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## SAFEGUARDING CHILDREN AND CHILD PROTECTION

This policy is available to parents and is published on the School's website.

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### DATA PROTECTION STATEMENT

Woldingham School takes its responsibilities for personal data very seriously and has policy in place to ensure compliance with the Data Protection Act 2018 incorporating the General Data Protection Regulations [GDPR].

The data collected when dealing with any safeguarding or child protection issue is defined by the Data Protection Act 2018 as 'special category' data. This is the most sensitive category of data and as such it is essential that every care is taken to keep the data secure.

If there is any possibility that the data has been lost then it must be reported immediately to the Privacy Officer ([privacy@woldinghamschool.co.uk](mailto:privacy@woldinghamschool.co.uk)) for investigation. Any confirmed loss of special category data is reportable to the Information Commissioner's Office and may result in an external investigation.

All staff involved in collecting and processing data relating to safeguarding and child protection must ensure they have read, understand and operate according to the school's Data Protection Policy. They must also be familiar with the school's Privacy Notice to ensure any processing required that is not covered by the Privacy Notice is reported to the Privacy Officer ([privacy@woldinghamschool.co.uk](mailto:privacy@woldinghamschool.co.uk)).

### 1. RELEVANT POLICIES This policy should be regarded in light of the School's policies:

- a) *Countering-bullying*
- b) *Recruitment Selection & Disclosure*
- c) *Staff Behaviour*
- d) *Visitors*
- e) *Whistleblowing*
- f) *Staff Mobile Communications AUP*
- g) *Staff ICT and internet AUP*
- h) *Relationships & Sex Education Policies*
- i) *SEN & Disability (SEND)S*
- j) *Equal Opportunities*
- k) *Mental Health*

## 2. SAFEGUARDING CONTACTS IN SCHOOL

<b>Designated Safeguarding Lead (DSL)</b>	Margaret Giblin, Deputy Head People <a href="mailto:giblinm@woldinghamschool.co.uk">giblinm@woldinghamschool.co.uk</a>	tel: 01883 654486
<b>Deputy Safeguarding Leads</b>	Taryn Bennett, Head of Boarding <a href="mailto:bennett@woldinghamschool.co.uk">bennett@woldinghamschool.co.uk</a>	tel: 01883 654215
	Charlotte Owen, Head of Marden <a href="mailto:owenc@woldinghamschool.co.uk">owenc@woldinghamschool.co.uk</a>	tel: 01883 654291
	Sarah Norman, Head of Year 10 <a href="mailto:normans@woldinghamschool.co.uk">normans@woldinghamschool.co.uk</a>	tel: 01883 654191

### Safeguarding Governors

**Martin Redman** ([Redmanm@woldinghamschool.co.uk](mailto:Redmanm@woldinghamschool.co.uk))

**Alexandra Maule** ([maulea@woldinghamschool.co.uk](mailto:maulea@woldinghamschool.co.uk))

*(See end of policy, Section 7, for Surrey Safeguarding and other useful contacts.)*

## 3. COMMITMENT TO SAFEGUARDING

**3.1** Woldingham School is fully committed to safeguarding and promoting the welfare of every student in our care. Our aim is to ensure that all pupils are in an environment which promotes their safety and welfare by ensuring that all staff, teaching and non-teaching, are aware of their responsibilities in relation to child protection.

**3.2** All staff at Woldingham recognise that it is everyone's responsibility and that all staff have a role to play in identifying concerns, sharing information and taking prompt action. We work in accordance with Surrey Safeguarding Children Partnership (SSCP), inter-agency procedures and also with other agencies or authorities according to the family domicile of the student.

### 3.3 Designated Safeguarding Lead

The Deputy Head People, **Margaret Giblin**, is the Designated Safeguarding Lead (DSL). (The DSL's duties are as outlined in KCSIE 2018 (annexe B). The DSL attends Surrey Safeguarding Children Partnership's termly update briefings and full update training every two years (last full update training July 2019). This update training includes understanding the assessment process for providing early help and intervention and working knowledge of Local Authority Child Protection Case & Review conferences. The DSL also attends termly update meetings provided by SSCP. **Taryn Bennett, Charlotte Owen & Sarah Norman** are the Deputy Safeguarding Leads who have equivalent status as the DSL in the absence of the DSL. They have also received higher level Child Protection training provided by Surrey Safeguarding as above, including inter-agency collaboration.

### 3.4 Safeguarding Governors

Two members of the Board of Governors, **Alexandra Maule and Martin Redman** are designated with responsibility for Safeguarding/Child Protection. The safeguarding Governors meet termly with the DSL and Deputy DSL to monitor Safeguarding procedure and policy and also to monitor any child protection cases. Safeguarding is a standing item on the Governors' Education & Welfare Committee meeting agenda within the pastoral report and the DSL also reports to the Board of Governors termly. An annual audit issued by Surrey Safeguarding Children Partnership is completed each year by the DSL and Safeguarding Governors and a copy is circulated to the full board of Governors to enable review of the policy and procedures and of the efficiency with which the related duties have been discharged. The safeguarding policy is reviewed, and approved by the Board of Governors, annually; it is updated

throughout the year as required. The Safeguarding Governors visit school to meet with staff and students to monitor their awareness of safeguarding procedures in school. This also provides the opportunity for staff to comment on the efficacy of safeguarding procedures which helps to shape future staff update training.

### **3.5 Safer Recruitment**

3.5.1 Woldingham School follows the Government's recommendations for the safer recruitment and employment procedures of all staff who work with our students, with specific reference to 'Keeping Children Safe in Education (KCSIE) (September 2018)' and 'Working Together to Safeguard Children (July 2018)'. We have a clear statement on our website and in any job advertisements that our school is committed to safeguarding and promoting the wellbeing of students in our care.

3.5.2 Staff are issued with the following documents before commencing work at Woldingham and have to sign to declare that they have read and understood the documents before they join.

- Keeping Children Safe in Education (part 1 to all staff and Annexe A to those who work most closely with children)
- Safeguarding and Child Protection Policy
- Countering Bullying Policy
- Staff behaviour policy (*based on Guidance for Safer Working Practice for Those Working with Children and Young People in Education Settings' (October 2015).*)
- ICT/Mobile Devices Acceptable use policy
- Student behaviour policy

3.5.3 The School also obtains assurance that appropriate Child Protection checks and procedures apply to any staff employed by another organisation and working with our pupils on another site.

### **3.6 Staff induction and training**

3.6.1 All staff who work with the students, including part-time and voluntary staff, are given advice within the Staff Behaviour policy (based on 'Guidance for Safer Working Practice for Those Working with Children and Young People in Education Settings' (October 2015). They are made aware that Margaret Giblin is the Designated Safeguarding Lead (DSL), are instructed in the contents of this Safeguarding policy and are issued with Part 1 KCSIE (Annexe A is also issued to teaching and residential staff who work most closely with children). New staff are given training as part of their induction. This training includes (but is not limited to): gaining an understanding of what is meant by 'safeguarding' and promoting children's welfare; recognising what to do if they have concerns about the welfare of children; the safeguarding response to children who go missing from education; use of reasonable force; learning how concerns are reported and managed; raising awareness about safe working practice when working with children including staff/pupil relationships and use of social media; whistleblowing policy; Prevent; acceptable use of ICT.

3.6.2 Staff receive update training (at least annually) which includes presentations but also quizzes, group discussions and 'attitude' tests to ensure that staff understand their role in the safeguarding process. Update training topics during 2018-19 included: changes to KCSIE 2018, neglect, child exploitation & county lines, neglect, 'Breck's Last Game', honour based violence, right wing extremism in Surrey. All training materials are available to staff on the DSL's area on Firefly.

3.6.3 Staff leading overnight/residential trips are reminded of safeguarding procedures before departure.

- 3.6.4 Support staff (including minibus drivers), part-time staff and visiting teachers are also given regular Safeguarding updates.
- 3.6.5 All Staff also sign a declaration annually in September to declare that they have read and understood the updated documentation and that there has been no change to their DBS status since their last DBS check.

#### 4. PROCEDURES *(Staff are asked to refer to more guidance provided in the staff handbook.)*

- 4.1 Students are provided with strong pastoral support and we work to maintain an ethos where our girls feel safe and secure, where they are encouraged to talk and are always listened to. They are given advice in their student handbook, on the School Intranet and in the Health Centre of who they can go to if they are troubled or in need of help or support. Students are taught about safeguarding and e-safety as part of the PSHE programme; topics include healthy relationships, using age and stage appropriate language to explore topics such as friendships, appropriate touch, keeping safe, recognising and assessing risk and knowing how and where to get help when needed. The services of the School's Independent Counsellor, confidential on-line advice and Childline are also publicised in each Year area.
- 4.2 Any member of staff who is told of an incident or who has a strong suspicion of physical or sexual abuse happening to a girl at school, at home, or outside the School, **must** report this to the DSL immediately, or, if she is absent, to the deputy designated DSL. Staff should also be aware of pupil on pupil abuse and not just adult on child abuse; when there is reasonable cause to suspect that a child is suffering, or likely to suffer, 'significant harm', any such abuse will be referred to SSCP C-SPA (or other county's Multi Agency Partnership - MAP). In the event of disclosures about pupil on pupil abuse, all children involved, whether perpetrator or victim, are treated as being at risk.
- 4.3 School staff should **not** investigate reports of physical or sexual abuse themselves. Alleged victims, perpetrators, those reporting abuse and others involved should **not** be interviewed by staff if it is clear that there is an allegation of abuse. Similarly, if staff observe injuries that appear to be non-accidental, they must discuss their concerns with the DSL. Any concerns about emotional abuse or neglect must also be reported to the DSL.
- 4.4 When considering the need for safeguarding, consideration will be given as to whether the child has suffered, or is likely to suffer 'significant harm' or whether they are 'in need' of early help and/or additional support from one or more agencies (see below for child 'in need').
- 4.5 If a child is in immediate danger or is at risk of harm, this must be reported to SSCP C-SPA /MAP immediately (and also to the police in the case of suspicion of a criminal offence being committed).
- 4.6 It is important to note that staff must **never** promise confidentiality to pupils who make allegations or disclosures, because of their duty of care to those pupils. They can, however, guarantee that they will only pass on information to the minimum number of people required to ensure proper action is taken.
- 4.7 Staff should make a written record of any disclosure or serious allegation and give a copy to the DSL immediately. The DSL must report any disclosure or serious allegation to the relevant MAP (In Surrey, from June 2019, this is now the **C-SPA** – Children's Single Point of Access). This must be within 24 hours and followed up with a written report within 48 hours. If there is significant risk of harm, this referral will be made immediately. Although the referral would normally be made by the DSL or her deputy (who are the most appropriate people to make the referral), **anybody**

(including volunteers and part-time staff) can make a referral themselves directly to SSCP. Staff must do so if they are not happy with the action taken by the DSL. If a member of staff makes a referral directly to SSCP, s/he must inform the DSL as soon as possible thereafter and certainly within 24 hours. Anybody can obtain informal advice on borderline cases from the C-SPA/MAP (see contact numbers at the bottom of this policy). Following any referral the DSL, or her deputy, will work closely with SSCP (or other relevant Safeguarding Board) and contribute to any inter-agency investigation or support which is required. Whilst we would always work closely with families, it should be noted that parental consent is not required for referrals to statutory authorities.

#### 4.8 Early help (*In SSCP, the Early help approach is called 'Family Resilience'*)

- 4.8.1 Providing early help is more effective in promoting the welfare of children than reacting later. Early help means providing support as soon as a problem emerges, at any point in a child's life. Early help can also prevent further problems arising. Staff are aware of their responsibility to identify children who may be in need of family resilience/early help. If that is the case, it should be referred to the DSL who will contact SSCP's C-SPA/other county's Early Help Hub.
- 4.8.2 Staff should, in particular, be alert to the potential need for early help for a child who:
- is disabled and has specific additional needs;
  - has special educational needs, whether or not they have a statutory Education, Health and Care Plan;
  - is a young carer;
  - is showing signs of engaging in anti-social or criminal behaviour including gang involvement and association with organised crime groups;
  - is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems and domestic violence;
  - has returned home to their family from care;
  - is showing early signs of abuse and/or neglect;
  - is at risk of being radicalised or exploited and/or
  - is a privately fostered child.
- 4.8.3 Although decisions to seek support for a child in need of early help would normally be taken in consultation with parents and the child, and SSCP require parental consent in order to access Early Help, the school is not required to gain parental consent for referral when there are reasonable grounds to believe that a child is at risk of significant harm.
- 4.8.4 Once a referral is made to the Early Help Hub, the appropriate agencies will work together to:
- identify children and families who would benefit from early help;
  - undertake an assessment of the need for early help; and
  - provide targeted early help services to address the assessed needs of a child and their family which focuses on activity to significantly improve the outcomes for the child.
- 4.9 Whatever the concern, the most important thing is that children receive the right help at the right time to address risks and prevent issues escalating. The importance of acting upon, and referring, the early signs of abuse, neglect and radicalisation, cannot be understated. Abuse and neglect continue because of the secrecy and silence which surround them.
- Don't think "What if I'm wrong?" think "What if I'm right?"  
and make sure that you report any suspicions of abuse.***
- 4.10 Any suspected deficiencies or weakness in the Child Protection arrangements must be reported to the DSL, who will remedy the procedures without delay.

#### 4.11 Record keeping

- 4.11.1 The DSL will keep a separate confidential file any Child Protection concerns/cases. These are kept securely in the DSL's office. A chronology (summary) will be kept with each individual file. If the chronology/summary of concerns has not led directly to a referral, the summary will be reviewed regularly by the DSL and her deputy in order that concerning patterns of behaviour can be spotted.
- 4.11.2 If a child moves to another school, the original file will be forwarded securely to the new school, by hand if possible, but if not via recorded delivery. If delivered by hand, a receipt will be requested from the receiving school. We will keep a copy of the chronology until we are sure that the file has been received by the new school, after which it will be shredded. If the girl does not move school we will keep her file at least until her 25 birthday.
- 4.11.3 If we consider that a court case may be pending for a child who is moving schools but for whom we have a child protection file, we will keep a copy of the CP file for reference for the court case and inform the new school or college. When any court proceedings are complete, we will destroy the copy of the file.
- 4.11.4 In addition to the child protection file, the DSL will consider if it would be appropriate to share any information with the new school or college in advance of the child leaving, for example, information which would allow the new school to continue supporting the child and to have support in place for when the child arrives.

#### 4.12 Golden rules

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

- listen attentively;
- be calm and reassuring;
- be non-judgemental;
- 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 such as '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, child's demeanour, any staff involved in the discussion. (If the account is typed up, the original hand-written notes must be submitted alongside the typed version.)

## 5. PRACTICAL ADVICE FOR STAFF REGARDING CHILD PROTECTION ISSUES

### 5.1 CHILD ABUSE - SIGNS AND SYMPTOMS

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

online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Although these signs do not necessarily indicate that a child has been abused, they may help adults recognise that something is wrong. The possibility of abuse should be investigated if a child shows a number of these symptoms, or any of them to a marked degree. **NB:** Staff should remain aware that abuse, neglect and safeguarding are rarely standalone events and that can be covered by one definition or label. A child may be subjected to a combination of different kinds of abuse. It is also possible that a child may show no outward signs and hide what is happening from everyone.

## 5.2 Sexual Abuse (see also Child Sexual Exploitation CSE in 5.8 below)

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (see 5.6 below).

Indicators:

- Being overly affectionate or knowledgeable in a sexual way inappropriate to the child's age
- Medical problems such as chronic itching, pain in the genitals, STIs
- Other extreme reactions, such as depression, self-mutilation, suicide attempts, running away, overdoses, anorexia
- Personality changes such as becoming insecure or clinging
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Sudden loss of appetite or compulsive eating
- Being isolated or withdrawn
- Inability to concentrate
- Lack of trust or fear of someone they know well, such as not wanting to be alone with a babysitter or child minder
- Starting to wet again, day or night/nightmares
- Become worried about clothing being removed
- Suddenly drawing sexually explicit pictures
- Trying to be 'ultra-good' or perfect; overreacting to criticism.

## 5.3 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. 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.

Indicators:

- Unexplained recurrent injuries or burns
- Improbable excuses or refusal to explain injuries
- Wearing clothes to cover injuries, even in hot weather
- Refusal to undress for PE
- Bald patches

- Chronic running away
- Fear of medical help or examination
- Self-destructive tendencies
- Aggression towards others
- Fear of physical contact - shrinking back if touched
- Admitting that they are punished, but the punishment is excessive
- Fear of suspected abuser being contacted

#### 5.4 Emotional Abuse

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

Indicators:

- Physical, mental and emotional development lags
- Sudden speech disorders
- Continual self-depreciation ('I'm stupid, ugly, worthless, etc')
- Overreaction to mistakes
- Extreme fear of any new situation
- Inappropriate response to pain ('I deserve this')
- Neurotic behaviour (rocking, hair twisting, self-mutilation)
- Extremes of passivity or aggression

#### 5.5 Neglect

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

Indicators:

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Poor state of clothing
- Emaciation
- Untreated medical problems
- No social relationships
- Compulsive scavenging
- Destructive tendencies



## 5.6 Peer on Peer abuse

5.6.1 All staff are made aware that safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but may not be limited to:

- bullying (including cyberbullying),
- gender based violence/sexual assaults and sexting
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence and sexual harassment;
- upskirting;
- sexting (also known as youth produced sexual imagery); and
- initiation/hazing type violence and rituals.

5.6.2 Peer on peer abuse should be recognised as such and should never be tolerated or passed off as ‘banter’ or ‘part of growing up’. The gendered nature of peer on peer abuse should be recognised (i.e. that it is more likely that girls will be victims and boys perpetrators), but that all peer on peer abuse is unacceptable and will be taken seriously. Students are taught to recognise such behaviours through the Health Education and Thrive (PSHEE) curriculum as well as informally through assemblies and class or tutor group discussion. Any allegation of such abuse will be promptly investigated and action will be taken according to its severity with appropriate referral to SSCP or the police if required. All students involved, victims and perpetrators, will be given appropriate support within our pastoral care structure.

## 5.7 Female Genital Mutilation (FGM)

5.7.1 Under section 5B of the Female Genital Mutilation (FGM) Act 2003, the school recognises its statutory duty to report to the police if we discover (either through disclosure of the victim or other evidence) that FGM appears to have been carried out on a girl under 18 years of age. Any such case will also be discussed with the school’s DSL and SSCP, as appropriate.

5.7.2 FGM is illegal in England and Wales under the FGM act (2003). It is a form of child abuse and violence against women. From 31 October 2015, a mandatory reporting duty requires teachers to report ‘known’ cases of FGM in under 18s, which are identified in the course of professional duty, to the police. The DSL should also be informed so that a referral may be made to SSCP, as appropriate. The mandatory reporting duty does not apply to cases where staff merely *suspects* that an act of FGM has been carried out, or that a child is at risk of FGM or in known cases of girls over 18 years of age; such cases should be reported to the DSL who will follow usual safeguarding procedures. There are no circumstances in which a teacher or other member of staff should examine a girl if FGM is suspected.

### 5.7.3 Signs that may indicate a child has undergone FGM:

- Child talking about ‘getting ready for a special ceremony’
- Family taking a long trip abroad
- Child’s family being from one of the ‘at risk’ communities for FGM – Kenya, Ethiopia, Somalia, Sudan, Sierra Leone, Egypt, Nigeria, Eritrea (as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan)
- Knowledge that the child’s sibling has undergone FGM
- Child talks about going abroad to be ‘cut’ or to prepare for marriage.
- Prolonged absence from school/other activities
- Behaviour change on return from a holiday abroad, e.g, being withdrawn or subdued
- Bladder or menstrual problems
- Finding it difficult to sit still/looking uncomfortable
- Complaining of pain between the legs

- Mentioning something somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group
- Reluctance to take part in physical activity
- Repeated urinal tract infection
- Child makes a disclosure

5.7.4 Further information: [Multi Agency Statutory Guidance on FGM \(April 2016\)](#)

## 5.8 Child Sexual Exploitation (CSE)

5.8.1 “Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.

“The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.” (DfE February 2017)

5.8.2 Like all forms of child sexual abuse, child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person’s immediate knowledge (through others copying videos or images they have created and posting on social media, for example);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

5.8.3 It can occur through the use of technology without the child’s immediate recognition; e.g. being persuaded to post sexual images on the internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child’s limited availability of choice resulting from their social/economic and/or emotional vulnerability. What marks out sexual exploitation is an imbalance of power within the relationship. The perpetrator always holds some kind of power over the victim, increasing the dependence of the victim as the exploitative relationship develops.

5.8.4 Children involved in any form of sexual exploitation should be treated primarily as the victims of abuse and their needs carefully assessed. The aim should be to protect them from further harm and

they should not be treated as criminals. The primary law enforcement response should be directed at perpetrators who groom children for sexual exploitation.

#### 5.8.5 CSE Risk Indicators:

- Regularly coming home late or going missing
- Overtly sexualised dress, sexualised risk taking (including internet use)
- Unaccounted increase in goods or money
- Associating with unknown adults
- Reduced contact with family and friends and other support networks
- Having a much older boyfriend/girlfriend
- Staying out overnight with no reasonable explanation
- Sexually transmitted infections
- Experimenting with drugs and alcohol
- Poor self-image, eating disorders, self-harm
- Non-school attendance
- Associating with other sexually exploited young people
- Secretive about mobile phone/more than one mobile phone
- Late night phone/internet activity
- Getting into cars with unknown adults or associating with known CSE adults
- Being groomed on the internet
- Clipping - i.e. offering to have sex for money or other payment and then running before sex takes place
- Disclosure of physical sexual assault and then refusing to make or withdrawing a complaint.

5.8.6 **Child sexual exploitation is never the victim's fault, even if there is some form of exchange:** all children and young people under the age of 18 have a right to be safe and should be protected from harm.

5.8.7 Further information and guidance can be found at:

[DfE Child Sexual Exploitation February 2017](#)  
[SSCP procedures](#)

## 5.9 Youth Produced Sexual Imagery (Sexting)

5.9.1 This increase in the speed and ease of sharing imagery has brought concerns about young people producing and sharing sexual imagery of themselves. This can expose them to risks, particularly if the imagery is shared further, including embarrassment, bullying and increased vulnerability to sexual exploitation. Producing and sharing sexual images of under 18s is also illegal. Although the production of such imagery will likely take place outside of school, these issues often manifest in schools. We aim to respond swiftly and confidently to ensure that children are safeguarded, supported and educated. All incidents of youth produced sexual imagery should be dealt with as safeguarding concerns. The response to these incidents will be guided by the principle of proportionality and the primary concern at all times will be the welfare and protection of the young people involved.

5.9.2 When an incident involving youth produced sexual imagery comes to the attention of staff:

- The incident should be referred to the DSL as soon as possible.
- The DSL should hold an initial review meeting with appropriate school staff.
- There should be subsequent interviews with the young people involved (if appropriate).
- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.

- At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral will be made to children's social care and/or the police immediately.

5.9.3 The initial review meeting will consider the initial evidence and aim to establish:

- Whether there is an immediate risk to a young person or young people.
- If a referral should be made to the police and/or children's social care.
- If it is necessary to view the imagery in order to safeguard the young person (NB – in most cases, the imagery should not be viewed). This will only be decided upon in consultation with the DSL and another member of SLT. It will be viewed in the presence of the DSL and Headmistress and the circumstances of the requirement to view the imagery will be documented.
- What further information is required to decide on the best response.
- Whether the imagery has been shared widely and via what services and/or platforms. This may be unknown.
- Whether immediate action should be taken to delete or remove images from devices or online services.
- Any relevant facts about the young people involved which would influence risk assessment.
- If there is a need to contact another school, college, setting or individual.
- Whether to contact parents or carers of the pupils involved - in most cases parents should be involved.

5.9.4 An immediate referral to police and/or children's social care will be made if at this initial stage:

- The incident involves an adult.
- There is 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 educational needs).
- What you know about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent.
- The imagery involves sexual acts and any pupil in the imagery is under 13.
- We have reason to believe a pupil or pupil is at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming.

5.9.5 **Devices and evidence** (please see also [‘Screening, Searching and Confiscation - February 2018’](#))

- Do not take copies or forward the imagery
- If it is necessary to retain the device, switch the device off and keep it under lock and key.

5.9.6 The 2018 guidance (above) clarifies that staff may lawfully examine data or files on an electronic device that is:

- Prohibited by the school rules; or
- That the school reasonably suspect has been, or is likely to be, used to:
  - commit an offence; or
  - cause personal injury or damage to property.

5.9.7 If the member of staff has reasonable grounds to suspect the device contains evidence in relation to an offence, or contains a pornographic image of a child or an extreme pornographic image, such material should not be deleted and the device should be given to the police as soon as reasonably practicable.

5.9.8 Further guidance is available at 'UK Council for Child Internet Safety [‘Sexting in Schools \(Jan 2017\)’](#) and also [‘Education for a connected world: a framework to equip children and young people for digital life’](#)

### **5.10 Children with Special Educational Needs and Disabilities**

Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. Staff must be alert to the fact that additional barriers can exist when recognising abuse and neglect in this group of children. These may include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further explanation;
- Children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these barriers.

### **5.11 Looked After Children**

5.11.1 The school will ensure that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by the local authority. This includes ensuring that a designated member of staff (DSL) has responsibility for their welfare and progress, and has up to date assessment information from the local authority, the most recent care plan and contact arrangements with parents, and delegated authority to carers.

5.11.2 The Designated teacher also acknowledges their responsibility (as above) to previously looked after children. We recognise that these children may remain vulnerable and the importance of agencies working together to support them.

### **5.12 Private fostering**

5.12.1 Private fostering occurs where a child under the age of 16 (or 18 if disabled) is provided with care and accommodation by someone to whom they are not related in that person's home. If a member of staff becomes aware that a pupil may be in a private fostering arrangement, they should raise this in the first instance with the Designated Safeguarding Lead. The School will then notify the local authority of the circumstances.

5.12.2 Woldingham School does not make arrangements for Guardians of Boarders; that is a private arrangement between parents and Guardians. However, if the school becomes aware that a Boarder stays with a Guardian (who is not a close relative) for more than 28 days in the year, that too counts as private fostering and the DSL will ensure that parents have contacted the relevant local authority should be informed.

### **5.13 PREVENT DUTY (see also procedures for visiting speakers within the Visitor's Policy)**

5.13.1 Under section 26 of the Counter-Terrorism and Security Act 2015, the School recognises its duty to have "due regard to the need to prevent people from being drawn in to terrorism" (Prevent Duty). Prevent duty is the responsibility of all staff to have due regard to the need to prevent people from being drawn in to terrorism. All staff are aware of the need to safeguard children and young people from violent extremism; it is when children are feeling low, lost or vulnerable that they are at highest risk of radicalisation. Extremism is defined by the Government as:

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

5.13.2 Students are provided with opportunities, through the subject & PSHEE curriculum, to explore sensitive or controversial issues in the safety of the classroom. Such sessions equip them with knowledge and skills to understand and manage difficult situations, to make safer choices and to recognise when pressure from others threatens their own personal safety and wellbeing. Visiting speakers are assessed to ensure appropriate content and will be supervised at all times.

5.13.3 Although we are not a not a high risk area for radicalisation, all staff are aware not to be complacent. Staff are aware that, in Surrey, we are at higher risk of right wing extremism than other types of radicalisation. Risk assessments also includes monitoring of curriculum subject content. Our school IT systems have appropriate levels of filtering to ensure children are safe from terrorist and extremist material when accessing the internet. We also have software to monitor inappropriate use of the internet. This is checked by the Director of IT each week and any concerns are reported directly to the DSL.

5.13.4 The DSL has undertaken Prevent awareness training and staff are trained as part of their induction, including an on-line 'Channel' course.

5.13.5 **Signs or indicators that a child may be at risk of radicalisation:**

- noticeable change in behaviour;
- absenteeism;
- significant signs of stress;
- quick to anger;
- becoming more detached/isolated/withdrawn;
- crying a lot;
- using new phrases/vocabulary/scripted speech;
- using extremist or divisive language;
- closed to discussion and debate;
- fixated on one subject;
- unhealthy attachment to the internet;
- 'testing' or vocalising provocative views to people they respect (to get a reaction).

5.13.6 When considering any of the above, the context should be considered sensitively. Key is advice to staff is to:

- **Notice** – changes in behaviour, content of students' work.
- **Check** – whether there are any other indicators.
- **Share** – with other key staff, including DSL.

5.13.7 Further DfE guidance can be found at:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/439598/prevent-duty-departmental-advice-v6.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf)

## 5.14 Online Safety

5.14.1 The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful material;
- **contact:** being subjected to harmful online interaction with other users; and
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm.

5.14.2 The school limits our students' exposure to harmful sites by filtering software which limits access to extremist sites. Monitoring software is also installed so that we can identify inappropriate use of the internet. This is monitored by the Director of IT and findings reported to the DSL each week. The school's Acceptable Use Policy (staff and student) outlines clear guidelines for safe use of devices to protect themselves and others. Students are taught how to protect themselves online and also how to protect their online reputation through the Thrive (PSHEE) programme.

### 5.15 Domestic Violence

An ongoing theme in Serious Case Reviews of children suffering harm is Domestic Abuse as a risk factor and the lack of information sharing between the police, social care, health professionals/practitioners and others.

As a Surrey school, we are signed up to **Operation Encompass**. This means that we will receive a phone call to school from the Police prior to 9am on the morning after a domestic incident has happened in the child's home. Operation Encompass breaks down this information sharing barrier to enable the provision of timely care and support for the innocent and often silent victims of domestic abuse – the children.

### 5.16 Children Missing from Education (CME)

5.16.1 The School follows the statutory guidance for Children Missing Education (Sept 2016) and recognises its duty to inform the local authority of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 days or more. The school will also inform the local authority if a child is going to be removed from the school register for any of the circumstances stated in Annexe A of KCSIE (September 2018) and will also inform the local authority of any child who joins the school.

5.16.2 All children, regardless of their circumstances, are entitled to a full-time education which is suitable to their age, ability, aptitude and any special educational needs they may have. Local authorities have a duty to establish, as far as it is possible to do so, the identity of children of compulsory school age who are missing education in their area as CME is a possible indicator of abuse. The school will follow its procedures for unauthorised absence, particularly on repeat occasions. The school will inform the local authority of any pupil who is going to be removed from the admission register where the pupil:

- has been taken out of school by their parents and the school has received written notification from the parent that they are being educated outside the school system e.g. home schooled;
- has been certified by a medical officer as unlikely to be in a fit state to attend school before ceasing to be of compulsory school age;
- has been permanently excluded and the school is not informed of the next school the pupil will attend.

#### 5.16.3 DfE Children Missing Education Statutory Guidance (Sept 2016)

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/550416/Children\\_Missing\\_Education\\_-\\_statutory\\_guidance.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_-_statutory_guidance.pdf)

### 5.17 Sexual Harassment and Sexual Violence

5.17.1 Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Staff will follow normal safeguarding procedures and will respond in a calm, considered and appropriate response to any such reports.



5.17.2 The DSL (or deputy) will follow safeguarding procedures, including completing a risk assessment, consideration of early help and referrals to children's social care and/or the police, as appropriate. Consideration will also be given to any support the victim and alleged perpetrator may require.

5.17.3 Risk assessments will be recorded and will be kept under review.

5.17.4 Full guidance is available in KCSIE Section 5 for managing cases of sexual harassment and sexual violence.

5.17.5 DfE guidance (May 2018) is linked [here](#).

### **5.18 Contextualised Safeguarding**

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

5.18.2 [Additional information on contextualised safeguarding is included in this link.](#)

## **6. MANAGEMENT OF ALLEGATIONS MADE AGAINST STAFF (including volunteers or persons living in staff accommodation)**

4.12 The procedure for dealing with allegations against staff should not compromise child protection but should be consistent with the principles of natural justice. The school will support any investigations in to historical cases of child abuse.

### **PROCEDURE**

4.13 Allegations against another member of staff regarding abuse by him/her **must** be reported immediately to the Headmistress directly, who will refer to the Local Authority Designated Officer (LADO). If the Headmistress is the subject of the allegation the case must be referred to Robert Parkinson (the Chair of Governors – [parkinsonr@woldinghamschool.co.uk](mailto:parkinsonr@woldinghamschool.co.uk)), without informing the Head first, who will refer to the LADO.

4.14 In borderline cases, discussions with the LADO can be held informally without naming the member of staff or the school.

4.15 The LADO will advise the School whether the matter can be investigated by the School or whether there are sufficient grounds for investigation by the Police. At this stage, the School may not be permitted to discuss the allegation with the member of staff concerned.

4.16 Discussions with the LADO should be recorded in writing, and any communication with both the individual and parents of the child/children should be agreed.

4.17 There may be a need to remove the member of staff from the situation whilst an investigation is undertaken. As a boarding school, it may be necessary to make arrangements for alternative



accommodation away from children where a member of boarding staff is suspended following an investigation of a Child Protection nature. Suspension is understandably very distressing for the accused person and disruptive for the School, and therefore is a decision that merits very careful consideration.

- 4.18 Suspension is most likely to occur when it is necessary for the conduct of the investigation to proceed unimpeded or where children, or others, are at risk or likely to be at risk. Suspension may or may not be appropriate and should not be undertaken without good reason. Where suspension is a possible outcome, the member of staff will be called to an interview with the Headmistress, informed of the accusation and advised to seek the help of his or her organisation, as appropriate. The member of staff will be given opportunity to make representation concerning the suspension.
- 4.19 Any suspension on full pay is a neutral act in law designed to safeguard the interests of all concerned and does not imply either blame or punishment.
- 4.20 On conclusion of a case, if the allegation is substantiated and the person is dismissed or the school ceases to use the person's services, or the person resigns or otherwise ceases to provide his or her services, the LADO should discuss with the case manager. In such circumstances, the school will make a referral to Disclosure and Barring Service (DBS) and will consider whether to refer the case to the Secretary of State, as required by sections 141D and 141E of the Education Act 2002. The Secretary of State may investigate the case, and if s/he finds there is a case to answer, must then decide whether to make a prohibition order in respect of the person.
- 4.21 As an independent school, we are also under a duty to consider making a referral to the Teaching Regulation Agency (TRA) where a teacher has been dismissed, (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. The reasons such an order would be considered are: unacceptable professional conduct; conduct that may bring the profession in to disrepute; a conviction, at any time, for a relevant offence.
- 4.22 The School will report to the DBS, within one month of leaving the School, any person whose services are no longer used because he or she is considered unsuitable to work with children.
- 4.23 Since October 2012, there are restrictions on the reporting or publishing of allegations against teachers. The school will therefore make every effort to maintain confidentiality and guard against unwanted publicity.

## 7. FURTHER CONTACTS AND USEFUL LINKS

Full details of **Surrey Safeguarding Children Board** procedures can be found at:  
<http://www.surreyscb.org.uk/>

**SSCP Levels of Need (Threshold) document**  
<http://www.surreyscb.org.uk/wp-content/uploads/2016/10/Levels-of-Need-Final-3-October16.pdf>

**Referrals about children** - Contact C-SPA:

**Email:** csmash@surreycc.gov.uk

**Emergency duty team**

**Child Protection Consultation line**

**0300 470 9100**

(Mon – Fri, 09:00 – 17:00)

emails are dealt with during normal office hours

**01483 517898**

(outside above hours)

**0300 470 9100** – and select option for consultation line.

(for advice on whether to refer; Mon- Fri 09:00 – 17:00)

**Early Help  
MAP**

**03311 435548** ([earlyhelp@ Surreycc.gov.uk](mailto:earlyhelp@ Surreycc.gov.uk))

**03311 435554** ([childrensap@ Surreycc.gov.uk](mailto:childrensap@ Surreycc.gov.uk))

**Local area contact team: South East Surrey**

**0300 123 1620**

**Duty LADO** (Mon – Fri, 09:00 – 17:00)

**0300 123 1650**

Option 4 – Safeguarding Children Unit, then option 3 – LADO.

or [LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk).

*(NB: Surrey advise contacting on-duty LADO, not having a named LADO)*

**Surrey Police:**

**0845 125 2222**

or **101** (non-emergency) or **999** (emergency).

**DfE Prevent advice:**

**0207 340 7264**

or [counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk)

**Useful links:**

[Keeping Children Safe in Education September 2019](#)

[Working Together to Safeguard Children \(July 2018\)](#)

[Guidance for Safer Working Practice for Those Working with Children and Young People in Education Settings' \(October 2015\).](#)