say they have read, understood and agree to work within the College's child protection policy, staff behaviour policy (code of conduct) and Keeping Children Safe in Education (KCSIE) Part 1 and annex B and ensure that the policies are used effectively;
- Will organise child protection and safeguarding induction, regularly updated training and a minimum of annual updates (including online safety) for all staff, keep a record of attendance and address any absences;
- Ensure that in collaboration with the College leadership and Governors, the Child Protection Policy is reviewed annually and the procedures and implementation are updated and reviewed regularly;
- Ensure that the Child Protection Policy is available publicly and that parents are aware that referrals about suspected harm and abuse will be made and the role of the College in this;
- Establish and maintain links with the Surrey Safeguarding Children Partnership (SSCP) to make sure staff are aware of training opportunities and the latest policies on local safeguarding arrangements, and engage with the Schools and Education Safeguarding Forum;
- Contribute to and provide, with the Head, the "Audit of Statutory Duties and Associated Responsibilities" to be submitted annually to the Surrey County Council Education Safeguarding Team;
- Ensure that the name of the Designated Safeguarding Lead and deputies, are clearly advertised in the College, with a statement explaining the College's role in referring and monitoring cases of suspected abuse;
- Meet all other responsibilities as set out for DSLs in Keeping Children Safe in Education DfE 2023;
- DSL will hold termly meetings with their deputies to reflect on training, policies, and trends within the College;
- Will attend an annual review of the role with the Head to reflect on safeguarding targets and trends within the College.

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

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

- Be trained to the same standard as the Designated Safeguarding Lead and the role is explicit in their job description;
- Provide support and capacity to the DSL in carrying out delegated activities of the DSL; however, the lead responsibility of the DSL cannot be delegated;
- Attend termly meetings with the DSL to reflect on training, policies, and trends within the College;
- In the absence of the DSL, carries out the activities necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the DSL the deputy will assume all of the functions above.

### **All members of The Governing Body:**

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

- The College has effective safeguarding policies and procedures including a Child Protection Policy, a Staff Behaviour Policy or Code of Conduct, a Behaviour Policy and a response to children who are absent from education. Ensure policies are consistent with Surrey Safeguarding Children Partnership SSCP and

statutory requirements, are reviewed annually and that the Child Protection policy is available on the school website;

- The SSCP is informed in line with local requirements about the discharge of duties via the annual safeguarding audit;
- That the College operates a safer recruitment procedure that includes statutory checks on staff suitability to work with children and disqualification by association regulations and by ensuring that there is at least one person on every recruitment panel who has completed safer recruitment training, if there is not a panel conducting interviews then the individual will have completed the safer recruitment training;
- That at least one member of the governing body has completed safer recruitment training and is updated as required;
- All governors and trustees 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 schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.
- All governors are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements.
- Staff have been trained appropriately and this is updated in line with guidance and all staff have read Keeping Children Safe in Education (2023) Part 1 and Annex B, and that mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance;
- That all staff, including temporary staff and volunteers, are provided with Keeping Children Safe in Education (2023) Part 1, the College's Child Protection policy, the Staff Code of Conduct policy, the role and identity of the DSL (and deputies) and the safeguarding response to children who are absent from education and the Behaviour Policy;
- That the College has procedures for dealing with allegations of abuse against staff (including the Head), volunteers and against other children and that a referral is made to the DBS and/or the Teaching Regulation Agency (as applicable) if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have had they not resigned;
- Policies and processes are in place to deal with concerns (including allegations) which do not meet the harm threshold or "low level concerns" as defined in KCSIE 2023;
- That a nominated Governor for safeguarding is identified;
- That a member of the Senior Leadership Team has been appointed by the Head as the Designated Safeguarding Lead (DSL) who will take lead responsibility for safeguarding and child protection and that the role is explicit in the role holder's job description;
- That on appointment, the DSL and deputy(s) undertake interagency training (SCP Foundation Modules 1&2 and DSL New to Role) and also undertake DSL training updated every two years;
- That children are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through personal, social, health and economic education (PSHE – or PSD) and relationship and sex education (RSE);
- That the College will comply with DfE and Surrey County Council [Children Missing Education](#) requirements;
- The College will comply with regular data returns requested by the Local Authority, regarding all children, of statutory school age, attending alternative provision and/or on a reduced or modified timetable;
- Make sure that the school has appropriate filtering and monitoring systems in place and review their effectiveness
- Review the DfE's filtering and monitoring standards, and discuss with IT staff and service providers about what needs to be done to support the school to meet these standards

- Make sure the DSL takes lead responsibility for understanding the filtering and monitoring systems in place as part of their role
- Make sure that all staff undergo safeguarding and child protection training, including online safety and that such training is regularly updated and is in line with advice from the safeguarding partners
- Make sure staff understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training. Ensure that safeguarding and child protection files are maintained as set out in KCSE 2023 Annex C
- 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. The Governors will ensure they have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems;
- Enhanced DBS checks (without barred list checks, unless the governor is also a volunteer at the school) are in place for all Governors;
- That any weaknesses in Safeguarding are remedied immediately.

## 10. Confidentiality and Sharing Information

All matters relating to child protection will be treated as confidential and only shared as per HM Government guidance Information Sharing July 2023.

Information will be shared with staff within the College who ‘need to know’. Relevant staff have due regard to Data Protection principles which allow them to share (and withhold) information.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that **“the GDPR General Data Protection Regulations and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe”**. There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.

All staff must be aware that they cannot promise a child to keep secrets which might compromise the child’s safety or wellbeing. However, staff are aware that matters relating to child protection and safeguarding are personal to children and families, in this respect they are confidential and the Head or DSLs will only disclose information about a child to other members of staff on a need to know basis.

All staff will always undertake to share our intention to refer a child to Social Care with their parents/carers unless to do so could put the child at greater risk of harm or impede a criminal investigation.

## 11. Child Protection Procedures

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

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

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

### Action to be taken when abuse is suspected:

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

1. Make an initial record of the information related to the concern;
2. Report it to the DSL immediately;
3. The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available;
4. Make an accurate record (which may be used in any subsequent court proceedings) as soon as possible and within 24 hours of the occurrence, of all that has happened, including details of:
  - Dates and times of their observations
  - Dates and times of any discussions in which they were involved.
  - Any injuries
  - Explanations given by the child / adult
  - Rationale for decision making and action taken
  - Any actual words or phrases used by the child
5. The records must be signed and dated by the author or / equivalent on electronic based records;
6. In the absence of the DSL or their Deputy, staff must be prepared to refer directly to C-SPA (and the police if appropriate) if there is the potential for immediate significant harm.

**Following a report of concerns the DSL must:**

1. [Using the Surrey Levels of Need guidance](#), decide whether or not there are sufficient grounds for suspecting significant harm, in which case a referral must be made to the C-SPA and the police if it is appropriate;
2. Normally the College should try to discuss any concerns about a child's welfare with the family and where possible to seek their agreement before making a referral to the C-SPA. However, this should only be done when it will not place the child at increased risk or could impact a police investigation. The child's views should also be taken into account.

If there are grounds to suspect a child is suffering, or is likely to suffer, significant harm or abuse the DSL must contact the C-SPA, (or relevant referral point for the child's home address) by sending a [Request for Support Form \(RSF\)](#) by email to: [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk) or contact the C-SPA on 0300 470 9100. If a child is in immediate danger and urgent protective action is required, the Police (dial 999) must be called. The DSL must also notify C-SPA of the occurrence and what action has been taken;

3. If the DSL feels unsure about whether a referral is necessary they can choose the Schools and Early Years Child Protection Consultation Line option on 0300 470 9100 to discuss concerns;
4. If there is not a risk of significant harm, the DSL will either actively monitor the situation or consider Early Help;
5. Where there are doubts or reservations about involving the child's family, the DSL should clarify with the consultation line, C-SPA or the police whether the parents should be told about the referral and, if so, when and by whom. This is important in cases where the police may need to conduct a criminal investigation;
6. When a pupil is in need of urgent medical attention and there is suspicion of abuse the DSL or their Deputy should take the child to the accident and emergency unit at the nearest hospital, having first notified the C-SPA. The DSL should seek advice about what action the C-SPA will take and about informing the parents, remembering that parents should normally be informed that a child requires urgent hospital attention;
7. The exception to this process will be in those cases of known FGM where there is a mandatory requirement for the teacher to report directly to the police. The DSL should also be made aware.

## **12. Dealing with disclosures**

### **All staff**

It is important to remember that victims of abuse generally do not tell, and staff must be alert to behaviour changes, or information or gossip from other peers or other sources suggesting harm.

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

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

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

### **Guiding principles, the seven R's**

#### **Receive**

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

#### **Reassure**

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

#### **Respond**

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

#### **Report**

- Share concerns with the DSL immediately;
- If you are not able to contact your DSL or a Deputy DSL, and the child is at risk of immediate harm, contact the SPA or Police, as appropriate directly;
- If you are dissatisfied with the level of response you receive following your concerns, you should press for re-consideration;

## **Record**

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

## **Remember**

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

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

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

## **What happens next?**

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

If they have concerns that the disclosure has not been acted upon appropriately they might inform the Head or Safeguarding Governor of the College, may contact the C-SPA or use the whistleblowing Helpline (see P36).

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

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

See Appendix 1: Child Protection Procedures Flowchart for more information.

## **13. Safeguarding concerns and Allegations against Adults Working with Children**

### **Procedure:**

This procedure should be used in all cases in which it is alleged a member of staff, including supply staff, or volunteer in a school, or another adult who works with children has:

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



- *behaved or been involved in an incident outside of a setting which did not involve children but could impact on their suitability to work with children*

In dealing with allegations or concerns against an adult, staff must:

- Report any concerns about the conduct of any member of staff or volunteer to the Head immediately;
- If an allegation is made against the Head, the concerns need to be raised with the Chair of Governors as soon as possible (without informing the Head). If the Chair of Governors is not available, then the LADO should be contacted directly;
- There may be situations when the Head or Chair of Governors 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 Head or Chair of Governors they will contact the LADO on 0300 123 1650 option 3 *LADO*  
Email: [LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk) immediately and before taking any action or investigation;
- Following consultation with the LADO inform the parents of the allegation unless there is a good reason not to.
- If an allegation is made about agency supply staff then the school will inform the agency of these concerns. Agencies will be fully involved and co-operate with any enquiries from the LADO, police and/or children's social care

In liaison with the LADO, the College will determine how to proceed and if necessary the LADO will refer the matter to Children's Social Care and/or the police.

If the matter is investigated internally, the LADO will advise the College to follow the procedures set out in Part 4 of 'Keeping Children Safe in Education' (2023) and the SSCP procedures.

In particular, if a member of staff is subsequently dismissed/removed (or would have been) then a referral to the DBS will be made. In the case of a member of teaching staff, the matter will be referred to the TRA (Teaching Regulation Agency) to consider prohibition from teaching.

#### **14. Low Level Concerns**

The safety and wellbeing of children at the College is dependent on the vigilance of all staff and their prompt communication to the DSL, a Deputy DSL or the Head of any concerns, no matter how small, about any conduct by an adult which causes them to doubt that adult's suitability to work with, or have access to, children. All references in this section to "adult" should be interpreted as meaning any adult and any visitor, unless otherwise stated. The College is conscious of its duty of care to pupils and will always act, including if alerted to the possibility of abuse arising from situations or persons outside the school setting.

The notification and prompt handling of all concerns about adults is fundamental to safeguarding children. It helps to identify and prevent abuse and to protect adults against misunderstandings or misinterpretations. It also encourages openness, trust and transparency and it clarifies expected behaviours. Those raising concerns or reporting allegations in good faith will always be supported, and adults in respect of whom concerns or allegations have been raised will not suffer any detriment unless the concern or allegation is found to be substantiated.

**Epsom College actively encourages staff to speak out. If a member of staff is concerned about the behaviour or actions of any adult, speak to the DSL, a Deputy DSL or the Head**

#### **Code of Conduct**

All staff must behave responsibly and professionally in all dealings with children, and specifically with pupils for whom they have a duty of care. All staff must follow the procedures set out in the College's 'Code of Conduct for All Staff'. Staff should always avoid behaviour that could be misinterpreted by others. As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Staff should note that it is an offence for a person aged 18 or over and in a position of trust to touch a child in a sexual way or have a sexual relationship with a child, even if the relationship is consensual. A position of trust could arise even if the member of staff does not teach the child.

### **Epsom College's Low-Level Concern Policy**

The overarching aim of the College's Low-Level Concern Policy is to facilitate a culture in which the clear values and expected behaviours which are set out in the College's Code of Conduct for All Staff are adhered to, constantly monitored, and reinforced by all staff. In particular, the intention of this policy is to:

- maintain a culture of openness, trust and transparency in which staff are confident and clear about expected behaviours of themselves and their colleagues, the delineation of boundaries and reporting lines;
- ensure staff feel empowered to raise any low-level concern, whether about their own or a colleague's behaviour, where that behaviour might be construed as falling short of the standards set out in the College's Code of Conduct for All Staff; and
- provide for responsive, sensitive and proportionate handling of such concerns when they are raised – maintaining on the one hand confidence that concerns when raised will be handled promptly and effectively whilst, on the other hand, protecting staff from false allegations or misunderstandings.

### **What is a Low-Level Concern?**

A low-level concern is any concern, no matter how small and even if no more than a 'nagging doubt', that an adult may have acted in a manner inconsistent with the College's Code of Conduct for All Staff, or simply, even if not linked to a particular act or omission, a sense of unease as to the adult's behaviour particularly towards or around children.

<b>Low level concerns about self</b>	<b>Low level concerns about another adult</b>
<p>From time to time, an individual may find themselves in a situation which might appear compromising to others or which could be misconstrued. Equally, an individual may for whatever reason have behaved in a manner which on reflection they consider falls below the standard set out in the Code of Conduct for All Staff.</p> <p>Self-reporting in these circumstances is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived. As such, the College sees self-reporting of low-level concerns as an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.</p>	<p>From time to time, an individual may notice behaviour or actions in others which leave them concerned. These are behaviour or actions which fall short of a formal allegation of abuse. These tend to be behaviours which indicate that the College's Code of Conduct for All Staff has not been met.</p> <p>Any such concerns can be dealt with as a Low-Level Concern.</p>

### **What should a member of staff do if they have one?**

Where a low-level concern exists it should be reported to the DSL, a Deputy DSL or to the Head as soon as reasonably possible and, in any event, within 24 hours of becoming aware of it (where the concern relates to a particular incident). If the concern is about the DSL or SLT this should be reported directly to the Head, if the concern is about the Head it should be reported to the Chairman of Governors via the Secretary to Council (Emma Winfield).

### **How will the low-level concern be handled?**

The Deputy DSLs report all low level concerns to the DSL, who in turn will discuss all low level concerns they receive with the Head as soon as possible, and in any event within 24 hours of becoming aware of it. The Head will, in the first instance, be satisfied that it is a low-level concern and should not be reclassified as an *allegation* and dealt with under the appropriate procedure. The circumstances in which a low-level concern might be reclassified as an allegation are where:

- a) the threshold is met for an allegation
- b) there is a pattern of low-level concerns which collectively amount to an allegation, or
- c) there is other information which when taken into account leads to an allegation.

Where the Head is in any doubt whatsoever, external advice will be sought, if necessary on a no-names basis.

Having established that the concern is low-level, the DSL will discuss it with the individual who has raised it and will take any other steps to investigate it as necessary. Most low-level concerns by their very nature are likely to be minor and will be dealt with by means of management guidance, training etc.

### **What records will be kept?**

Where a low-level concern has been communicated, a confidential record will be kept in a central file which logs all low-level concerns. This is necessary to enable any patterns to be identified. However, no record will be made of the concern on the individual's personnel file (and no mention made in job references) unless either:

- a) the concern (or group of concerns) has been reclassified as an allegation as above; or
- b) the concern (or group of concerns) is sufficiently serious to result in formal action under the school's grievance, capability or disciplinary procedure.

### **How will this be reviewed?**

The low-level concerns file will be reviewed termly in the safeguarding committee, a redacted copy will be used to identify any patterns in behaviour.

## **15. What is Child Abuse?**

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

### **What is abuse and neglect?**

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or by another child or children.

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

- **Emotional abuse** - The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development.

It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children.

These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another.

It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

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

The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse by other children is a specific safeguarding issue in education

- **Neglect** - Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

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

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate care-givers)
- ensure access to appropriate medical care or treatment.

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

[The SPC Neglect Strategy](#) and the [Neglect Risk Assessment Tool](#) is available to provide a more detailed information regarding neglect.

## 16. Indicators of Abuse – Neglect:

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

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

Neglect can include parents or carers failing to:

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

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

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

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

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

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

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

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

Physical indicators of neglect:

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

Behavioural indicators of neglect:

- Constant tiredness
- Frequent absence from school or lateness
- Missing medical appointments

- Isolated among peers
- Frequently unsupervised
- Stealing or scavenging, especially food
- Destructive tendencies.

### **17. Indicators of Abuse – Emotional Abuse:**

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

- Emotional abuse is difficult to define, identify/recognise and/or prove.
- Emotional abuse is chronic and cumulative and has a long-term impact.
- All kinds of abuse and neglect have emotional effects although emotional abuse can occur by itself.
- Children can be harmed by witnessing someone harming another person – as in domestic abuse.
- Most harm is produced in low warmth, high criticism homes, not from single incidents.

### **18. Indicators of Abuse – Physical Abuse:**

Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly, it is not necessary to be concerned about most of these minor injuries. But accidental injuries normally occur on the *bony prominences* – e.g. knees, shins.

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

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

In the context of the College, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when:

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

### **19. Indicators of Abuse – Sexual Abuse:**

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

Sexual exploitation is seen as a separate category of sexual abuse. The [SSCP professional guidance](#) provides school staff with information regarding indicators of CSE (further information about CSE is available on Page 31).

Characteristics of child sexual abuse:

- it is often planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic;

- grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent (this may occur online);
- grooming the child’s environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives.

Most people who sexually abuse children are men, but some women sexually abuse too.

## **20. Sexual Violence and Sexual Harassment between Children in Schools – Child-on-Child Abuse:**

Safeguarding issues can manifest themselves via child on child abuse.

### **Policy**

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

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

We are clear that abuse is abuse, should never be tolerated or passed off as ‘banter’, ‘just having a laugh’ or ‘part of growing up’.

We recognise that it is more likely that girls will be victims and boys perpetrators, that those with learning difficulties, those who identify as part of the LGBT community, or who are thought by others to do so even if they are not, may be particularly vulnerable.

We recognise the different forms child on child abuse can take, such as: sexual violence and sexual harassment, physical abuse, sexting, initiation/hazing type violence and rituals.

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

### **Prevention**

The College aims to reduce the likelihood of child-on-child abuse through providing training to staff to promote:

- The established values and ethos of respect, friendship, courtesy and kindness;
- High expectations of behaviour;
- Clear consequences for unacceptable behaviour;
- Providing a developmentally appropriate PSD (i.e. PSHE) curriculum which tackles issues such as: healthy and respectful relationships, respectful behaviour and consent, gender roles, stereotyping, equality, body confidence and self-esteem, prejudiced behaviour; teaches that sexual violence and sexual harassment is always wrong, and addresses cultures of sexual harassment;
- Systems for pupils to raise concerns with staff, knowing they will be listened to, valued and believed;
- Robust risk assessments and providing targeted work for pupils identified as being a potential risk to other pupils and those identified as being at risk.

Research indicates that young people rarely disclose child-on-child abuse and that if they do, it is likely to be to their friends. Therefore, the College will also educate pupils in how to support their friends if they are concerned about them, that they should talk to a trusted adult in the school and what services they can contact for further advice.

The College will engage with specialist support and interventions where necessary.

## **Sexual Violence and Sexual Harassment between Children in Schools:**

### **Context**

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

*'Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, 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 taken seriously and offered appropriate support.'*<sup>1</sup>

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 College staff are supported and protected as appropriate.

### **Responding to reports of sexual violence and sexual harassment**

- Children making a report of sexual violence or sexual harassment, including “upskirting” (The Voyeurism 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: advice for schools (DfE July 2022) guidance.
- Staff taking the report will inform the DSL or a Deputy DSL immediately.
- Staff taking a report will never promise confidentiality.
- Parents or carers should usually be informed (unless this would put the child at greater risk).
- If a child is at risk of harm, is in immediate danger, or has been harmed, a referral (RSF) will be made to the C-SPA email: [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk) or telephone 0300 470 9100, as appropriate.

### **Risk Assessment:**

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

- The victim, especially their protection and support.
- The alleged perpetrator, their support needs and any discipline action.
- All other children at the College.
- 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 College’s approach to supporting and protecting pupils.

Support regarding risk assessments can be accessed from the SCC [Education Safeguarding Team](mailto:education.safeguarding@surreycc.gov.uk) – [education.safeguarding@surreycc.gov.uk](mailto:education.safeguarding@surreycc.gov.uk), and/or ACT

### **Action: 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
- Ongoing risks
- Other related issues or wider context.

### **The DSL will follow any of these options as appropriate:**

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<sup>1</sup> Sexual violence and sexual harassment between children in schools and colleges DfE 2021



- Manage internally
- Early Help intervention
- Refer to C-SPA
- Report to the police (generally in parallel with a referral to C-SPA).

### **Ongoing Response:**

The DSL will manage each case individually and will ensure the risk assessment is reviewed regularly with relevant partner agencies, for example the Police and Children's Social Care.

Where 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 College premises and on transport where appropriate.

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the College 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 (gross misconduct) and may lead to the view that allowing the perpetrator to remain at the College would seriously harm the education or welfare of the victim (and potentially themselves and other pupils).

Where a criminal investigation into sexual assault leads to a conviction or caution, the College will, if it has not already, consider any suitable sanctions in light of the Behaviour Policy, which may include consideration of permanent exclusion. Where the perpetrator is going to remain at the College, the Head should continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on College 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 affected children and adults will receive appropriate support and safeguards on a case-by-case basis.

The College will take any disciplinary action against the alleged perpetrator in accordance with the Behaviour Policy.

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

### **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 pupils to pupils 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.

### **NSPCC Helpline**

A new helpline number: 0800 136 663, run by the NSPCC, went live on 1 April, 2021 to support potential victims of sexual harassment and abuse in education settings. This aims to provide both children and adults who are victims of sexual abuse in schools with the appropriate support and advice, including on how to contact the police and report crimes if they wish. The helpline also provides support to parents and professionals.

This number is posted in all Houses and the Lower School in the information titled "Contact details for Independent people and agencies.....".

References:

[DfE Keeping Children Safe in Education 2023](#)

## **21. Child on Child Abuse**

The Governors, the Senior Leadership Team, and all staff (which term shall apply to all volunteer staff members) at Epsom College are committed to the prevention, early identification, and appropriate management of child-on-child abuse (as defined below) both within and beyond the College.

### **Protection of Pupils**

In particular, the College believes that in order to protect children, all schools should:

- be aware of the nature and level of risk to which their students are or may be exposed, and put in place a clear and comprehensive strategy which is tailored to their specific safeguarding context; and
- take a whole-school community Contextual Safeguarding approach to preventing and responding to child-on-child abuse.
- Regard the introduction of this policy as a preventative measure. The College does not feel it is acceptable merely to take a reactive approach to child-on-child abuse in response to alleged incidents of it; and
- believe that in order to tackle child-on-child abuse proactively, it is necessary to focus on all four of the following areas:
  - i. systems and structures;
  - ii. prevention;
  - iii. identification; and
  - iv. response/intervention,

### **Strategy and Application**

This policy sets out the College's strategy for improving prevention and identifying and appropriately managing child-on-child abuse. It is the product of a comprehensive consultation — which has involved students, staff and parents, and a risk assessment.

The policy applies to all Governors, the Senior Leadership Team, and staff. It is reviewed annually, and updated in the interim, as may be required, to ensure that it continually addresses the risks to which students are or may be exposed. A number of staff and students are involved in each annual review which involves, and is informed by, an assessment of the impact and effectiveness of this policy over the previous year.

This policy recognises that abuse is abuse, and should never be passed off as 'banter', 'just having a laugh', or 'part of growing up', - is compliant with the statutory guidance on child-on-child abuse as set out in Keeping Children Safe in Education (September 2020),"

The school does not use the term 'victim' and/or 'perpetrator'. This is because the College takes a safeguarding approach to all individuals involved in concerns or allegations about child-on-child abuse, including those who are alleged to have been abused, and those who are alleged to have abused their peers, in addition to any sanctioning work that may also be required for the latter. Research has shown that many children who present with harmful behaviour towards others, in the context of child-on-child abuse, are themselves vulnerable and may have been victimised by peers, parents or adults in the community prior to their abuse of peers.

### **Understanding Child-on-Child Abuse**

Peer abuse is behaviour by an individual or group, intending to physically, sexually or emotionally cause hurt to others. All staff should recognise that children are capable of abusing their peers. Child-on-child abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children and within children's relationships (both intimate and non-intimate), friendships and wider peer associations.

Child-on-child abuse can take various forms, including but not limited to:

- Serious bullying (including online bullying);

- Relationship abuse
- Domestic violence and abuse
- Child sexual exploitation,
- Youth and serious youth violence
- Harmful sexual behaviour, and/or
- Prejudice-based violence, including but not limited to, gender-based violence.

Examples of online child-on-child abuse would include sexting, online abuse, child-on-child grooming, the distribution of youth involved sexualised content and harassment.

Stopping violence and ensuring immediate physical safety is the first priority of any education setting, but emotional bullying can sometimes be more damaging than physical. College staff, alongside the Designated Safeguarding Lead and/or Deputy Designated Safeguarding Leads, have to make their own judgements about each specific case and should use this policy guidance to help.

## Responsibility

Keeping Children Safe in Education (KCSIE), 2023 states that

*‘Governing bodies and proprietors should ensure their child protection policy includes procedures to minimise the risk of child on child abuse and sets out how allegations of child-on-child abuse will be recorded, investigated, and dealt with’.*

It also emphasises that the voice of the child must be heard

*‘Governing bodies, proprietors and school or college leaders should ensure the child’s wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place, and they should be well promoted, easily understood and easily accessible for children to confidently report, any form of abuse or neglect, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.’*

At Epsom College we continue to ensure that any form of abuse or harmful behaviour is dealt with immediately and consistently to reduce the extent of harm to the young person, with full consideration to the impact on that individual child’s emotional and mental health and well-being.

## Contextual Safeguarding

This policy encapsulates a Contextual Safeguarding approach, which is about changing the way that professionals approach child protection when risks occur outside of the family, thereby requiring all those within a Local Safeguarding Partnership to consider how they work alongside, rather than just refer into, children’s social care, to create safe spaces for children.

The College has adopted a whole-school community Contextual Safeguarding approach, which means:

- being aware of and seeking to understand the impact that these wider social contexts may be having on the College’s students,
- creating a safe culture in the College by, for example, implementing policies and procedures that address child-on-child abuse and harmful attitudes; promoting healthy relationships and attitudes to gender/ sexuality; training on potential bias and stereotyped assumptions,
- being alert to and monitoring changes in students’ behaviour and/or attendance, and

- contributing to local child protection agendas by, for example, challenging poor threshold decisions and referring concerns about contexts to relevant local agencies.

## **Abuse and Harmful Behaviour**

It is necessary to consider

- what abuse is and what it looks like
- how it can be managed
- what appropriate support and intervention can be put in place to meet the needs of the individual
- what preventative strategies may be put in place to reduce further risk of harm.

Abuse is abuse and should never be tolerated or passed off as ‘banter’ or ‘part of growing up’. It is important to consider the forms abuse may take and the subsequent actions required.

- Children are vulnerable to abuse by their peers. Such abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures.
- Children can abuse other children. This can include (but is not limited to): abuse within intimate partner relationships; bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiation/hazing type violence and rituals. (KCSIE 2023)
- Staff should not dismiss abusive behaviour as normal between young people and should not develop high thresholds before taking action.
- Staff should be aware of the potential uses of information technology for bullying and abusive behaviour between young people.
- Child-on-child abuse may affect boys differently from girls, and this difference may result from societal norms (particularly around power, control and the way in which femininity and masculinity are constructed) rather than biological make-up. Barriers to disclose will also be different. The College recognises this and will seek to explore gender dynamics of any child-on-child abuse within the College setting.
- Staff should be aware of the added vulnerability of children and young people who have been the victims of violent crime (for example mugging), including the risk that they may respond to this by abusing younger or weaker children.
- Staff should also be aware that children with Special Educational Needs and/or Disabilities (SEND) are more likely to be abused than their peers without SEND, and additional barriers can sometimes exist when recognising abuse in children with SEND. These can include assumptions that indicators of possible abuse such as behaviour, mood and injury relate to a child’s disability without further exploration, the potential for children with SEND to be disproportionately impacted by behaviours such as bullying and harassment without outwardly showing any signs, communication barriers and difficulties and overcoming these barriers. Details of children with SEND are available from the SEND Register issued by the Academic Support Department.
- Some children may be more likely to experience child-on-child abuse than others as a result of certain characteristics such as sexual orientation, ethnicity, race or religious belief.

## **Recognising peer/child abuse**

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

When dealing with other alleged behaviour which involves reports of, for example, emotional and/or physical abuse, staff should consider where the alleged behaviour falls on a spectrum and to decide how best to respond. This could include, for example, whether it:

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

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

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

### **General principles**

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

Any response should:

- include a thorough investigation of the concern(s) or allegation(s), and the wider context in which it/they may have occurred (as appropriate) – depending on the nature and seriousness of the alleged incident(s), it may be appropriate for the police and/or children’s social care to carry out this investigation,
- treat all children involved as being at potential risk while the child allegedly responsible for the abuse may pose a significant risk of harm to other children, they may also have considerable unmet needs and be at risk of harm themselves. The College should ensure that a safeguarding response is in place for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it, and additional sanctioning work may be required for the latter,
- take into account:
  - that the abuse may indicate wider safeguarding concerns for any of the children involved, and consider and address the effect of wider sociocultural contexts – such as the child’s/ children’s peer group (both within and outside the College); family; the College environment; their experience(s) of crime and victimisation in the local community; and the child/children’s online presence. Consider what changes may need to be made to these contexts to address the child/ children’s needs and to mitigate risk, and
  - the potential complexity of child-on-child abuse and of children’s experiences, and consider the interplay between power, choice and consent. While children may appear to be making choices, if those choices are limited they are not consenting,

- the views of the child/children affected. Unless it is considered unsafe to do so (for example, where a referral needs to be made immediately), the DSL should discuss the proposed action with the child/children and their parents, and obtain consent to any referral before it is made. The College should manage the child/children's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so. It is particularly important to take into account the wishes of any child who has allegedly been abused, and to give that child as much control as is reasonably possible over decisions regarding how any investigation will be progressed and how they will be supported.

## **Information sharing, data protection and record keeping**

When responding to concern(s) or allegation(s) of child-on-child abuse, the College will:

- Always consider carefully, in consultation with children's social care, the police and other relevant agencies (where they are involved), how to share information about the concern(s) or allegation(s) with the student(s) affected, their parents, staff, and other students and individuals,
- Record the information that is necessary for the College and other relevant agencies (where they are involved) to respond to the concern(s) or allegation(s) and safeguard everyone involved,
- Keep a record of the legal purpose for sharing the information with any third party, including relevant authorities, and ensure that the third party has agreed to handle the information securely and to only use it for the agreed legal purpose, and
- Be mindful of and act in accordance with its safeguarding and data protection duties, including those set out in Working Together to Safeguard Children (December 2023) and the HM Government advice on Information Sharing (updated in July 2023).

## **Disciplinary action**

The College may wish to consider whether disciplinary action may be appropriate for any child/children involved. However, if there are police proceedings underway, or there could be, it is critical that the College works in partnership with the police and/or children's social care.

Where a matter is not of interest to the police and/ or children's social care, the College may still need to consider what is the most appropriate action to take to ensure positive behaviour management. Disciplinary action may sometimes be appropriate, including to:

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

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

## 22. Anti-Bullying/Cyberbullying

The College's policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. This includes homophobic and gender-related bullying and, indeed, all other relevant protected characteristics under the UK Equality Act 2010.

A record of known bullying incidents is logged in CPOMS which is shared with, and analysed by, the Safeguarding, Educational & Pastoral Committee of the Board of Governors. All staff are aware that children with SEND and/or children who identify as Lesbian, Gay, Bisexual or Transgender (LGBT) are more susceptible to being bullied/victims of child abuse.

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

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 Head and the DSL will also consider child protection procedures.

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

**'Cyberbullying'**: the use of electronic communications technologies (such as e-mail, mobile phone and text messaging, digital photography, instant messaging, personal websites, chat rooms, blogs and social networking sites) to harass, intimidate, insult, abuse, embarrass or otherwise harm or cause distress to others. As with all other forms of bullying, cyberbullying is regarded by the College as totally unacceptable.

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

## 23. Online Safety

The College has an online safety policy (Pupils' Use of ICT, Mobile Phones and other Electronic Equipment) which explains how we try to keep pupils safe in school and how we respond to online safety incidents.

Children increasingly use electronic equipment on a daily basis to access the internet, share and view content and images via social media sites such as Tik Tok, Facebook, twitter, Instagram, snapchat, and for online gaming.

Some adults and other children use these technologies to harm children. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing children to engage in extremist or sexual behaviour such as webcam photography or face-to-face meetings.

Pupils may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders.

Pupils are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated. The College's E-safety Officer is Ms Marisa Bosa.

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

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

## Remote Education

The college will be in regular contact with parents/carers. These communications will be used to reinforce the importance of children being safe online and parents/carers are likely to find it helpful to understand what systems the College uses to filter and monitor online use.

The College will ensure that parents/carers are aware of what their children are being asked to do online, including the sites they will be asked to access and we will be clear about who from the College their child is going to be interacting with online.

## **24. Racist Incidents**

Our policy on racist incidents is set out separately within the Anti-Bullying Policy 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 on CPOMS and this is reported to the Safeguarding, Educational and Pastoral meetings annually.

## **25. Radicalisation and Extremism**

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

Extremism is defined as:

*A vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.*

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

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

The College 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.

The College seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

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

Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and the school follows the [DfE advice Promoting Fundamental British Values as part of SMSC \(spiritual, moral, social and cultural education\) in Schools \(2014\)](#).

The Governors, Head and the Designated Safeguarding Lead (DSL) will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessments will include, the use of school premises by external agencies, the Anti-bullying Policy and other issues specific to the College's profile.

When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL in the first instance.



They should then follow the safeguarding procedures and refer cases by e-mail to [preventreferrals@surrey.pnn.police.uk](mailto:preventreferrals@surrey.pnn.police.uk) following the Prevent referral process and use the Prevent referral form. If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101 or 01483 632982 and ask to speak to the Prevent Supervisor for Surrey.

The Department of Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).

### **Indicators of vulnerability to radicalisation**

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

Extremism is defined by the Crown Prosecution Service as:

*The demonstration of unacceptable behaviour by using any means or medium to express views which:*

- *Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;*
- *Seek to provoke others to terrorist acts;*
- *Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or*
- *Foster hatred which might lead to inter-community violence in the UK.*

There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.

Indicators of vulnerability include:

- Identity Crisis – the student / pupil is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
- Personal Crisis – the student / pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
- Personal Circumstances – migration; local community tensions; and events affecting the student / pupil’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
- Unmet Aspirations – the pupil may have perceptions of injustice or a feeling of failure;
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration;
- Special Educational Needs and Disability – pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

More critical risk factors could include:

- Being in contact with extremist recruiters;
- Accessing violent extremist websites, especially those with a social networking element;

- Possessing or accessing violent extremist literature;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Justifying the use of violence to solve societal issues;
- Joining or seeking to join extremist organisations; and
- Significant changes to appearance and / or behaviour;
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

The Department of Education guidance [The Prevent Duty](#) can be accessed via this link.

## 26. Domestic Abuse

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

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

We use the term domestic abuse to reflect that a number of abusive and controlling behaviours are involved beyond violence. Slapping, punching, kicking, bruising, rape, ridicule, constant criticism, threats, manipulation, sleep deprivation, social isolation, and other controlling behaviours all count as abuse.

Living in a home where domestic abuse takes place is harmful to children and can have a serious impact on their behaviour, wellbeing and understanding of healthy, positive relationships. Children who witness domestic abuse are at risk of significant harm and staff are alert to the signs and symptoms of a child suffering or witnessing domestic abuse.

The College is enrolled onto the Operation Encompass scheme, a joint project between Surrey Police, Surrey County Council, Surrey Domestic Abuse Service and Surrey Schools, where every school day morning our DSL is notified of all domestic abuse incidents that have occurred and been reported to Police in the previous 24 hours which involved a child at this school (72 hours on a Monday morning). This provides an opportunity for us to ensure the right support is in place at the right time for children who are experiencing domestic abuse.

## 27. Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of **child sexual abuse**.

It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity

- in exchange for something the victim needs or wants, and/or
- for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual.

Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. All staff are aware of the link between online safety and vulnerability to CSE.

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

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

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

The DSL will complete the Surrey Safeguarding Children Partnership [CSE Screening Tool](#) alongside staff who know the child well on all occasions when there is a concern that a child is being, or is at risk of, being sexually exploited or where indicators have been observed that are consistent with a child who is being or who is at risk of being sexually exploited.

In all cases if the tool identifies any level of concern (green, amber or red) the DSL should contact the C-SPA and email the completed CSE Screening Tool along with a Request for Support form. If a child is in immediate danger the police should be called on 999.

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

## **28. Child Criminal Exploitation & Gangs**

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity.

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

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

The risk or potential risk of harm to the child may be as a victim, a gang member or both - in relation to their peers or to a gang-involved adult in their household. Teenagers can be particularly vulnerable to recruitment into gangs and involvement in gang violence. This vulnerability may be exacerbated by risk factors in an individual's background, including violence in the family, involvement of siblings in gangs, poor educational attainment, or poverty or mental health problems.

Criminal exploitation of children is a typical feature of **County Lines** criminal activity. Key identifying features of involvement in county lines are when children are missing, when the victim may have been trafficked for

transporting drugs, a referral to the National Referral Mechanism should be considered with Children's Social Care and Police colleagues.

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

Any concerns that a child is being or is at risk of being criminally exploited will be passed without delay to the DSL. The College 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 college and make reasonable enquiries with the child and parents to assess this risk.

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

## 29. Sharing nudes and Semi-Nudes:

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

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

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

All incidents of this nature should be treated as a safeguarding concern and in line with the UKCCIS guidance

[Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)

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

If a member of staff becomes aware of an incident involving youth produced sexual imagery they should follow the child protection procedures and refer to the DSL immediately.

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

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

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

At any point in the process if there is concern a young person has been harmed or is at risk of harm a referral should be made to the C-SPA or the Police as appropriate.

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

- The incident involves an adult;

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

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

During the decision making the DSL will consider if:

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

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

The DSL will record all incidents of youth produced sexual imagery, including the actions taken, rationale for actions and the outcome.

### **30. Female Genital Mutilation (FGM)**

Female Genital Mutilation (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 'known' cases of FGM in under 18s](#), which are identified in the course of their professional work, to the police.

The duty applies to all persons in the College who are employed or engaged to carry out 'teaching work' in the school, 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.

If a teacher is informed by a girl under 18 that an act of FGM has been carried out on her or a teacher observes 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 the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth, the teacher should personally make a report to the police force in which the girl resides by calling 101. The report should be made immediately.

College 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 College's child protection procedures. Staff should be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer holiday.

There should also be consideration of potential risk to other, younger girls in the family and practicing community. Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including dialling 999 if appropriate.

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

### **31. 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. It is illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not used.

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.

College 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 0200 7008 0151.

### **32. So-called 'Honour'-based Abuse**

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

Honour based abuse might be committed against people who:

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

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

#### **One Chance Rule**

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

The College 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.

### **33. 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.

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

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

The College 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.

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

### **34. Looked After Children**

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

The school/college will ensure that staff have the necessary skills and understanding to keep looked after children safe. 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.

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

The designated teacher for looked after children and the DSL have details of the child's social worker and the name and contact details of SCC's Head of Virtual School.

### **35. Children Missing Education**

All children, regardless of their circumstances, are entitled to an efficient, full time education which is suitable to their age, ability, aptitude and any special educational needs they may have.<sup>2</sup>

The College recognises that children missing education are at significant risk of underachieving, being victims of abuse and harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.

At induction all members of teaching staff are informed of the College's policy on "Attendance at School and Children Missing Education Policy". This is available on the website and from the DSL or Bursar's offices.

All staff responsible for the registration of pupils (Housemasters/Housemistresses, Reception, Matrons) are aware of the College's procedures for pupils missing from school.

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

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

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<sup>2</sup> Children missing education DfE September 2016

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

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

The College will:

- Enter pupils on the admissions register on the first day on which the college has agreed, or has been notified, that the pupil will attend the College.
- Notify the Local Authority within five days of adding a child's name to the admission register. The notification must include all the details contained in the admission register for the new pupil.
- Monitor each child's attendance through their daily register and follow the SCC procedure in cases of unauthorised absence.
- Remove a child's name from the admissions register on the date that the child leaves the College.
- The College will notify the Local Authority when they are about to remove a child's name from the school register under any of the fifteen grounds listed in the regulations, no later than the date that the child's name is due to be removed.
- Where parents notify the College, in writing, of their intention to electively home educate the college will forward a copy of the letter to the Elective Home Education Team / Education Welfare. Where parents orally indicate that they intend to withdraw their child to be home educated and no letter has been received, the College will not remove the child from roll and will notify Education Welfare at the earliest opportunity.

### **36. Attendance and Behaviour**

Additional policies and procedures are in place regarding attendance and behaviour (i.e. Attendance at School and Children Missing Education Policy and Behaviour Policy), both available on the website or from the DSL/Bursar.

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

The College will work in partnership with Surrey Police and other partners for reporting children that go missing from the college 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.

### **37. Physical intervention**

The College's policy on physical intervention by staff is set out separately.<sup>3</sup> It acknowledges that staff must only ever use physical intervention as a last resort to prevent pupils from hurting themselves or others, from damaging property, or from causing disorder, and that at all times it must entail the minimal force necessary to prevent injury to another person.

Such events should be recorded and signed by a witness, and reported immediately to the DSL so that the child's parent can be notified the same day. It must be understood that physical intervention of a nature that causes injury or distress to a child may be considered under child protection or disciplinary procedures.

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<sup>3</sup> Policy document: *Use of Reasonable Force to Control or Restrain Pupils*.



### 38. Whistle-blowing

The College recognises that children cannot be expected to raise concerns in an environment where staff fail to do so. Childline posters are available throughout the school for pupils to access the helpline where they wish to do so, and confidential telephone access is available to them.

All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues. If necessary they should speak in the first instance to the DSL or to the Head, to whom they must report any concern or allegation about school practices or the behaviour of colleagues that are likely to put pupils at risk of abuse or other serious harm. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 from 8.00am to 8.00pm Monday to Friday and Email [help@nspcc.org.uk](mailto:help@nspcc.org.uk). The College's whistle-blowing procedure is set out in full in a separate document.<sup>4</sup> This document is on the College website, sent out to all staff when an offer of employment is made, is in staff handbooks and is given to staff as part of their regular child protection training updates.

Students may also use the anonymous reporting site 'Whisper' to report on anything they are unhappy with at school. These 'whispers' are responded to by DSLs who will keep records to help track any patterns around the school.

### 39. Complaints

The College has in place formal complaints procedures for both pupils and parents. Complaints and concerns relating to any child protection issue should be addressed in the first instance to the DSL, who will attempt to resolve the matter in a way that satisfies the complainant while balancing the rights and duties of pupils. Pupils will not be penalized for making a complaint in good faith.

### 40. Health & safety

The College's Health & Safety Policy<sup>5</sup>, together with other published procedures and policies,<sup>6</sup> reflect the consideration given to the protection of pupils and concern for their welfare, both physically within the school environment, and, for example, in relation to internet use, and when away from the College undertaking school trips and visits.

### 41. Guardians

With regard to Standard 19 of the National Minimum Standards for Boarding, Epsom College will not appoint guardians for any of its' pupils.

#### Other useful Policies:

- Access, Security and Visitors Policy (full and summary) – [w:public/Common Room Handbook/ Linked documents](#)

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<sup>4</sup> Policy document: *Whistle-blowing*.

<sup>5</sup> *Health and Safety*, which is retained in the Bursar's office.

<sup>6</sup> *Policies relating to the use of IT at Epsom College*, which forms part of the Common Room Handbook, and *EVOLVE*, which is available on Staff Share / Public.

- Awaiting DBS Procedures – <w:public/Common Room Handbook / linked documents>
- Advice on Safeguarding Pupils who may be Vulnerable to Extremism – sent out to staff annually
- Recruitment, Selection and Disclosure Policy and Procedure – on the [website](#)

## 42. Contact Information

**The Surrey Children's Single Point of Access C-SPA 0300 470 9100 email [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk) (referral for children) or [asmash@surreycc.gov.uk](mailto:asmash@surreycc.gov.uk) (referral for adults)** provides advice to us for all enquiries whether there are concerns about a child's care at home, or an allegation against a member of staff in which case the option for the DO/LADO should be requested. The DSL is advised to select the option on 0300 470 9100 for the Schools and Early Years Child Protection Consultation Line when not sure whether a referral is necessary, or whether parents should be notified first. Where a child's home address is outside Surrey, this number will also find the correct local authority children's social care contact point. Out of the hours 8am till 6 pm, urgent enquiries can be directed to 01483 517898, or in an emergency Surrey police should be called on 999.

**The Surrey Safeguarding Children Partnership SCP (formerly SSCB) Surrey Child Protection procedures** are available at [www.surreycc.gov.uk/safeguarding](http://www.surreycc.gov.uk/safeguarding)

**The Early Help Partnership Service** will assist the college, supporting enquires and the Lead Professional on 0208 541 9282 further information at [www.surreycc.gov.uk/earlyhelp](http://www.surreycc.gov.uk/earlyhelp)

**The Surrey Family Information Service** is a free internet telephone and outreach service providing information and advice to parents of children 0-19, and young people up to 25 years where they have a disability or special educational needs

**The Education Safeguarding Team at Surrey County Council** can be contacted by schools for advice on any aspect of safeguarding arrangements on 01483 517771 or by email to [education.safeguarding@surreycc.gov.uk](mailto:education.safeguarding@surreycc.gov.uk)

**The Pupil Tracking Officer** will be notified where any child is removed from the college and the whereabouts of their next school is unknown [susan.strank@surreycc.gov.uk](mailto:susan.strank@surreycc.gov.uk) or contact through 0300 200 1006

**ACT** is the Advice, Consultation and Therapy for young people with sexually harmful behaviour. They can be contacted on 01483 519606 or via email on [act@surreycc.gov.uk](mailto:act@surreycc.gov.uk)

Radicalisation concerns should be directed to **the Surrey SPA on 0300 470 9100 [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk)** In addition the Department for Education has dedicated a telephone helpline (**020 7340 7264**) to enable staff and governors to raise concerns relating to extremism directly. Concerns can also be raised by email to [counter.extremism@education.gsi.gov.uk](mailto:counter.extremism@education.gsi.gov.uk).

**The Surrey SPA on 0300 470 9100 [asmash@surreycc.gov.uk](mailto:asmash@surreycc.gov.uk)** should be contacted in the event of a concern about possible FGM. Where a teacher discovers that FGM has been carried out on a girl under the age of 18 they have a mandatory duty to report this to the police by dialling **101**.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 from 8.00am to 8.00pm Monday to Friday and Email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

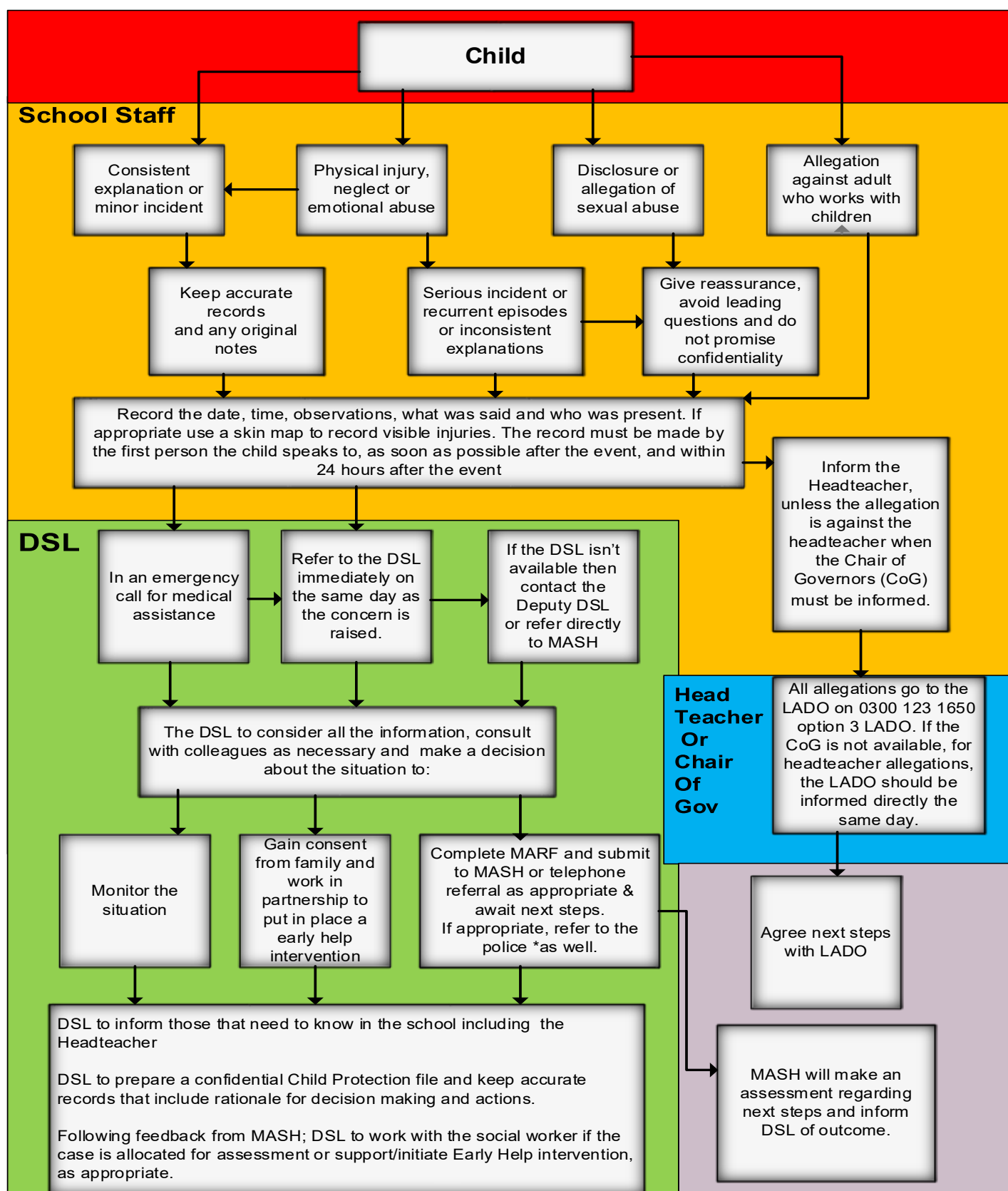
**Further advice on safeguarding and child protection is available from:**

- [Surrey County Council Education Safeguarding Team](#)
- NSPCC: <http://www.nspcc.org.uk/>
- ChildLine: <http://www.childline.org.uk/pages/home.aspx>
- CEOPSThinkuknow: <https://www.thinkuknow.co.uk/>
- Anti-Bullying Alliance: <http://anti-bullyingalliance.org.uk/>

- Beat Bullying: <http://www.beatbullying.org/>
- Childnet International –making the internet a great and safe place for children. Includes resources for professionals and parents <http://www.childnet.com/>
- Thinkuknow (includes resources for professionals and parents) <https://www.thinkuknow.co.uk/>
- Safer Internet Centre <http://www.saferinternet.org.uk/>
- Contextual Safeguarding Network <https://www.contextualsafeguarding.org.uk/>
- [Stopitnow UK confidential Freephone Helpline 0808 1000 900 for anyone concerned about addiction to online pornography who may have seen images of those under 18, or concerned about their own sexual feelings or thoughts about children](#)

**In addition,** Annex B provided in Part One of Keeping Children Safe in Education (2023) to all staff, and on Staff Share / Public / Safeguarding Documentation, provides links to further agencies and advice on page 26.

## Appendix 1: Child Protection Flowchart



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

## Appendix 2: Human Rights Act

The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them.

Under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. The specific convention rights applying to schools and colleges are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination, 25 and
- Protocol 1, Article 2: protects the right to education.

Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. Further information (including on absolute and qualified rights) can be found at Human Rights | Equality and Human Rights Commission ([www.equalityhumanrights.com](http://www.equalityhumanrights.com)).

## Appendix 3: Nominated Safeguarding Governor Role Description

### Nominated Safeguarding Governor Role Description

#### 1 Overall responsibility

1.1 Section 157 of the Education Act 2002 places a duty on governing bodies to ensure that suitable provision is made to safeguard and promote the welfare, health and safety of pupils. Statutory guidance sets out that a school should have a governor who understands the requirements of the safeguarding guidance and legislation and who advises the Board accordingly. The Board of Governors have therefore nominated the Safeguarding Governor to this role, as well as to ensure there are appropriate safeguarding procedures at the College and to champion best practice. The Board of Governors remains collectively responsible for safeguarding arrangements at the College.

1.2 The Safeguarding Governor will work with the College's Designated Safeguarding Lead (DSL). The Chair will also act as a point of contact for College staff in the first instance should there be need to escalate a safeguarding concern to Governor level.

1.3 The Board of Governors recognises that it maintains overall responsibility for the safety of everyone that comes into contact with the College, as well as ensuring that all College staff and volunteers are provided with adequate safeguarding training. The Safeguarding Governor should therefore ensure that alongside the duties set out in this policy, safeguarding remains a priority with sufficient governor time being applied to this area.

1.4 The Board of Governors recognises that as part of its obligations in respect of safeguarding it must be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 and their local multi-agency safeguarding arrangements, as detailed in the Keeping Children Safe in Education 2023 guidance.

#### 2 The Safeguarding Governor

2.1 Safeguarding Governor: John Hay

2.2 Deputy Safeguarding Governor: Tania Botting

2.3 The Board of Governors recognise that appointing a Deputy Safeguarding Governor is best practice. This ensures that there is always a Governor available to address safeguarding concerns and that there is a clear succession plan.

2.4 The identity of and contact details for the Safeguarding Governor, together with an outline of their duties, will be publicised widely within the College community to ensure that pupils, parents/guardians, staff and other Governors understand the purpose and importance of the role.

#### 3 Duties

3.1 To either produce and undertake, or procure regular appropriate Governor training so that:

3.1.1 the Board of Governors fully understands its role including its responsibilities with regard to well-being, safeguarding and child protection and support the Safeguarding Governor in the performance of these duties; and

3.1.2 the Board of Governors has sufficient knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place at the College are effective and support the delivery of a robust whole College approach to safeguarding

3.2 To ensure that the College makes opportunities available to the Board of Governors and staff to feed into the College's approach to safeguarding and safeguarding policies.

3.3 To champion the promotion of well-being, safeguarding and child protection issues at the highest level within the College.

3.4 To review and ensure the College complies with the Department for Education's "Keeping children safe in education" and "Working together to safeguard children" guidance, the Charity Commission's "Safeguarding for charities and trustees" guidance and the "Prevent duty guidance" (as may be amended from time to time).

3.5 To regularly monitor and evaluate the College's safeguarding procedures and policy and how they are applied in practice to ensure they remain fit for purpose and in line with current legislation, guidance and best practice and to report to the Board of Governors on any necessary amendments.

- 3.6 To ensure that the College has met its statutory duties (under Section 157 the Education Act 2002) by overseeing annual safeguarding audits and by ensuring that any weaknesses identified are rectified by the College without delay through the execution of an action plan.
- 3.7 To monitor and evaluate the College's safer recruitment procedures and staff code of conduct.
- 3.8 To monitor and evaluate the Single Central Record (SCR) annually and sign it, or more frequently on occasions where staff turnover is high.
- 3.9 To ensure that the College appoints a DSL for child protection who is a member of the senior leadership team and who has undertaken appropriate training.
- 3.10 To ensure that the DSL and DDSL roles are clearly defined in the role holder's job description and that the role has the appropriate status and authority within the College to enable the DSL and DDSLs to carry out the duties of the post.
- 3.11 To ensure that the DSL is given sufficient dedicated time, funding, training resources and support to carry out the role effectively.
- 3.12 To monitor and ensure that all College staff, including temporary staff and volunteers, are provided with the College's child protection and safeguarding policy and staff code of conduct policy.
- 3.13 To monitor and ensure training is implemented for all College staff and volunteers to ensure they continue to meet statutory requirements, have an awareness of safeguarding issues that can put children at risk of harm and know how to address safeguarding concerns if they do occur.
- 3.14 To monitor the complaints log for indications of trends that may indicate potential safeguarding issues.
- 3.15 To ensure that all staff receive information on induction about the College's safeguarding arrangements, policies and staff code of conduct policy and the role of the DSL
- 3.16 To ensure there are appropriate measures and procedures in place, including the Whistle-blowing policy to ensure staff feel able to escalate and report safeguarding concerns (including low-level concerns if applicable, as well as allegations against other staff, supply staff, volunteers and contractors) to the DSL, Head or to the Chair, where appropriate.
- 3.17 To monitor and evaluate the College's procedures for dealing with allegations of abuse and ensure these are in line with statutory requirements and are effective.
- 3.18 To ensure the College contributes to multi-agency working ensuring that the DSL makes appropriate disclosures of actual or alleged safeguarding incidents to the relevant bodies including the Local Authority Designated Officer (LADO), the Local Authority Children's Services, the relevant Multi-agency Safeguarding Hub, the police and the Charity Commission (including under the serious incident reporting regime), as necessary.
- 3.19 In conjunction with the DSL, DDSL and the Safeguarding Sub-Committee to monitor and evaluate the College's online safeguarding procedures and the provision of relevant training.
- 3.20 To contribute to ensuring any deficiencies in the College's safeguarding practices that are brought to the attention of the Board of Governors, from any source, are investigated and addressed.
- 3.21 To ensure that staff have the necessary knowledge and understanding to keep looked after / previously looked after children safe, with identified staff tasked to promote their educational achievement and wellbeing.
- 3.22 To ensure staff teach children about how to keep themselves and others safe, including online, that online safety is a running and interrelated aspect of implementing a whole College approach to safeguarding, and that appropriate IT filters and monitoring systems are in place to prevent children from accessing harmful or inappropriate material online.
- 3.23 To ensure that the Board of Governors is made aware of any proven incident or allegation (anonymised where appropriate) which has implications for the College's Safeguarding and Child Protection Policy and Code of Conduct for staff.

#### 4 Acting in an emergency

4.1 Should there be an occasion when there is an urgent safeguarding issue (whether a child protection issue or otherwise) which requires either the Chair of Governors or the Safeguarding Governor, they shall have the authority to manage the situation internally with the Head or DSL as appropriate but shall report all such action regularly to the Chair or Safeguarding Governor and on each occasion seek continued authority to proceed.

4.2 However, the Safeguarding Governor does not have the authority to bind the Board of Governors externally and therefore should there be a need to report matters to external bodies, regulators or agencies, the Safeguarding Governor will make recommendations to the Board of Governors for its collective approval.

#### 5 Reporting and review

The Safeguarding Governor will keep the Governing Board up to date with their work through regular termly written or verbal reports. However, in the event of a safeguarding incident, whether alleged or actual, the Safeguarding Governor shall provide more regular updates, as necessary for the Board of Governors.

Effective from            September 2023

Last Review date        September 2023