



SAFEGUARDING CHILDREN – CHILD PROTECTION POLICY

This policy which applies to the whole school inclusive of boarding is publicly available on the school website and upon request a copy (which can be made available in large print or other accessible format if required) may be obtained from the School Office.

(In our school the pupils are referred to as students. Therefore the use of the term 'child' or 'student' is interchangeable in this policy as is appropriate and the age range of the students at Woldingham is from 11 to 18 years)

Keeping Children Safe in Education (KCSIE) (DfE: September 2025) is referred to as this policy as KCSIE (currently in force),

We have a whole school approach to safeguarding, which is the golden thread that runs throughout every aspect of the school. All our school policies support this policy.

Oversight and monitoring of the implementation of this policy rests with **Julia Connor, Ifey Summers and Nick Waite**, who are the designated members of the Board of Governors for safeguarding and are responsible for the adoption of the policy in practice. They can be contacted through the school.

Scope: Safeguarding is everyone's responsibility throughout the school and boarding facilities. All who work, volunteer or supply services to our school have an equal responsibility to understand and implement this policy and its procedures both within and outside of normal school hours, including activities away from school. All new employees and volunteers are required to state that they have read, *understood, and will abide by this policy (inclusive of KCSIE (currently in force), Part 1 inclusive of Annexes 'A' and 'B'* and confirm this by signing the Policies Register.

Legal Status: Complies with The Education (Independent School Standards) (England) Regulations (ISSR) (DfE: currently in force), the National Minimum Standards (NMS) for Boarding Schools (DfE: currently in force) *KCSIE (currently in force)*, with particular reference to NMS Part D:Standard 8 and other relevant legislation and regulations. This policy is also in accordance with the procedures agreed by the [Surrey Council Safeguarding Children's Partnership](#) which comprises Surrey Children's Services, the local NHS commissioning group and Surrey Police.

Monitoring and review: The 'Board of Governors and/or 'Trustees' are the 'Proprietor' This policy is subject to continuous monitoring, refinement and audit by Head and Deputy Head Safeguarding, who is the Designated Safeguarding Lead (DSL). The Board of Governors will undertake a full annual review of this policy and its procedures, inclusive of the implementation and efficiency with which the related duties have been discharged. This discussion will be formally documented in writing. The Governors recognise the expertise staff build by undertaking safeguarding training and managing safeguarding concerns. As such, staff have the opportunity to contribute to and shape our safeguarding arrangements and child protection policy. Any deficiencies or weaknesses recognised in arrangements or procedures will be remedied immediately and without delay. This policy is reviewed annually or earlier if changes to the systems and arrangements take place, or if legislation, regulatory requirements or best practice guidelines so require. All staff will be informed of the updated/reviewed policy and it is made available to them in either a hard copy or electronically.

Reviewed: September 2025

Next Review: September 2026

Mrs Sue Baillie
Head

The Safeguarding (Child Protection) Policy forms pages 1 to 29 of this document. The appendices are on pages 30 to 54. However, the inspectorate requires us to number all pages consecutively and not to have the appendices as separate documents. We have separate comprehensive documents such as *Safer Recruitment and Staff Selection*, *Sexual Violence and Sexual Harassment*, *Online Safety Child-on-Child abuse*, *Low Level Concerns* and so on. KCSIE sets out that boarding schools have additional factors to consider with regard to safeguarding and this is reflected in our Safeguarding Child Protection Policy and other policies integral to Woldingham, such as our *Boarding Care Policy*. All our students understand our policy on sexual relationships between students. This includes the unique nature of boarding accommodation and the risks associated with children sharing overnight accommodation. Additionally, strategies and procedures are in place regarding harmful online content and how boarders' devices are managed in terms of bringing a device into the school, and harmful content that may already be downloaded on to it, and the opportunity to download harmful content via 3, 4 and 5G that will bypass the school's filtering and monitoring systems.

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Child Protection:

Staff are trained and supported to respond appropriately and sensitively to all safeguarding concerns following our agreed procedures. We encourage a culture of listening to students, identifying and acting on early signs of abuse, neglect and exploitation, reassessing concerns when situations do not improve to ensure the right help at the right time to address risks and prevent risks escalating; allegations, concerns, suspicions and complaints against staff are dealt with promptly, and in accordance with DfE and local guidance. We keep accurate records and share relevant information quickly to challenge inactivity and take all practical and appropriate steps to ensure that our school premises are as secure as possible.

Woldingham School is committed to safeguarding and promoting the welfare of our students and expects all staff and volunteers to share this commitment. It is our aim that all students fulfil their potential

We will always act in the best interests of the student. We recognise we are an agent of referral and not of investigation. Any person may make a referral (including whistleblowing) to external agencies such as the Surrey Local Safeguarding Children's Partnership C-SPA or the Local Authority Designated Officer (LADO) and the police, if necessary. We also allow access for children's social care from the host local authority and from the local authorities where the students reside in undertaking their safeguarding (Child Protection) duties. This policy is also dovetailed with the Behaviour Management, Discipline and Sanctions and Anti-bullying Policies. Woldingham aims to ensure that boarders are safe, including in the school's boarding accommodation and away from the school's premises. Effective measures are taken to manage safeguarding risks and protect children from harm, and to manage well any incidents that do occur.

KEY INTERNAL CONTACT DETAILS

Our School's Designated Safeguarding Lead (DSL) has lead responsibility for child protection and are also the Prevent Officer and Deputy Prevent Officer responsible for the prevention of radicalisation, extremism and being drawn into terrorism. There are also several Deputy DSL's. Their telephone numbers are prominently displayed in the school. Woldingham School's DSL and Deputy DSLs are:

Designated Safeguarding Lead (DSL) and Prevent Officer for the whole school inclusive of boarding and also designated teacher for *children in care, looked after children*

Miss Taryn Bennett who is Deputy Head Safeguarding

Telephone number for school hours: 01883 654251 Out of school hours: 07514 800042

Email: bennett@woldinghamschool.co.uk

Deputy Designated Safeguarding Lead (DDSL)

Ms Kate Renshaw who is Deputy Head Pastoral

Telephone number for school hours: 01883 654291 Out of school hours: 07786 584866

Email: renshawk@woldinghamschool.co.uk

Deputy Designated Safeguarding Lead (DDSL)

Mr Terry Nunes who is Head of Year 9

Telephone number for school hours: 01883 654179 Out of school hours: 07979 903904

Email: nunest@woldinghamschool.co.uk

Deputy Designated Safeguarding Lead (DDSL)

Mme Marie Emery who is Head of Year 10

Telephone number for school hours: 01883 654099 Out of school hours: 07768 812936

Email: emerym@woldinghamschool.co.uk

Deputy Designated Safeguarding Lead (DDSL)

Mr Alex Sharkey who is Head of Wellbeing

Telephone number for school 01883 654357 Out of school hours: 07768 856655

Email: sharkeya@woldinghamschool.co.uk

Deputy Designated Safeguarding Lead (DDSL)

Mrs Pippa Whitby who is Director of Boarding

Telephone number for school 01883 654100 Out of school hours: 07768 853414

Email: whitbyp@woldinghamschool.co.uk

Chair of Governors

Catharine Berwick who is the Chair of Governors

Email: berwickc@woldinghamschool.co.uk

At Woldingham School, the Board of Governors are the named Proprietor.

The Designated Governors for Safeguarding and Prevent Duties

In our school, the Governors for Child Protection, are **Julia Connor, Ifey Summers and Nick Waite**, who will liaise with the Local authority and/or partner agencies on issues of child protection who can be contacted on:

Email: connorj@woldinghamschool.co.uk summersi@woldinghamschool.co.uk waiten@woldinghamschool.co.uk

KEY EXTERNAL CONTACT DETAILS

External responsibilities and therefore details of any external personnel named below may be subject to change without notification to the school.

The Local Authority Designated Officer (LADO) service manages allegations against individuals who work with or volunteer with children in Surrey. If you have a concern with someone who works with children, please contact the LADO on 0300 123 1650 (option 3).

Duty LADO, Safeguarding Children Unit, Fairmount House, Bull Hill, Leatherhead, Surrey, KT22 7AH

Telephone: 0300 123 1650 Email: LADO@surreycc.gov.uk (or LADO@surreycc.gcsx.gov.uk for secure emails)

Emergency Duty team (out of hours' service): 01483 517898 Email: edt.ssd@surreycc.gov.uk

Keeping Children Safe in Education (Department for Education (DfE): currently in force) makes it clear that anybody can make a direct referral to Surrey's Children's Services (SCS) including the LADO. If a student's situation does not appear to be improving the staff member with concerns should press for re-consideration. Concerns should always lead to help for the student at some point.

Surrey Multi-Agency Partnership for Children at Risk and Children in Need/Early Help/Intervention and Assessment Services Students who have suffered or are likely to suffer significant harm are children at risk. Students who are in need of additional support from one or more external agencies are children in need.

Concerns about a child: If a student has suffered/likely to suffer harm, the DSL must immediately report this to Surrey's Children's Single Point of Access (C-SPA). **Children in need of additional support from one or more agencies:** The DSL refers students immediately to the Surrey Early Help Partnership Service using the inter-agency assessment process via the Early Help Assessment (EHA) Form, thus utilising the "Team around the Child" (TAC) approaches in line with the referral threshold set by the Local Safeguard Children Part. A referral can be made direct or through Surrey C-SPA.

Email: earlyhelphub@surreycc.gov.uk Tel: 03311435548.

The contact details of the **Children's Single Point of Access C-SPA** for Children at Risk and Children in need of additional support from one or more agencies is as follows:

Telephone: 0300 470 9100 (9.00am – 5.00pm Monday to Friday). Email: cspa@surreycc.gov.uk Emergency Duty Team Out of Hours (5pm-9am): 01483 517898 edt.ssd@surreycc.gov.uk

The C-SPA combines Children's Service Social Workers and Police staff. They will decide whether a referral needs to go to a Social Worker or whether more information or an Early Help Assessment is needed.

If a student is in immediate danger or left alone, you should contact the police or call an ambulance immediately on 999.

Police Child Abuse Investigation Team – call 101

Police Domestic Abuse Investigation Team – call 101

For safeguarding questions or advice about safeguarding arrangements and incidents within schools contact the **Education Safeguarding Team** on 01483 517008 or Email: education.safeguarding@surreycc.gov.uk.

Education Safeguarding Team Manager: Clare Stewart

Education Safeguarding Advisor: Narinder Ghosal

Education Safeguarding Advisor: Elisabeth Clark

Schools Family Workforce Development Advisor: Andrea Page

The Local Authority Prevent Lead for support and advice for the prevention of radicalisation is: PC Oliver Greenaway
Tel: 101 ext. 39055 – 07720 043980 Email: Oliver.Greenaway@surrey.pnn.police.uk [Prevent referral process](#)
preventreferrals@surrey.pnn.police.uk

Female Genital Mutilation (FGM): Any student at risk of FGM must be referred to Surrey C-SPA and the police. Police contact details are: For non-emergency 101 and for emergency calls 999. For advice and guidance telephone: 0800 028 3550 or Email: fgmhelp@nspcc.org.uk

Surrey Safeguarding Children's Partnership (SSCP): which coordinates how children are safeguarded and protected from harm. Printed copies of the SSCP procedures are available from the School office and the SSCP can be contacted as follows:

C-SPA Support Team, Fairmount House, Bull Hill, Leatherhead, Surrey, KT22 7AH

Telephone: 0300 470 9100

Email: cspa@surreycc.gov.uk

Website: <http://www.surreyscb.org.uk/>

Surrey Virtual School for Children in Care, County Hall, Penrhyn Road, Kingston Upon Thames, KT1 2DJ

Email: <http://virtual.school@surreycc.gov.uk>

Tel: 0208 541 9502 <https://www.surreyvirtualschool.org.uk/training-and-events/designated-teacher/>

Other useful contacts for this policy:

Disclosure and Barring Service (DBS)

Address for referrals: PO Box 181, Darlington, DL1 9FA Telephone for referrals: 01325 953 795 Telephone for customer services: 0870 909 08 Email: customerservices@dbs.gsi.gov.uk

NSPCC Child Protection Helpline: 0808 800 5000 **Childline:** Tel: 0800 1111 www.childline.org.uk The NSPCC

whistleblowing helpline is available for staff that do not feel able to raise concerns regarding child protection failures internally.¹ Staff can call: 0800 028 0285 – line is available from 8:00am to 8:00PM, Monday to Friday and email: help@nspcc.org.uk

In addition to national hotlines, the school has 2 independent persons with whom our students can share personal problems or concerns.²

SEQUENCE OF EVENTS TO BE FOLLOWED WHEN A YOUNG PERSON DISCLOSES ABUSE OR NEGLECT³:

The following strict guidance relates to any disclosures about events within or outside the school, concerning adults or other students.

Woldingham's Golden Rules:

If a girl makes a disclosure of abuse it is important to:

- listen attentively, be calm and reassuring, be non-judgmental;
- avoid condemning the alleged abuser, allow the girl to express her feelings – do not make assumptions about them;
- give the girl as much time as she needs to talk – if necessary, ring Reception to arrange emergency cover for lessons;
- always use open questions such as 'Is there anything else you need to tell me?' – avoid leading questions like 'Did they ...';
- tell the girl that she was right to tell someone, reassure her that it is not her fault, explain what will happen next;
- carefully record the discussion as soon as possible after the event – try to write 'verbatim' what the girl has said;
- sign and date this record recording: the time, location/setting, girl's demeanor, any staff involved in the discussion. (If the account is typed up, the original hand-written notes must be submitted alongside the typed version).
- Reassure the girl that they are not to blame. Tell the girl that you know how difficult it must have been to confide in you. If there is a need for medical attention seek assistance without delay.

Surrey's Safeguarding Children's Partnership Guiding principles: The seven R's (adapted for our students)

Receive:

- Listen to what the student has to say, accepting what is said and take it seriously without displaying shock or disbelief.
- Make a note of what has been said as soon as practicable.
- Create a safe environment by offering the student a private and safe place if possible. Stay calm, reassuring the student but advising that you cannot promise to keep a secret or confidentiality (as this may ultimately not be in the best interest of the student). A suggested form of words that may help when talking to students and which may need to be simplified in individual circumstances are as follows: "I will keep our conversation confidential and agree with you what information I can share, unless you tell me something that will affect your personal safety or that is illegal, but I will tell you if I am going to pass information on and who to."

Reassure:

¹ NMS 11.5 (ISSR P3 para 8(b))

² NMS 11.4 (ISSR P3 para 8(b))

³ NMS 8.1 (ISSR P3 para 7(a) and (b), and P3 para 8(a) and (b))

- Reassure the student, 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', 'everything will be alright now', 'I'll keep this confidential'.
- Reassure. For example, you could say: 'I believe you', 'I'm glad you came to me', 'I'm sorry this happened', 'We are going to do something together to get help'

Respond:

- Respond to the student 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 the student why something has happened.
- Do not criticize the alleged perpetrator(s); the student may care about him/her, and reconciliation may be possible
- Do not ask the student to repeat it all for another member of staff. Explain what you have to do next and who you have to talk to. Reassure the student that it will be a senior member of staff.
- Seek consent from the student to share any information disclosed but should consent not be given, an explanation can be given as to why the DSL must be told.
- When the student has finished, don't leave the student alone; speak to someone who can help keep the student safe.

Report:

- Share concerns with the DSL immediately, or follow procedures for allegations against staff, volunteers, and Advisory Board.
- If you are not able to contact the DSL or the Deputy DSL, and the student is at risk of immediate harm, contact the C-SPA or Police, as appropriate directly.
- If you are dissatisfied with the level of response you receive following your concerns, you should press for re-consideration.

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 student. If the student 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 student: listen, reassure, and be available.
- 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 student? Did the procedure work?
- Were any deficiencies or weaknesses identified in the procedure? Have these been remedied? Is further training required?

It is also important to keep the following points in mind:

- Do not take responsibility for investigating the allegation yourself – investigation is the sole statutory responsibility of Children's Services and/or police. Do not approach or inform the alleged abuser.
- Do not assume that someone else will take the necessary action.
- Never take photographs of injuries or examine marks solely to assess whether they have been caused by abuse.
- Do not speculate, confront another person allegedly involved, or offer opinions about what is being said.
- Never fail to pass the information on to the correct person or ask a student to sign a copy of the disclosure or a 'statement'.

ALLEGATIONS AGAINST STAFF, VOLUNTEERS, CONTRACTORS, DSLs AND THE PROPRIETOR:

This applies where an adult within the school has harmed, may have harmed, or poses a risk of harm to a child. This also applies when an adult within the school community may have committed a criminal offence related to a child.

- Allegations concerning all, other than the Head, are to be reported straight away to the Head (or in her absence the DSL). The Head will immediately contact the LADO to discuss the allegation and will act on the advice provided. She will keep the Chairman of the Board of Governors informed. The individual against whom the allegation is made is not to be informed.

- Allegations concerning the Head are to be reported straight away to the Chairman of the Board of Governors, who will immediately contact the LADO to discuss the allegation and will act on the advice provided. The Head is not to be informed.
- Allegations concerning a member of the Board of Governors are to be reported to the Head, who will immediately contact the LADO to discuss the allegation and act on the advice provided. The individual against whom the allegation is made is not to be informed.
- Where an allegation is made against a supply teacher, the Head will immediately contact both the agency and the LADO.
- Allegations against an adult who is no longer employed by the school, or historical allegations, will be referred to the police.
- Allegations relating to incidents occurring when an individual or organisation uses a school's premises (private hire of facilities) will be dealt with like all safeguarding allegations. Private hire groups will have their own safeguarding policies in place. However, the school will also follow their safeguarding policies and procedures if an allegation is made known, including informing the Local Authority Designated Officer (LADO).

In each case, the Head or DSL will refer to the LADO within 24 hours via the SPA who will then advise about next steps, including any necessary investigation. The Police will be informed if a criminal offence is alleged. Guidance will be sought from the LADO and/or Police to inform the decision on whether an accused individual can remain on school grounds and on what conditions. If Woldingham is given information suggesting that a member of staff is abusing a child who isn't a student at the school, the DSL will immediately report to the LADO and follow procedure as if it were one of our own students.

In borderline cases, the Head will consult with the LADO without identifying the family. As soon as sufficient concern exists that a student may be at risk of significant harm, a referral to Children's Services will be made without delay. The school will not investigate allegations without the agreement of the LADO. In cases of serious harm, the Police will be informed from the outset. Discussions will be recorded in writing, with any communication with both the individual and the parents of the student/students agreed. Arrangements for alternative accommodation away from other students in cases where a member of the boarding staff is suspended pending an investigation concerning child protection will be applied. Woldingham makes every effort to maintain confidentiality and guard against publicity if there are allegations against teachers or staff up to the point where the accused person is charged with an offence. The following definitions will be used when determining the outcome of all allegation investigations.

- **Substantiated:** there is sufficient evidence to prove the allegation;
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
- **False:** there is sufficient evidence to disprove the allegation;
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term doesn't imply guilt or innocence;
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Unsubstantiated, false or malicious allegations: If a report is determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether this is a cry for help on other matters. In such circumstances, a referral to children's social care may be appropriate. Where an allegation by a student is proven to have been malicious, the Head may take disciplinary action in accordance with the school's Behaviour Management, Discipline and Sanctions Policy. Where a parent has made malicious allegations, the Head may terminate the student's placement at the school on the basis that they have treated the school or a member of staff unreasonably, unless a working relationship based on trust, respect and transparency is established moving forward. Woldingham reserve the right to contact the C-SPA to determine the appropriate action. We have a duty of care towards our employees so ensure that effective support is provided for anyone facing an allegation through the school's Human Resources (HR) arrangements.

Low-Level Concerns (please also see our Staff Behaviour Policy (Code of Conduct) and Low Level Concerns Policy): Woldingham understands the importance of acknowledging, recording and reporting **all** safeguarding concerns, regardless of perceived severity. We understand that concern can escalate over time to become much more serious. A low-level concern is defined as any concern about an adult's behaviour towards, or concerning, a child that does not meet the harms threshold (see below) or is otherwise not serious enough to consider a referral at the time of reporting. Low-level concerns refer to behaviour on the part of a staff member towards pupils that is considered inappropriate in line with statutory safeguarding advice, the Staff Behaviour Policy (Staff Code of Conduct), as cited in this policy. The harms threshold is the point at which a concern is no longer low-level and constitutes a threat of harm to a student. This threshold is defined as accusations that an adult has:

- behaved in a way that has harmed a student or may have harmed a student, possibly committed a criminal offence against, or related to, a student or behaved towards a student in a way that indicates they may pose a risk of harm to students;
- behaved in any way that indicates they may not be suitable to work with students.

All low-level concerns about a member of staff should be reported to the Head. If the concern is related to a person employed by a supply agency, that concern should be recorded, shared with the Head and the supply agency or employer. Records of low-level concerns will be recorded in the same way as allegations that meet the harms threshold so that any patterns in behaviour are identified and a course of action decided upon.

CONTEXT AND STATEMENT OF PURPOSE

Our associated documentation includes statutory guidance *Working Together to Safeguard Children 2023*, along with the Prevent Duty Guidance 2015, our Safer Recruitment Policy, Whistleblowing Policy, Staff Behaviour Policy (Staff Code of Conduct), and The Teachers' Standards and other relevant school policies and procedures.⁴

The Board of Governors at Woldingham takes seriously its responsibility under Section 157 of the Education Act 2002 to safeguard and promote children's welfare; to work with other agencies to ensure adequate arrangements to identify, assess and support those students who are suffering harm. Our aim is to ensure that all students are in an environment which promotes their safety and welfare by ensuring that all staff are aware of their responsibilities in relation to child protection. A member of the senior leadership team, appointed as DSL, acts with independence. The written confirmation of the appointment as DSL states that the post involves contacting the LADO on any matter that the DSL considers cannot be properly dealt with internally. Our DSL is also provided with external supervision and can directly access advice without referring to the Governors. This enables separation between DSL and Governors.

Abuse, neglect and exploitation (please refer to Appendix 1 of this policy): *Working Together to Safeguard Children 2023* defines abuse as a form of maltreatment of children. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. They may be abused through being witnesses to domestic abuse where they hear, see or experience the effects. Children may be abused by a family member, institution or a community setting, by those known to them or, more rarely, by others e.g. online abuse. They may be abused by adults or other children. Teenagers can suffer domestic abuse in their relationships. It is important to remember that significant harm can be 'actual' (happening now) or 'likely' (where harm is probable). In safeguarding concern or allegation, some of the following features may be found:

- **Physical abuse** - violence, particularly deliberate, causing injuries such as bruises, broken bones, burns or cuts, or forcing others to use drugs or alcohol.
- **Emotional abuse** - also known as psychological abuse blackmail or extortion; emotional maltreatment; threats and intimidation.
- **Neglect** - the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.
- **Sexual abuse** – indecent exposure/touching or sexual assaults/harassment; forcing others to watch pornography, sexting, encouraging other students to attend inappropriate parties; photographing or videoing other students performing indecent acts and **child sexual exploitation** in which students are sexually exploited for money, power or status.

Woldingham recognises that abuse is rarely covered by one definition or label. In most cases, multiple issues will overlap. Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example, the National Society for the Prevention of Cruelty to Children (NSPCC) offers information on its website www.nspcc.org.uk/preventing-abuse/. Schools can also access broad government guidance on the issues listed here via the GOV.UK website: <https://www.gov.uk/>.

Support: We support students who may have been at risk of significant harm (which includes the way staff respond to their concerns and any work that may be required) or students who have been abused, in accordance with their agreed child protection plan. We seek to address both the mental and emotional welfare of students and families through:

- the provision of individual counselling, a positive and safe school environment, careful and vigilant teaching, accessible pastoral care, good adult role models and promoting full co-operation with and contribution to the provision of appropriate coordinated support and/or early help from external agencies.

⁴ NMS 8.2 (ISSR P3 para 7(a) and (b), and P3 para 8(a) and (b))

- operating robust and sensible health and safety procedures along with clear and supportive policies on drugs, alcohol and substance misuse, recognising that students have a right to feel secure and learn effectively.

Our students have the right to respect and protection from abuse, regardless of age, gender, ability, language, religion, race, nationality, sexuality, culture, or disability and to feel valued and confident, knowing how to approach adults if they are in difficulty. In our school, a bullying incident is treated as a child protection concern when there is reasonable cause to suspect that a student is suffering, or likely to suffer, significant harm. We will work openly with parents as far as possible, reserving the right to contact Children's Services or the Police without notifying parents if this is in the student's best interest. In preparing this policy, we have been attentive to the nature, age range and other significant features of the school in the provisions made for safeguarding. At Woldingham School with the age range of 11 to 18 years we are aware of the potential for problems relating to emotional health issues, body image, eating disorders, self-harm, and also radicalisation and extremism. We provide staff, volunteers, and Governors with the guidance they need to keep children safe in our school and inform parents and guardians how we will safeguard their children. Woldingham promotes safe practice and professional conduct to safeguard children and mitigate against the potential for misunderstandings, so teachers and other staff are not vulnerable to allegations. Our staff maintain an attitude of 'it could happen here' as far as safeguarding is concerned.

Main Responsibilities of the DSL: Our Proprietor ensures that a member of the Senior Leadership Team is appointed to the role of DSL and has the appropriate status and authority within our school to carry out the duties of the post. The DSL takes **lead responsibility** for safeguarding and child protection (including online safety), and this is explicit in the role holder's job description. The DSL has additional time, funding, training, resources and support to carry out the role effectively. A detailed list of responsibilities for the DSL/Deputy DSL is given in Annex C of [KCSIE \(currently in force\)](#) and also in Appendix 3 below.

Definition of safeguarding from *Keeping Children Safe in Education (KCSIE)* (DfE: currently in force): This is defined as providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment, whether that is within or outside the home, including online; preventing the impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. Children (Woldingham usually refers to students as cited in this policy, except where legislative and regulatory criteria require us to refer to them as children) include everyone under the age of 18.

Underpinning values: Where there is a safeguarding issue, Woldingham will work in accordance with the principles outlined in the Surrey Safeguarding Children's Partnership Inter-agency child protection procedures:

- A child's welfare is paramount. A child has a right to have their welfare safeguarded and to protection from harm and exploitation;
- Each child is unique. Action taken by child welfare organisations should be child-centred, taking account of a child's cultural, ethnic and religious background, gender, sexual orientation, individual ability and any special needs⁵;
- A child's parents and carers should be made aware of their responsibilities and their rights and the power of professionals to intervene in their family circumstances;
- Parents will be advised about the Safeguarding (Child Protection) Policy on admission to the School. A copy of this policy is available on the website;
- Individual family members should be involved in decisions affecting them. They must be treated with courtesy and respect, with due regard given to working with them in a spirit of partnership to safeguard children's welfare. However, it may not be appropriate to advise parents/carers immediately about a referral depending on circumstances and the advice given by the Local Authority's Children's Social Care Department. The welfare of the child is paramount at all times;
- Each child has a right to be consulted about actions taken by others on his/her behalf in an age-appropriate way. The concerns of children and their families should be listened to and due consideration given to their understanding, wishes and feelings. However, it may not always be possible to respect a child's/carer's request for confidentiality. If a child may be at risk of significant harm, there is a duty on the School to share information with Children's Social Care. This will be explained to the child or family member and appropriate reassurance given;
- Personal information is treated as confidential. It should only be shared with the permission of the individual concerned (and/or those with parental responsibility) unless the disclosure of confidential personal information is necessary to protect

⁵ NMS 3.1 (ISSR P3 para 8(b))

a child or promote their welfare. In all circumstances, information must be confined to those people directly involved in the professional network of each individual child and on a strict “need to know” basis;

- Professionals should be aware of the effects of outside intervention on children and family life;
- Explanations by professionals to children, their families and other carers should be plainly stated and jargon-free. Unavoidable technical and professional terminology should be explained in simple terms;
- Sound professional practice is based upon positive inter-agency collaboration, evidence-based research and effective supervision and evaluation.

Safeguarding is a broader term than child protection, encompassing the elements set out above and is what our school should do for all students; Child Protection is part of this definition and refers to activities undertaken to protect students who have been harmed or are at significant risk of being harmed. Where a student is thought to be suffering significant harm, or at risk of suffering significant harm, this must be reported to [C-SPA](#) immediately. Action must also be taken to promote the welfare of students who are believed to be in need of additional support, even if they are not suffering harm or at immediate risk. Such instances must be addressed through inter-agency assessment using local processes.

Thresholds for Intervention: If staff have any concerns about a student’s welfare, they should act on them immediately, following the procedures set out in this policy. We use the [SSCP Levels of Need](#) to help us decide whether there are grounds to suspect significant harm, in which case a referral must be made to the C-SPA and the police if it is appropriate. Please see Appendix 4 which sets out the process our staff will go through if they have concerns about a student. Options will then include:

- managing any support for the student internally via the school or school’s own pastoral support processes;
- an early help assessment; or
- a referral for statutory services, for example as the student might be in need, is in need or suffering or likely to suffer harm. This is done by sending a [Request for Support Form](#) by secure email to: csplash@surreycc.gov.uk or contact the Single Point of Access (SPA) consultation line on 0300 470 9100 to discuss the concerns. If a student is in immediate danger and urgent protective action is required, the Police (dial 999) must be called. The DSL must also notify the C-SPA of the occurrence and what action has been taken.

If the allegation threshold is NOT met, the LADO will agree an appropriate response (e.g. for the school to undertake further enquiries or undertake an internal investigation). **If the allegation threshold is met** a strategy meeting will normally be held by phone, Zoom or in person. Normally a senior manager/safeguarding lead, the LADO, HR, Police and social care are invited to attend. Relevant information is shared, risks to students are considered and appropriate action agreed –e.g. child protection and other enquiries, disciplinary measures or criminal proceedings. A record of the meeting will be made, and regular reviews will take place until a conclusion is reached. Our staff are aware that students may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. By building trusting relationships with students, staff can facilitate communication and know that they can speak to the DSL if they have any concerns about a student. Students who are, or who are perceived to be LGBT+, are at greater potential risk of harm because they could be targeted by other students. Risks can be compounded if they lack a trusted adult they can be open with. We seek to remove the additional barriers faced by these students and to provide them with a safe space to speak out.

Early Help: In the first instance, staff should discuss early help requirements with our DSL. The DSL will lead on liaising with other agencies and in setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an Early Help Assessment. It is the aim of targeted Early Help Services, arranged by the local authority, to address the assessed needs of a student and their family, which focuses on activity to significantly improve the outcomes for the student. Our staff are, in particular, alert to the potential need for early help for a student who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation

Woldingham School is committed to safeguarding and promoting the welfare of our students and expects all staff and volunteers to share this commitment. It is our aim that all students fulfil their potential

- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

After gaining consent from the student/family to share information gathered from discussions, relevant professionals will be invited to come together in a 'Team around the Child' (TAC) to assess the child's needs and decide with the child/family a course of action to provide the services needed. A TAC is a multi-disciplinary team of practitioners established on a case-by-case basis to support a child and their family.

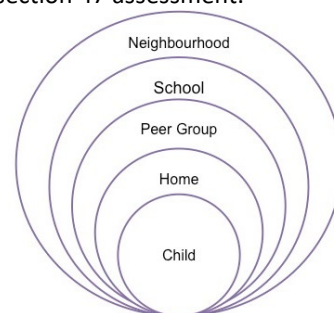
Children in Need - S17 of the Children's Act 1989: Section 17 of the Children's Act says that an assessment for services should be undertaken by the Local Authority in the following circumstances:

- Student(s) are unlikely to achieve or maintain, or to have opportunity to achieve or maintain a reasonable standard of health or development, without the provision of services by a local authority.
- Their health or development is likely to be impaired, or further impaired without the provision of such services.
- They are disabled.
- This could include students who self-harm or disclose an intent to commit suicide.

Child Protection (S47 Children's Act 1989): The Local Authority has a statutory duty to investigate when there is reasonable cause to suspect that a student is suffering, or likely to suffer, significant harm due to the action or inaction of others. There is no one absolute criterion for judging what constitutes significant harm. Consideration of the severity of ill-treatment may include the extent of the harm suffered, the context within which it occurred and its duration. To understand and evidence 'significant harm', it's necessary to consider the family context, together with the student's development within their wider social and cultural environment. Significant harm may also arise from a combination of significant events which are both acute and long standing and that may impair the student's physical, psychological and social development. If staff or volunteers have significant concerns about any student, they should make them known to the DSL. A referral to children's social care will be made immediately if there is risk of immediate harm to a student. If a crime may have been committed, the matter will be reported to the police. It is important to understand that anyone can make a referral.

Working with our Safeguarding Partners: Woldingham will work with children's social care, the police, health services and other services to promote students' welfare and protect them from harm. This includes providing a coordinated offer of early help when additional needs of students are identified and will contribute to inter-agency plans to provide additional support to students subject to child protection plans. We allow access for children's social care from the host local authority and from a placing local authority, for that authority to conduct, or consider conducting, a section 12 or a section 47 assessment.

Contextual Safeguarding: Young people's behaviours, levels of vulnerability and levels of resilience are all informed by the social/public and private contexts in which young people spend their time. When spending time in these extra-familial contexts, young people may be exposed to healthy norms or harmful norms that are conducive to abusive and exploitative relationships. As a result, we identify, assess and intervene where possible in all social environments where abuse and exploitation of young people can occur – in essence to take a 'contextual' approach to safeguarding. For example, our school leadership works with professionals and the student body to challenge harmful elements of school culture. Additionally, we help to promote a culture of safety with the curriculum and around the school regarding students' online activities – a place where young people spend an increasing amount of time, raising their vulnerability to potential abuse. We will provide as much contextual information as possible to Children's social care when a referral is made. Please visit <https://www.contextualsafeguarding.org.uk/> for more information.



The Student Voice: Woldingham believes that students should have a say.⁶ Young people are encouraged to use the Student Voice Page, available on the student's Learning Management System (LMS).

Our procedures allows students to anonymously report concerns about themselves, their friends or geographical locations within their school, community or home (during periods of remote learning).⁷ Reports made via the Student Voice Page will be triaged by the DSL who will assign actions and be responsible for ensuring that such matters are dealt with in a timely and age-appropriate manner, within the parameters set by the Surrey Effective Family Resilience Model. Where a student is identified, a report will be created on CPOMS and the CPOMS incident number referenced on the Student Voice Page. Any follow-up actions will be recorded on the student's safeguarding file using CPOMS. If a concern around an area of the community is raised Woldingham will work closely with multi-agency partners to share the detail and context of the concern.

If a report is made about an employee, volunteer or adult in the school, we will follow our normal procedure for managing allegations against adults working in the school and make a referral to the LADO. If the adult is unnamed, the Head will assess the information and decide whether to notify the LADO. Students are reminded that the Student Voice Page is an additional tool for reporting concerns, and that staff are always on hand to listen to their concerns and worries.⁸

Serious Violent Crime and Serious Violence: Our staff are aware of the indicators which may signal that students are at risk from, or are involved with, serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm, a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that students have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. All staff are made aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced maltreatment and having been involved in offending, such as theft or robbery. If staff suspect that a student is at risk of serious violence, this will be reported to the DSL immediately. Please see the Home Office Guidance, which the school follows, on Preventing youth violence and gang involvement.

Concerns and allegations of abuse made against other students⁹ (Child-on-child Abuse inclusive of sexual violence or harassment and banter) – Please see our Child-on-child Abuse, including Sexual Violence and Sexual Harassment Policy for more details including the latest DfE Guidance (Sexual Violence and Sexual Harassment between children in schools (DfE: currently in force)): We recognise that some students on occasion will negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's Anti-Bullying (including Cyber-bullying) and Behaviour Management Policies.¹⁰ Staff are clear as to our policy and procedures with regards to child-on-child abuse and are trained to manage a report of child-on-child sexual violence and sexual harassment. The school understands that though we may have few or even no reported cases of child-on-child abuse, such abuse may still be taking place and simply not being reported.

We recognise the gendered nature of child-on-child abuse (i.e. that it is more likely that girls will be victims and boys perpetrators. Woldingham is an all-girls school but maintains a zero-tolerance approach to abuse, believing that it should never be tolerated or dismissed as 'just banter' or 'part of growing up'. Downplaying certain behaviours can lead to a culture of unacceptable behaviours, an unsafe environment for students and, in worst case scenarios, a culture that normalises abuse, leading to students accepting it as normal and not reporting it. Child-on-child abuse can take many forms, including:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;

⁶ NMS 13.1 (ISSR P8 para 8(b))

⁷ NMS 14.2 (ISSR P8(b) and reported under ISSR P7 para 33(complaints))

⁸ NMS 11.3 (ISSR P3 para 8(b))

⁹ NMS 8.4 (ISSR P3 para 7(a) and (b), and P3 para 8(a) and (b))

¹⁰ NMS 16.1 (ISSR P3 para 10(bullying))

- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nude and semi-nude images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

When dealing with abuse by young people on peers, we follow the key safeguarding documents, *Keeping Children Safe in Education* (DfE: currently in force) and *Working Together to Safeguard Children 2023*, even where an alleged perpetrator(s) is a student. The proprietor is aware of their obligations under the Human Rights Act and the Equality Act alongside our local multi-agency safeguarding arrangements. This includes careful consideration of how the school supports our students with regard to particular protected characteristics including disability, sex, sexual orientation, gender reassignment and race. Additionally, we use a [Child-on-child Abuse toolkit](#) to support staff in safeguarding students. Sexualised abuse, including verbal abuse by peers is a safeguarding issue included in the school's broader approach to safeguarding. If the school receives an allegation of abuse by one or more students that is alleged to have taken place outside of the school premises, our safeguarding principles remain the same, and we still carry out a referral to children's services as necessary.

However, where there is 'reasonable cause to suspect that a student is suffering, or likely to suffer significant harm' the concern or allegation of Child-on-child abuse must be reported to the DSL immediately, who will then refer to the Surrey Children's services C-SPA (Children's Single Point of Access). A factual record should be made of the concern or allegation but no attempt at this stage should be made to investigate the circumstances. A copy of the discussions and outcomes will be kept in both student's files. Additionally, if appropriate, the DSL will also refer students to an external safeguarding agency such as Childline and NSPCC. This will entail:

- effective implementation of our school's usual safeguarding and anti-bullying policies (and recognition that sexualised abuse, including verbal abuse, by peers is a potential safeguarding issue);
- seeking advice from statutory agencies, as appropriate, and readiness to make a referral if an incident meets the referral threshold set by the local Safeguarding Children Partnership;
- if a student is in immediate danger or is at risk of harm, an immediate referral to children's social care and/or the police;
- following the advice for practitioners in: *What to do if you're worried a child is being abused*;
- effective information sharing with any agencies or other professionals involved;
- where allegations of abuse or assault have been made against one or more of our students, a thorough risk-assessment of the situation and risk-based decision-making (with the benefit of the advice of statutory authorities, where appropriate) should be carried out with a view to ensuring the safety of all students. Both alleged victims and perpetrator(s) should receive appropriate support.
- decisions arising that might include, for example, whether the accused student should be removed from our school for a period of time, or from certain classes; whether contact with certain individuals should be prevented or supervised,
- the availability of counselling, the adequacy of arrangements for listening to students etc;
- good record keeping of related conversations, meetings and communications.

Minimising the risk of child-on-child abuse: Woldingham recognises that where the school provides boarding accommodation for students, there are additional risks for child-on-child abuse. We have employed procedures to help minimise the risk, with the majority of these focusing on educating our students about what is and is not appropriate with regards to all forms of relationships with their peers, both within the school and their boarding accommodation. As part of our PSHEE and Relationship and Sex Education (RSE) lessons, we promote healthy and respectful student-to-student communications and behaviours and provide an environment which challenges inappropriate behaviour.¹¹ We teach our students to look out for potential signs of an imbalance in power, the importance of permission-seeking and giving in relationships with friends, peers and adults and what to do to seek support. We make it explicit to our students what constitutes sexual harassment and sexual violence and why these are always unacceptable. We also teach our students about different types of bullying (including cyberbullying), the impact of bullying, responsibilities of bystanders (primarily reporting bullying to an adult) and how to get help.

¹¹ NMS 17.1

Sexual Violence and Sexual Harassment between students: We take our definition from the Sexual Offences Act 2003, which considers rape, assault by penetration and sexual assault to be types of sexual violence. **All allegations of sexual violence will be reported to the police in parallel with children's social care.** In addition, we define sexual violence as 'unwanted conduct of a sexual nature' that can occur online and offline. Sexual violence and sexual harassment can be between two students or a group of students of any age and sex. Both sexes may be affected, although girls are statistically more likely to be victims of sexual violence, and boys more likely to be perpetrators. Sexual violence and sexual harassment may overlap; they can occur online or face to face and are never acceptable. We recognise (and reflect in our SEND Policy) that Students with SEND are likely to be more vulnerable (especially where a student with SEND is a 'full' or 'flexi' boarder). Woldingham is aware that online sexual violence or sexual harassment can be more complex, such as non-consensual sharing of sexual images; sexualised online bullying; unwanted sexual comments including on social media and sexual exploitation; coercion and threats. Sexual harassment is likely to violate a student's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. We recognise that sexual violence and harassment can occur both on and offline, both physically and verbally and is never acceptable. Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names, sexual "jokes", taunting or upskirting;
- physical behaviour, such as: deliberating brushing against someone, interfering with someone's clothes (this may cross a line into sexual violence) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment, which might include: non-consensual sharing of nude and semi-nude images and or videos (both often referred to as sexting); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

Responding to reports of sexual violence and sexual harassment: We recognise that children may not find it easy or know how to tell staff verbally that they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful, and that staff may be informed by a third party or through behaviour indicators of the victim. We understand the importance of the school's role in acting upon any concerns immediately and making sure all victims are reassured and that they are being taken seriously, regardless of how long it has taken them to come forward. Though it may not be necessary to report one-off issues to the police, each allegation of abuse will be taken seriously, and the DSL will still refer these allegations to children's social care, who will support the school in deciding whether the victim or alleged perpetrator(s) are in need of protection or other services. However, all allegations of sexual violence will be reported to the police, in parallel with children's social care. Though children's sexual behaviours can be developmentally expected, some more harmful sexual behaviours may cause developmental damage. The Brook sexual behaviours traffic light tool is used to help us consider harmful sexual behaviours. Reports of sexual violence are often complex and require difficult decisions to be made, on a case-by-case basis, with the DSL taking the lead role, supported by external agencies such as children's social care or the police. Some situations are statutorily clear: a child under the age of 13 can never consent to sexual activity (the age of consent is 16); sexual intercourse without consent is rape (as defined in law); creating or sharing sexual images or videos of under 18s is illegal, including children making or sharing these themselves.

Actions following a report of sexual violence and/or sexual harassment: A factual record should be made of the concern or allegation, taking the victim seriously, but no attempt at this stage should be made to investigate the circumstances, unless a student is in immediate danger or at risk of harm, in which case an immediate referral will be made to children's social care and/or the Police. Every report will be considered on a case-by-case basis. Additionally, where there is a report of rape, assault by penetration or sexual assault, this should be passed to the Police. Victims will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; they will not be made to feel ashamed for making a disclosure. We explain to our students in a way that avoids alarming or distressing them that the law is in place to protect students and young people rather than criminalise them. The DSL will follow the advice for practitioners in what to do if you're worried a child is being abused, will follow through the outcomes of the discussion, and if so advised by Children's Social Care. We'll make a formal referral if the incident meets the referral threshold set by the Local Safeguarding Children Partnership, ensuring effective information sharing with any agencies or other professionals involved. The DSL will ensure good record keeping of related conversations, meetings and communications. A copy of the discussions, and outcomes will be kept securely. Staff should not assume that someone else is dealing with the incident and should discuss concerns with the DSL. Where an incident between two students takes place away from the school, the school's duties and procedures remain the same.

School Staff are trained as per Part One of KCSIE on how to manage a disclosure and are aware of anonymity in cases where an allegation is progressing through the criminal justice system. Woldingham will do all they reasonably can to protect the anonymity of students involved in any report of sexual violence or sexual harassment, including considering the impact of social media. The DSL will make an immediate written risk and needs assessment where there has been a report of sexual violence, considering the victim, alleged perpetrator(s), and other students and staff at the school (including actions to protect them). Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. Risk assessments are kept under review.¹² In cases of sexual violence, a professional risk assessment by external specialists may be required and should be used to inform the school's own risk assessment. Woldingham will consider any report of sexual violence or harassment and act in the best interests of the student. Woldingham will also consider when to inform the alleged perpetrator(s), and this may be discussed with relevant agencies. The school actively considers the risks posed to our students and ensures adequate measures are in place to protect and keep students safe. Staff may be expected to participate in any early help assessment, child protection enquiry, strategy discussion or other outcome, following a referral.

With any report of sexual violence and/or harassment, the DSL will consider:

- the wishes of the victim in terms of how they want to proceed. Victims will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered;
- the nature of the alleged incident(s), including, whether a crime may have been committed and consideration of harmful sexual behaviour, the ages of the students involved;
- the developmental stages of the students involved;
- any power imbalance between the students, including age gaps or differences in maturity, cognition or understanding (including SEND or learning difficulties), if the alleged incident is a one-off or a sustained pattern of abuse;
- intra familial harms and any necessary support for siblings following incidents;
- that sexual violence and sexual harassment can take place within intimate personal relationships between peers;
- are there ongoing risks to the victim, other students, adult students or school staff and
- other related issues and wider context.

Managing the report: The school's response is underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions will be recorded. Dependent on the disclosure of sexual violence or sexual harassment, the school will consider the following courses of action:

- **Managing internally:** in some cases of sexual harassment (such as one-off incidents) the school may manage the incident internally, without the involvement of early help, following our behaviour management policy;
- **Involve Early help:** when a report may not require the use of statutory intervention, involving early help is particularly useful in addressing non-violent, harmful sexual behaviour and may prevent escalation;
- **Referral to children's social care:** in cases where there has been harm, is at risk of harm, or there is an immediate danger, a referral will be made to C-SPA. Parents or carers will generally be informed of this, unless there is a clear reason not to at this stage. A risk and needs assessment will also be produced at this stage;
- **Reporting to the Police:** in cases where rape, assault by penetration or sexual assault is reported. Woldingham will not wait for the outcome of a Police investigation before protecting the victim, perpetrator(s) and other students in the school. The DSL will work closely with the Police to ensure that our actions do not jeopardise the Police investigation. If a student is convicted or cautioned, we will update the risk assessment and consider suitable action through the behaviour policy.

It is important for Woldingham to ensure the victim and perpetrator(s) remain protected, especially from bullying or harassment. Where no further action is taken, or a student found not guilty, Woldingham will continue to support the victim and perpetrator(s).

This is how victims of child-on-child abuse will be supported: All students involved, whether perpetrator(s) or victim(s), are treated as being 'at risk'; a thorough risk-assessment and risk-based decision-making (with the benefit of the advice of statutory authorities, where appropriate) will be carried out to ensure the safety of all students and, for example, whether the accused student should be removed from school for a period or removed from classes and any transport etc. which is shared with the victim, whether sleeping arrangements should be changed for boarders, whether contact with certain individuals should be prevented or supervised, the availability of counselling such as referring students to an external safeguarding agency like Childline and NSPCC and the adequacy of arrangements for listening to students etc. We recognise that any actions taken will

¹² NMS 9.3 (ISSR P3 para 8(b))

be in the best interests of both students and is not perceived to be a judgement of guilt of the alleged perpetrator(s). Additionally:

- Support for the victim will consider their age, the nature of the allegations and the risk of further abuse; an alleged perpetrator(s) may have unmet needs themselves.
- The needs and wishes of the victim will be paramount, and they will be able to continue their normal routine as far as possible, so that school is a safe space for them.
- Woldingham School will be prepared to support a victim over a long period of time.
- Woldingham School will do everything we reasonably can to protect victims from bullying or harassment as a result of any report they have made.
- Where the victim or perpetrator(s) moves to another school it is important that the new establishment is made aware of any ongoing support needs.
- Woldingham School must ensure the victim is safeguarded, but still provide the perpetrator(s) with an education and support as necessary.
- Woldingham School may discipline the alleged perpetrator(s), including while the police or social care investigation is ongoing, although they will liaise with these bodies to assist in determining any sanctions.
- Woldingham School will be clear about when their actions are to support the victim or perpetrator(s), and when their actions are to discipline the perpetrator(s) for their past conduct.
- A student against whom an allegation of abuse has been made may be excluded from the school for a fixed period during the investigation and the School's policy on behaviour, discipline and sanctions will apply.

If it is necessary for a student to be interviewed by the police about allegations of abuse, the School will ensure that, subject to the advice of Children's social care, the student's parents are informed as soon as possible and that the student is supported during the interview by an appropriate adult. Normally, the DSL will try to discuss any concerns about a student's welfare with the family and, where possible, seek their agreement to making a referral to C-SPA if necessary. However, in accordance with DfE guidance, this will only be done when this will not place the student at increased risk. The student's views will also be taken into account. Where there are doubts or reservations about involving the student's family, the DSL should clarify with C-SPA or the police whether, when and by whom the parents should be told about the referral. This is important in cases where the police may need to conduct a criminal investigation. Where appropriate, the DSL should help the parents understand that a referral is in the interests of the student and that the school will be involved in the enquiry or police investigation. In the case of students whose parents are abroad, the student's Education Guardian will be requested to provide support to the student and to accommodate him/her if it is necessary to exclude him/her during the investigation.

Where neither social services nor the police accept the complaint, a thorough school investigation should take place into the matter using the school's usual disciplinary procedures. In situations where the school considers a safeguarding risk is present, a risk assessment will be prepared along with a preventative supervision plan.¹³ The plan should be monitored and a date set for a follow-up evaluation with everyone concerned. We draw upon the support offered by [The National Organisation for the Treatment of Abusers \(NOTA\)](#) to support staff training on Sexual violence and Harassment between peers.

When a student is in need of *urgent* medical attention and there is suspicion of abuse an ambulance should be called. If the response from the emergency services states that the school should take the student to hospital then the DSL, with an escort, should take the student to the Accident and Emergency Unit at the nearest hospital. They should first notify C-SPA and seek advice about what action the C-SPA or the police will take and how the parents will be informed. Normally, parents would be informed that a student requires urgent hospital attention. If the suspected abuse is sexual then the medical examination should be delayed until the C-SPA and the police can liaise with the hospital, unless the needs of the student are such that medical attention is the priority. There must at all times be a responsible adult with the student, whether from the school, C-SPA or the police, if the parents are not included. All unnecessary delays should be eradicated and inaction at any level should be challenged. In borderline cases, this can be done informally and without initially giving names. The School will not investigate allegations without the agreement of the LADO. In cases of serious harm, the police will be informed from the outset. Discussions will be recorded in writing, with any communication with the individual or the parents of the student(s) agreed.

Working with parents and carers: Woldingham will, in most cases, engage with the parents of both the victim(s) and the perpetrator(s) and will consider carefully what information they provide. It is good practice for the school to meet the victim's

¹³ NMS 20.3 (ISSR P3 para 8(b))

parents with the victim present to discuss safeguarding arrangements and also good practice to meet the perpetrator's parents to discuss what arrangements are being put in place, such as moving them out of classes. Where there are doubts or reservations about involving the student's family, the DSL should clarify with the C-SPA or the police whether, when and by whom, the parents should be told about the referral. This is important in cases where the police may need to conduct a criminal investigation. Where appropriate, the DSL should help the parents understand that a referral is in the interests of the student and that the school will be involved in the enquiry or police investigation. In the case of students whose parents are abroad, the student's Education Guardian will be requested to provide support to the student and to accommodate him/her if it is necessary to exclude him/her during the investigation.

Supporting witnesses of sexual violence or sexual harassment: Consideration should be given to supporting students who have witnessed sexual violence, especially rape and assault by penetration. Witnessing such an event is likely to be traumatic and support may be required. Following any report of sexual violence or harassment, it is likely that students will take "sides". The school will do all it can to ensure the victim(s), alleged perpetrator(s), and any witnesses, are not being bullied or harassed. Social media is likely to play a significant role in the fall out from any incident or alleged incident. There is the potential for contact between victim and alleged perpetrator(s) and a high likelihood that friends from either side could harass the victim or alleged perpetrator(s) online. When writing a risk-assessment for the students involved in an incident of sexual violence or sexual harassment, we will consider whether any additional potential support is needed to keep all our students safe.

All staff and volunteers: Safeguarding is everyone's responsibility. It applies to all who work, volunteer, learn, or supply services to our school. All staff and volunteers have an equal responsibility to understand and implement this policy and its procedures both within and outside of normal school hours including activities away from school. This includes a duty to act upon any suspicion, concern or disclosure that may suggest that a student is at risk of significant harm or in need of support services. All staff and volunteers should be alert to students at risk of being radicalised or drawn into extremism or Child Sexual Exploitation whether from an adult or another student (further details of these signs are in Appendix 1).

They are required to report instances of actual or suspected student abuse or neglect to the DSL or Deputy DSL. Additionally, they are expected to make themselves available for appropriate training if necessary out of normal school hours and to read both this policy and Part 1 of the latest edition of KCSIE and 'What to do if you are a worried a child is being abused' latest edition. Special arrangements will be put in place for anyone working in the school whose command of English is insufficient to enable them to read and digest the contents of this policy and Part 1 of KCSIE.

Public Displays of Affection (PDA): We recognise that students may develop deep personal relationships in school and in boarding. Staff and volunteers are particularly aware of the potential for abuse by peers in a boarding environment and students in the boarding community have privacy guidelines and avenues through which they can express concern.

SPECIFIC ISSUES RELATING TO SAFEGUARDING

Teaching children how to Keep Safe (Educating our students about safeguarding and radicalisation including the delivery of the Prevent Strategy): Our school ensures that students develop a clear understanding both of safeguarding issues and what they may do to play their part in ensuring their welfare and safety and in building resilience against the dangers of radicalisation: our programme for PSHEE supports this process as part of a broad and balanced curriculum. Within our PSHEE curriculum, we have a programme for Relationship and Sex Education (RSE) which includes issues such as:

- "sexting", "banter", sexual assault between young people and gender-based issues
- healthy and respectful relationships;
- what respectful behaviour looks like;
- gender roles, stereotyping, equality;
- body confidence and self-esteem;
- prejudiced behaviour;
- that sexual violence and sexual harassment is always wrong and addressing cultures of sexual harassment;
- keeping safe whilst online and
- information on the grooming process and how to protect themselves including online, and how to get help.

We ensure that our students (especially those who are boarding at the school) are aware of the dangers of these safeguarding issues and promote positive relationships based on mutual respect. We make it clear to all of our students that sexual relationships between students is strictly prohibited. If a student is found to be having a sexual relationship with another

student at the school, Woldingham will follow the statutory and legal guidance in line with KCSIE (currently in force). Through our School values, we encourage students to respect others. Age-appropriate anti-bullying lessons are held in school and include the risks of cyber bullying, online safety, and child-on-child abuse, including how victims will be supported.

Additionally, whenever appropriate, subjects in the curriculum and co-curriculum activities will be used to reinforce the messages given. We follow the standards for safeguarding and protecting children in sport stated by the NSPCC Child Protection in Sport Unit - NSPCC Standards for Safeguarding in Sport ([link](#)). If a member of staff becomes aware of a suspected case which involves sexting, inappropriate banter or sexual assault between young students, gender based or otherwise, this will be considered as a safeguarding concern and reported to the DSL, who will consider the allegation on a case-by-case basis. Depending on the severity of the case, this may involve the school's anti-bullying procedures or the parents of the students involved. In the case of serious harm, a referral to Surrey's SPA will be completed and the police are informed from the outset.

Students who are lesbian, gay, bisexual, or questioning their gender (please also refer to gender identity policy): Whilst we recognise that a student or a young person being lesbian, gay or bisexual is not in itself an inherent risk factor for harm, these students can be targeted by other students. In some cases, a student who is perceived by other students to be LGBT+ (whether they are or not) can be just as vulnerable as students who identify as LGBT+. The school endeavours to reduce the additional barriers faced by these students, and we provide a safe space for them to speak out or share their concerns with a trusted member of staff as required. We build LGBT+ inclusion into our [Relationships Education, Relationship and Sex Education and Health Education](#) curriculum, including how to counter homophobic, biphobic and transphobic bullying and abuse. When supporting a gender questioning child, the school will take a cautious approach and will consider the broad range of the child's individual needs in partnership with the child's parents (unless doing so would cause significant harm). This would be alongside any clinical advice available. The school recognises that children questioning their gender may well have wider vulnerabilities including complex mental health needs or additional diagnoses such as autism or attention deficit hyperactivity disorder, as well as the process of social transition having a variety of unknown impacts.

Within Spiritual, Moral, Social and Cultural (SMSC) development, we instill values within students that build resilience and prevent students being drawn into radicalisation and extremism. We explore what extremism might look like, how this threatens peace, and we build resilience to radicalism by providing a safe environment for debating controversial issues. We actively promote British Values within our SMSC and create an environment in which students know they are listened to and valued. We educate our students to reject violence and cruelty in whatever form they take, whether it be from animal rights activists, Al Qaeda influenced groups, racist and fascist organisations, or any other extremist group.

Racist Incidents: Our policy on racial equality is set out separately, supported by our Behaviour/Anti-bullying policies, which acknowledge that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of any racist incidents.

Online Safety¹⁴ (Please see our Online Safety Policy, available on the school website, for more details): Our students increasingly use electronic equipment on a daily basis to access the Internet and share content and images via social media sites. Unfortunately, some adults and other students use these technologies to harm students. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing students to engage in sexual behaviour such as webcam photography or face-to-face meetings. Students 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. The school Online Safety Coordinator, who works closely with the DSL, takes lead responsibility on online safeguarding matters.

We have a whole school approach to online safety, including a clear policy on the use of mobile technology, which empowers us to protect and educate our students and staff in the use of technology and establishes mechanisms to identify, intervene, and escalate any concerns where appropriate. The designated safeguarding lead has lead responsibility for understanding the filtering and monitoring systems and processes in place. They are supported by the Director of IT. The governors and the Senior Leadership Team (SLT) ensure that students are safe from potentially harmful and inappropriate content including terrorist and extremist material when accessing the internet on school systems through appropriate filtering, internet safety rules and online safety education with the curriculum in line with our Online Safety and Cyberbullying

¹⁴ NMS 8.3 (ISSR P3 para 7(a) and (b), and P3 para 8(a) and (b))

policies. These are reviewed regularly to ensure their effectiveness. Our Online Safety policy details the actions required from students and staff to maintain a safe electronic environment and is based on current best practice drawn from a wide range of sources. Our key message to keep students and young people safe is promoted and applied to both online and offline behaviours, being careful to ensure “over blocking” does not lead to unreasonable restrictions. We ensure staff are appropriately trained in online safety; all staff receive training on the expectations, applicable roles and responsibilities in relation to filtering and monitoring. We consider carefully how to measure mobile data (4G/5G) usage on the school premises including the management of students’ devices and the content they may have on them. (Please also see our Acceptable Use of Mobile Phones and 3G/4G/5G compatible devices policy located in the Online Safety policy). As part of staff training, the leadership team ensure that staff know how to escalate concerns they may have about a student in relation to online safety. Much of the guidance from the DfE’s two new publications in this area (filtering and monitoring standards, which support schools to have effective systems in place, and the Cyber security standards for schools and colleges) is adhered to as best practice. Procedures which safeguard our systems are reviewed periodically to keep up with evolving cyber-crime technologies. Practices are amended as needed to ensure the safety of both staff and students.

In planning curriculum input on online safety, materials are differentiated to take account of the different ages, levels of understanding and vulnerabilities of our students so that all students are able to access this input effectively. We acknowledge that as well as providing a variety of positive opportunities, the use of technology has become a significant component of many safeguarding issues and can provide the platform that facilitates exploitation of students and young people. This includes the rise of [harmful online challenges and online hoaxes](#), which the school educates about within our online safety curriculum. The breadth of issues classified within online safety are considerable but can be categorised into **four** areas of risk:

- **CONTENT:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism, misinformation, disinformation (including fake news) and conspiracy theories.
- **CONTACT:** being subjected to harmful online interaction with other users such as peer to peer pressure, commercial advertising or adults posing as children with the intent to groom or exploit.
- **CONDUCT:** personal online behaviour that increases the likelihood of, or causes, harm, such as sending of explicit images or online bullying
- **COMMERCE:** risks such as online gambling, inappropriate advertising, phishing and or financial scams

Staff are in regular contact with parents and carers, communicating the requirements of students’ online usage, including which online resources students are required to use for their studies and who from the school they may be interacting with. Staff also support parents and carers in providing links to current advice and guidance on Internet-Safety, including social media and online radicalisation risks through [Internet Matters](#) and the National Child Exploitation and Online Protection Command (CEOP) <https://www.ceop.police.uk/Safety-Centre/>.

As generative AI develops, the school recognises the merits and safeguarding concerns surrounding the use of it. The Head of Academic Digital Innovation, DSL and Director of IT work closely to ensure both staff and students use generative AI safely, and consider how to apply filtering and monitoring to AI being used for educational purposes. This is done in conjunction with the DfE publication on generative AI: product safety expectations.

Information and support: There is a wealth of information available to support us in Keeping Children Safe online. The following is not exhaustive but should provide a useful starting point: www.disrespectnobody.co.uk; www.ceop.police.uk; www.saferinternet.org.uk; www.internetmatters.org.uk; www.pshe-association.org.uk; www.educateagainsthate.com; <https://www.gov.uk/government/publications/teaching-online-safety-in-schools>.

Safer Recruitment, the Single Central Record (SCR)¹⁵: (Please also refer to our Safer Recruitment, Selection and Disclosures Policy and Procedure and Single Central Register for Staff Appointments) Our school operates safer recruitment procedures (in accordance with Part Three of KSCIE: currently in force) including required pre-appointment checks on teaching and non-teaching staff, volunteers, the Board of Governors, supply staff, staff of contractors and other individuals working with or nearby students. Pre-appointment checks can include online searches and shortlisted candidates are notified of this in advance. In accordance with the full requirements of the SCR, before starting work, the details of these checks are recorded. Referees will be asked to confirm to the best of their knowledge that the applicant

¹⁵ NMS 19.1 ISSR P4 para 18(2)(f) (staff) and/or P4 para 19(2)(e) (supply staff) and ISSR P3 para 8(b))

has not been radicalised and does not support terrorism or any form of extremism. The SCR of appointments is rigorously maintained. Checks are recorded in the SCR by reference to the usual considerations such as role, frequency, supervision, payment and employment by another organisation.

Through risk assessments, the school also ensures that appropriate checks have been made upon the staff of other organisations working with our students on external trips and visits, including adults who supervise students on work experience (career shadowing program). In any case where the required documentation is unavailable or checks have not been completed prior to the starting date for any member of staff or other adult who may have access to students, then a risk assessment will be carried out to determine the appropriate course of action, e.g. allowing appropriately supervised access for a specified period or postponing the starting date.

Safeguarding arrangements for staff employed by another organisation: We ensure procedures are followed to enable appropriate child protection (including DBS checks) and are applied to staff employed by other organisations in contact with School (including obtaining written confirmation that DBS checks have been completed) students including working on another site (please see policy on Educational Visits). Woldingham will obtain DBS checks on contractor staff, who also receive safeguarding training from the DSL. In no circumstances will the school decide to stop using a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome. The Board of Governors will discuss with the supply agency whether it is appropriate to suspend the supply teacher subject to an allegation or concern, or redeploy them to another part of the school, whilst an investigation is carried out. The school, in co-operation with the LADO, police and/or children's social services and the supply agency, will usually take the lead on an investigation of this nature.

Visitors and visiting speakers: Appropriate safeguarding and prevent duty checks upon visiting speakers and other visitors will be made and recorded. All visitors and visiting speakers will be required to undergo an identity check on arrival and wear a visitor's badge. They will not be allowed unsupervised access to students. The School keeps a visitor's book at Reception. All visitors must sign in on arrival and sign out on departure and are escorted whilst on School premises by a member of staff or appropriately vetted volunteer. Additionally, a risk assessment will be carried out. Unidentified visitors will be challenged by staff or reported to the Head or School Office. We have clear protocols for ensuring that any visiting speakers, who might fall within the scope of the *Prevent* duty, whether invited by staff or by the students themselves, are suitable and appropriately supervised; this will if appropriate include a barred list check and internet search. At Woldingham School, speakers are never left alone with students. The interaction between the *Prevent* requirement to check speakers and the KCSIE (currently in force) is likely to mean in practice that checks on visiting speakers will be recordable on the SCR either as checks on staff or un-prescribed checks on volunteers. In accordance with the ISSR, checks are recorded in the SCR by reference to the usual considerations such as role, frequency, supervision, payment and employment by another organization.

The *Prevent* statutory guidance: We ensure that visiting speakers sign a confirmation that they understand our *Prevent* duties as a school and agree to speak and act within the letter and spirit of these duties. If a visiting speaker works for an organisation, then the organisation will provide a letter prior to the visit confirming their suitability to speak to our students. An internet search is always carried out. All visiting speakers are included in our Visiting Speakers log. The interaction between the *Prevent* requirement to check speakers and KCSIE (currently in force) is likely to mean in practice that checks on visiting speakers will be recordable on the SCR either as checks on staff or un-prescribed checks on volunteers.

Preventing Extremism and Radicalisation: (Also please refer to Appendix 1 of this policy). We have clear protocols for ensuring that visiting speakers sign a confirmation that they understand our *Prevent* duties as a school and agree to speak and act within the letter and spirit of these duties. If a visiting speaker works for an organisation then the organisation will provide a letter prior to the visit confirming their suitability to speak to our children. Where this is not possible then an internet search will be carried out. All visiting speakers are included in our Visiting Speakers log. The interaction between the *Prevent* requirement to check speakers and the KCSIE (currently in force) is likely to mean in practice that checks on visiting speakers will be recordable on the SCR either as checks on staff or un-prescribed checks on volunteers.

Woldingham ensures that we can 'demonstrate activity', as required by the statutory guidance, in the following key areas: risk assessment of students being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology, working in partnership, staff training and IT policies. This is wholly in keeping with our school ethos and approach to promote a broad, tolerant and open- minded understanding of the world around us, including an appreciation of the democratic process and precluding the promotion of partisan political views in the classroom, in extra

and co-curricular activities, or in any other aspect of the school's activities. The school is able to demonstrate a general understanding of the risks affecting children and young people in the area. As part of our Training Process, all staff receive annual 'Channel Awareness' (Prevent) training: <https://www.elearning.prevent.homeoffice.gov.uk/edu/screen1.html>

Protecting students from the risk of radicalisation is seen as part of Woldingham's wider safeguarding duties and is similar to protecting students from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences. We understand that during the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised. We consider the level of risk of students identified as being at 'risk of radicalisation' and make an appropriate referral, which can include 'Channel' or children's services. The Board of Governors, Head and the DSL will assess the level of risk within the school and act to reduce that risk. Risk assessments may include due diligence checks for external speakers and private hire of facilities, anti-bullying policy and other issues specific to the school's profile, community and philosophy. Our *Prevent* strategy demonstrates a specific understanding of the risks affecting children and young people and identifying students who may be at risk of radicalisation, including support we can give.

Prevent duty: The DSL receives appropriate training, in accordance with Annex B of KCSIE at least every two years to:

- Provide advice and support to members of staff on protecting students from radicalisation;
- Equip staff through Prevent, Channel and other appropriate training to identify and assess students at risk of being drawn into terrorism and to challenge extremist ideas;
- Liaise with those responsible for Personal, Social, Health and Economic Education (PSHEE), Spiritual, Moral, Social and Cultural (SMSC) assembly and other appropriate curricular programmes actively to promote British values and to teach students about the dangers of radicalisation and extremism; and
- Liaise with those responsible for the school's electronic systems seriously to limit, through appropriate filtering, scope for access through these systems to any website or Internet source deemed problematic from a Prevent perspective.

Mobile phones, cameras and electronic devices: We ensure staff are appropriately trained in on-line safety and we carefully consider how to measure mobile data (4G/5G) usage on the school including the management of students' devices and the content they may have on them through both our online and behaviour management policies. As part of staff training, the leadership team ensure that staff know how to escalate concerns they may have about a student in relation to online safety. Staff should not use personal mobile telephones in the presence of students and must never use personal cameras for taking or storing images or recordings of students. Any images or recordings should only be taken, edited or stored on school computers with the express permission of the Head. Photographs or recordings should only be made where there is a legitimate school purpose. Students' privacy and dignity must be preserved at all times. Images or recordings should not be transmitted to third parties without permission of the Head or parents of the student involved. The school's Acceptable Use Policy sets out the expectations for students and parents on the use of mobile phones and cameras whilst at the school. Staff should not use any other electronic device capable of capturing images of students other than a school camera or school-issued phone. This is in line with the whole-school policy on the use of mobile phones and cameras. The LADO is to be informed if there is any contravention of the school policy regarding the use of personal mobile phones, cameras or other electronic and communication devices by adults working or volunteering at the school.

Induction and On-going Training for all staff, temporary staff, volunteers, the Head and the Proprietor (Board of Governors) in line with SSCP advice: Our arrangements for the level and focus of role-appropriate and refresher training is in accordance with SSCP criteria, as required by KCSIE (DfE: currently in force). Woldingham uses Surrey's *Keeping Children Safe – Safeguarding Training Pathway* as the guide for staff training. All staff are provided with copies of key documents, which they are required to understand. For staff that cannot read English, we take steps to ensure that they understand key information. This includes the active promotion of British values and an understanding of extremism, radicalisation and child exploitation. All our staff are made aware of systems that support safeguarding in our school. These are explained to them as part of their staff induction as well as on-going training. This includes:

- The Safeguarding Children: Child protection Policy; the identity of the DSL and Deputy DSLs and information about their roles (such as implications for mental health, pastoral care and how to identify children at risk of radicalisation);
- The Faculty and Staff Behaviour Policy (Code of Conduct) (which covers as a minimum, acceptable use of technologies, staff student relationships and communications, including via social media and whistleblowing)
- Part One of KCSIE (DfE: currently in force) and 'Annex A' and copies of policies (such as Behaviour Management, Anti-

- Bullying, Whistleblowing, Children Missing in Education, and Online Safety including Cyber Bullying);
- Ensuring all staff are sensitized to act when any incident may be referred to as bullying, tyranny, terror, intimidation, harassment, etc., even if the alleged person has no history of that behaviour.
- Effective Behaviour Management, ensuring a good and safe educational environment which meets all students' needs;
- Our Board of Governors will also be expected to fully understand Part Two of KCSIE (DfE: currently in force).

We assist staff in undertaking their roles and responsibilities as set out in Part One of KCSIE. This includes talking new staff through the content of Part One to a depth appropriate to the person and/or particular role for which they are being inducted. All staff undertake *Prevent* awareness training and are able to refer students to the DSL for further help. Staff are informed of arrangements to listen to students by the use of counsellors, listeners, helplines and other systems to gain views and insight. We work in partnership with local *Prevent* coordinator. When available in our local authority, Workshop to Raise Awareness of *PREVENT* (WRAP) training will be provided for all staff. Our Safeguarding training for the Board of Governors equips them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole-school approach to safeguarding.

In addition, all staff receive safeguarding and child protection as required at least annually, providing them with the relevant skills and knowledge to safeguard children effectively. In addition, safeguarding is a standing agenda item at the beginning of weekly school section meetings. Our Staff are made aware of the early help process and understand their role in it. This includes identifying emerging problems, liaising with the DSLs, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early-help assessment. Our staff are made aware of the process for making referrals to C-SPA and statutory assessments under the Children Act of 1985 that may follow a referral, along with the role they might be expected to play in assessments. The DSL makes it clear in induction and in guidance provided for staff that they have a responsibility to speak up about safeguarding and welfare matters within the school and to external agencies where necessary. Our staff receive annual online safety training (including at Induction), which looks at emerging technologies, strategies to support online safety and highlight key requirements from our online safety policy. Online safety training for staff is integrated and considered as part of the overarching safeguarding approach. Our Staff are also made aware of the early help process and understand their role in it. This includes identifying emerging problems, liaising with the DSL, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.

Following consultation with the Surrey Safeguarding Children Partnership (SSCP), all staff members and the Proprietor will undertake appropriate child protection training regularly i.e. every 3 years as a minimum for all staff (Woldingham provide an annual update to all staff), with the DSL and Deputy DSL attending training every 2 years in line with requirements within KCSIE (DfE: currently in force) inter-agency working. Such training will include local inter-agency protocols and training in the SSCP approach to *Prevent* duties. *Prevent* training is included at the beginning of school year In-Service Training (INSET); we liaise with SSCP who provide the training.

Children who are particularly vulnerable: Woldingham recognises that some students are more vulnerable to abuse, neglect and exploitation and that additional barriers exist when recognising abuse for some students. Using the Department for Education's definition, Vulnerable children are those who have a 'Children in Need' Plan or a Child Protection Plan, or who are a Looked After Child; those who have an EHCP, young carers and those identified as vulnerable by children's social care, including adopted children. A young carer is a person under 18 who provides or intends to provide care for another person (of any age, except where that care is provided for payment, pursuant to a contract or as voluntary work). Additionally, sponsored and other international pupils in the UK without their parents/guardians may be particularly vulnerable and may need additional support in terms of their safety and wellbeing.

We understand that this increase in risk is due to more societal attitudes and assumptions or child protection procedures, which fail to acknowledge a student's diverse circumstances, rather than the individual student's personality, impairment or circumstances. Particular vigilance will be exercised in respect of students who are the subjects of Child protection Plans and any incidents or concerns involving these students will be reported immediately to the allocated Social Worker (and confirmed in writing). If a student has disclosed witnessing domestic violence or it is suspected that the student may be living in a household that is affected by family violence, this will be referred to the DSL as a safeguarding issue. Where it comes to our notice that a child under the age of 13 is, or may be, sexually active, this will result in an immediate referral to Children's services and advice being given to the DSL. This will determine how and when information will be shared with

parents/guardians/carers and the investigating agencies.

In some cases, possible indicators of abuse such as a student's mood, behaviour or injury might be assumed to relate to the student's impairment or disability rather than giving a cause for concern. Or a focus may be on the student's disability, special educational needs or situation without consideration of the full picture. In other cases, such as bullying, the student may be disproportionately impacted by the behaviour without outwardly showing any signs that they are experiencing it. Some students may also find it harder to disclose abuse due to communication barriers; lack of access to a trusted adult or not being aware that what they are experiencing is abuse.

Safeguarding disabled students and students with medical conditions: Our staff are aware that disabled students (especially those who board) experience greater risks, vulnerability and barriers to services. They may have additional needs relating to physical, sensory, cognitive and/or communication impairments. Some disabled students may be more vulnerable to child-on-child abuse or abuse from adults because it may be assumed that indicators of possible abuse such as behaviour, mood and injury relate to the student's disability; they may have fewer outside contacts than other students; receive intimate, personal care; have an impaired capacity to resist or avoid abuse; have communication difficulties; fear losing services or; be more vulnerable to peer abuse (e.g. bullying, sexual assault, intimidation). Our staff are alert to the medical needs of students, including those students with longer term conditions or disabilities, and offer additional pastoral support to these students¹⁶.

Listening to the wishes of students and young people: If the school becomes aware of a safeguarding concern, the school will ensure the student's wishes and feelings are taken into account when determining what action to take and what services to provide, though the school will operate with the best interests of the student at heart. If Woldingham believes that a child is at 'risk of harm' or 'in need', a referral to the C-SPA will be completed regardless of the child's or parent's wishes. We believe it is critical that our students have an adult who they can trust and ensure that there are appropriate systems so students know whom they can turn to and that staff will listen to them. These include: The School Council; Teachers; School Nurses, Therapists, and helplines such as NSPCC and the Childline. Woldingham actively encourages a sensitive and open 'listening' environment in which staff and students may feel free to discuss general matters relating to safeguarding and raise specific concerns. Members of staff should use the school's whistleblowing policy if they have any concerns about the handling of safeguarding matters either in general or in specific cases, should they feel unable to raise concerns regarding child protection failures internally.

Looked After Children: The Head will ensure staff have the skills, knowledge and understanding necessary to keep safe children who are looked after by a Local Authority, if we have such children on roll. This includes ensuring that there is a designated member of staff responsible for their welfare and progress and educational achievement and ensuring this person has up to date assessment information from the Local Authority to ensure prompt action is taken where necessary to safeguard students. The designated teacher will also be responsible for promoting the educational achievement of students who have left care through adoption, special guardianship, or student arrangement orders or who were adopted from state care outside England and Wales. This includes the student's social worker and Head, the most recent care plan and contact arrangements with parents, and delegated authority to carers including the student's legal status. See <https://www.gov.uk/government/publications/promoting-the-education-of-looked-after-children>.

Student Mental Health (Please also refer to the Woldingham Mental Health Policy): Woldingham takes its responsibilities towards students that may be experiencing mental health difficulties seriously. We provide support including having links with therapists, psychiatrists and the National Health Service (NHS). Our school counsellors meet with and support students throughout their school journey. The staff team being responsible for the safety and wellbeing of students operate an 'open door' policy to encourage students to seek help themselves and for staff to refer any concerns so they are dealt with quickly and appropriately. We work closely with these professionals to maintain the students' safety within school and adhere to any advice and guidance we are given. We want to make sure our students are happy, healthy and thrive and understand we all need a little help from time to time with the busy and stressful lives we have today. We ensure all staff are aware that mental health problems can, in some cases, be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation. Whilst we refer our students to trained professionals for a diagnosis of a mental health problem, our staff are well placed to observe our students 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

¹⁶ NMS 7.1 (ISSR P3 para 8(b))

students have suffered abuse, neglect or exploitation, or other potentially traumatic adverse childhood experiences, we recognise this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff are aware of how these students' experiences, can impact on their mental health, behaviour and education. If staff have a mental health concern about a student that is also a safeguarding concern, our Safeguarding procedures are followed, by speaking to the DSL.

Children Missing from Education: (Please also refer to Missing Children Policy): Our procedures regarding children missing from education comply with our local Safeguarding Partnership and with KCSIE (currently in force), as well as the DfE's statutory guidance on school attendance Working Together to Improve School Attendance. Our staff will follow the School's separate procedures for dealing with students who go missing, particularly on repeat occasions. They should act to identify any risk of abuse, neglect and exploitation, including sexual abuse or exploitation. Woldingham will put in place appropriate safeguarding policies, procedures and responses for students who go missing from education, particularly on repeat occasions. Staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage. Staff are aware that being absent, as well as missing, from education can be warning sign of a range of safeguarding concerns, including sexual abuse, sexual exploitation or child criminal exploitation. More information can be found in 'Statutory guidance on children who run away or go missing from home or care' and KCSIE (DfE: currently in force). We will follow-up unexplained absences of any student with a telephone call from the school on the morning of the first day of absence and notify social services if there is an unexplained absence of more than two days of a student who is on the child safeguarding register.

Wherever possible, we will hold three emergency contact details for each student to make contact with a responsible adult if necessary. The DSL shall also inform the applicable local authority of any student who has been absent without the school's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the school and the local authority. Additionally, the DSL will notify the applicable local authority (within which the student resides) when not at Woldingham, of any student who is going to be deleted from the admission register (removed from the school roll). We will follow-up unexplained absences of any student with a telephone call from the School on the morning of the first day of absence and notify social services if there is an unexplained absence of more than two days of a student who is on a Child protection Plan. Unauthorised absence procedures will be followed where a child or young person:

- has 10 days of more continuous absence from school without an explanation and/or
- has left school suddenly and the destination is unknown and/ or
- has not taken up an allocated school place as expected and/or
- is in custody for a period of more than four months due to a final court order and Woldingham School does not reasonably believe he/she will be returning at the end of the period or, has been permanently expected.

The applicable local authority must be notified as soon as the grounds for deletion are met, but no later than the time of deleting the students' name from the register. This will assist the local authority with its duty to identify children of compulsory school age who are missing in education and follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse or neglect. We comply with the directives received from the local authority and the DfE with regard to reporting children who have left Woldingham or are missing from education.

Notifiable Incidents: This is an incident involving the care of a student, which meets any of the following criteria:

- A student has died (including cases of suspected suicide) and abuse or neglect is known or suspected;
- A looked after student has died (including cases where abuse is **not** known or suspected);
- A student has been seriously harmed and abuse or neglect is known or suspected;
- A student in a regulated setting or service has died (including cases where abuse is **not** known or suspected).

Any such incident should be reported to Surrey Safeguarding Children's Partnership (SSCP) Child Death Overview Panel (CDOP) coordinator whose contact details are by telephone 01372 833319 Email: cdop@surreycc.gov.uk, Ofsted and the DfE along with the *Reporting of Injuries, Diseases and Dangerous Occurrences* (RIDDOR) in accordance with the regulations of 2013.

Students at risk of running away or going missing: Woldingham has a comprehensive Children Missing Education & Missing Children policy, and any staff or volunteer who has concerns that a student may be at risk of running away or going missing should alert the DSL at the earliest opportunity. In the event of a student going missing or running away the Missing Child

protocol should be followed. All absences should be accounted for, and registration procedures should be followed for any student not in school without an acceptable reason given.

Children being withdrawn from school: If a child is withdrawn from the school, all efforts will be made to identify the school to which the child is being admitted; their confidential educational and child protection records will be sent separately. If the parent/guardian/carer fails to provide information regarding the new school, an urgent referral will be made to Surrey C-SPA. Educational records sent to our school concerning a child who is not registered by the parent will be returned and the school advised to refer to their Local Authority Education Welfare Service. A student's name will only be removed from the School's Admission Register in accordance with the Child Registration Regulations. Further information is contained in our Admissions Policy.

Physical intervention (use of reasonable force): Our policy is compliant with DfE Guidance 'Use of reasonable force in schools'. Events are recorded and signed by a witness. Staff who are likely to need to use physical intervention are appropriately trained. We ensure that all staff understand when it is and is not appropriate to use reasonable force, to ensure a student does not harm themselves or others, and staff understand that the term 'reasonable' means using no more force than is needed. We understand that physical intervention of a nature that causes injury or distress to a student may be considered under child protection or disciplinary procedures. Where a student has been, or alleges they have been, subject to chastisement through the use of an implement or substance, this will immediately be reported for investigation to the LADO. Please see our Physical Intervention Policy for more details.

Records and the sharing of information with relevant agencies: Written notes will be kept of all incidents relating to individual students. These may be shared with other agencies. All contact with parents and external agencies relevant to Child protection will be logged and kept in confidential records, which are kept separate from educational records and can only be accessed by designated people within the school. The content of Child protection reports will be shared with the parents/guardians/carers in advance of any meetings. Referrals made to Woldingham are recorded on the Inter-Agency Referral Form. All concerns, discussions and decisions made and their reasons should be recorded in CPOMS. If in doubt about recording requirements, staff should discuss this with the DSL. As part of meeting a student's needs we recognise we have clear powers to share, hold and use information between our professionals and local agencies. As part of meeting a student's needs we recognise the importance of information sharing between our professionals and local agencies and we follow procedures set out in *Working Together to Safeguard Children 2023*. Our Data Protection Officer and DSL provide guidance to staff to ensure they are confident with processing information for safeguarding purposes and also the sharing of safeguarding information without permission where there is a good reason to do so. This may also include withholding information where the serious harm test under legislation is met. Additionally, KCSIE (currently in force) recommends that education professionals read the DfE Data Protection guidance for schools (DfE, 2024b); this guidance is aimed at school staff, governors and trustees and sets out how to comply with data protection law, develop data policies, understand what staff and pupil data to keep and prevent personal data breaches. Fears about sharing information will not be allowed to stand in the way of the need to safeguard and promote the welfare of students. Records will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved, and a note of any action taken, decisions reached and the outcome.

Staff should not assume a colleague or another professional will take action and share information that might be critical in Keeping Children Safe. Although inter-agency working and information sharing are vital in identifying and tackling all forms of abuse, it is clear they are especially important to identify and prevent child sexual exploitation. Records concerning allegations of abuse must be preserved for the term of the Independent inquiry into Child Sexual Abuse and at least until the accused has reached normal pension age or for 10 years from the date of the allegation if it is longer.

CPOMS: Working alongside our school's existing safeguarding processes, CPOMS is an intuitive system to help with the management and recording of child protection, behavioural issues, bullying, special educational needs, domestic issues and much more. The major benefit to CPOMS is how it brings together all safeguarding and pastoral care concerns in one place, alongside the necessary tools to analyse each student's situation simply and thoroughly. Every member of staff across the school has an obligation to report any concerns which they may have. CPOMS allows them to record information in a central repository and have relevant people alerted immediately. Our senior leaders are able to build a chronology around a student and to produce reports as required.

School website safeguarding statement: To ensure the privacy and safety of students where students are named, only their first names are given. When choosing photographs for the website, the school is mindful of the way students may appear in them and will not include images which are in any way inappropriate. We follow a policy of seeking parent, guardian or carer's permission before using images which show students on the website or in the local press. The list showing students who are barred from appearing in the press, or on the website, is kept in the School Office and is available whenever photographers are present. No private information about students is published on the website such as surnames or contact details.

Staff Behaviour Policy (Staff Code of Conduct) - Power, Positions of Trust and Staff Behaviour: Guidance is provided in the *Staff and Faculty Behaviour policy and Teachers' Standards* on how adults can ensure that their behaviour and actions do not place our students or themselves at risk of harm or allegations of harm to a student (for example, in one-to-one tuition, sports coaching, conveying a student by car, engaging in inappropriate electronic communication with a student, and so on). The staff Behaviour policy is wide-ranging and covers staff/student relationships and communications including use of social media, "breach of trust" and whistle-blowing statements.

Corporal Punishment is prohibited for all students. The prohibition includes the administration of corporal punishment to a student during any activity, whether or not within the school premises and applies to all 'members of staff', including all those acting *in loco parentis*, such as unpaid, volunteer supervisors. Where a student has been or alleges they have been subject to chastisement through the use of an implement or substance, this will immediately be reported for investigation to the LADO.

Safeguarding arrangements during mandatory school closures/remote working (such as COVID-19): Woldingham considers safeguarding of critical importance at a time when our school is required to close and will do all it can to continue to protect its students and staff, especially those who are vulnerable. This includes arrangements for online/remote learning spaces and the monitoring of attendance to those lessons. Whilst additional arrangements have been established, all the school's policies, rules and guidelines remain in place and adherence to all statutory guidance is expected. Additional details regarding the behaviour and conduct of both staff and students, including our arrangements for remote learning and 1:1 meetings can be found in our Safeguarding Arrangements for Remote Working Policy.

School Closure/Remote Working Risk Assessment: As part of our additional safeguarding arrangements, we have developed a 'School Closure/Remote Working' risk assessment, which identifies and addresses the risks associated with students being required to stay at home. The mitigation measures devised by this risk assessment will enable the school to ensure we can, as effectively as possible, safeguard children who are not physically at the school. Although not an exhaustive list, below are some specific examples of how staff will safeguard children:

Teaching and support staff will:

- be available during their normal working hours (either full school day or part-time as specified in their contracts) to respond to email and other appropriate work software alerts.
- keep a register of attendance of video lessons and a log of work completed, feeding back concerns in attendance to the DSL; attend any relevant meetings via telephone or video conference as requested.
- report any safeguarding or pastoral concerns as normal through CPOMs and follow-up with DSLs as usual.
- know which student/students are vulnerable and will ensure regular contact is made both with the families and the student's social worker (if applicable).

Senior Leadership Team will:

- be available during their normal working hours (either full school day or part-time as specified in their contracts) to respond to email and other appropriate work software alerts.
- establish a system to monitor safeguarding and attendance patterns and respond accordingly where there are concerns for the safety of students; attend/chair any relevant meetings via telephone or video conference as requested.
- inform all staff on a regular basis by email of safeguarding training or updates.
- know which student/students are vulnerable and will ensure regular contact is made both with the families and the student's social worker (if applicable).

Safeguarding children engaged in close, one-to-one teaching: We recognise that students may be more vulnerable when working with adults in a close one-to-one teaching provision. Please refer to the *Woldingham Staff and Faculty Code of Conduct and Teachers' Standards* on how adults can ensure that their behaviour does not place students or themselves at risk of harm or allegations of harm to a student (for example, in one-to-one tuition, sports coaching, conveying a student by car, counselling and so on). The *Staff and Faculty Code of Conduct* is wide-ranging and covers staff/students'

relationships (including working alone with students) and communications including use of social media, “breach of trust” and whistle-blowing statements. The following guidance and arrangements have been taken from our Staff and Faculty Behaviour (Code of Conduct) Policy which aim to safeguard children in one-to-one teaching situations:

- Staff must conduct themselves professionally in their relationships with students, parents and staff and must not behave in a way that could bring the School into disrepute or risk allegations being made.
- No member of staff should ever be behind a locked door with a student.
- One-to-one meetings should, wherever possible, take place in public or semi-public places such as classrooms or offices. If in classrooms, ensure you are seated so that you and the student can be seen through the visibility panel in the door.
- When in a private meeting with a student or one-to-one session, staff should ensure furniture is positioned to allow easy access into or out of the room and that the glass panel in the door is not obscured.
- Staff will at no time travel unaccompanied outside of the School with students.
- Staff should ensure that a meeting is arranged during normal School hours when there are plenty of other people about;
- Staff will avoid sitting or standing in close proximity to the student, except as necessary to check work.
- Staff must report any incident that causes you concern to the DSL in accordance with the School’s Child protection Policy, and make a written record (signed and dated); and
- report any situation where a student becomes distressed or angry to the DSL.

Staff taking medication or other substances: Staff must seek medical advice if they are taking medication that may affect their ability to care for students, and staff medication must be securely stored out of the reach of students at all times.

Whistleblowing: Our Whistleblowing Policy, which is on the school website, is integrated into training and codes of conduct. We make it clear both in induction and other training and in guidance provided for staff that they have a responsibility to speak up about safeguarding and welfare matters within our school and to external agencies where necessary. This is part of how we establish a positive, safeguarding culture in our school. The school also has a culture of valuing staff and of reflective practice. There are procedures for reporting and handling concerns, including poor or unsafe practice and potential failures in the safeguarding regime, provision for mediation and dispute resolution where necessary. Training and support are provided for staff including transparency and accountability in relation to how concerns are received and handled. Our school has regard to KCSIE (DfE: currently in force) and as a result has clear processes for reporting and recording allegations. The NSPCC whistleblowing helpline is available for staff that feel unable to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 or Email: help@nspcc.org.uk

Working in partnership and responding to parents and carers: Our school works in partnership with parents/guardians/carers and local authorities communicating as clearly as possible (in particular with parents for whom English is not their first language) for the best outcomes for students. Parents are welcome to approach the DSL if they have any concerns about the welfare of any student in the school. If preferred, parents may discuss concerns in private with the students’ form teacher (Advisor) or the Head who will notify the DSL in accordance with these procedures.

Reasons for no longer using a person’s services and reporting to the Disclosure and Barring Service (DBA) along with considering referral to the Teaching Regulation Agency (TRA). If a member of staff or volunteer tenders his or her resignation or ceases to provide his or her services and a prohibition order may be appropriate, any child protection allegations will still be followed up by the School in accordance with this policy and a referral will be made to the Disclosure and Barring Service and the TRA as soon as possible if the criteria are met, that is, they have caused harm or posed a risk of harm to a child. Where the school dismisses or ceases to use the services of a teacher because of serious misconduct or might have dismissed them or ceased to use their services had they not left first, we will consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency). Ceasing to use a person’s services includes: dismissal; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation; and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering. We would ensure that such reports include as much evidence about the circumstances of the case as possible. We would never use ‘Compromise agreements’ to prevent a referral being made to the DBS when it is legally required, nor an individual’s refusal to cooperate with an investigation.

Our school operates these safeguarding procedures in line with locally agreed inter-agency procedures. Our Integrated Safeguarding Portfolio consists of the following legal status documents, related documents and references that have

been used in formulating this policy along with the forms required to be completed when referring to Children's services and the LADO and the Proprietor's annual Safeguarding Audit and Review.

This policy has been compiled in conjunction with and reference to the following related documents, which are: also on request from the School Business Office: Anti-bullying, Behaviour Management including Discipline, Sanctions and Exclusions; Physical Restraint; Preventing Extremism and Radicalisation Policy; Health Centre and First Aid Policy; Educational Visits (including Learning Outside of the Classroom (LOtC); Online Safety including Cyber Bullying and Acceptable Use; Personal, Social, Health and Economic Education (PSHEE); Sex and Relationship Education (SRE); Special Educational (additional) Needs; Spiritual, Moral, Social and Cultural (SMSC) Development; Whistleblowing, Staff Code of Conduct; *Keeping Children Safe in Education Information for all school and school staff* (DfE: currently in force).

Cooperation with the local authority: We cooperate entirely with any investigation carried out by the local authority, including those involving the LADO, in conjunction with the Police. Our policy is in accordance with the guidance provided in KCSIE (DfE: currently in force).

Confidentiality: We regard all information relating to individual child or adult protection issues as confidential and we only pass information on to appropriate persons. The school will cooperate with Children's services and Police to ensure that all relevant information is shared for the purposes of child protection investigations under section 47 of the Children Act 1989 in accordance with the requirements of Working Together to Safeguard Children 2023. Staff know they cannot promise confidentiality and that there are other agencies which Students can turn to e.g. Childline: 0800 1111.

APPENDIX 1 - TYPES AND SIGNS OF ABUSE, NEGLECT AND EXPLOITATION INCLUDING POSSIBLE INDICATORS

Types of Abuse, neglect and exploitation Including Specific Safeguarding Issues: We are aware that abuse, neglect and safeguarding issue are rarely standalone events that can be covered by one definition or label. Abuse may take place wholly online, or technology may be used to facilitate offline abuse. In most cases, multiple issues will overlap with one another and could include:

Abuse, neglect and exploitation; Neglect (Physical or Emotional); Physical Abuse; Emotional Abuse; Peer Abuse; Extremism/Radicalisation; Domestic Violence; Drug/Alcohol Abuse; Emotional Abuse; Abuse of Trust; Sexual Abuse; Children who Sexually Abuse; Witnessing Domestic Abuse or Violence; Child Sexual Exploitation (CSE); Child Exploitation and Online Safety; Child Sexual Exploitation; Child Exploitation and Online Safety; Female Genital Mutilation (FGM); Forced Marriages; Fabricated or Induced Illness; Faith Abuse; Safeguarding Disabled Children; Disability and Vulnerability; Honour-Based Violence; Private Fostering; Elective Home Education; Vulnerable Groups; Bullying including Cyber Bullying; Vulnerable Children; Children in Need; Child Missing Education (Children who run away or go missing); Child Missing from Home or Care; Missing Children and Adults Strategy; Young Carers; Cared for Children and Significant Harm; Gangs and Youth Violence; Gender-Based Violence/Violence Against Women and Girls (VAWG); Hate; Mental Health; Private Fostering; homeless; family members in prison; Preventing Radicalisation; Teenage Relationship Abuse; Sexting; Trafficking. Expert and professional organizations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues.

PHYSICAL ABUSE: The nature of physical abuse: A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. 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. shins. Injuries on the *soft* areas of the body are more likely to be inflicted intentionally. If a body map is to be used to record physical abuse, they should only be used to record observed injuries and no student should be asked to remove clothing by a member of staff of the school.

Indicators of physical abuse/factors that should increase concern include:

- Multiple bruising or bruises and scratches/bi-lateral injuries (especially on the head and face including around the mouth); clusters of bruises – e.g. fingertip bruising (caused by being grasped); bruises around the neck and behind the ears – the most common abusive injuries are to the head;
- Marks indicating injury by an instrument – e.g. linear bruising (stick), parallel bruising (belt), marks of a buckle;
- Bite marks; deliberate burning may also be indicated by the pattern of an instrument or object - e.g. electric fire, cooker, cigarette; scalds with upward splash marks or *tide marks*; untreated injuries; injuries to genital areas;
- Recurrent injuries, burns or bald patches; having broken bones or unexplained bruising, burns or welts in different stages of healing; being unable to explain an injury, or providing explanations that are inconsistent, vague or unbelievable.
- If a student has an injury to which they cannot explain, where the parent or student is apparently secretive or evasive or if the explanation does not appear to match the injury.

EMOTIONAL ABUSE: Definition of emotional abuse: The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or 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. This can also occur when a child is a young carer for a parent who is disabled, has mental health problems or misuses alcohol or drugs. It may involve seeing or hearing the ill treatment of another, for example where there is fighting or violence in the home. It may involve serious bullying (including Cyber Bullying), causing students frequently to feel frightened or in danger, or the exploitation or corruption of students. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

The nature of emotional abuse: Most harm is produced in *low warmth, high criticism* homes, not from single incidents. Emotional abuse is chronic and cumulative and has a long-term impact. Abuse, neglect and exploitation have emotional effects although emotional abuse can occur by itself. Witnessing someone harming another person – as in domestic violence, can harm children. 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 on.

Indicators of Emotional Abuse: Developmental issues include delays in physical, mental and emotional development; poor school performance and speech disorders, particularly sudden disorders or changes.

Behavioural indicators of neglect include: Constant tiredness; frequent absence from school or lateness; missing medical appointments; becoming isolated among peers; being frequently unsupervised; stealing or scavenging, especially food and having destructive tendencies, poor relationships with peers; running away.

Behaviour: Acceptance of punishment which appears excessive; over-reaction to mistakes; continual self-deprecation (‘I’m stupid, ugly, worthless etc.’); neurotic behaviour (such as ricking, hair-twisting, thumb-sucking); self-mutilation; suicide attempts; drug/solvent abuse; running away; compulsive stealing, scavenging; acting out; low trust in certain adults; regressive behaviour – e.g. wetting; eating disorders; destructive tendencies; arriving early at school, leaving late.

Social issues: withdrawal from physical contact or from social interaction; over-compliant behaviour or insecure, clinging behaviour; poor social relationships.

Emotional responses: extreme fear of new situations; inappropriate emotional responses to painful situations (“I deserve this”); fear of parents being contacted; self-disgust; unusually fearful with adults; lack of concentration, restlessness, aimlessness; extremes of passivity or aggression; excessive need for approval, attention and affection.

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); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs. Far more children are registered to the category of neglect on Child protection Plans than to the other categories. 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 would suggest that an appropriate intervention or conversation at this early stage could address the issue and prevent a child continuing to suffer until it reaches a point when they are at risk of harm or in significant need. Neglect is often linked to other forms of abuse, so any concerns school staff have should at least be discussed with the DSL. The [Neglect Risk Assessment Tool](#) is available to provide a more detailed information regarding the assessment of neglect.

Indicators of neglect: The following is a summary of some of the indicators that may suggest a student is being abused or is at risk of harm. It is important to recognise that indicators alone cannot confirm whether a student is being abused. Each student 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.

Physical indicators of neglect include: Constant hunger and stealing food; poor personal (including dental) hygiene – unkempt, dirty or smelly; being underweight; wearing dress unsuitable for weather; poor state of clothing; illness or injury untreated and looking sad, false smiles, constant tiredness, frequent absence from school or lateness and frequently unsupervised.

SEXUAL ABUSE: The nature of sexual abuse: Sexual abuse is often perpetrated by people who are known and trusted by the child – e.g. relatives, family friends, neighbours, babysitters, and people working with the child in school, faith settings, clubs or activities. Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Adult males do not solely perpetrate sexual abuse. Women can also commit acts of sexual

abuse, as can other children. Where it comes to our notice that a child under the age of 13 is, or may be, sexually active, this will result in an immediate referral to Children's services and advice being given to the DSL. This will determine how and when information will be shared with parents/guardians/carers and the investigating agencies.

Indicators of sexual abuse: Physical observations include damage to genitalia, anus or mouth; sexually transmitted diseases; unexpected pregnancy, especially in very young girls; soreness in genital area, anus or mouth and other medical problems such as chronic itching; unexplained recurrent urinary tract infections and discharges or abdominal pain. The concerns listed are not exhaustive. Staff can and should also record and report other concerns about a student, such as general welfare concerns.

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE): The school recognises that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. In some cases, exploitation or abuse will be in exchange for something the victim needs or wants (e.g. money, gifts or affection), and/or will be of financial benefit or other advantage, such as increased status, to the perpetrator or facilitator. Students can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim. Whilst the age of the child may be a contributing factor for an imbalance of power, there are several other factors that could make a student more vulnerable to exploitation, including gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources. The following can be indicators of child criminal or sexual exploitation where students:

- appear with unexplained gifts, money or new possessions;
- associate with other children involved in exploitation;
- suffer from changes in emotional well-being;
- misuse drugs and alcohol;
- go missing for periods of time or regularly come home late; and
- regularly miss school or education or do not take part in education.

We recognise that children who have been exploited will need additional support to help maintain them in education. CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Some additional specific indicators that may be present in CSE are students who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

Further information on signs of a student's involvement in sexual exploitation is available in Home Office guidance: [Child sexual exploitation: guide for practitioners](#)

Characteristics of Child Sexual Exploitation and abuse: it is often planned and systematic – people do not sexually abuse children by accident, through 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; grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives.

Specific safeguarding issues

All our staff are aware of a range of safeguarding issues that can put children at risk from harm - some of which are listed below. They are aware that behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos are signs of risk from harm. Our staff are aware safeguarding issues manifest themselves via child-on-child abuse. This is most likely to include, but not limited to: bullying (including Cyber Bullying), gender-based violence/sexual assaults and sexting.

CHILD-ON-CHILD ABUSE: Our staff are clear as to the school's policy and procedures with regards to child-on-child abuse and we follow KCSIE and WTTSC. See paragraph '**Concerns and allegations of abuse made against other children (Child-on-child Abuse)**' inclusive of sexting and banter for the procedures we take to minimise the risk of child-on-child abuse and how allegations will be investigated and dealt with.

Youth produced sexual imagery (Sexting) - Please refer to our Child-on-child Abuse Policy. The practice of students sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. The DfE provides [searching screening and confiscation advice for schools](#). The UK Council for Child Internet Safety (UKCCIS) Education Group has recently published [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#).

The term 'sharing nudes and semi-nudes' means the sending or posting of nude or semi-nude images, videos, or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. Images, videos or live streams may involve more than one child.

Alternative definitions used by children and young people may be referred to as:

- youth produced sexual imagery
- Indecent imagery
- 'Sexting'
- Image-based sexual abuse (often used when referring to the non-consensual sharing of nudes and semi-nudes)
- Deep fakes/ deep nudes may refer to digitally manipulated and AI generated nudes and semi-nudes

It is illegal to possess, distribute, show and make indecent images of anyone under the age of 18.

Nudes and semi-nudes refers to images, videos and live streams where:

- A person under the age of 18 creates and shares a nude or semi-nude image of themselves with a peer under the age of 18
- A person under the age of 18 shares a nude or semi-nude image 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 a nude or semi-nude image created by a person under the age of 18.
- A person under the age of 18 digitally manipulates an image of a young person into an existing nude online or use artificial intelligence (AI) to generate a new nude or semi-nude of a young person.

All incidents of this nature should be treated as a safeguarding concern in line with the UKCCIS guidance 'Sharing nudes and semi-nudes: advice for education settings working with children and young people' (March 2024): responding to incidents and safeguarding 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 accordingly.

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 as soon as possible. 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 should not view, copy or print the youth produced sexual imagery. The DSL should hold an initial review meeting with appropriate school staff and subsequent interviews with the students 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 student 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 Children's social care 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 student'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 student is at immediate risk of harm owing to the sharing of the imagery, for example the student is presenting as suicidal or self-harming.

If none of the above applies then the DSL will use their professional judgement to assess the risk to students involved and may decide, with input from the Head, to respond to the incident without escalation to Children's social care or the police. In applying judgement, 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 student in the imagery;

- the student is more vulnerable than usual i.e. at risk;
- there is a significant impact on the students involved;
- the image is of a severe or extreme nature;
- the student 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 add cause for concern i.e. home circumstances;
- the students have been involved in incidents relating to youth produced imagery before.

If any of these circumstances are present the situation will be escalated according to our child protection procedures, including reporting to the police or children's social care. Otherwise, the situation will be managed within the school. The DSL will record all incidents of youth produced sexual imagery, including both the actions taken, actions not taken, reasons for doing so and the resolution in line with safeguarding recording procedures. This guidance reflects the UKCCIS Guidance. https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/551575/6.2439KGNCSEXtinginSchools

Removal of sexual images/videos: If the incident involves sexual images or videos that have been made and circulated online, the victim can be supported to get the images removed through the [Internet Watch Foundation \(IWF\)](#). The IWF will make an assessment of whether the image is illegal in line with UK Law. If the image is assessed to be illegal, it will be removed and added to the IWF's Image Hash list.

Upskirting: 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

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

Other community safety incidents in the vicinity of a school can raise concerns amongst students and parents, for example, people loitering nearby or unknown adults engaging students in conversation. As students get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. We provide outdoor-safety lessons/assemblies to our students, to help combat this risk, focusing on building students' confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

CHILD CRIMINAL EXPLOITATION: COUNTY LINES: County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Students can be targeted and recruited into county lines in a number of locations including schools. Students are also increasingly being targeted and recruited online using social media. Students can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. A number of the indicators for CSE and CCE as detailed above may be applicable to where students are involved in county lines. Some additional specific indicators that may be present where a student is criminally exploited through involvement in county lines are students who:

- go missing and are subsequently found in areas away from their home;
- have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;

- have their bank accounts used to facilitate drug dealing.

The school has access to guidance published by the Home Office: [County Lines Toolkit For Professionals](#)

MODERN SLAVERY AND THE NATIONAL REFERRAL MECHANISM: Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. [Modern slavery: how to identify and support victims](#)

CHILDREN AND THE COURT SYSTEM: Woldingham recognises that students are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support students 5-11-year olds and 12-17 year olds. They explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making student arrangements via the family courts following separation can be stressful and entrench conflict in families. We recognise this can be stressful for students. The Ministry of Justice has launched an online [child arrangements information tool](#) with clear and concise information on the dispute resolution service and this may be useful for some parents and carers.

CHILDREN WITH FAMILY MEMBERS IN PRISON: Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. Our staff use information [NICCO](#) provides to support any children who have parents in prison, to help mitigate negative consequences for those children.

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

Indicators of Honour-based abuse: Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found on pages 38-41 of the Multi agency statutory guidance on FGM (pages 59-61 focus on the role of schools) and pages 13-14 of the Multi-agency guidelines: Handling case of forced marriage.

Actions if HBA is suspected: If staff have a concern regarding a student that might be at risk of HBA they should activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with Police and Children’s services. In the social context of the school, 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 student (adults words); no explanation is forthcoming; the student (or the parent/carer) is secretive or evasive or the injury is accompanied by allegations of abuse or assault. We become concerned if the child or young person:

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

FEMALE GENITAL MUTILATION (FGM): This comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Circumstances/symptoms that may point to FGM happening include:

- A student talking about getting ready for a special ceremony; a student’s family taking a long trip abroad
- A student’s family being one of the ‘at risk’ communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan);

Woldingham School is committed to safeguarding and promoting the welfare of our students and expects all staff and volunteers to share this commitment. It is our aim that all students fulfil their potential

- Knowledge that a sibling has undergone FGM; a student talking about going abroad to be 'cut' or to prepare for marriage; Difficulty in walking, sitting or standing; spending lengthier time in the bathroom/toilet than usual;
- Unusual behaviour after a school absence/reluctance to undertake usual medical examinations and
- Asking for help, but not detailing the problem in full due to fear or embarrassment.

Mandatory reporting duty: Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers** along with regulated health and social care professionals in England and Wales, to report to the Police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Teachers **must** personally report to the Police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss such cases with the school DSL and involve Children's services as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

FORCED MARRIAGE: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages. Schools can play an important role in safeguarding children from forced marriage. The Forced Marriage Unit has published Multi-agency guidelines, with pages 32-36 focusing on the role of schools. Schools and staff can contact the Forced Marriage Unit if they need advice or information. Contact: 020 7008 0151 or email: fmu@fco.gov.uk. Woldingham also has access to E-Learning training from the Foreign Office, promoted through the Surrey Safeguarding Partnership: <http://www.safeguardingchildrensea.co.uk/resources/awareness-of-forced-marriage-register-for-training/>

All staff are aware of the 'One Chance' Rule' in relation to forced marriage, FGM and HBV. Staff recognise they may only have one chance' to speak to a student who is a potential victim and have just one chance to save a life. The school is aware that if the victim is not offered support following disclosure that the 'One Chance' opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBV cases.

HOMELESSNESS: Being homeless or being at risk of becoming homeless presents a real risk to a student's welfare. Our DSL and deputy DSL are aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Staff are still alert to the signs that families of students may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children's social care where a student has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: [Homeless Reduction Act Factsheets](#). The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

GANGS AND YOUTH VIOLENCE: We will endeavour to protect our children and young people from exposure to gang activity and exploitation by having robust attendance and behaviour policies and acting on relevant information or allegations. We will take all reports seriously and share this information appropriately with other agencies to safeguard our students from harm.

DOMESTIC VIOLENCE AND ABUSE: The Home Office define domestic abuse as: *“Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence and abuse between those aged 16 or over, who are or have been intimate partners or family members regardless of gender and sexuality”.*

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Students can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. If a member of staff is concerned that domestic abuse is occurring within a family or relationship they should inform the DSL who will consider a referral to Children’s services and/or the Police as necessary.

If a member of staff is concerned that domestic abuse is occurring within a family or relationship they should inform the DSL who will consider a referral to Surrey Children’s services and/or the Police as necessary. The school 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 student 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 students who are experiencing domestic abuse. Operation Encompass also provides an advice helpline for staff who may be concerned about students who have experienced domestic abuse. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990

Students may suffer both directly and indirectly if they live in households where there is domestic violence. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on students and it will often be appropriate for such students to be regarded as children in need under the Children Act 1989. In some cases, a student may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life. Where there is evidence of domestic violence, we will report our concerns to the appropriate agency including children’s social care and the police to prevent the likelihood of any further abuse taking place. Advice on identifying students who are affected by domestic abuse and how they can be helped is available at: [NSPCC- UK domestic-abuse Signs Symptoms Effects Refuge what is domestic violence/effects of domestic violence on children](#) [Safelives: young people and domestic abuse](#)

BULLYING - Please also refer to our Anti-Bullying Policy, which sets out our procedures to prevent bullying and to deal with it if and when it occurs within the school. This may be defined as deliberate, repeated (systematic) aggressive verbal, psychological or physical conduct by an individual or group against another person or persons. Very often bullying is the act of oppressing or dominating by threat or force where the aggressor may persecute or tease physically or morally to frighten into action or inaction. Bullying can include:

- Physical: pushing, hitting, kicking, pinching etc.
- Verbal: name-calling, spreading rumours, constant teasing and sarcasm.
- Emotional: tormenting, ridiculing, humiliating, ignoring.
- Racial: taunts, graffiti and gestures; Religious/cultural.
- Sexual, sexist or homophobic: unwanted physical contact or abusive comments.
- Cyber-bullying: through social networking websites, mobile phones and text messages, photographs and email.

Signs that may indicate bullying:

- Behavioural changes such as reduced concentration, becoming withdrawn, depressed, tearful, emotionally up and down, reluctance to go to school etc.; a marked drop off in performance at school.
- Physical signs such as stomach aches, headaches, difficulties in sleeping, bingeing on food, cigarettes or alcohol and a shortage of money or frequent loss of possessions.

SELF-HARM AND SUICIDAL BEHAVIOUR: Self-harm can be deliberate with the aim of a student just causing themselves an injury, attempted suicide which does not result in end of life or a successful attempt to end life resulting in death. Majority of self-harmers keep it a secret that goes undiscovered, finding it is the only way to express their feelings. Students self-harm for many reasons including: being bullied both at school or online, mental health issues, eating disorders, domestic abuse, any type of student abuse, parental conflict and bereavement. Signs of distress may include:

- cutting behaviours and self-poisoning, other forms of self-harm, such as burning, scalding, banging, hair pulling; not looking after their needs properly emotionally or physically;
- direct injury such as scratching, cutting, burning, hitting yourself, swallowing or putting things inside;
- staying in an abusive relationship, taking risks too easily, eating distress (anorexia and bulimia);
- addiction for example, to alcohol or drugs and low self-esteem and expressions of hopelessness.

During a disclosure of self-harm staff should check whether the student has ingested anything or has anything on their person that could cause damage or harm. Any concerns from staff members should be referred to the DSL, as an Early Help assessment may need to be completed to involve services that can help, or in the case of significant harm a referral can be made to Children's services.

PRIVATE FOSTERING ARRANGEMENTS: A private fostering arrangement occurs when someone other than a parent or close relative cares for a student for a period of 28 days or more, with the agreement of the student's parents. It applies to students under the age of 16 or 18 if the student is disabled. Students looked after by the local authority or who are placed in residential schools, students' homes or hospitals are not considered to be privately fostered. Private fostering occurs in all cultures, including British culture and students may be privately fostered at any age. Woldingham recognises that most privately fostered children remain safe and well but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the student has been trafficked into the country. By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. However, where a member of staff becomes aware that a student may be in a private fostering arrangement they will raise this with the DSL and the DSL will notify Children's services of the circumstances.

ALTERNATIVE PROVISION: On occasion it may be necessary for the school to place a student with an alternative provision provider. In these instances, the school would remain responsible for the safeguarding of the student in question, and would ensure the provider satisfied the student's needs. Written information is sought from the alternative provider to ensure appropriate safeguarding checks have been conducted on individuals working at their establishment (with our student), including requesting updates on staffing changes that could put said student at risk.

To ensure we know where all of our students are during school hours, records of addresses of any alternative providers are made, and regular check ins with the alternative provider are made, at least half termly, to ensure regular attendance is taking place and safeguarding needs are met. If any concerns arise, the placement should be reviewed and cease if necessary.

LOOKED AFTER CHILDREN: The most common reason for students becoming looked after is as a result of abuse, neglect or exploitation. The school ensures that staff have the necessary skills and understanding to keep looked after students safe. Appropriate staff have information about a student's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the student and contact arrangements with birth parents or those with parental responsibility. The designated teacher and Member of the Board of Governors for students looked after will have the appropriate level training to equip them with the knowledge and skills to undertake their role. The designated teacher for students looked after and the DSL have details of the student's social worker and the name and contact details of the Surrey County Council's Head of Virtual School.

TRAFFICKED CHILDREN: Child trafficking involves moving children across or within national or international borders for the purposes of exploitation. Schools which have the ability to sponsor Child Student visa applications could be seen as soft targets for somebody trying to facilitate child trafficking into the UK. Exploitation includes children being used for sex work, domestic work, restaurant/ sweatshop, drug dealing, shoplifting and benefit fraud. Where the School is made aware of a student suspected of or actually being trafficked/exploited, including being in Private Fostering, the DSL will report our concerns to Children's social care.

RADICALISATION: KCSIE define radicalisation as 'the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups'. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. There is no single way of identifying someone who is likely to be susceptible to extremism. Background factors may contribute to vulnerability which are often combined with other influences and needs on which extremists may prey. Staff should use their judgement to identify at risk students and act proportionately which may include the DSL making a referral to the [Channel programme](#).

APPENDIX 2 – MAIN RESPONSIBILITIES OF THE DSL, DEPUTY DSL, GOVERNORS AND THE HEAD :

Main Responsibilities of the DSL: Our Proprietor (Board of Governors) ensures that a member of the Senior Leadership Team, is appointed to the role of the DSL and has the appropriate status and authority within our school to carry out the duties of the post including maintaining an overview of safeguarding within the school, to open channels of communication with local statutory agencies and to monitor the effectiveness of policies and procedures in practice. The Deputy DSL will act as DSL in their absence and will carry out safeguarding tasks and duties as specified by the DSL in accordance with the details below.

The DSL has the additional time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and interagency meetings – and/or to support other staff to do so – and to contribute to the assessment of students. If the DSL is unavailable these duties will be carried out by the Deputy DSL. Whilst the activities of the DSL may be delegated appropriately to the DDSL, the ultimate **lead responsibility** for child protection, as set out above, remains with the DSL and this **lead responsibility** should not be delegated.

Availability: During term time, our DSL (or a deputy) is always available (during school hours) for staff in the school to discuss any safeguarding concerns, either in person or via phone/video call. The school will organise adequate and appropriate cover arrangements for any out of hours/out of school time activities including when the school is closed.

Managing Referrals includes: The DSL is expected to:

- refer cases of suspected abuse to the local authority children's social care as required, the LADO for child protection allegations which concern a member of staff or volunteer, the Disclosure and Barring Service where a person is dismissed or left due to risk/harm to a student and/or the police if a crime may have been committed;
- support staff who make referrals to local authority children's social care and the Channel programme;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- refer cases where a person is dismissed or left due to risk/harm to a student to the Disclosure and Barring Service as required;
- refer cases where a crime may have been committed to the Police as required. NPCC- [When to call the police](#) gives guidance on when to consider calling the police and what to expect when working with the police.

Working with others: The DSL is expected to: act as a source of support, advice and expertise for all staff; act as a point of contact with the three safeguarding partners; liaise with the Head to inform them of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations (including the requirement for students to have an Appropriate Adult) - [PACE Code C 2019](#); as required, liaise with the "case manager" (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member; liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, senior mental health leads and special educational needs co-ordinators (SENCOs), on matters of safety and safeguarding and welfare (including online and digital safety): when deciding whether to make a referral by liaising with relevant agencies and so that students' needs are considered holistically; liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health; promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances; promote educational outcomes by knowing the welfare, safeguarding and child protection issues that students in need are experiencing, or have experienced, and is therefore best placed to identify the impact that these issues might be having on students' attendance, engagement and achievement at school. Working with the Head and other staff, the DSL should take lead responsibility for:

- ensuring that the school knows who its cohort of students who currently need a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and
- support teaching staff to feel confident to provide additional academic support or reasonable adjustments to help students who need or have needed a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on students' educational outcomes.

Information sharing and managing the child protection file: The DSL is responsible for ensuring that child protection files are kept up to date and stored securely. Records should include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, decisions reached and the outcome i.e. rationale for the decisions made. They should ensure the file is only accessed by those who need to see it and where the file or content

within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of (KCSIE: currently in force).

Where students leave the school (including in year transfers) the DSL will ensure their child protection file is transferred to the new school as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This will be transferred separately from the main student file, with secure transit, and confirmation of receipt should be obtained. Receiving schools should ensure key staff such as DSLs and SENCOs are aware as required. Lack of information about their circumstances can impact on the student's safety, welfare and educational outcomes. In addition to the child protection file, the DSL will also consider if it would be appropriate to share any additional information with the new school or school in advance of a student leaving to help them put in place the right support to safeguard this student and to help the student thrive in the school or school.

Raising Awareness – The Designated Safeguarding Lead (DSL) will:

- ensure the school's child protection policies are known, understood and used appropriately;
- ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this; and
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and,
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that students, including students with a social worker, are experiencing, or have experienced, with teachers and school leadership staff. Their role could include ensuring that the school, and their staff, know who these students are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that students in this group might face and the additional academic support and adjustments that they could make to best support these students.

Training, knowledge and skills: The DSL and deputies undergo training to provide them with the knowledge and skills required to carry out the role. This training is updated at least every two years. The DSL undertakes Prevent awareness training. This training provides the DSL with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of students, as well as specific harms that can put students at risk and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to, and understands, the school's child protection policy and procedures, especially new and part time staff;
- are alert to the specific needs of students in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation;
- understand the importance of information sharing and with the three safeguarding partners, other agencies, organisations and practitioners;
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting students from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep students safe whilst they are online at school;
- can recognise the additional risks that students with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support students with SEND to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and

- encourage a culture of listening to students and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

In addition to the formal training set out above, we give time for their knowledge and skills be refreshed (this might be via e-bulletins, meeting other DSLs, or through reading and digesting safeguarding developments) at regular intervals, as required, and at least annually, supporting the DSLs' understand and keeping up with any developments relevant to their role.

Providing support to staff: Training should support the DSL in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure each member of staff has access to, and understands, the school's child protection policy and procedures, especially new and part time staff;
- ensure that staff are supported during the referrals processes; and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understanding the views of students: It is important that all students feel heard and understood. Therefore, DSLs (and deputies) should be supported in developing knowledge and skills to:

- encourage a culture of listening to students and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them, and,
- understand the difficulties that students may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

Holding and sharing information: The critical importance of holding, using and sharing information effectively is set out in (Parts one and two of KCSIE: currently in force), and therefore the DSL should be equipped to:

- understand the importance of information sharing, both within the school, and with other schools and/or schools on transfer including in-year and between primary and secondary education, and with the three safeguarding partners, other agencies, organisations and practitioners;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation; and
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

Understanding processes and procedures: Training should provide DSLs with a good understanding of their own role, and the processes, procedures and responsibilities of other agencies, particularly children's social care, to:

- understand the assessment process for providing early help and statutory services, including local criteria for action and local authority children's social care referral arrangements;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so; and
- understand the importance of the role the DSL has in providing information and support to Children's Social Care to safeguard and promote the welfare of students.

Responding to specific needs and harms: Training should give the DSL the knowledge and skills to identify, understand and respond to specific needs that can increase the vulnerability of students, as well as specific harms that can put students at risk. This includes to:

- be alert to the specific needs of students in need, those with special educational needs and disabilities (SEND), those with relevant health needs and young carers;
- understand the lasting impact that adversity and trauma can have, including on a student's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
- understand and support the school or school with regard to the requirements of the Prevent duty and be able to provide advice and support to staff on protecting students from the risk of radicalisation;
- understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep students safe whilst they are online at school or school; and

- recognise the additional risks that students with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and be confident they have the capability to support students with SEND to stay safe online.

Board of Governors (Proprietor): The Board of Governors, who receive from the DSL a safeguarding report at each meeting has a corporate responsibility for all safeguarding matters relating to the students of the school. This includes specific responsibilities for ensuring that all who are employed, supply services or volunteer at the school, are informed of the content of this policy and any reviews and updates. To this end, the Board of Governors are the named Proprietor who will:

- liaise with the senior leadership of the school, the DSL and Deputy DSL, holding them to account on matters relating to safeguarding and also liaise with the LSCP and LADO as and when required by this policy;
- with the DSL, jointly produce the written annual review/audit and report where the minutes are sufficiently detailed to demonstrate both the breadth and the depth of the review, which is shared with the local authority;
- check the staff's understanding and implementation of the policy, ensuring that they are all aware of the referral process and how to implement safeguarding protocols; monitor the policy, procedures and the efficiency with which they are implemented;
- ensure that there are clear job specifications for the DSL and Deputy DSL who have the knowledge, skills and understanding necessary to keep safe students who are looked after by a local authority;
- find out, on each visit to the school, if the policy is known in practice by talking to a number of staff and volunteers right across the school to see if they would know who to go to in the case of a suspected abuse and what they would do in terms of comments they might make to the student;
- review how students are taught about safeguarding, including online, through the curriculum and PSHEE;
- ensure the school contributes to interagency working in line with the Working Together to Safeguard Children 2023 through effective communication and cooperation with local agencies.

The Head and the DSL will:

- ensure that the safeguarding and child protection policy and procedures adopted by the Proprietor are implemented and followed by all staff;
- allocate sufficient time and resources to enable the DSL and Deputy DSL to carry out their roles effectively, including the assessment of students and attendance at strategy discussions and other necessary meetings;
- ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively. Reporting wrongdoing by staff in the workplace that does not involve safeguarding and welfare of students is dealt with in accordance with the school's Whistleblowing procedures;
- provide immunity from retribution or disciplinary action against staff in the event of them 'whistleblowing' in good faith; ensure that student's safety and welfare are addressed through the curriculum and be able to understand safer recruitment procedures and processes and deal with allegations against members of staff and volunteers.

APPENDIX 3- THE ROLE OF THE LOCAL AUTHORITY DESIGNATED OFFICER (LADO)

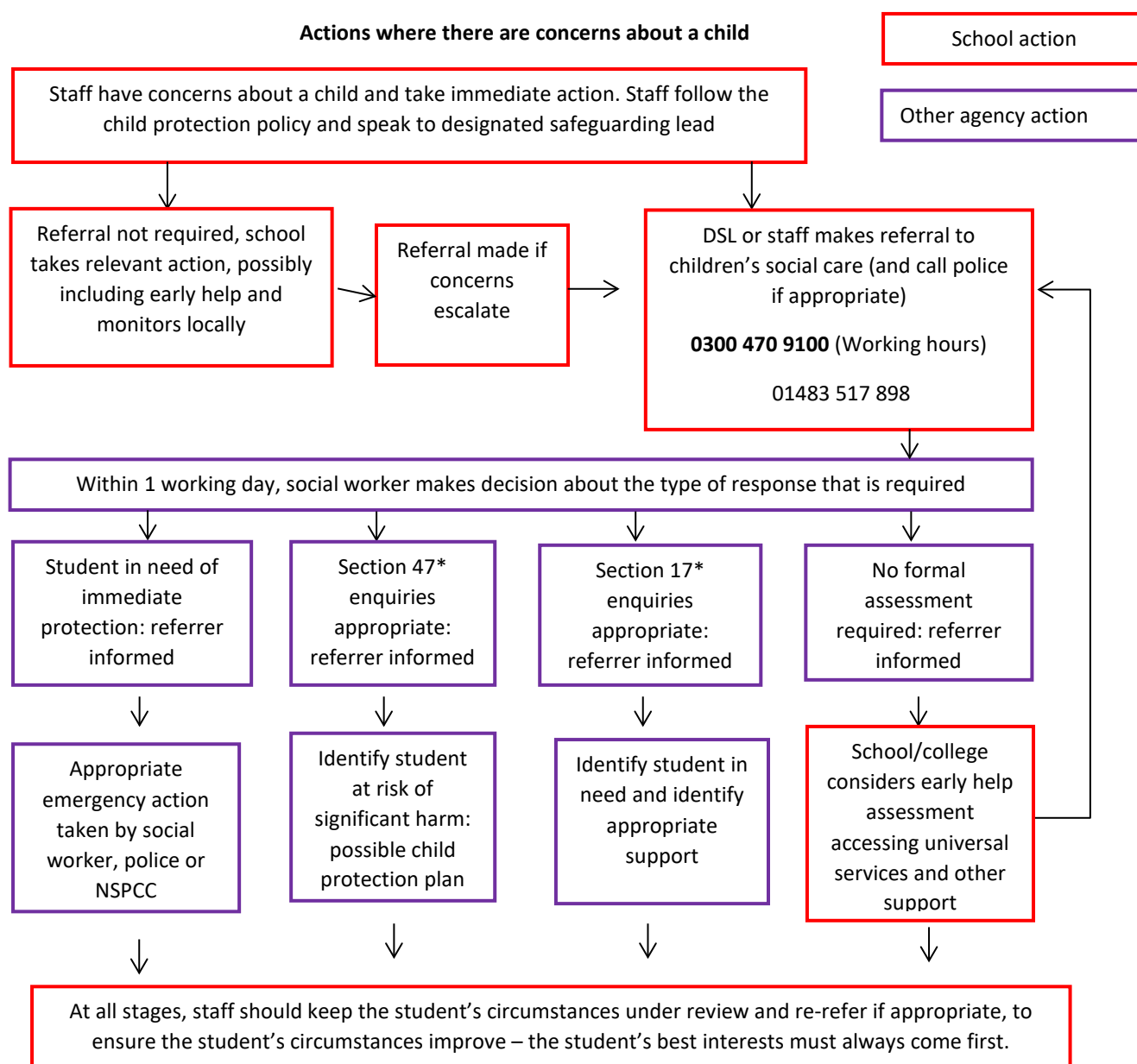
The role of the LADO is set out in *Working Together to Safeguard Children 2023* and is governed by the Authorities duties under section 11 of the Children Act 2004 and SSCP Inter-Agency Policy and Procedures. This guidance outlines procedures for managing allegations against people who work with students who are paid, unpaid, volunteers, casual, agency or anyone self-employed.

The LADO must be contacted within one working day in respect of all cases in which it is alleged that a person who works with students has behaved in a way that has harmed, or may have harmed a student, possibly committed a criminal offence against or related to a student; or behaved towards a student or students in a way that indicates they may pose a risk of harm to students. There may be up to three strands in the consideration of an allegation. A police investigation of a possible criminal offence, enquiries and assessment by children's social care about whether a student is in need of protection or in need of services and consideration by an employer of disciplinary action in respect of the individual. Please refer to the external contact details in this policy.

The LADO is involved from the initial phase of the allegation through to the conclusion of the case and is available to discuss any concerns and to assist the school in deciding whether there is a need to make a referral and/or take any immediate management action to protect a student. The LADO:

- provides advice, information and guidance to employers and voluntary organisations around allegations and concerns regarding paid and unpaid workers, managing and overseeing individual cases from all partner agencies;
- ensures the student's voice is heard and that they are safeguarded; ensuring there is a consistent, fair and thorough process for all adults working with students and young people against whom an allegation is made;
- monitors the progress of cases to ensure they are dealt with as quickly as possible, recommending a referral and chairing the strategy meeting in cases where the allegation requires investigation by police and/or social care.

APPENDIX 4 – ACTIONS REQUIRED BY KCSIE WHERE THERE ARE CONCERNS ABOUT A CHILD

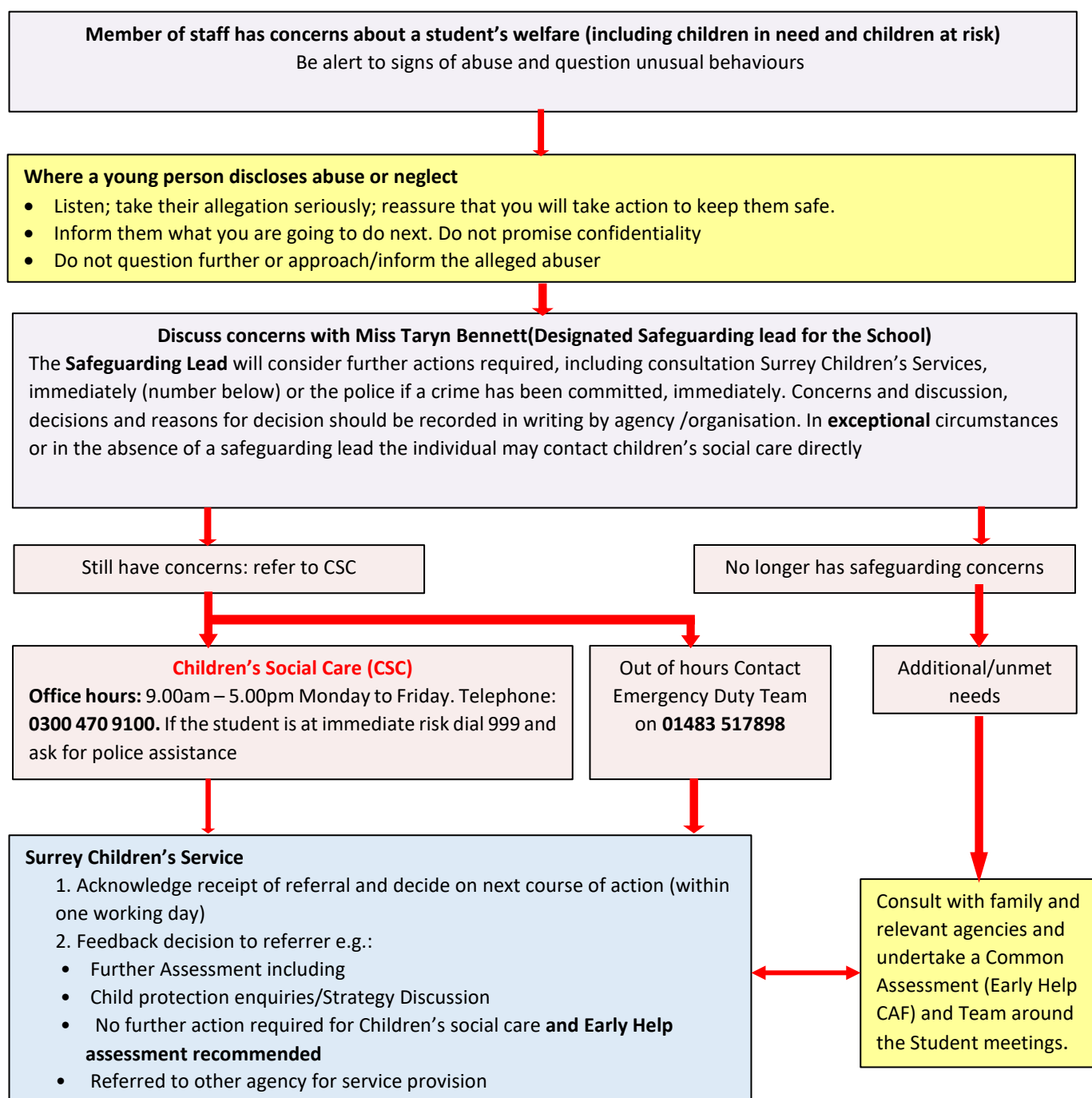


*Children Act 1989

- (1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.
- (2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of Working Together to Safeguard Children 2023 provides detailed guidance on the early help process.
- (3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of Working Together to Safeguard children 2023
- (4) Under the Children Act 1989, local authorities are required to provide services for students in need for the purposes of safeguarding and promoting their welfare. Students in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a student is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the student's welfare. Full details are in Chapter one of Working Together to Safeguard children 2023
- (5) This could include applying for an Emergency Protection Order (EPO).

Further guidance on making a decision is provided in the Children's social care, Thresholds and Practice Standards, available at: <https://www.surreyscp.org.uk/wp-content/uploads/2021/04/Effective-family-resilience-SSCP-Dec-2020-v7.pdf>

APPENDIX 5 - WHAT TO DO IF YOU ARE WORRIED A CHILD IS BEING ABUSED OR NEGLECTED



MAKING A DECISION

Further guidance on making a decision is provided in the Children's social care, Thresholds and Practice Standards, available at:

<https://www.surreyscp.org.uk/wp-content/uploads/2021/04/Effective-family-resilience-SSCP-Dec-2020-v7.pdf>

APPENDIX 6 - ALLEGATIONS AGAINST ADULTS/SCHOOL STAFF/VOLUNTEERS

Risk of Harm to Children

If you become aware that a member of staff/volunteer may have:

- Behaved in a way that has harmed a student, or may have harmed a student;
- Possibly committed a criminal offence against or related to a student or
- Behaved towards a student or students in a way that indicates they may pose a risk of harm to a student



Report immediately to Miss Taryn Bennett(Deputy Head Safeguarding) or a Deputy DSL, who would immediately inform the Head of School.

However, if any concern or allegation is against the Head then this must immediately be reported to the LADO without informing the Head.

The contact details for the LADO are in the box below.



Report the allegation within one working day to the Local Authority Designated Officer (LADO) team:

- The LADO team: 0300 123 1650 - ask to speak to the LADO (option 3).
- If the LADO is not available, please contact the Surrey Single Point of Access (SPA) Telephone (office hours) 0300 470 9100
- Emergency Duty team (out of hours service): 01483 517898



The LADO will:

1. Consider the relevant facts and concerns regarding the adult and student or students, including any previous history
2. Decide on next course of action - usually straight away, sometimes after further consultation with other multi-agency parties such as the Police and HR.



If the allegation threshold is NOT met, the Designated Officer will agree with you an appropriate response

(e.g. for the agency to undertake further enquiries or undertake an internal investigation)



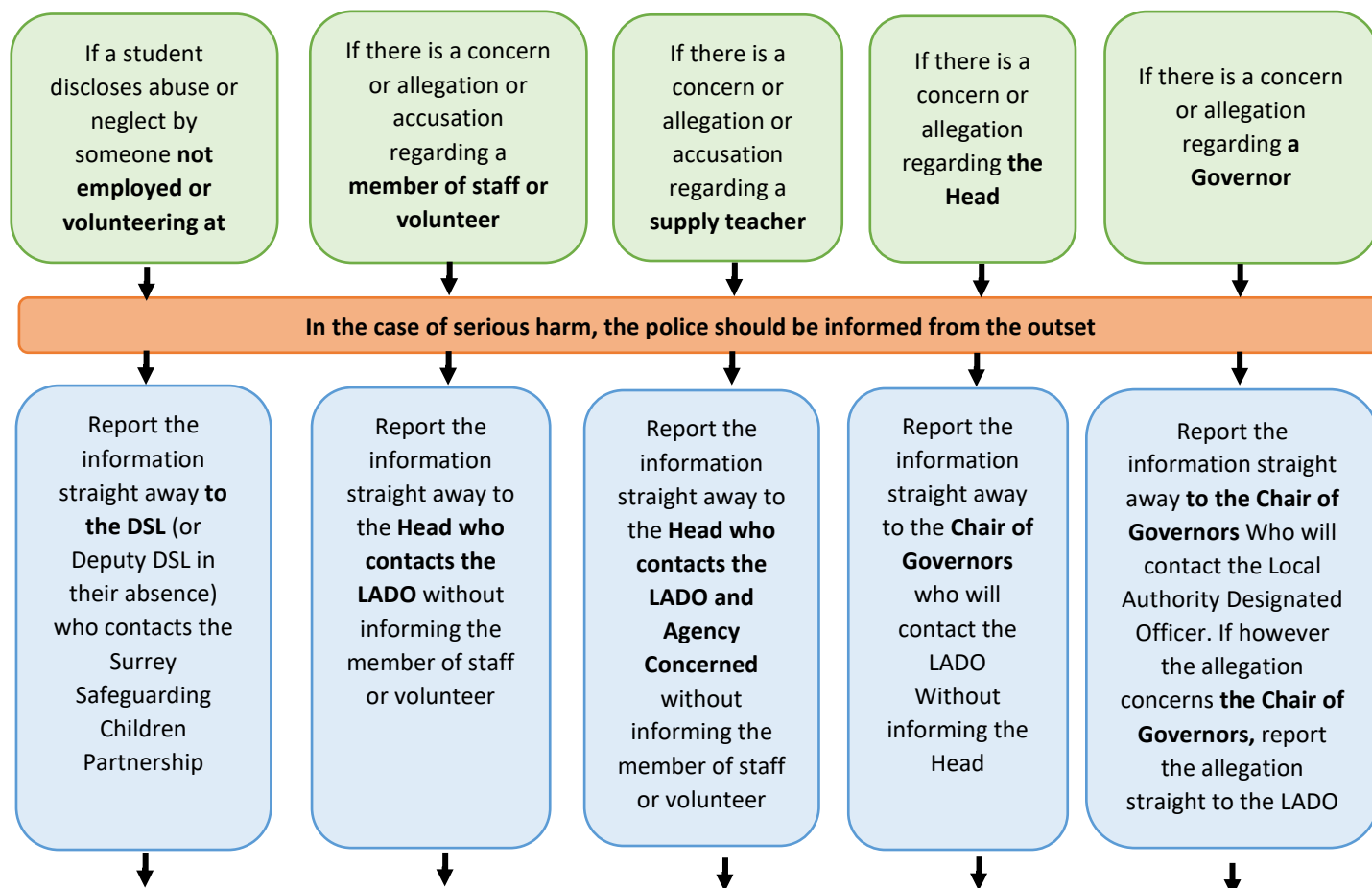
If the allegation threshold is met a strategy meeting will normally be held either by phone or in person. Normally a senior manager/safeguarding lead, the Designated Officer, HR, Police and social care are invited to attend. Relevant information is shared, risks to students are considered and appropriate action agreed –e.g. child protection and other enquiries, disciplinary measures or criminal proceedings. A record of the meeting will be made, and regular reviews will take place until a conclusion is reached.

Keeping Children Safe in Education (DfE: currently in force) makes it clear that anybody can make a direct referral to Children's social care (CSC) including the LADO and other external agencies.

APPENDIX 7 - SAFEGUARDING CONCERNS OR ALLEGATION OF ABUSE ON A CHILD

A FLOWCHART FOR ALL STAFF, VOLUNTEERS AND PROPRIETORS

The following safeguarding procedures apply where you become aware a member of staff/volunteer has, or a student discloses to you that an adult has behaved in a way that has, or may have harmed a student; possibly committed a criminal offence against or related to a student or behaved towards a student or students in a way that indicates they may pose a risk of harm to a student.



Designated Safety Lead Contact Details: -

Miss Taryn Bennett who is Deputy Head Safeguarding

Telephone number for school hours: 01883 654251 Out of school hours: 07514 800042 Email: bennett@woldinghamschool.co.uk

Deputy Designated Safeguarding Leads (DDSLs): -

Ms Kate Renshaw who is Deputy Head Pastoral

Telephone number for school hours: 01883 654291 Out of school hours: 07786584866 Email: renshaw@woldinghamschool.co.uk

Mr Terry Nunes who is the Head of Year 9

Telephone number for school hours: 01883 654179 Out of school hours: 07979 903904 Email: nunest@woldinghamschool.co.uk

Mme Marie Emery who is Head of Year 10

Telephone number for school hours: 01883 654099 Out of school hours: 07768 812936 Email: emerym@woldinghamschool.co.uk

Mr Alex Sharkey who is Head of Wellbeing

Telephone number for school hours: 01883 654357 Out of school hours: 07768856655 Email: sharkeya@woldinghamschool.co.uk

Mrs Pippa Whitby who is Director of Boarding

Telephone number for school hours: 01883 654100 Out of school hours: 07768 853414 Email: whitbyp@woldginhamschool.co.uk

Keeping Children Safe in Education (DfE: currently in force) makes it clear that anybody can make a direct referral to Children's social care including the LADO and other external agencies.

Co-operation with the Local Authority: We cooperate entirely with any investigation carried out by the Local Authority, including those involving the LADO, in conjunction with the police. Our policy is in accordance with the guidance provided in KCSIE (DfE: currently in force). Availability: During term time the DSL (or DDSLs) should always be available during school hours for staff to discuss any safeguarding concerns. Our school will organise adequate and appropriate cover arrangements for any out of hours/out of term activities and also when the school is closed.

**APPENDIX 8 – WHEN A YOUNG PERSON DISCLOSES ABUSE OR NEGLECT, A FLOW CHART FOR ALL
STAFF, VOLUNTEERS AND PROPRIETORS**

The following sequence of events should be adhered to:

Create a safe environment by offering the student a private and safe place if possible. Stay calm and reassure the student, stressing that they are not to blame. Tell the student that you know how difficult it must have been to confide in you. If there is a need for medical attention seek assistance without delay.

Listen to what the student has to say taking it seriously. Stay calm, reassuring the student but **advising that you cannot promise to keep a secret or confidentiality**, (as this may ultimately not be in the best interest of the student). A suggested form of words that may help when talking to students and which will likely need to be simplified for some of our pupils are as follows: *"I will keep our conversation confidential and agree with you what information I can share, unless you tell me something that will affect your personal safety or that is illegal, but I will tell you if I am going to pass information on and who to."* If immediate medical intervention is required, assistance should be called for. Tell the student what you are going to do next after the disclosure

When talking to the student, do not interview the student and keep questions to a minimum. Encourage the student to use his/her own words and do not ask leading questions, interrupt their dialogue or make assumptions which might give particular answers. Do not repeat the disclosure or ask the student to repeat their disclosure other than to clarify what is being said. Do not display shock or disbelief. Seek consent from the student to share any information disclosed but should consent not be given, an explanation can be given as to why the DSL must be told. When the student has finished speaking, do not leave the student alone, but speak to someone who can help keep the student safe.

Record in detail the circumstances and timings of the disclosure including the nature and extent of any injuries, explanations given by the student (as much as possible in the student's own words) and the action taken (which may be used in any subsequent court proceedings). After the disclosure immediately **record in writing** the student's name, address and date of birth and the student's behaviour and emotional state as well as who else was present at the time of the disclosure. Sign (with time and date) all notes made and give them to the DSL. Call for immediate assistance from the DSL or deputy DSL or follow the procedures for allegations against staff, volunteers, and Governors. The DSL (or other responsible person within the scope of this policy) will then deal with the matter. The student has chosen to tell a member of staff and their account will be believed and actions taken accordingly. The official school safeguarding form should also be completed by the person who receives the allegation and

Do not take responsibility for investigating the allegation yourself, as investigation is the sole statutory responsibility of Children's Services and/or the police. Reassure the student that the matter will be dealt with. Do not approach or inform the alleged abuser. Immediately inform the DSL so any required action can be taken to protect the pupil. The DSL will consider the information and decide on the next steps. Every complaint or suspicion of abuse from within or outside the School will be taken seriously and action taken in accordance with this policy.

Never take photographs of injuries or examine marks and injuries solely to assess whether they may have been caused by abuse or investigate or probe, aiming to prove or disprove possible abuse. Do not assume that someone else will take the necessary action. Do not speculate or accuse anybody, confront another person (adult or student) allegedly involved, offer opinions about what is being said or about people allegedly involved or forget to record what you have been told. **Never** fail to pass the information on to the correct person, or ask a student to sign a written copy of the disclosure or a 'statement'. Woldingham School is a co-educational special school for students between the ages of 11 and 19.

APPENDIX 9 – A CHILD PROTECTION CUE CARD

The following cue card is given to all staff and volunteers to be carried at all as folded A6, two-sided, crib card

A Child protection Guide – Cue Card

We are committed to safeguard and promote the welfare of all at our school.

A code of good practice for staff and volunteers designed for you to keep with you – carry it.

This Cue Card is intended to provide a readily accessible reference promoting the principle of our Child protection Policy

What happens if:

You suspect a child is being abused or neglected

1. Immediately inform the Designated Safeguarding Lead (DSL) or if about the DSL inform the Head, if about the Head inform the Chair of the Governors as is appropriate.
2. Record and date any facts which are relevant to your concern and pass these onto the DSL or the Head, or the Chair of the Governors as is appropriate.
3. Do not investigate the issue yourself.

A child discloses to you abuse by someone else:

1. Allow the child to speak without any interruptions, accepting what is said and without investigating further or asking leading questions.
2. Reassure the child that 'it is not their fault' and that they were right to tell you.
3. Record, in the child's own words, details of the disclosure and refer this immediately to the DSL, or the Head, or the Chair of the Governors as is appropriate. Do not investigate these issues yourself.

You receive an allegation about a member of staff or yourself:

1. Immediately inform the DSL of the allegation or if about the DSL inform the Head, or if about the Head inform the Chair of the Governors as is appropriate.
2. Record and date the details of the allegation in writing.

Do treat everyone with respect.

Do provide an example of behaviour you wish others to follow.

Do plan activities which involve more than one person being present, or at least within sight or hearing of others.

Do respect a young person's right to personal privacy.

Do provide access for young people to talk to others about any concerns they may have.

Do recognise, and allow for, the special needs of young people with disabilities and learning difficulties.

Do encourage young people with disabilities and learning difficulties.

Do avoid inappropriate physical or verbal contact with young people.

Do remember that someone else might misinterpret your actions.

Do respect the cultural, religious and ethnic backgrounds of others.

Do recognise that caution is required even in sensitive moments of counselling.

Do avoid situations that compromise your relationship with young people.

Do NOT permit abusive peer activities (e.g. bullying or racism).

Do NOT judge or jump to conclusions about others.

Do NOT show favouritism to any individual.

Do NOT be drawn into attention seeking behaviour, such as crushes/ tantrums.

Do NOT make inappropriate remarks or gestures.

Do NOT rely on good reputation.

Do NOT believe 'it could never happen to me'.

Do NOT interview or meet with children in private or outside of school.

Do NOT let concerns or allegations of abuse go unrecorded.

Do NOT play physical contact games with young people.

APPENDIX 10: THE ORGANISATION AND RELATIONSHIP OF SAFEGUARDING AND PASTORAL CARE POLICIES AND PROCEDURES AT WOLDINGHAM SCHOOL

Ensuring that our community is collectively responsible and able to ensure that we keep our pupils safe at all times is fundamental aim for our School. Woldingham School has developed a series of Policies and Procedures that are intended to support this endeavour. The following diagram illustrates the inter-relationship of these Policies.



Diagrams as a separate appendix are as follows:

- Social Media and Mental Health
- Missing Children Procedure
- Adverse Childhood Experiences (ACEs)
- Anderson Children Multi-Agency Learning Review
- County Lines
- Briefing: Neglect
- Briefing: Harmful Sexual Behaviour (HSB)
- Briefing: Domestic Abuse
- Safeguarding Children
- Sexting
- Contextual Safeguarding
- Briefing: Supporting Families Enhancing Futures
- Briefing: Professional Disagreement & Escalation
- Briefing: Child Sexual Exploitation
- Briefing: Private Fostering
- Early Help

APPENDIX 11: ADDITIONAL ADVICE AND SUPPORT:

The following is not exhaustive but does provide a useful starting point.

Abuse

[Supporting practice in tackling child sexual abuse - CSA Centre](#) Expertise on Student Sexual Abuse
[What to do if you're worried a child is being abused](#) – DfE advice [Domestic abuse: Various Information/Guidance](#) - Home Office (HO) [Faith based abuse: National Action Plan](#) - DfE advice
[Disrespect NoBody campaign - GOV.UK](#) - Home Office website paper [Together we can stop child sexual abuse](#) – HM Gov.

Bullying

[Preventing bullying including cyberbullying](#) - DfE advice

Children missing from education, home or care

[Children missing education](#) - DfE statutory guidance [Children missing from home or care](#) - DfE statutory guidance
[Trafficking: safeguarding Children](#) - DfE and Home Office guidance; [Modern slavery: how to identify and support victims](#) – Child exploitation disruption toolkit - HO statutory guidance; [County Lines Toolkit For Professionals](#) - The Children's Society

Confidentiality

[Gillick competency Fraser guidelines](#) - Guidelines to help with balancing Children's rights along with safeguarding

Drugs

[Drug strategy 2021](#) - Home Office strategy [Information and advice on drugs](#) - Talk to Frank website

[Drug and Alcohol education — teacher guidance & evidence review](#) – PSHE Association

(so called) "Honour Based Abuse" including FGM and forced marriage

[Female genital mutilation: multi agency statutory guidance](#) - DfE, DoH, HO [Forced marriage](#) - [FGM resource pack](#) –

Health and Well-being

[Rise Above: Free PSHE resources on health, wellbeing and resilience](#) - Public Health England

[Supporting pupils at schools with medical conditions](#) - DfE statutory guidance [Mental health and](#)

[behaviour in schools](#) - DfE advice; [Overview - Fabricated or induced illness](#) - NHS advice

[Government information sharing advice](#) - Guidance on information sharing for people who provide safeguarding services to children, young people, parents and carers.

[Information Commissioner's Office: Data sharing information hub](#)

Online safety-advice

[Childnet](#) provide guidance for schools on cyberbullying

[Educate against hate](#) provides practical advice and support on protecting students from extremism and radicalisation

[London Grid for Learning](#) provides advice on all aspects of a school or college's online safety arrangements

[NSPCC E-safety for schools](#) provides advice, templates, and tools on all aspects of online safety arrangements

[Safer recruitment consortium](#) "guidance which may help ensure staff behaviour policies are robust and effective

[Searching screening and confiscation](#) advice on searching students and confiscating items such as mobile phones

[South West Grid for Learning](#) provides advice on all aspects of a school or college's online safety arrangements

[Use of social media for online radicalisation](#) - A briefing note for schools on how social media is used to encourage travel to Syria and Iraq

[Online Safety Audit Tool](#) from UK Council for Internet Safety

Online safety- Remote education, virtual lessons and live streaming

[Guidance Get help with remote education](#) h other resources and support for teachers and school leaders

[Departmental guidance on safeguarding and remote education](#) including planning remote education strategies

[London Grid for Learning](#) guidance, including platform specific advice

[National cyber security centre](#) guidance on configuring and deploying video conferencing; [UK Safer Internet Centre](#)

Online Safety- Support for students

[Childline](#); [UK Safer Internet Centre](#) to report and remove harmful online content [CEOP](#) for advice on making report

Online safety- Parental support

[Childnet](#) offers a toolkit to support parents and carers of students of any age to start discussions about their online

[Commonsensemedia](#) independent reviews, age ratings, about all types of media for students and their parents

[Government advice](#) protecting students from online harms such as student sexual abuse, sexting, and cyberbullying

[Internet Matters](#) age-specific online safety checklists, guides on how to set parental controls, and practical tips

[How Can I Help My Child?](#) Marie Collins Foundation – Sexual Abuse Online

[Let's Talk About It](#) provides advice for parents and carers to keep students safe from online radicalisation

[London Grid for Learning](#) provides support for parents and carers to keep their students safe online,

[Stopitnow](#) from [The Lucy Faithfull Foundation](#) concerned about someone's behaviour, including students

[National Crime Agency/CEOP Thinkuknow](#) provides support for parents and carers to keep their students safe online

[Net-aware](#) support for parents and carers from the NSPCC and O2, a guide to social networks, apps and games

[Parentzone](#) provides help for parents and carers on how to keep their students safe online

[Talking to your Child about online sexual harassment: A guide for parents](#) – Children's Commissioner's parent guide

[#Ask the awkward](#) – Student Exploitation and Online Protection Centre guidance to parents to talk to their students

Woldingham is committed to safeguarding and promoting the welfare of students and young people and expects all staff and volunteers to share this commitment. It is our aim that all students fulfil their potential

Private fostering

[Private fostering: local authorities](#) - DfE statutory guidance

Radicalisation

[Prevent duty guidance](#) - Home Office; [Prevent duty: additional advice for schools and studentcare providers](#) ; [Educate Against Hate website](#); [Prevent for FE and Training](#) - Education and Training Foundation (ETF) [Extremism and Radicalisation Safeguarding Resources](#) – Resources by London Grid for Learning

Serous Violence

[Factors linked to serious violence and how these factors can be used to identify individuals for intervention](#) – Home Office
[Youth Endowment Fund](#) – Home Office; [Gangs and youth violence: for schools and colleges](#) - Home Office advice [Tackling violence against women and girls strategy](#); [Violence against women and girls: national statement of expectations for victims](#) -

Sexual violence and sexual harassment Specialist Organisations

[Barnardo's](#) ; [Lucy Faithful Foundation](#) - UK-wide child protection charity dedicated to preventing student sexual abuse.

[Marie Collins Foundation](#) –works directly with students, and families to enable their recovery following sexual abuse.

[NSPCC](#) - specialising in child protection with statutory powers to safeguard children at risk of abuse.

[UK Safer Internet Centre](#) -advice and support to students, young people, parents, carers a about staying safe online.

Harmful sexual behaviour

[Rape Crisis \(England & Wales\)](#) or [The Survivors Trust](#) for information, advice, and details of local specialist sexual violence

[NICE guidance](#) developing interventions working with families and carers; and multi-agency working.

[HSB toolkit](#) The Lucy Faithfull Foundation - designed for parents, carers, family members and professionals providing support advice and information. The 'Shore Space' resource offers a confidential chat service supporting young people who are concerned about their own or someone else's sexual thoughts and behaviour.

[NSPCC Learning: Protecting students from harmful sexual behaviour](#) and [NSPCC - Harmful sexual behaviour framework](#); [Contextual Safeguarding Network – Beyond Referrals \(Schools\)](#) self- assessment toolkit and guidance

[Preventing harmful sexual behaviour in students - Stop It Now](#) provides a guide for parents, carers and professionals

Support for Victims

[Anti-Bullying Alliance](#) - Detailed information for anyone being bullied, along with advice for parents and schools.

[Rape Crisis](#) - services to support people who have experienced rape, student abuse or any kind of sexual violence.

[The Survivors Trust](#)- UK-wide national umbrella agency with resources and support dedicated to survivors of rape, sexual violence and student sex abuse; [Victim Support](#) - Supporting students and young people who have been affected by crime; [Childline](#) provides free and confidential advice for students and young people.

Toolkits

[ask AVA](#) - The Ask AVA prevention platform has been created to support education practitioners across the UK to develop and deliver a comprehensive programme to stop Violence Against Women and Girls.

[NSPCC](#) - Online Self-assessment tool to ensure organisations are doing everything they can to safeguard children.

[NSPCC](#) - Resources which help adults respond to students disclosing abuse.

NSPCC also provides free and independent advice about HSB: [NSPCC - Harmful sexual behaviour framework](#)

[Safeguarding Unit, Farrer and Co. and Carlene Firmin, MBE, University of Bedfordshire](#) - Peer-on-Peer Abuse

[Contextual Safeguarding Network](#) – self-assessment toolkit for schools to assess their own response to HSB.

[Childnet - STAR SEND Toolkit](#) equips, enables and empowers educators with the knowledge to support young people with special educational needs and disabilities.

[Childnet - Just a joke?](#) provides lesson plans, activities, a quiz and teaching guide designed to explore problematic online sexual behaviour with 9-12 year olds.; [Childnet - Step Up, Speak Up](#) a to online sexual harassment amongst young people aged 13-17 years old.

[NSPCC - Harmful sexual behaviour framework](#) An evidence-informed framework for students and young people displaying HSB.

[Contextual Safeguarding Network – Beyond Referrals - Schools](#) levers for addressing HSB in schools.

Sharing nudes and semi-nudes

[London Grid for Learning-collection of advice](#) - information and resources re the sharing of nudes and semi-nudes.

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

Advice for schools and colleges on responding to incidents of non-consensual sharing of nudes and semi-nudes.

[Support for parents/carers; NCA CEOP Thinkuknow: what students may be doing online including advice on how to help challenge harmful sexual attitudes and start a conversation to support positive sexual behaviour](#)

APPENDIX 12: ACRONYMS

The following is not exhaustive but does provide a useful starting point.

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

CSE (Child Sexual Exploitation)

CCE (Child Criminal Exploitation)

CME (Children Missing from Education)

CSC (Children's Social Care)

DSL (Designated Safeguarding Lead)

DDSL (Deputy Designated Safeguarding Lead)

DFE (Department for Education)

DBA (Disclosure and Barring Service)

EHCP (Education, Health and Care plan)

FGM (Female Genital Mutilation)

GDPR (General Data Protection Regulation)

HBA (Honour based abuse)

HO (Home Office)

ISSR (Independent School Standards Regulations)

KCSIE (Keeping Children Safe in Education)

LADO (The Local Authority Designated Officer)

LGBT+ (Lesbian, Gay, Bisexual, Transgender, Queer or Questioning)

MAP (Multi-Agency Partnership)

NMS (National Minimum Standards)

PSHEE (Personal, Social, Health and Economic Education)

PR (Parental Responsibility)

PDA (Public Displays of Affection)

RSE (Relationships and Sex Education)

SSCP (Surrey Safeguarding Children Partnership)

SCC (Surrey County Council)

SCR (Single Central Record)

SRE (Sex and Relationship Education)

SENCO (Special Educational Needs Coordinator)

TRA (Teaching Regulation Agency)

TAC (Team around the Child)

VAWG (Violence Against Women and Girls)