



Halliford  
School  
SHEPPERTON

# Safeguarding and Child Protection Policy

## November 2022

# SAFEGUARDING AND CHILD PROTECTION AT HALLIFORD

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## DEFINITIONS

### Terminology

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

- protecting children from maltreatment;
- preventing impairment of children's 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.
- preventing impairment of children's mental and physical health or development.

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

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

**Child** includes everyone under the age of 18.

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

### Definition of commonly used acronyms

CAF Common Assessment Framework

C-SPA Children's Single Point of Access

DBS Disclosure & Barring Service

DSL Designated Safeguarding Lead

DDSL Deputy Designated Safeguarding Lead

KCSIE Keeping Children Safe in Education (July 2022) (statutory guidance)

LADO Local Authority Designated Officer

PSHE Personal Social Health Education

SSD Social Services Department

TAC Team around the Child

TRA Teaching Regulation Agency

## KEY SCHOOL CONTACTS

### Safeguarding Governors

Designated Safeguarding Governor:

Miss Amy Wallace  
amy.wallace@hallifordschool.co.uk

Chairman of the Governors:

Mr Ken Woodward  
The chairman may be contacted via the Clerk to the Governors – Mrs Elspeth Sanders  
clerktogovernors@hallifordschool.co.uk

### Designated Safeguarding Lead

Acting Designated Safeguarding Lead (DSL)

Mr James Davies  
dsl@hallifordschool.co.uk  
01932 223593

### Deputy Designated Safeguarding Leads

Headmaster

Mr James Davies  
headmaster@hallifordschool.co.uk  
01932 234925

Assistant Head Co-Curricular

Mr Sean Slocock  
assistantheadcc@hallifordschool.co.uk

Head of House

Mr Matthew Shales  
matthew.shales@hallifordschool.co.uk

### Designated Staff for Looked After Children

Acting Designated Safeguarding Lead (DSL)

Mr James Davies  
dsl@hallifordschool.co.uk  
01932 223593

### Prevent Lead

Acting Designated Safeguarding Lead (DSL)

Mr James Davies  
dsl@hallifordschool.co.uk  
01932 223593

### E Safety Lead

Acting Designated Safeguarding Lead (DSL)

Mr James Davies  
dsl@hallifordschool.co.uk  
01932 223593

In the event of the indisposition of all members of the designated safeguarding team from illness or any other reason, any safeguarding matters should be referred to the most senior person in the School or the Chair of Governors who will liaise with the local safeguarding authorities.



## KEY EXTERNAL MULTI-AGENCY CONTACTS

Surrey Children Services Children's Single Point of Access (C-SPA)  
c/o Surrey Police  
PO Box 101  
Guildford  
Surrey  
GU1 9PE

**Phone:** 0300 470 9100

**Out of hours phone:** 01483 517898 to speak to the emergency duty team.

**Email:** emails are dealt with during normal office hours

**For concerns for a child or young person:** [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk)

**Secure email:** if you want to report concerns for a child or young person using secure email, please contact:  
[cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk)

**For concerns for an adult:** [ascmash@surreycc.gov.uk](mailto:ascmash@surreycc.gov.uk)

### **For out of hours support, contact the Emergency Duty Team (EDT)**

The Emergency Duty Team service is not intended as an alternative means of accessing the usual daily activities of Surrey County Council.

The team operates outside of normal office hours:

Monday to Friday 5pm to 9am

Weekends 24 hours a day

The EDT also operates throughout all bank holiday periods

Contact the team:

Tel: 01483 517898

Fax: 01483 517895

SMS number: 07800000388 (for deaf and hard of hearing callers online)

To make a call via text direct, please dial 18001 01483 517898

Email: [edt.ssd@surreycc.gov.uk](mailto:edt.ssd@surreycc.gov.uk)

### **Local Authority Designated Officer (LADO)**

For concerns and advice regarding child protection allegations against staff contact the Duty LADO.

Tel: 0300 200 1006

Email: [LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk) or [LADO@surreycc.gcsx.gov.uk](mailto:LADO@surreycc.gcsx.gov.uk) for secure emails.

Surrey Children's Services North East Area  
Fairmount House, Bull Hill, Leatherhead, KT22 7AH

Tel: 0300 200 1006 for all Teams listed below:

North East Referral Assessment & Intervention Team

North East Early Help Assessment Co-coordinator

North East Child Protection & Proceedings

North East Looked After Children Team

Surrey Education Safeguarding Team

Tel: 01483 517771

Email : [education.safeguarding@surreycc.gov.uk](mailto:education.safeguarding@surreycc.gov.uk)

## **Surrey Family Information Service**

[www.surreycc.gov.uk/people-and-community/family-information-service](http://www.surreycc.gov.uk/people-and-community/family-information-service)

## **Training**

For details of the training offered by the Surrey Safeguarding Children Partnership:

[Training & Events | Surrey Education Services \(surreycc.gov.uk\)](#)

[Training for Schools - Surrey Safeguarding Children Partnership \(surreyscp.org.uk\)](#)

**NSPCC Sexual Violence Hotline:** 0800 136663

## **Domestic Abuse**

Surrey Domestic Abuse Helpline - 01483 776822

Alternatively talk to the local outreach service.

East Surrey Domestic Abuse Services - Covering Reigate & Banstead, Mole Valley and Tandridge  
01737 771350

Your Sanctuary Outreach Service Covering Woking, Runnymede and Surrey Heath - 01483 776822

North Surrey Outreach Service - Covering Epsom & Ewell, Elmbridge and Spelthorne - 01932 260690

South West Surrey Outreach Service - Covering Guildford and Waverley - 01483 898884

Local Police Station - 01483 571212 or 101

Emergency: 999

Email: [spelthorne@surrey.police.uk](mailto:spelthorne@surrey.police.uk)

## **Counter terrorism – Prevent**

Surrey Police Counter Terrorism contacts:

Anti-terrorist hotline – 0800 789 321

E-mail – [ctsa@surrey.pnn.police.uk](mailto:ctsa@surrey.pnn.police.uk)

Website - [www.surrey.police.uk/advice/protect-yourself-and-others/counter-terrorism/](http://www.surrey.police.uk/advice/protect-yourself-and-others/counter-terrorism/)

Surrey Prevent Supervisor

Claire Mc Donald – 01483 632982

## EXTERNAL AGENCIES FOR FURTHER ADVICE ON SAFEGUARDING AND CHILD PROTECTION

NSPCC 24-hour Helpline

Tel: 0808 800 5000

Text: 88858

Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

Post: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London EC2A 3NH

NSPCC Whistleblowing Helpline

If you have concerns about a child you can contact the NSPCC in the following ways:

Call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday

Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

NSPCC FGM Helpline

Tel: 0800 028 3550

Email: [fgmhelp@nspcc.org.uk](mailto:fgmhelp@nspcc.org.uk)

Forced Marriage Unit

Tel : 020 7008 0151

Email: [fmu@fco.gov.uk](mailto:fmu@fco.gov.uk)

<https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage>

Childline

Tel: 0800 1111

[www.childline.org.uk/pages/home.aspx](http://www.childline.org.uk/pages/home.aspx)

Anti-Bullying Alliance

[www.anti-bullyingalliance.org.uk](http://www.anti-bullyingalliance.org.uk)

Beat Bullying

[www.beatbullying.org](http://www.beatbullying.org)

National Bullying Helpline

Tel: 0845 22 55 787

The Lucy Faithfull Foundation (LFF)

Tel: 0800 1000 900

Email: [help@stopitnow.org.uk](mailto:help@stopitnow.org.uk)

[www.parentsprotect.co.uk](http://www.parentsprotect.co.uk)

Childnet International – making the internet a great and safe place for children. Includes resources for professionals and parents

[www.childnet.com](http://www.childnet.com)

CEOP – Thinkuknow

[www.ceop.police.uk](http://www.ceop.police.uk)

[www.thinkuknow.co.uk](http://www.thinkuknow.co.uk)

UK Safer Internet Centre helpline for School Staff

Tel: 0844 381 4772

Email: [helpline@saferinternet.org.uk](mailto:helpline@saferinternet.org.uk)

Internet Watch Foundation hotline for reporting criminal content  
[www.iwf.org.uk](http://www.iwf.org.uk)

DfE Prevent helpline for schools & parents  
Tel: 020 7340 7264 (non-emergency)  
Email: [counter.extremism@education.gsi.gov.uk](mailto:counter.extremism@education.gsi.gov.uk)

Educate Against Hate  
[www.educateagainsthate.com](http://www.educateagainsthate.com)

Care Knowledge  
[www.careknowledge.com](http://www.careknowledge.com)

Further Resources:

London Grid for Learning  
<https://undressed.lgfl.net/>

County Lines Toolkit  
<https://www.gov.uk/government/publications/child-exploitation-disruption-toolkit>

Child Sexual Abuse Centre of Expertise  
[www.csacentre.org.uk](http://www.csacentre.org.uk)

Online Challenges and Hoaxes  
<https://www.gov.uk/government/publications/harmful-online-challenges-and-online-hoaxes>

## MISSION STATEMENT

Halliford is a school based on strong family values where we know and respect every student as an individual. We encourage and support Hallifordians to flourish and become the best version of themselves that they can possibly be.

We aim for excellence by being academically ambitious but at the same time academically sensitive.

We inspire Hallifordians within a community that is founded on high quality teaching and learning, outstanding pastoral care and first class sporting, cultural and co-curricular opportunities.

## INTRODUCTION

### Safeguarding Statement

Halliford School (“the School”) is committed to safeguarding and promoting the welfare of each and every child in its care. We recognise our moral and statutory responsibility to safeguard and promote the welfare of all students. We believe that all students, regardless of age, special needs or disability, racial/cultural heritage, religious belief or sexual orientation have the right to be protected from all types of harm and abuse. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. Child protection forms part of the School’s safeguarding responsibilities. Halliford will be a School whereby any form of abuse will never be tolerated, ‘as this can lead to a culture of unacceptable behaviours and an unsafe environment for students’.

### Purpose of the Policy

The purpose of this **Safeguarding and Child Protection Policy** (“the Policy”) is to set out how the School will carry out its commitment to and responsibilities for safeguarding. It forms a fundamental part of the approach of the School to providing excellent pastoral care to all students, including young people who may be over the age of 18 years. The School will, at all times, consider what is in the best interests of the child when executing this policy.

### Background

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002, and in line with government publications: ‘Working Together to Safeguard Children’ 2018 (WTSC), Revised Safeguarding Statutory Guidance 2 ‘Framework for the Assessment of Children in Need and their Families’ 2000, ‘What to do if You are Worried a Child is Being Abused’ 2015 and ‘Revised Prevent duty guidance for England and Wales’, April 2021. The guidance also reflects, both ‘Keeping Children Safe in Education’ September 2018, 19, 20, 21 and 22, and Surrey Safeguarding Children Partnership Procedures Manual (a copy can be found on line - [Surrey Safeguarding Children Partnership Procedures Manual. | Surrey Safeguarding Children Partnership](#)).

### Governing Body Responsibility

The Governing body takes seriously its responsibility under section 175 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure there are adequate arrangements within our School to identify, assess, and support those children who are suffering harm. *To review all matters related to Safeguarding during the termly Safeguarding Committee meetings and to review the Safeguarding and Child Protection Policy at least annually alongside an annual report from the DSL.*

## OVERALL SAFEGUARDING AND WELFARE PRINCIPLES, AIMS AND OBJECTIVES

### Policy Principles

- The welfare of the child is paramount.
- Abuse will never be tolerated, 'as this can lead to a culture of unacceptable behaviours and an unsafe environment for students'.
- All children regardless of age, gender, culture, language, race, ability, sexual identity or religion have equal rights to protection, safeguarding and opportunities.
- We recognise that all adults, including temporary staff, volunteers and governors, have a full and active part to play in protecting our students from harm and have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm;
- All staff believe that our School should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child.
- Students and staff involved in child protection issues will receive appropriate support.

### Aims and objectives which this policy is designed to support:

- To create an environment in the School that is safe and secure for all students.
- To support the child's development in ways that will foster security, confidence and independence.
- To encourage and support the students in establishing satisfying relationships within their families, with peers and with other adults.
- To ensure that the School environment and culture enables students to feel able to seek help and advice however difficult or trivial the issue that is worrying them.
- To raise the awareness of all teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.
- To provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we, the School, contribute to assessments of need and support packages for those children.
- To encourage the students to develop a sense of autonomy, independence and self-worth.
- To work with parents to build their understanding of and commitment to the welfare of all students.
- To develop and promote effective working relationships with other agencies, especially the Police and Social Care.
- To promote students' welfare and prevent radicalisation and extremism.
- To ensure that all staff working within our School who have unsupervised access to children have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory enhanced DBS check (according to guidance), and a single central register is kept and regularly reviewed.

### The School achieves these aims by:

- Ensuring the recruitment of individuals who are suitable and appropriate to work with children and who have positive safeguarding attitudes.
- Providing excellent pastoral care and fostering optimism and a positive school atmosphere where students feel secure and are encouraged to talk. Students are encouraged to find a person (whether a staff member or peer) whom they trust and to speak to that person about any issues which may be worrying them. Students are additionally reminded of specific individuals with whom they are able to talk via posters, planners, the school website and assemblies.
- Valuing and promoting effective relationships with parents and professionals from other agencies.
- Teaching students, via PSHE and a varied curriculum, to identify, reduce and manage risks. This includes educating students, through regular internal and externally provided ICT safety talks, about the safe use of electronic equipment and access to the internet.

- Ensuring that children are safeguarded from potentially harmful and inappropriate online material through embedding a whole school approach towards online safety, including the acceptable use of mobile technology and the use of appropriate filters and monitoring systems.
- Ensuring that all staff, including governors are regularly trained, supported and supervised to enable them to identify abuse and welfare concerns and deal with such concerns appropriately and sensitively.
- Ensuring new staff have a robust induction process, including safeguarding training, staff code of conduct, prevent and e-safety training. Please see the Staff Induction Policy for further details.
- Ensuring that all staff are regularly trained in relation to online safety.
- Ensuring staff, including governors are trained regularly and are aware of correct management of safeguarding reports
- Encouraging staff to discuss child protection, safeguarding and welfare concerns confidentially with the Designated Safeguarding Lead (DSL) in order to ensure they have confidence in their own abilities to identify and appropriately handle welfare concerns and cases of abuse and neglect.
- Creating a culture of openness, trust and transparency in which any concerns about the conduct of staff, visitors and other adults in school can be shared and dealt with in an appropriate and sensitive manner. Ensuring staff are also aware of the Staff Low Level Concerns Policy.
- Following the procedures laid down in this Policy and by the Surrey C-SPA, as appropriate.

The School has due regard to the recommendations of the Independent Inquiry into Child Sex Abuse (IICSA) (March 2022).

IICSA noted that sexual abuse can and does occur

- in all types of schools;
- to all ages of children.

And so it recommended that schools must go beyond the acceptance that ‘it could happen here’ to the belief that ‘it probably is happening here’.

The Inquiry maintained that there is no simple general solution to the problem of child sexual abuse (CSA) in schools. Instead a series of incremental changes are proposed most of which require government action. However, several specific actions for individual schools are recommended, which Halliford School fully embraces.

Accordingly we shall:

1. report any allegation of child sexual abuse to the inspectorate as well as to the DBS and TRA;
2. ensure that the Headmaster, DSL, and members of the DDSL team (and DSG) are trained to the highest level;
3. ensure that RSE for all pupils including those with SEND is as effective as possible; and
4. ensure that pre-appointment checks and supervision of volunteers are as effective as possible.

## Summary Guidance

### Disclosures

If a child discloses to you or you suspect abuse:

- Report any disclosure immediately to a DSL or, in their absence, the DDSL.
- Do not question a child should you suspect abuse, but refer your suspicion to the DSL or DDSL immediately.
- Make a clear record of what the child has said to you and give this to the DSL or DDSL.
- Do not ask leading questions and do not promise confidentiality to the child.
- Ensure that the child is safe.
- Do tell the child that you must speak to a DSL or the DDSL.
- Be guided by the DSL or DDSL as to what you should do next: do not investigate yourself.
- Do not discuss the issue with colleagues, friends, family or anyone else unless otherwise directed by the DSL or DDSL.
- Be aware that you may wish to contact local children's services and/or the Police directly.

**Remember:** It is important for all staff to understand that some children may find it hard to tell someone they are being abused: they may not be ready or know how to do so. Hence we provide a wide range of avenues for children to speak out with confidence that support will be available and action will be taken, including: tutors, learning support staff, trusted adults for LGBTQIA+ students, class teachers, counsellors, senior pastoral staff, medical staff.

### Child-on-child including sexual harassment or violence

If a child discloses to you or you suspect abuse:

- Report this immediately to the DSL or in their absence a DDSL.
- Make a clear record of what the child has said to you or of the information given to you.
- Be guided by the DSL or DDSL as to next steps: do not investigate yourself.

In all cases of disclosure:

**Reassure** victims that they are being taken seriously and that they will be supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment; no victim ever be made to feel ashamed for making a report.

### Allegations against and low-level safeguarding concerns regarding staff other than the Headmaster

- Report an allegation immediately to the Headmaster or in his absence the Chair of Governors without informing the person against whom the allegation has been made.
- Should you believe that there may be a conflict of interest on the part of the Headmaster, refer the matter to the Chair of Governors and/or local children's services.
- Be aware that should the need arise you may contact local children's services and/or the Police directly.

### Allegations against and low-level safeguarding concerns regarding to the Headmaster

- Report this immediately to the Chair of Governors without informing the Headmaster.
- Be aware that should the need arise you may contact local children's services and/or the Police directly.



## VALUES

### Supporting Children and Young People

At Halliford School, we recognise that a child who is abused or witnesses violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth. We recognise that the School may provide the only stability in the lives of children who have been abused or who are at risk of harm.

We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

Children are taught to understand and manage risk through our personal, social, health education (PSHE) and Relationship and Sex Education (RSE) and through all aspects of School life. This includes online safety.

Halliford School will support all children by:

- Encouraging self-esteem and self-assertiveness, through the curriculum as well as our relationships, whilst not condoning aggression or bullying.
- Promoting a caring, safe and positive environment within the School.
- Recognising that children 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. This should not prevent staff from having a professional curiosity and speaking to the DSL / DDSL if they have concerns about a child.
- Responding sympathetically to any requests for time out to deal with distress and anxiety.
- Offering details of helplines, counselling either through our own counselling service or other avenues of external support.
- Liaising and working together with all other support services and those agencies involved in the safeguarding of children.
- Notifying Social Care as soon as there is a significant concern.
- Providing continuing support to a child about whom there have been concerns who leaves the School by ensuring that appropriate information is copied under confidential cover to the child's new setting and ensuring the School medical records are forwarded as a matter of priority.
- Covering relevant issues for schools through RSE.

We recognise that the School plays a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection and transparency of support.

Halliford School will therefore:

- Work to establish and maintain an ethos where children feel secure, are encouraged to talk and are always listened to.
- Include regular consultation with children via their tutor and Head of House.
- Hold regular student voice sessions including weekly student forums, breaktime meetings with the Headmaster, Student Council and various student led committees.
- Ensure that all children know there is an adult in the School whom they can approach if they are worried or in difficulty.
- Ensure staff determine how best to build trusted relationships with children and young people including those with SEND and who are LGBTQIA+ which facilitates communication.
- Include safeguarding across the curriculum, including PSHE, opportunities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help.
- Ensure all staff are aware of School guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.
- Ensure that any other matters of significance that arise pertinent to Halliford School are discussed through assemblies, tutor period, PSHE lessons as appropriate.

## REFERENCES

This Policy is in accordance with the following key documents:

- KCSIE September 2022
- Behaviour in Schools 2022
- Ofsted Review Sexual Violence in Schools and Colleges 2021
- Covid 19 Procedures in Schools and Colleges September 2021
- The Children Act 2004
- Disclosure and Barring Service (DBS) Referral Guidance (as may be amended from time to time)
- Education Acts (various)
- Education (Independent Schools Standards) (England) Regulations 2019 (as amended from time to time)
- Information Sharing: Advice for practitioners providing safeguarding services to young people, parents and carers July 2018
- Teacher misconduct: disciplinary procedures for the teaching profession April 2018
- Independent Schools Inspectorate (ISI) Handbook for the Inspection of Schools – Commentary on the Regulatory Requirements – September 2019
- Teaching Online Safety in Schools June 2019
- Protection of Freedoms Act 2012
- Safeguarding Vulnerable Groups Act 2006
- Surrey Safeguarding Children Partnership (SSCP) Procedures [Surrey Safeguarding Children Partnership \(procedures.org.uk\)](https://www.procedures.org.uk)
- Use of Reasonable Force in Schools (DfE Guidance) 2013
- What to do if you are worried a Child is being Abused 2015
- Working Together to Safeguard Children: An inter-agency guide July 2018

The School recognises and acts upon the legal duties set out in the above statutes, regulations and guidance, to protect its students (and staff) from harm, and to co-operate with other agencies in carrying out those duties and responding to safeguarding concerns. In particular, this Policy is used in accordance with locally agreed inter-agency procedures set out in the Surrey Safeguarding Children Partnership Procedures and guidance.

## **SAFE STUDENTS SAFE STAFF**

Halliford School seeks to provide an environment in which all students feel secure, and in which they feel supported in their endeavours to achieve their best in all spheres of School life. All staff, whether paid or voluntary, have a duty of care to keep students and children safe, and to safeguard and promote their well-being. This duty is to a large extent exercised through the development of caring and professional relationships between staff and students, and by staff behaviour which demonstrates integrity, maturity and good judgement.

In order to support this, as a School we will ensure that:

- All staff will be given a copy of Part 1 and Annex B of Keeping Children Safe in Education 2022 and will sign to say they have read and understood it. This also applies to the Governing Body in relation to part 2 of the same guidance.
- All staff receive information about the School's safeguarding arrangements; the School's staff Code of Conduct (Safe Students Safe Staff), Child Protection & Safeguarding policy, the role and names of the Designated Safeguarding Lead and their deputies.
- All staff receive safeguarding and child protection training at induction, which is regularly updated and receive safeguarding and child protection updates (for example, via email and weekly staff briefings), as required, but at least annually.
- Staff are trained in managing reports of child on child abuse and harmful sexual behaviour.
- All staff and governors complete the online safeguarding training programme, 'VWV On-Stream'.
- All members of staff are trained in and receive regular updates in online safety and reporting concerns.
- All staff and governors have regular child protection awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse.
- The Child Protection & Safeguarding policy is made available via the School website.
- The School provides a coordinated offer of Early Help when additional needs of children are identified and contributes to early help arrangements and inter-agency working and plans;
- External users of the School site and those organising activities for children are aware of the School's Child Protection Policy, guidelines and procedures;
- The name of the designated members of staff for child protection, the Designated Safeguarding Lead and deputies, are clearly advertised in the School along with their contact details.

## **APPLICABILITY AND AVAILABILITY OF THE POLICY**

### **Applicability of the Policy**

The Policy is directed to all members of staff, whether academic or support, supply and volunteers at the School (temporary or permanent). Adherence to the Policy is mandatory for all staff and volunteers (both referred to hereinafter as "the staff") and its use is not subject to discretion. The Policy applies whenever the staff are working with students whether at School or away from the School. The latter include all School visits and trips, as well as off-site sporting and cultural activities. Staff should read this policy in conjunction with the latest Staff Handbook and Employment Manual.

### **Availability of the Policy**

The Policy is available to all parents and staff on the School's website. A paper version is also available to parents upon request to the School office. Students are made aware of this Policy through the PSHE programme and other means of sharing information appropriate to their age and understanding. Start of the year Parent Curriculum Information Evenings also feature a Safeguarding reminder to parents.

## ROLES AND RESPONSIBILITIES

**The Governing Body** through their nominated representatives should ensure that:

- Evaluate, critically reflect upon and take an active engagement in the safeguarding of the School.
- Read Keeping Children Safe in Education (2022) Part 2 and complete the VVW online training for Governors.
- Facilitate a whole-school approach to safeguarding and child protection so it is at the forefront and underpins all aspects of process and policy development.
- The School has a suitable Safeguarding and Child Protection Policy and procedures in place that are in accordance with local authority guidance and locally agreed inter-agency procedures, and the policy is made available to parents on request.
- The School has a suitable staff code of conduct (Safe Students, Safe Staff Policy)
- All staff have read Keeping Children Safe in Education (2022) part 1 and that mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance.
- The School operates safe recruitment procedures and makes sure that all appropriate checks are carried out on staff and volunteers who work with children.
- The School has procedures for dealing with allegations of abuse against staff and volunteers that comply with guidance from the local authority and locally agreed inter-agency procedures.
- The School has procedures for dealing with allegations of abuse against staff (including the Headmaster), volunteers and against other children and that a referral is made to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have had they not resigned.
- A senior member of the School's management team, and at least one deputy are designated as the Designated Safeguarding Leads to take lead responsibility for child protection.
- Staff undertake appropriate child protection training, including the whole governing body.
- The Governing Body remedies, without delay, any deficiencies or weaknesses regarding child protection arrangements.
- On appointment, the DSL and deputies undertake interagency training and 'Update' training every two years.
- Ensure that, where necessary, teaching about safeguarding and online safety is adapted for vulnerable students, victims of abuse and some SEND.
- A governor is nominated to be responsible for liaising with the Local Authority and /or partner agencies in the event of allegations of abuse being made against the Headmaster, or other staff in his absence.

- Where services or activities are provided on the School premises by another body, that the body concerned has appropriate policies and procedures in place in regard to safeguarding children and child protection and liaises with the School on these matters where appropriate.
- Appropriate online filtering and monitoring systems are in place within the School IT network and we regularly review their effectiveness.
- The Governing Body review their policies and procedures annually and these are signed off by the Chair of Governors.

**The Headmaster** should ensure that:

The policies and procedures adopted by the Governing Body, particularly those concerning referrals of cases and suspected abuse and neglect are fully understood, implemented, and followed by all staff.

Sufficient resources and time are allocated to enable the designated safeguarding leads and other staff to discharge their responsibilities.

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

Systems are in place for children to express their views and give feedback which operate with the best interest of the child at heart.

All staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children, and such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistle blowing policies. These may be reported using the Staff Low-Level Concerns Policy.

He is the point of contact for all allegations against staff and liaises with the Local Authority Designated Officer (LADO), before taking any action and on an ongoing basis, where an allegation is made against a member of staff or volunteer.

Anyone who has harmed or may pose a risk to a child is referred to the Teaching Regulation Agency.

**The specific responsibilities of the DSL/DDSL** are as follows:

#### **Managing referrals**

Refer all cases of suspected abuse to the local authority, children's social care and:

- The designated officer(s) for child protection concerns (all cases which concern a staff member, or supply staff), LADO
- Liaise with the Headmaster to make a TRA referral (cases where a person is dismissed or left due to risk/harm to a child); and/or
- Police (cases where a crime may have been committed)

Liaise with the Headmaster to inform him of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.

Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

## **Training**

The Designated Safeguarding Lead should receive appropriate training carried out every two years, or more regularly where appropriate in order to:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments.
- 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.
- Be alert to the specific needs of children in need, those with special educational needs and young carers.
- Be able to keep detailed, accurate, secure written records of concerns and referrals.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the School may put in place to protect them.
- Update staff on any changes in content or emphasis to the School's safeguarding policy or procedures. (This should be done at least termly and be accompanied by printed notes)
- Allow them to recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online.

## **Raising Awareness**

The Designated Safeguarding Lead should ensure all the School's policies, relating to Safeguarding and Child Protection are known and used appropriately:

- Ensure the School's Safeguarding and Child Protection Policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with the governing body regarding this.
- Ensure all staff are aware of reporting lines and the management of reports of safeguarding matters.
- Ensure the Safeguarding and 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.
- Ensure staff are aware of changes brought about KCSIE 2022 and subsequent amendments.
- Ensure staff are aware of changes brought about by other documentation, such as Working Together to Safeguard Children (WTSC) 2018.
- Link with the local C-SPA to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- Where children leave the School ensure their child protection file is transferred to the new School or college as soon as possible. This should be transferred separately from the main Student file, ensuring secure transit and confirmation of receipt should be obtained.

## **Contact with Surrey C-SPA**

The School has regular contact with Surrey C-SPA and this Policy is compatible with and meets all applicable requirements laid down by them. The School has positive communication with them to ensure compliance with any changes in local protocol and access to relevant support.

## Administration

The DSL refers a child if there are concerns about possible abuse, to the Children's Services C-SPA, and acts as a focal point for staff to discuss concerns. Referrals should be made in writing, following a telephone call.

The DSL is responsible for keeping detailed, accurate written records of all concerns about a child even if there is no need to make an immediate referral. They will ensure that all such records are kept confidential, stored securely and are separate from Student records, until the child's 25th birthday and will ensure that an indication of the existence of the additional file above is marked on the Student's records.

The DSL will ensure that when a Student leaves the School, their child protection file is passed to the new School within 5 days, or the first 5 days of term if a new school year (separately from the main Student and ensuring secure transit) and that confirmation of receipt is obtained. In addition, they will ensure that a copy of the Child Protection file is retained until such a time that the new School acknowledges receipt of the original file. The copy should then be shredded.

The DSL will ensure that either they, or another senior staff member, attend case conferences, core groups, or other multiagency planning meetings, contribute to assessments, and provide a report where required which has been shared with the parents.

The DSL will ensure that any Student currently with a child protection plan who is absent from School without explanation for two days is referred to their key worker's Social Care Team.

## Wider Responsibilities KCSIE Annex C

- Take a lead responsibility for online safety relating to safeguarding and child protection
- Work with mental health leads where safeguarding concerns are raised
- Promote supportive engagement with parents and carers
- Raising educational outcomes of children in need by knowing and helping address issues that they are experiencing by; ensuring teaching staff know which students who need a social worker are, understanding their academic progress and attainment and maintaining a culture of high aspiration.
- Supporting teaching staff to provide additional academic support or reasonable adjustments to help children with safeguarding concerns or those with a social worker, recognising the impact this can have on a child's educational outcomes.
- Liaise with the headteacher or principal to inform him of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This includes being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - [PACE](#)

## Responsibility of all School Staff

Understand that it is everyone's responsibility to safeguard and promote the welfare of children and that they have a role to play in identifying concerns, sharing information and taking prompt action.

Consider, at all times, what is in the best interests of the child.

Understand the importance of challenging inappropriate behaviours between peers. If they do not, this can create an unsafe environment and lead to a culture that normalises abuse.

Know how to respond to a student who discloses abuse through delivery of 'Working together to Safeguard Children' (2018).

## **Safeguarding is everyone's responsibility**

Safeguarding is everyone's responsibility and all staff, regardless of their role, should exercise vigilance and be watchful for, and aware of, signs that a child may be in need of help, as well as the signs of abuse and neglect. If a staff member has any concerns about a child s/he should complete a Cause for Concern form and hand it to the Designated Safeguarding Lead ("DSL"), or in their absence to the Deputy Designated Safeguarding Lead ("DDSL"). The DSL (or DDSL if appropriate) will discuss the matter with the member of staff and will decide on an appropriate course of action. This discussion and actions taken will be recorded on the Cause for Concern Form.

## **Early Help and Inter-agency work**

All staff should be aware of the early help process, and understand their role in it. This includes: identifying emerging problems and potential unmet needs; liaising with the DSL/DDSL; sharing information with other professionals to support early identification and assessment; and in some cases, acting as the lead professional in undertaking an assessment of the need for early help.

All staff should be alert to identifying children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life. If a member of staff has a concern that a child may be in need of early help then s/he should, in the first instance, discuss early help requirements with the DSL.

Where a child and family would benefit from coordinated support from more than one agency (e.g. education, health, Police) there should be an inter-agency early help assessment - such as the Common Assessment Framework. This should identify what help the child and family require to prevent needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act (1989). If early help is appropriate, where they are not taking the lead, the DSL should support the member of staff in liaising with other agencies, and setting up an inter-agency early help assessment as appropriate.

The early help assessment should be undertaken by a lead professional who should provide support to the child and family, act as an advocate on their behalf and coordinate the delivery of support services. The lead professional role could be undertaken by the DSL or a teacher (or a GP, family support worker, health visitor and/or special educational needs coordinator). Decisions as to who performs this role should be taken on a case by case basis and should be informed by the child and their family.

Any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child 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;
- Has witnessed or are witnessing domestic abuse;
- 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 care or from home;
- Is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- Is at risk of being radicalised or exploited;
- Has a family member in prison, 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;

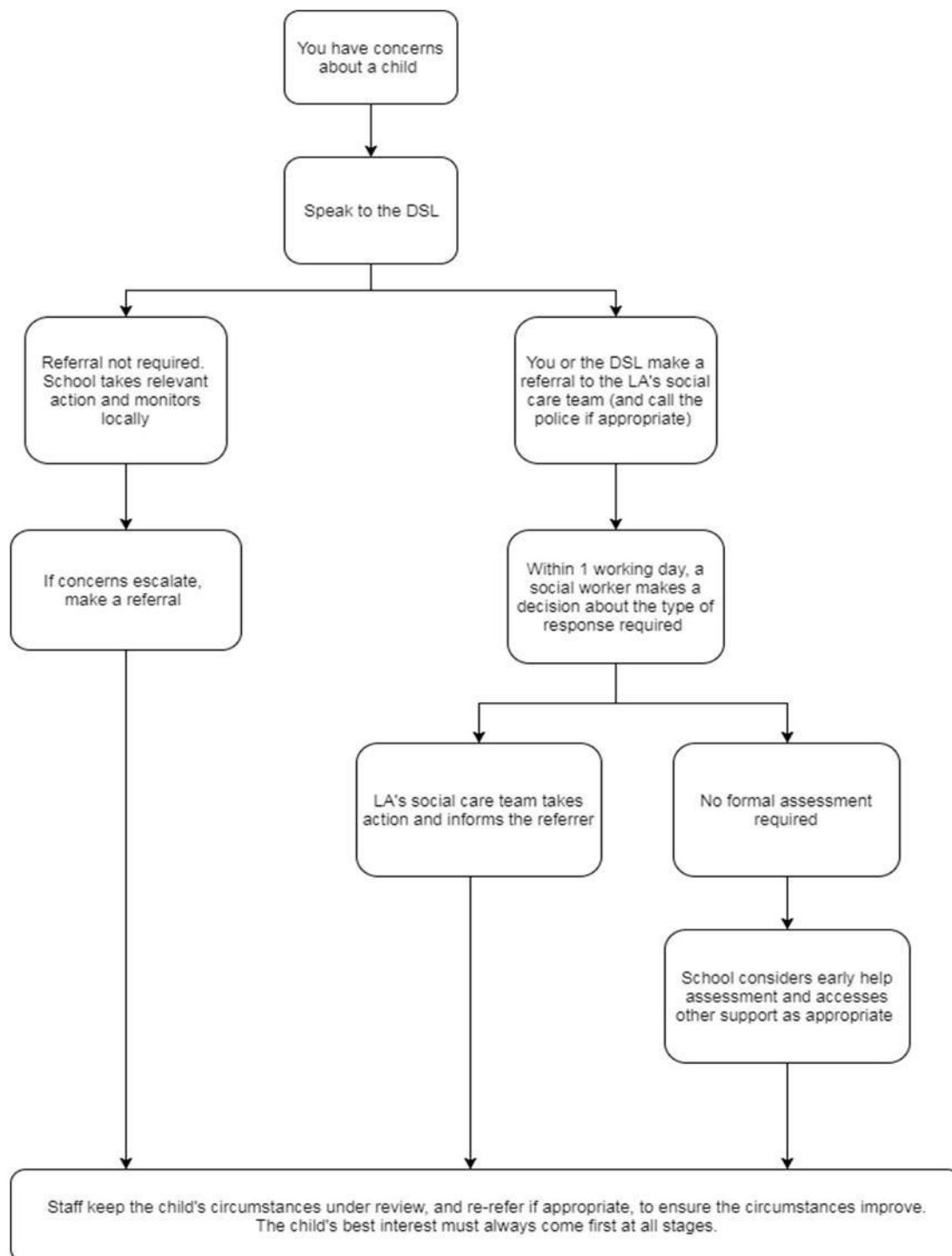


- Is misusing drugs or alcohol themselves;
- Has returned home to their family from care;
- Is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- Is a privately fostered child; and
- Is persistently absent from education, including persistent absences for part of the school day.

**If in doubt or you have any concerns about the safety or welfare of a child**

- 1. Complete a Cause for Concern form or incident report on CPOMS from January 2023.**
- 2. Pass the form immediately to the DSL/DDSL and hold a discussion about the situation.**
- 3. Maintain confidentiality and liaise with DSL about progress.**

**The process and flow chart will inform you further:  
Flow Chart – Reporting a Cause for Concern**



### **For an early help assessment to be effective:**

It should be undertaken with the agreement of the child and their parents or carers, and should involve the child and their family as well as all of the professionals who are working with them; a teacher (or other relevant professional) should be able to discuss concerns they may have about a child and family with a social worker in the local authority. Children's social care in each local authority should set out the process for how this will happen; and if parents and/or the child do not consent to an early help assessment, then the lead professional should make a judgement as to whether, without help, the needs of the child will escalate. If so, a referral to children's social care may be necessary.

Effective early help in a school setting involves the School (under the guidance of the DSL) providing high quality support, in cooperation with or coordinating other agencies as appropriate. This will address the assessed needs of the child and their family early, in order to prevent the needs escalating and significantly improve the outcomes for the child. It is hoped that in each case this should improve the welfare of the relevant child. However, each case should be kept under constant review, and consideration should be given to a referral to the Local Authority's Children's Social Care if the child's situation does not appear to be improving.

### **Child in Need**

*A child who has suffered or likely to be at risk of significant harm, or a child in immediate danger.*

If at any time it is considered that the child may be a Child in Need (section 17, Children Act 1989;2004) a referral should be made to children's Social Care in the Local Authority in which the child has main residence, and in accordance with the threshold document published by the relevant C-SPA. The concerns held by the school should be shared with the parents/guardian of the child where possible.

If there is evidence that the child has, or is likely to be at risk of significant harm (section 47, children Act 1989; 2004; ), an urgent referral (telephone initially, then followed up with documentation) should be made to children's Social Care in the Local Authority where the child has main residence and in accordance with the threshold document published by the relevant C-SPA. The concerns held by the school will be shared with the parents/guardian of the child unless to do so will heighten any risk of further harm to the child. The school on these occasions will request and adhere to the advice given by Social Care and/or the Police and record this. If the Child in need, has suffered or is at risk of significant harm, or is in immediate danger, a referral should be made immediately to children's social care – in the local authority where the child lives and in accordance with the threshold document published by the relevant C-SPA. In cases of significant harm or immediate danger the police should be notified immediately.

In situations where it is thought that the child is in immediate danger, the Police should be notified immediately by telephone using 999, followed by the school contacting Social Care. The concerns held by the school will be shared with the parents/guardian of the child unless to do so will heighten any risk of further harm to the child. The school on these occasions will request and adhere to the advice given by Social Care and/or the Police and record this.

## Staff Awareness and Responsibilities

Staff will:

Always refer any safeguarding or child protection concerns to the DSL or if necessary, where the child is at immediate risk, to the police or Children's Social Care. Wherever possible, there should be a conversation with the DSL (or DDSL), who will help staff decide what to do next.

Provide a safe environment in which children can learn.

Ensure staff determine how best to build trusted relationships with children and young people which facilitate excellent communication.

Understand the importance of challenging inappropriate behaviours between peers. If they do not, this can create an unsafe environment and lead to a culture that normalises abuse.

Staff are aware:

They need to respond appropriately to any significant changes in a child's general well-being – this includes monitoring attendance patterns and supporting systems which place the child at the heart of our practice – including suggestions that a child has run away from home. Are alert to patterns which suggest a child at risk of Child Sexual or Criminal exploitation, grooming, child on child abuse, radicalisation or gang-related recruitment – it will also relate to online activity.

They need to be open, accepting and ready to listen to a child. The need to take the child's worries seriously and not to interrupt if he/she is recalling a significant event; the need to avoid asking leading questions.

Of the need to reassure victims that they will be taken seriously, and that they will be supported and kept safe. They should not be given the impression that they are creating a problem or made to feel ashamed.

That children 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. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.

Of the requirement to make a handwritten note of the discussion immediately to give to the Designated Safeguarding Lead, noting time, date, place, people present and what was said. These notes may be required in a court proceeding. These concerns should be recorded on the Cause for Concern form or from January 2023 an incident report on CPOMS, including body maps – See Appendix I.

That **anyone** can make a referral. In both cases (child in immediate danger or risk of harm), staff making a referral should inform the DSL as soon as possible. In addition, that any member of staff has a duty to make a referral to external agencies if they consider that the School response has been inadequate (and to persist with such until they are satisfied with the response). All staff should be aware of the process for making referrals to children's social care (this will normally be to the DSL, DDSL, or to Surrey C-SPA) and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

Of the guidance for staff contained in the Safe Students Safe Staff Policy, to ensure that their behaviour and actions do not place students at risk of harm or themselves at risk of allegations of harm to a Student (for example one to one tuition, conveying a Student by car, engaging in inappropriate electronic communication with a Student).

That any child may benefit from early help, but should be particularly alert to the potential need for early help as set out in the framework previously.

They may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse.

That safeguarding issues can manifest themselves via child on child abuse. This is most likely to include, but may not be limited to, bullying (including cyberbullying), sexual violence, sexual harassment, upskirting and sharing of nudes and semi-nudes (Youth Produced Sexual Imagery –YPSI). All staff should be clear as to the school policy and procedures with regards to child on child abuse. Please refer to Appendix G of the School's policy.

That a child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

That it is mandatory to report any concern a member of staff has relating to FGM – this must be referred to the Police via the DSL

That the School does not tolerate hazing under the guise of 'banter' in any way. We recognise that abuse is abuse and should never be tolerated or passed off as 'banter', 'boys being boys' or 'just having a laugh' or 'part of growing up'. 'Banter' in any form will not be tolerated at Halliford, 'as this can lead to a culture of unacceptable behaviours and an unsafe environment for students.

The following guidance ensures staff are aware of when to inform the Police

[When to Call the Police - Guidance for Schools and Colleges](#)

## **CREATING A CULTURE OF SAFEGUARDING**

### **The School recognises that safeguarding covers much more than child protection.**

As well as protecting children from harm, 'safeguarding' widens the responsibility to preventing harm and promoting the well-being of children and supporting children in need (e.g. those with emotional and mental issues such as self-harm and eating disorders). The School recognises that safeguarding and promoting the welfare of children includes: protecting children from maltreatment, preventing the impairment of their health or development and ensuring, as far as possible, that they are growing up in circumstances consistent with the provision of safe and effective care.

The school recognises that technology is a significant component in safeguarding and wellbeing issues, and that children are at risk of online abuse, as well as face to face.

As a result this Policy will operate in conjunction with other related policies and procedures, covering areas such as Acceptable Use Policy (AUP), Health and Safety, Anti-Bullying, Digital Usage, Behaviour Management, Regulations for School Security, Staff Professional Standards and Duties and Procedures for Safe Recruitment.

### **The School takes its responsibilities for safeguarding and welfare of its students very seriously.**

As well as ensuring the School's policies and procedures support its safeguarding responsibilities, the School works in cooperation with students, their families, and when necessary with Children's Social Care Departments and other relevant agencies, to ensure the risk of harm to children is minimised and in order to continue to develop and improve the safeguarding culture within our School. Central to this process are the pastoral, welfare and PSHE programmes run by the School and the values which are espoused by the School not only through these programmes but also through the way the School lives out its daily life, in particular the care, understanding and fairness with which it handles issues that arise.

## PREVENTATIVE ACTION TAKEN BY THE SCHOOL

### Staff Recruitment

The School has a recruitment policy that is in accordance with Independent School Standards Regulations and that is designed to prevent unsuitable people working with its students. The full policy is set out on the School website and sent to all those who apply for any position at the School. The School takes the following measures to make sure that it is as effective as possible in practice:

- At least one member of any recruitment panel involved in the recruitment process has undertaken Safer Recruitment training.
- All required checks on the suitability of all staff and volunteers to work with children and young people in accordance with the guidance and regulations set out at Part 4 are carried out.
- All staff being recruited have received an unequivocal declaration from their previous employer or training establishment that they do not know of any reason why they should not work with children.
- An assessment of risk and appropriate supervision arrangements are in place if staff start work before their DBS disclosure has been obtained and a Barred List Check will have been undertaken provided all other checks are established.
- Candidates for positions which involve “teaching work” from countries in the European Economic Area (EEA) will be subject to a check carried out using the TRA Teacher Services System. Although restrictions applied by other countries are not legally binding in the UK, the School will make decisions with the knowledge of any such sanctions.
- The School obtains assurance that appropriate child protection checks have been carried out and procedures applied to any staff or volunteer of another organisation who work with the School’s students on another site. A reminder that DBS checks for volunteers are free to obtain.
- From September 2022 in line with paragraph 221 of KCSIE 2022, safer recruitment checks will include online searches on shortlisted candidates (**online searches**). The online searches the School carries out may include searches of internet search engines, websites and social media platforms.
- The School also carries out the mandated checks on the suitability of all people who serve on the Board of Governors in accordance with the guidance and regulations set out at Part 4.

From 01 January 2021 the TRA Teacher Services system will no longer maintain a list of those teachers who have been sanctioned in EEA member states. Candidates from overseas **must** undergo the same checks as all other staff in schools, including obtaining an enhanced DBS certificate with barred list information. This still applies even if the candidate has never been to the UK.

When recruiting, Halliford ensures that it:

- follows Part 3 of KCSIE which sets out the safer recruitment checks schools must conduct.
- makes any further checks that are appropriate so that relevant events that occurred outside of the UK can be considered - the Home Office provides guidance on [criminal records checks for overseas applicants](#).
- carries out additional checks for teaching roles, which may include information about their past conduct, for example, by checking documents issued by overseas teaching authorities. This evidence is considered together with other information which you have obtained through other safer employment checks.

Please see Policy 18a – Recruitment selection and disclosure policy and procedures for full details.

## Staff Dismissal

When the School ceases to use the services of any person, whether part or full time staff, agency staff, peripatetic teacher, volunteer or any other person because it is considered that the individual may be unsuitable to work with children, a referral will be made promptly to the Teacher Regulation Agency (TRA) Teaching Misconduct Unit, Teaching Regulation Agency, 53-55 Butts Road, Earlsdon Park, Coventry, CV1 3BH. E-mail: [misconduct.teacher@education.gov.uk](mailto:misconduct.teacher@education.gov.uk) In any event this will take place within 28 days in accordance with the School's legal duty.

## Staff Training

The School staff receive regular advice and training as follows. This is to ensure that they are alert to signs of abuse and neglect (as appropriate to their role), know to whom they should report concerns or suspicions of abuse or neglect and keep themselves updated (as appropriate to their role) on safeguarding and child protection procedures and issues.

- The DSL and DDSLs receive training in Safeguarding and Inter-Agency Working on appointment and update training every two years thereafter. This is in accordance with KCSIE and Surrey C-SPA requirements.
- All other staff including part time staff receive regular training in Child Protection. Volunteers are made aware of the School's arrangements and the key points of the Policy.
- All staff complete the online safeguarding training programme, 'VWV On-Stream'.
- Staff are given clear advice to ensure that they do not place either their students at risk of harm or themselves at risk from an allegation of harm. This advice is set out in the Employee Handbook entitled Safe Students Safe Staff.
- Staff are trained in delivering RSE Curriculum.
- All staff are given clear advice and guidance on the handling of issues involving confidentiality, information sharing and consent. This advice is set out in the Employee Handbook.
- Staff are given clear guidance on the need for them to avoid communication and contact with students on any online platform that is not registered to the school – such as social media or text.
- All staff are required to read and adhere to the Regulations for the Use of Communications Technology. They are also to ensure that any images taken of students are appropriate, stored and managed safely and are not published in any way without the consent of the School and the permission of the individuals concerned (the Registrar keeps a log of those who do not wish images of their children to be used).
- All staff are aware and trained in the management of reports relating to child on child abuse and harmful sexual behaviour.
- All staff receive induction training that includes: the School's Safeguarding and Child Protection Policy; the School's Staff Behaviour Policy (this is set out in the Safe Students Safe Staff Policy), the role of the Designated Safeguarding Lead and Part 1 and Annex B of KCSIE 2022, the Online Safety and Acceptable Use of IT Policies, and the Behaviour Management Policy.
- All members of staff will receive regular updates on safeguarding at least annually, with this including any changes to KCSIE and local authority guidance as well as reinforcement of key points from previous training through staff meetings, all-staff emails, and other appropriate mechanisms.
- All members of staff will receive guidance on the process for making referrals to children's social care.
- All members of staff will know what to do if a child tells them he/she is being abused, exploited or neglected.
- All members of staff understand the need to reassure victims of abuse or alleged abuse or sexual harassment or sexual violence that they will be taken seriously, supported and kept safe and that no victim need feel ashamed for making a report.



- All members of staff will recognise that if they have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the procedures in this safeguarding policy and speaking to the DSL.
- All academic staff are regularly trained in on-line safety.
- All staff are made aware of Whistle Blowing procedures during training.

### **Identification of Students at Risk**

In addition to making staff aware of what signs to be alert for that help to identify risk and what actions to take to make sure they are safe (see Appendix A to this Policy) the School has a comprehensive and layered pastoral system in order to monitor the general welfare and well-being of the students in the School. The structure is designed to make sure that no student is overlooked and to ensure that all those directly involved with their welfare are consulted on a regular basis. Students will also complete regular student voice surveys and have the opportunity to raise issues regularly.

### **Student Awareness**

Students are to be made aware of the safeguarding and child protection measures in place at Halliford during PSHE and in assemblies. In particular, they are to be made aware of the importance of talking to someone if they feel under threat of abuse or have actually been or are being abused. The PSHE programme at Halliford includes assertiveness training focused on helping children learn how to say 'no!'.

Students should have the confidence to report any concerns, about themselves or others, including those related to child-on-child abuse, to a member of staff who will in turn refer the report to the DSL or a member of the DSL team.

The School encourages the students in its care to raise any concerns that they might have and ensure that these are taken seriously. The School also encourages students to contribute their own ideas, according to their age and understanding, about how their safety and welfare could be further improved. The students are taught about e-safety within their PSHE and IT/Computing lessons. Regular Safeguarding surveys are issued, analysed and acted upon to ensure student voice is considered, but also so that awareness is raised in the student body. All classrooms have displayed posters raising awareness of the DSL team and where to look for help, including the NSPCC hotline.

### **Policy Review**

This Policy is reviewed as necessary to reflect changes in legislation, guidance and practice. The designated governor responsible for safeguarding and child protection matters keeps in touch with the School and DSL at regular intervals (approx. once a term), is available more frequently if required and undertakes an annual review of the School's child protection policies and procedures together with a review of any safeguarding incidents that have arisen and how they were managed (The HM, DSL, DDSL and Governor attend this review meeting). Following this annual review, the Main Board Meeting have Safeguarding on their main agenda where they discuss the policy and review. The DSL will be in attendance to answer any queries and clarify any points as required. The DSL will ensure that any discrepancies or weaknesses that may have been identified by this review in safeguarding and child protection arrangements are remedied without delay. Where appropriate, the Governing Body will be made aware of significant changes between these reviews. The policy is signed off by the Chairman of the Governors following the annual review or when any major changes have been made.

### **Record Keeping**

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If there is any doubt about whether to record something, discuss it with the DSL.

Records will be recorded using a 'Cause for Concern' form or from January 2023 an Incident report on CPOMS and will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome

Concerns and referrals will be kept in a separate child protection file for each child, this is held on CPOMS with access only for the DSL team (previously held in a fireproof locked location). All files previously created are fully scanned and inputted into CPOMS.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main student file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

## **OBLIGATORY ACTIONS TO BE UNDERTAKEN BY STAFF**

### **Declaration**

It is obligatory that every member of staff makes sure that they are fully conversant with this Policy along with the Safe Students Safe Staff Policy and the Staff Low-Level Concerns Policy and have signed the form at Appendix H confirming that they have read and understood these Policies and agree to abide by their contents.

### **Staff concerns**

It is obligatory for a member of staff to make their concerns known as soon as possible to the DSL or in his absence one of the DDSL's, or in the case of all being unavailable, the Headmaster, when they become concerned about the welfare of any Student and suspect that there may be a safeguarding issue.

In the case of a concern about the conduct of an adult – the Headmaster must be informed immediately, or if the concern relates to the Headmaster, the Chair of Governors must be informed, as per the Low-Level Concern Policy.

### **Disclosure**

It is obligatory for the DSL/DDSL to inform the appropriate outside agency within 24 hours of a disclosure or suspicion of abuse, as required by the Surrey C-SPA Procedures.

A member of staff with any concerns about possible abuse or receiving information about possible abuse MUST inform the DSL or Deputy DSL immediately.

## **GENERAL GUIDANCE FOR STAFF**

The welfare of the Student is paramount and takes precedence over every other consideration.

### **Introduction**

Abuse and neglect are forms 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 the family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or by another child or children. Any child in any family in any School could become a victim of abuse. Staff should always maintain an attitude of "It could happen here".

All staff should be aware that students may suffer from sexual, physical, emotional abuse and neglect while at School, at home or elsewhere and that the abuse may be perpetrated by staff, other adults including parents and other children. Children can suffer both sexual and physical abuse at the hands of other children. Such cases must be taken as seriously as abuse perpetrated by an adult and will be subject to the same child protection procedures. Appendix A to this Policy includes symptoms of abuse in order to help staff in identifying when abuse might be taking place.

## **IDENTIFICATION OF ABUSE**

All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another. All staff should also be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially

around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

### **Types of Abuse:**

**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. Physical abuse also covers Female Genital Mutilation (FGM) (See Appendix D).

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

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

**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 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.

There are also a number of specific safeguarding concerns that we recognise our students may experience:

- Child missing from education
- Child missing from home or care
- Child sexual exploitation (CSE)
- Child criminal exploitation (CCE)
- Bullying including cyberbullying
- County lines
- Domestic abuse
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage

- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Mental health - for further information on the main types of mental health needs as defined in the DfE guidance, please follow the link <https://www.gov.uk/government/publications/mental-health-and-behaviour-inSchools>
- Private fostering
- Radicalisation
- Youth produced sexual imagery (Sharing of nudes and semi-nudes)
- Teenage relationship abuse
- Trafficking
- Child on child abuse

We are also aware, as identified in KCSIE 2022, that students with SEND potentially have greater risk, along with those children who have or are witnessing domestic abuse.

### **Domestic Abuse**

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or 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. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Domestic abuse represents one quarter of all violent crime. It is actual or threatened physical, emotional, psychological or sexual abuse. It involves the use of power and control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, mental or physical ability. Domestic abuse can also involve other types of abuse. We use the term domestic abuse to reflect that a number of abusive and controlling behaviours are involved beyond violence. Slapping, punching, kicking, bruising, rape, ridicule, constant criticism, threats, manipulation, sleep deprivation, social isolation, and other controlling behaviours all count as abuse.

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

Schools are ideally placed to offer appropriate support, alongside other agencies, whether families are in crisis, or whether there are early signs of potential abuse.

Helplines:

<http://www.nationaldomesticviolencehelpline.org.uk>

Advice:

<http://www.nhs.uk/Livewell/abuse/Pages/domestic-violence-help.aspx>

<http://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/domestic-abuse>

<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/domestic-abuse/signs-symptoms-effects/>

<https://www.refuge.org.uk/our-work/forms-of-violence-and-abuse/domestic-violence/>

## **Child on child Abuse**

Child on child abuse occurs when a child poses a risk of harm to themselves or to others via their behaviours or actions. This can also include, but is not limited to, cases of serious bullying.

If a member of staff thinks for whatever reason that a student may pose a risk of harm to themselves or to others, the member of staff should report their concern to the DSL as soon as possible and follow the training issued in managing a report of such abuse (see the School's Anti-Bullying Policy which is accessible on the School's website for further details).

All staff should be aware that safeguarding issues can manifest themselves via child on child abuse; and that children are capable of abusing their peers. Staff should recognise that children are capable of abusing their peers, both within the school and outside it. Such abuse should never be tolerated or normalised through the common myth that it is part of growing up, boys being boys or banter.

Child on child abuse is most likely to include but is not limited to bullying (including cyber bullying), gender based violence, grooming, inappropriate or harmful sexualised play (younger children), sexual assaults, sharing of nudes and semi-nudes, upskirting and gender issues within groups of girls and boys. Should an allegation of abuse be made against another Student, all children involved (whether perpetrator or victim) will be treated as being "at risk". Where there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm, the allegation will be referred to children's social care using the alleged victim as the lead referral. The concern may indicate that one or more of the students concerned may be in need of additional support by local agencies and in those cases the DSL should follow local inter-agency procedures. Where appropriate, the matter will be dealt with under the School's Behaviour Policy with the use of relevant disciplinary sanctions. For further guidelines and advice, please refer to Appendix G.

Further guidance can be found using these links: <https://undressed.lgfl.net>, [addressing-child-on-child-abuse.pdf \(farrer.co.uk\)](https://www.farrer.co.uk/resources/child-on-child-abuse.pdf)

All staff should be aware that children can abuse other children (often referred to as child on child abuse) and that it can happen both inside and outside of school or college and online. It is important that all staff recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports. All staff should understand, that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such, it is important if staff have any concerns regarding child on child abuse, they should speak to their designated safeguarding lead (or deputy). It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, and that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

All staff are aware that victims must be reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school will not be downplayed and will be treated equally seriously. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor will a victim ever be made to feel ashamed for making a report.

It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

Halliford will also appreciate the importance of understanding intra familial harms and any necessary support for siblings following incidents.

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

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- Abuse in intimate personal relationships between 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;
- 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).

### **Children with Special Educational Needs and/or Disabilities**

Children with special educational needs and/or disabilities (SEND) are statistically more vulnerable to child abuse, and can face additional safeguarding challenges and additional barriers can exist when recognising abuse and neglect in this group of children. These include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration, along with ill-health.
- That children with SEND can be disproportionately impacted by things like child on child abuse, online and bullying without outwardly showing any signs.
- Communication barriers and difficulties in overcoming these challenges.
- We also recognise of the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and that these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children.
- Where necessary, the School will provide additional training to staff in the use of alternate communication systems, noting that there may be communication barriers and difficulties in managing or reporting these challenges.

### **Signs of abuse or neglect manifested by the parents or other responsible adult**

- Unrealistic expectations of the child i.e. demands a level of academic or physical performance of which they are not capable.
- Offers conflicting or unconvincing explanation of any injuries to the child.

- Appears indifferent to or overtly rejects the child; denies existence of or blames the child for the child's problems at home or at school.
- Sees and describes the child as entirely worthless, burdensome or in another negative light.
- Refuses offers of help for the child's problems; or is isolated physically or emotionally.

### **Grooming**

Grooming is the process by which an individual prepares a child, significant adults and the environment for abuse of this child. Children and young people can be groomed online or in the real world, by a stranger or by someone they know. Groomers may be male or female. They could be any age. Many children and young people do not understand that they have been groomed, or that what has happened is abuse. The signs of grooming are not always obvious. Groomers will also go to great lengths not to be identified. Children may:

- Be very secretive, including about what they are doing online.
- Have older boyfriends or girlfriends; go to unusual places to meet friends.
- Have new things such as clothes or mobile phones that they can't or won't explain.
- Have access to drugs and alcohol.
- Go missing from home or school.
- Display behavioural changes.
- Have sexual health issues.
- May present as suicidal, self/harming, feeling depressed, unworthy.

In older children, signs of grooming can easily be mistaken for 'normal' teenage behaviour, but you may notice unexplained changes in behaviour or personality, or inappropriate sexual behaviour for their age. See the NSPCC website for further information about grooming.

### **Signs of grooming and/or online abuse**

A child may be experiencing abuse online if they:

- Spend lots, much more, or much less time online, texting, gaming or using social media.
- Are withdrawn, upset or outraged after using the internet or texting.
- Are secretive about who they're talking to and what they're doing online or on their mobile phone; and/or have lots of new phone numbers, texts or e-mail addresses on their mobile phone, laptop or tablet.

### **Signs of grooming manifested by sex offenders**

It is important to remember that not all sex offenders will exhibit these signs listed below and if an individual exhibits some, or all of these signs it does not mean that they are a sex offender:

- Overly affectionate behaviour with a child.
- Affording special attention or preferential treatment to a child.
- Excessive time spent alone with a child outside of the classroom/school.
- Frequently spending time with a child in private or isolated areas.
- Transporting a child to or from the school.
- Making friends with a child's parents and visiting their home.
- Acting as a particular child's confidante.
- Giving small gifts, money, toys, cards, letters to a child. Using texts, telephone calls, e-mails or social networking sites to inappropriately communicate with a child.
- Flirtatious behaviour or making suggestive remarks or comments of a sexual nature, around a child.



## **Modus operandi of institutional grooming**

- Target vulnerable victim - Perpetrators target victims who are vulnerable, isolated, insecure and/or have greater emotional needs.
- Gain victim's trust – Offenders may allow a child to do something (e.g. eat ice cream, stay up late, view pornography) which is not normally permitted by the child's parents or the school in order to foster secrecy.
- Gain the trust of others – Institutional offenders are often popular with children and parents, successfully grooming not only the victim but also other members of the victim's family and the community at large. Filling a need / becoming more important to the child - This can involve giving gifts, rewards, additional help or advice, favouritism, special attention and/or opportunities for special trips or outings.
- Isolating the child - The perpetrator may encourage dependency and subtly undermine the victim's other relationships with friends or family members.
- Sexualising the relationship - This can involve playful touches, tickling and hugs. It may involve adult jokes and innuendo or talking as if adults, for example about marital problems or conflicts.
- Maintaining control and secrecy - Offenders may use their professional position to make a child believe that they have no choice but to submit to the offender.

## **Signs of grooming for radicalisation**

There are no known definitive indicators that a young person is vulnerable to radicalisation, but there are a number of signs that together increase their risk of being groomed in this way. Signs of vulnerability include:

- Underachievement
- Being in possession of extremist literature
- Poverty
- Social exclusion
- Traumatic events
- Global or national events
- Religious conversion
- Change in behaviour
- Extremist influences
- Conflict with family over lifestyle
- Confused identity
- Victim or witness to race or hate crimes
- Rejection by peers, family, social groups or faith

Extremism goes beyond terrorism and is defined in the Government's Counter Extremism Strategy as vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. We also regard calls for the death of members of armed forces as extremism. Extremists often target the vulnerable – including the young – by seeking to sow divisions between communities on the basis of race, faith or denomination; justifying discrimination towards women and girls; seeking to persuade others that minorities are inferior; or arguing against the primacy of democracy and the rule of law in our society.

## **Specific Safeguarding Issues**

All staff should have an awareness of safeguarding issues, some of which are listed below. Further details should be read in Part 1 of Keeping Children Safe in Education (2022). Safeguarding can link to issues such as drug-taking, alcohol abuse, truancy and sharing of nudes and semi-nudes. Sharing of nudes and semi-nudes, upskirting, can become an aspect of online safety abuse, between adults/children.

## **Child Criminal Exploitation (CCE)**

Children may be used to carry drugs or money from urban to rural areas. Identifying factors are also included. Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- Can affect any child or young person (male or female) under the age of 18 years
- Can affect any vulnerable adult over the age of 18 years
- Can still be exploitation even if the activity appears consensual
- Can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence
- Can be perpetrated by individuals or groups, males or females, and young people or adults; and is typified by some form of power imbalance in favour of those perpetrating the exploitation.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resource.

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

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual 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. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes and care homes. Children are also increasingly being targeted and recruited online using social media.

Children 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 children are involved in county lines.

Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children 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. Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

Further guidance can be found here <https://www.gov.uk/government/publications/child-exploitation-disruption-toolkit>

## Sexual Violence and Harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between two children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

**Staff should be aware of the importance of:**

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will immediately follow the procedures set out when responding to a safeguarding disclosure, as set out in this policy.

All staff are trained to manage a report - **effective safeguarding practice includes:**

If possible, managing reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy). However, this might not always be possible;

Where the report includes an online element, being aware of searching screening and confiscation advice (for schools) and UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people. **The key consideration is for staff not to view or forward illegal images of a child.**

The highlighted advice provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection;

Not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead or children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to;

Recognising that a child is likely to disclose to someone they trust: this could be anyone on the school staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child;

Recognising that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse;

Keeping in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation;

Listening carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was;

Considering the best way to make a record of the report. Best practice is to wait until the end of the disclosure (*do we mean 'disclosure'?*) and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made;

Only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Schools and colleges should be aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation; and

Informing the designated safeguarding lead (or deputy), as soon as practically possible, if the DSL (or deputy) is not involved in the initial report.

Sexual violence and sexual harassment is not acceptable and will not be tolerated. If suspected, all staff should follow the training given in managing reports of this nature.

### **Risk Assessment**

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

The risk and needs assessment will consider:

- The victim, especially their protection and support;
- Whether there may have been other victims,
- The alleged perpetrator(s); and
- All the other children, (and, if appropriate, adult students and staff) at the School, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments will be recorded and should be kept under review. At all times, the School will be actively considering the risks posed to all their students and put adequate measures in place to protect them and keep them safe. The DSL (or a deputy) will ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. The

school risk assessment is not intended to replace the detailed assessments of expert professionals. Any such professional assessments will be used to inform the school's or college's approach to supporting and protecting their students and updating their own risk assessment.

### **Action following a report of sexual violence and/or sexual harassment. What to consider.**

Sexual violence and sexual abuse can happen anywhere, and all staff at Halliford are advised to maintain an attitude of 'it could happen here. Halliford staff are aware of, and will respond appropriately to all reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the school. The DSL (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the School's initial response.

Important considerations will include:

- The wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's duty and responsibilities to protect other children;
- The nature of the alleged incident(s), including whether a crime may have been committed and/or whether Harmful Sexual Behaviour (HSB) has been displayed;
- The ages of the children involved;
- The developmental stages of the children involved;
- Any power imbalance between the children. For example, is the alleged perpetrator(s) significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?;
- If the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature);
- That sexual violence and sexual harassment can take place within intimate personal relationships between peers;
- Are there ongoing risks to the victim, other children, adult students or school or college staff;
- Other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

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

The starting point regarding any report will always be that there is a zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and it will not be tolerated. It is especially important not to pass off any sexual violence or sexual harassment as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

### **Serious violence**

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries

- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))
- Risk factors which increase the likelihood of involvement in serious violence include:
- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery
- Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a student being involved in, or at risk of, serious violence, they will report this to the DSL.

## **Mental Health**

All staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. When staff have a mental health concern about a child that is also a safeguarding concern, immediate action is taken, following this child protection policy and speaking to the DSL or a deputy. The school has a separate policy on Mental Health and Wellbeing – Policy 5a.

The following document also acts as further guidance: [mental health and behaviour in schools guidance](#).

## **CHILDREN WHO ARE PARTICULARLY VULNERABLE**

Halliford School recognises that some children are more vulnerable to abuse and neglect and that additional barriers exist when recognising abuse for some children.

We understand that this increase in risk is due more to societal attitudes and assumptions or child protection procedures which fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment or circumstances.

In some cases, possible indicators of abuse such as a child's mood, behaviour or injury might be assumed to relate to the child's impairment or disability rather than giving a cause for concern. Or a focus may be on the child's disability, special educational needs or situation without consideration of the full picture. In other cases, such as bullying, the child may be disproportionately impacted by the behaviour without outwardly showing any signs that they are experiencing it.

Some children 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.

To ensure that all of our students receive equal protection we will give special consideration to children who are:

- Disabled or have special educational needs
- Young carers
- Children with ill-health
- Affected by parental substance misuse, domestic abuse or parental mental health needs
- Asylum seekers
- Living away from home
- Vulnerable to being bullied or engaged in bullying
- Already viewed as a 'concern'
- Living in temporary accommodation
- Live transient lifestyles
- Living in chaotic and unsupportive home situations
- Vulnerable to discrimination on the grounds of race, ethnicity, religion, disability or sexuality
- At risk of sexual exploitation
- Do not have English as a first language
- At risk of female genital mutilation
- At risk of forced marriage
- At risk of being drawn into extremism.
- At risk of gang culture / county lines

### **Anti-Bullying/Cyberbullying – Online Safety**

Our School policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. This includes all forms e.g. cyber, racist, homophobic, gender-related or other kinds of discriminatory bullying.

We keep a record of known bullying incidents which is shared with and analysed by the Governing Body. All staff are aware that children with SEND and/or differences/perceived differences are more susceptible to being bullied/victims of child abuse, especially online. Information concerning online safety is filtered by SENSO and monitored by the DSL, with matters arising in this area noted as a likely cause of bullying, and managed in the same manner as face to face bullying.



If the bullying is particularly serious, or the anti-bullying procedures are seen to be ineffective, the Headmaster and the DSL will consider implementing child protection procedures.

The subject of bullying is addressed at regular intervals in PSHE education and discussed within standing items at the regular Pastoral Committee Meeting.

### **Racist Incidents**

Halliford School acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of racist incidents and these are dealt with robustly under our 'Behaviour Management Policy'.

### **Radicalisation and Extremism**

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

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

Some children are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal or dangerous.

Halliford School is clear that exploitation of vulnerable children and radicalisation should be viewed as a safeguarding concern and follows the Department for Education guidance for Schools and Childcare providers on preventing children and young people from being drawn into terrorism.

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

School staff receive training to help identify early signs of radicalisation and extremism. Indicators of vulnerability to radicalisation are detailed in Appendix F.

It is the School's Prevent duty under the Counter Terrorism & Security Act (2015) (The Prevent Duty) to have due regard to the need to prevent students from being drawn into terrorism. The referral procedures set out above also apply where there are concerns about children who may be at risk of being drawn into Radicalisation. The School also has in place a specific Preventing Extremism and Radicalisation Policy which sets out in detail the training requirements, prevention measures and procedures which staff must follow if they have concerns about a child being drawn into terrorism. All staff should familiarise themselves with and follow the procedures set out in this policy. The DSL is the designated Prevent duty person responsible for co-ordinating action within the school and liaising with other agencies, including the Prevent Lead.

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

The School Governors, the Headmaster and the DSL will assess the level of risk within the School and put actions in place to reduce that risk. Risk assessment may include, the use of School premises by external agencies, anti-bullying policy and other issues specific to the School's profile, community and philosophy.

When any member of staff has concerns that a Student may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL. They should then follow normal safeguarding procedures. If the matter is urgent then Surrey Police must be contacted by dialling 999. In non-urgent cases where police advice is sought then dial 101. The Department of Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).

### **Child Sexual Exploitation (CSE)**

CSE is a form of abuse which involves children receiving something from another individual or group in exchange for sexual activity. CSE usually involves an imbalance of power in the relationship. It can involve varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. In addition to the behavioural indicators above, key indicators of CSE include the child appearing with unexplained gifts or new possessions; associating with other young people involved in exploitation; and having older boyfriends or girlfriends. Any concerns regarding CSE should be immediately reported to the DSL.

Like all forms of child sex 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. (e.g. through others copying videos or images they have created and posted on social media)
- 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.
- Is typified by some form of power imbalance.

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.

Any concerns that a child is being or is at risk of being sexually exploited should be passed without delay to the DSL. Halliford School is aware there is a clear link between regular School absence/truancy and CSE. Staff should consider a child to be at potential CSE risk in the case of regular School absence/truancy and make reasonable enquiries with the child and parents to assess this risk.

The DSL will use the Surrey Safeguarding Children's Board CSE Screening Tool on all occasions when there is a concern that a child is being or is at risk of being sexually exploited or where indicators have been observed that are consistent with a child who is being or who is at risk of being sexually exploited.

In all cases if the tool identified any level of concern (green, amber or red) the DSL should contact their local Referral, Intervention and Assessment team and email the completed CSE Screening Tool. If a child is in immediate danger the police should be called on 999.

Halliford School is aware that a child often is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. As a consequence, the child may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse.

Halliford School includes the risks of sexual exploitation in the PHSE and SRE curriculum. Students will be informed of the grooming process and how to protect themselves from people who may potentially be intent on causing harm. They will be supported in terms of recognising and assessing risk in relation to CSE, including online, and knowing how and where to get help.

### **Female Genital Mutilation**

Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act (2003). It is a form of child abuse and violence against women. A mandatory reporting duty requires teachers to report 'known' cases of FGM in under 18s, which are identified in the course of their professional work, to the police.

The duty applies to all persons in Halliford School who are employed or engaged to carry out 'teaching work' in the School, whether or not they have qualified teacher status. The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the DSL, however they should be informed.

If a teacher is informed by a girl under 18 that an act of FGM has been carried out on her or a teacher observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth, the teacher should **personally** make a report to the police force in which the girl resides by calling 101. The report should be made by the close of the next working day.

School staff are trained to be aware of risk indicators of FGM which are set out in Appendix D. Concerns about FGM outside of the mandatory reporting duty should be reported as per Halliford School's child protection procedures. Staff should be particularly alert to suspicions or concerns expressed by female students about going on a long holiday during the summer vacation period. There should also be consideration of potential risk to other girls in the family and practicing community.

Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including dialling 999 if appropriate.

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

For further advice and guidelines, please refer to Appendix D

### **Forced Marriage**

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

Forced marriage is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.

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

School staff should never attempt to intervene directly as a School or through a third party. Contact should be made with the contact centre or the Forced Marriage Unit 020 7008 0151.

## **Honour-based Violence (HBV)**

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

Honour based violence might be committed against people who:

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

It is a violation of human rights and may be a form of domestic and/or sexual abuse. There is no, and cannot be, honour or justification for abusing the human rights of others.

## **One Chance Rule**

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.

Halliford School are 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.

## **Private Fostering Arrangements**

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or 18 if the child is disabled. Children looked after by the local authority or who are placed in residential Schools, children's homes or hospitals are not considered to be privately fostered. Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.

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

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's 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 Surrey Children's Social Care of the circumstances.

## **Looked After Children**

The most common reason for children becoming looked after is as a result of abuse and neglect. Halliford School ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child and contact arrangements with birth parents or those with parental responsibility.

The designated teacher for looked after children (The DSL) and the Headmaster have details of the child's social worker and the name and contact details of the Surrey County Council's virtual School head for children in care.

The designated teacher for looked after children (The DSL) and the Headmaster will work with the virtual School head to discuss the progress of looked after children in the School and how best to meet the needs in the child's personal education plan.

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken on concerns to safeguard these children, who are a particularly vulnerable group.

### **Children Missing Education**

Young people who go missing or run away can be at increased risk of sexual exploitation or other forms of abuse. Procedures are in place to ensure appropriate response to children and young people who run away or go missing, particularly on repeat occasions. If a child is missing from School without explanation from a parent or carer, the School secretary will ring home to find out where the child is following morning and afternoon registration. If a child has missed School repeatedly, the DSL and the Headmaster will be informed. The School will work with the parents and the Education Welfare Officer as necessary.

Attendance, absence and exclusions are closely monitored. A child going missing from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation.

The School needs to be aware of those students who are persistently absent or missing from school as this may be an indicator of welfare concerns, including abuse or neglect. All staff must also be aware of their role to prevent children from going missing from education through monitoring of attendance patterns, absences, reasons given and passing on to the DSL where appropriate. Staff need to be aware that children going missing from education can be a warning sign of safeguarding considerations.

The DSL will monitor unauthorised absences and take appropriate action including notifying the local authority particularly where children go missing on repeat occasions and/or are missing for periods during the School day in conjunction with 'Children Missing Education: Statutory Guidance for Local Authorities'.

Staff must be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

### **Online Safety**

Our students increasingly use electronic equipment on a daily basis to access the internet and share content and images via social media sites such as facebook, twitter, instagram, snapchat and Tik Tok.

Unfortunately, some adults and other children use these technologies to harm children. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing children to engage in 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.

To address this, our school aims to:

- Have robust processes in place to ensure the online safety of students, staff, volunteers and governors

- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones'). This includes access to the school wifi network, and personal data via 3/4/5G services.
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate using SENSO.
- Maintain regular contact with parents, reinforcing the importance of children being safe online and parents and carers are likely to find it helpful to understand what systems schools and colleges use to filter and monitor online use.

It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole school approach to online safety empowers the School to protect and educate students, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

Halliford ensures online safety is a running and interrelated theme whilst devising and implementing policies and procedures. This includes considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead and any parental engagement.

Halliford School has an Acceptable User Policy (AUP) which explains how we try to keep students safe in School and how we respond to online safety incidents and can be found in the front of each student planner.

Students are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated.

Staff should be aware of the risks from potentially harmful and inappropriate online material and receive regular updates on online safety.

All staff should be aware of the risks posed to children by technology and the internet and should understand their role in preventing, identifying and responding to harm caused by its use. This Policy should be read alongside the School's Digital Safety Policy, and which sets out the School's approach to online safety in further detail, as well as the School's Youth Produced Sexual Imagery advice in this policy.

The School has adopted a whole school approach to online safety which:

- captures the range and complexity of the risks and of children's experiences of those risks;
- seeks to mitigate those risks as far as possible without depriving children of the significant benefits provided by technology and the internet; and
- handles all cases of online harm appropriately and with sensitivity – using SENSO.

The risks posed to children by the internet and technology are wide-ranging and include risks resulting from:

**Content** - being exposed to harmful material

This includes but is not limited to:

- Violent pornography or sexual images of children which affect a child's perception of girls, love and relationships
- Material promoting harmful behaviours such as self-harm or eating disorders

- Propaganda or material promoting extremism, radicalisation and/or terrorism
- Material showing or depicting extreme violence or brutality
- Social media such as Facebook and Instagram which can provide children with distorted and unrealistic images of others' lives, causing some children to feel inadequate or distressed about their own lives.

**Contact** - being subjected to harmful interaction with others online

This includes but is not limited to:

- cyber-bullying
- contact from individuals seeking to groom children for the purposes of sexual abuse or radicalisation
- being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

**Conduct** - personal online behaviour that increases the likelihood of, or causes, harm;

- making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography)
- sharing other explicit images and online bullying

**Commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams.

Online harm can be caused via a number of different media, including but not limited to: mobile phones and apps; social media; the internet; and video games. Any child may suffer from online harm and all staff should be alert to the risk of it. Indicators that a child may be being abused or harmed online overlap with other indicators of abuse.

If you suspect that a child may be at risk of or suffering from online harm, discuss any concerns with the DSL immediately. The DSL will discuss the incident with you and agree on a course of action in accordance with the procedures set out in this Policy.

Students are educated about the risk of online harm – including youth produced sexual imagery, and the ways to mitigate those risks in PSHE, computing classes, assemblies and tutor groups. Staff are trained on the risks posed by technology and the internet and the ways in which they can prevent, identify and respond to cases appropriately and with sensitivity to cases of online harm. The School actively engages with parents to ensure a joined up approach when responding to cases of harm, and to ensure as far as possible that parents are aware of and understand the risks of it, are able to identify and respond appropriately to cases of online harm. The School takes measures to limit children's exposure to these risks from the school's IT systems, including by putting in place appropriate filters and monitoring systems which protect children from harm whilst not over-blocking.

### **Youth Produced Sexual Imagery (Sharing of nudes and semi-nudes)**

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

Youth produced sexual imagery refers to both images and videos where:

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

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a student to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL).
- Delete the imagery or ask the student to delete it.
- Ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility).
- Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers.
- Say or do anything to blame or shame any young people involved.
- You should explain that you need to report the incident and reassure the student(s) that they will receive support and help from the DSL.

All incidents of this nature should be treated as a safeguarding concern and in line with the UK Council for Child Internet Safety (UKCCIS) guidance '[Sexting in Schools and colleges: 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 children involved (if appropriate). Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the child at risk of harm. At any point in the process if there is concern a young person has been harmed or is at risk of harm a referral should be made to 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 child's development stage or are violent;
- The imagery involves sexual acts;
- The imagery involves anyone aged 12 or under; or



- There is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.

If none of the above apply then the DSL will use their professional judgement to assess the risk to students involved and may decide, with input from the Headmaster, 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 child in the imagery;
- the child is more vulnerable than usual i.e. at risk;
- there is a significant impact on the children involved;
- the image is of a severe or extreme nature;
- the child involved understands consent;
- the situation is isolated or if the image has been more widely distributed;
- there other circumstances relating to either the sender or recipient that may add cause for concern i.e. difficult home circumstances; or
- the children 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.

### **Historical Abuse**

These still need to be reported in accordance with Halliford procedures. A Student reporting “historical abuse” may benefit from family support and may need specific therapeutic and other professional help. In addition, child protection agencies will need to consider whether or not to conduct a child protection investigation, as a crime may have been committed and other children with whom the alleged abuser is (or has been) living or working with may have been abused or still be at risk of significant harm.

### **Host Families**

Homestays during exchange visits:

Halliford often makes arrangements for children to take part in exchange visits, either to other parts of the UK or abroad. Exchanges can benefit learning across a range of subjects. In particular, foreign visits can enrich the languages curriculum and provide exciting opportunities for students to develop their confidence and expertise in the use of other languages.

Halliford safeguards and promotes children’s welfare on these occasions by considering their safety and how best to minimise risk of harm to those involved during any exchange visit the school arranges, and when organising for the care and accommodation of a child with a host family (known as homestays) as part of the exchange.

In all cases, the School operates under the guidance contained with Keeping Children Safe in Education (2022)

## **Halliford arranged homestay – suitability of adults in UK host families.**

When arranging a homestay, the School considers the suitability of the adults in the respective families who will be responsible for the visiting child during the stay. In circumstances where Halliford arranges for a visiting child to be provided with care and accommodation in the UK (including where they engage a company to make those arrangements) in the home of a family to which the child is not related, the responsible adults will be engaging in regulated activity for the period of the stay. In such cases and where the school has the power to terminate such a homestay, the school would be the regulated activity provider. A regulated activity provider commits a criminal offence if it knows, or has reason to believe that, an individual is barred by the Disclosure and Barring Service (DBS) from engaging in regulated activity but allows that individual to carry out any form of regulated activity. As such, the School carries out a DBS check on the responsible adults in the case of all Homestay providers.

Where the child's parent(s) or a student themselves arranges their own homestay, this would be a private arrangement, therefore the school would not be the regulated activity provider.

## **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 child. 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 children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children 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. Assemblies are provided by the School and by the police community youth officer.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org).

## **Children and the court system**

Children 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 children 5-11-year olds and 12-17 year olds.

[ywp-5-11-eng.pdf \(publishing.service.gov.uk\)](#)

[ywp-12-17-eng.pdf \(publishing.service.gov.uk\)](#)

These guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

[Get help with child arrangements - Get help with child arrangements \(justice.gov.uk\)](#)

## Children with family members in prison

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

[NICCO](#)

## 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 - GOV.UK \(www.gov.uk\)](#)

## Cybercrime

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the **Cyber Choices** programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that **Cyber Choices** does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK

## **ACTION TO BE TAKEN IN THE EVENT OF A DISCLOSURE OR SUSPICION OF ABUSE**

### **Responding to a Disclosure of Abuse**

Children who disclose information about abuse usually do so with considerable difficulty and with much anxiety about the possible repercussions on themselves and others. In the event that a student decides to make a disclosure, staff and volunteers should make themselves available to listen and demonstrate to the student that what they are saying is being taken seriously and without criticism. They should also respond in a supportive, calm manner and avoid asking detailed questions. The role of the staff or volunteer is to listen, record and report; not to investigate. Staff and volunteers should take care to ensure that their behaviour and actions do not place students or themselves at risk of harm. Refer to the managing a report flowchart in this policy.

**Immediate Response - the “Do”s.** If a disclosure is made, the member of staff or volunteer should:

- Listen to and take seriously any disclosure or information that a child may be at risk of harm.
- Reassure victims that they will be taken seriously, and that they will be supported and kept safe. They should not be given the impression that they are creating a problem or made to feel ashamed.
- Explain sensitively to the person that you have a responsibility to refer the information to the DSL or one of the DDSLs.
- Try to ensure that the person disclosing does not have to speak to another member of School staff.
- Clarify the information. Using actual words where possible. Sign and date the record.
- Complete a body map of injuries if appropriate as guided by SSCP.
- Try to keep questions to a minimum and of an ‘open’ nature e.g. ‘Can you tell me what happened?’ rather than ‘Did x hit you?’
- Try not to show signs of shock, horror or surprise.
- Reassure and support the person as far as possible.
- Explain that only those who ‘need to know’ will be told.
- Explain to the person what will happen next and that they will be involved as appropriate.
- Make sure the child is safe and supported.
- Complete the Cause for Concern Form or from October half-term complete an Incident report on CPOMS and return it to the DSL or DDSLs as soon as possible.

**Immediate Response – The “Don’t”s.** The member of staff or volunteer should not:

- Promise confidentiality.
- Express feelings or judgements regarding any person alleged to have harmed the child.
- Judge or criticise the alleged perpetrator or the child.
- Ask leading questions.
- Interrogate or try to establish if the child is telling the truth.
- Attempt to investigate the circumstances.
- Put words in the child's mouth (i.e. finish their sentences).
- Trivialise any aspect of a disclosure.
- Let any allegations, suspicions or concerns go unreported.
- Undress the child or examine clothed parts of the child’s body in an attempt to determine the nature of any such injuries/neglect.
- Make promises they cannot keep e.g. “I’ll stay with you all the time” or “it will be alright now”.

## Confidentiality

If a student confides in a member of staff and requests that the information is kept secret, staff/volunteers must not make any promises about confidentiality. Staff must tell the student sensitively that they have a responsibility to inform the DSL or DDSL so that the child can be helped to stay safe and feel better.

Halliford School recognises that in order to effectively meet a child's needs, safeguard their welfare and protect them from harm, the School must contribute to inter-agency working in line with Working Together to Safeguard Children (2018) and share information between professionals and agencies where there are concerns.

All staff must be aware that should a student disclose information of abuse there could never be an absolute guarantee of confidentiality. There is a clear legal duty to pass on information about abuse or suspected abuse. Not to do so could place the member of staff concerned in the untenable position of failing to report a crime to the police. Far worse, it might mean that a child continues to suffer abuse.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act 1998, along with further guidance issues in Information Sharing July 2018, is not a barrier to sharing information where the failure to do so would place a child at risk of harm.

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

## Recording Information

The member of staff to whom the disclosure is being made **MUST** make brief notes at the time or immediately afterwards, which record the date, time, place and context of the disclosure or concern, and what has actually been said (wherever possible using the child's exact words, even if they seem childish, rude or inappropriate), not assumption or interpretation. The notes must be signed and dated and include the following:

- A clear distinction between fact, observation, allegation and opinion.
- A description of any observed injuries and bruises, including the completion of a body map
- A note of the non-verbal behaviour and the key words in the language used by the student (do not translate into "proper terms").

The member of staff must also complete a Safeguarding Cause for Concern Form or from January 2023 an Incident Report on CPOMS (see Appendix I to this Policy), along with body map, attach any original notes and pass them to the DSL (or DDSL in the absence of the former). The member of staff needs to appreciate that their records may be used in criminal proceedings or disciplinary investigations.

All information on Child Protection matters is confidential and records will be stored separately by the DSL and will not be accessible from the Student's School file. Staff must maintain records between themselves and the DSL, ideally on paper or email – where email is used documents can either be password protected or the use of initials. The DSL will ensure any information shared meets GDPR regulations 2018.

## Reporting to the DSL/DDSL

Staff who have even the slightest cause for concern in any matter relating to the safety and well-being of a student **MUST** report the matter as soon as possible to the DSL, or in his absence, the DDSL and at the latest by the end of the School day. The DSL and DDSL have a legal duty as 'designated persons' for all Child

Protection matters. The DSL, or in his absence, the DDSL will assume responsibility for taking the appropriate action.

Remember that the welfare of the student is always paramount and that it takes precedence over every other consideration. In the unlikely event of no DSL / DDSL being present in emergencies, contact the Police, or C-SPA directly.

### **Action to be Taken in the Event of a Disclosure**

The DSL/DDSL will review the evidence and decide the next step whether the concerns constitute a child in immediate danger and whether the case meets the referral thresholds. It is not the task of the School either to diagnose or investigate. That is the duty of the Children's Social Care, the Police and Medical Profession. One or other of the following courses of action will be taken:

- The DSL/DDSL will make an instant referral to the Surrey C-SPA and certainly within 24 hours. In cases of serious harm, the police should also be informed at the outset.
- If it is felt that advice is needed, then the DSL will telephone the Surrey County Local Authority Designated Officer before taking further action.
- A decision may be made not to refer but to take action within School. This may include "early help". 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 provides detailed guidance on the early help process).

Whatever action is decided, whether it is for an immediate referral or for advice, it must be taken within 24 hours of the disclosure or suspicion of abuse being brought to the attention of the School. The Headmaster will also inform the Chairman of Governors and the Designated Governor at the earliest opportunity that there has been a referral.

### **Care of the Student**

The School recognises that a child who is abused may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth. The School also recognises it may provide the only stability in the lives of children who have been abused or are at risk of harm. It will provide continuing support to a student who has disclosed abuse by providing a caring and safe environment within the School and encouraging self-esteem and self-assertiveness through the curriculum and through relationships. In doing so, the School will act in accordance with guidance from the relevant authorities to ensure that, for example, legal proceedings are not compromised. In certain cases, risk assessments will be required for the student involved, but also on occasion the wider scenario.

### **Notifying Parents**

The School will normally seek to discuss any concerns about a Student with their parents. This must be handled sensitively and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure.

However, if the School believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from Children's Social Care, but the best interests of the child will remain and a referral made without consent if required.

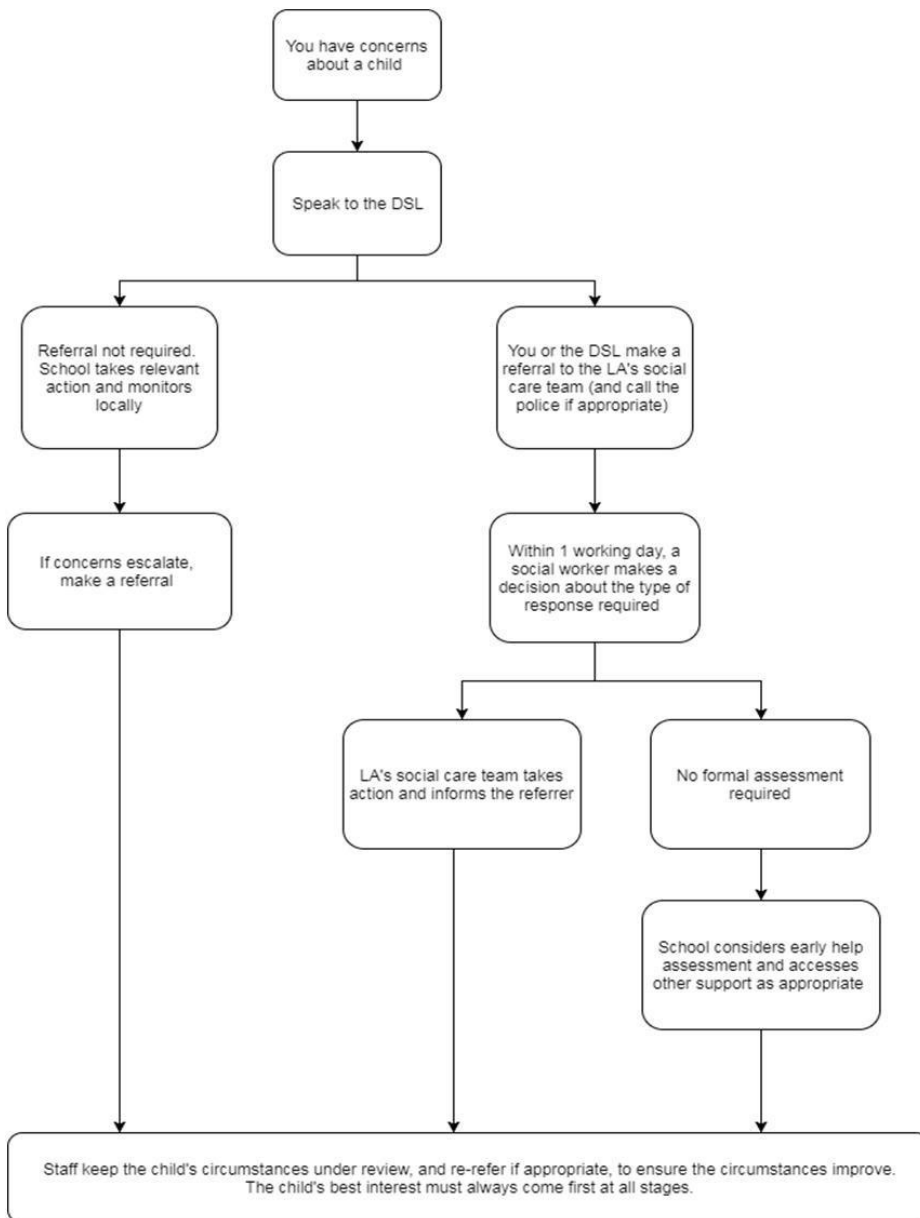
Where there are concerns about forced marriage or honour based violence parents should not be informed a referral is being made as to do so may place the child at a significantly increased risk.

Certain situations, such as when the student is 18 years of age, should not be immediately referred to parents without consent of the student.

### Supporting Staff

We recognise that staff working in the School who have become involved with a child who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting.

We will support such staff by providing an opportunity to talk through their anxieties with the Headmaster and DSLs and to seek further support as appropriate.



## ALLEGATIONS AGAINST A MEMBER OF STAFF

### Allegations

Any allegation of abuse made against a member of staff, a volunteer or the DSL, must be reported immediately to the **Headmaster and not the DSL**. Equally low-level concerns related to safeguarding about the conduct of a member of staff must be reported to the Headmaster making reference to the Staff Low-Level Concerns Policy.

**In cases where the Headmaster is absent or is the subject of an allegation, it will be reported to the Chairman of Governors** who will refer to the LADO. In the case of a member of staff, the Headmaster will be fully informed, unless the allegation is about them. The School will follow the procedures set out in part 4 of Keeping Children Safe in Education. The School will not seek to interview the student(s) or member(s) of staff involved until advice has been sought. Doing so may compromise any police interviews that may be necessary.

Should the Chairman of Governors be subject to an allegation, this matter would be referred directly to the LADO.

A staff member should report a concern/allegation directly to the LADO if they believe there is a conflict of interest in reporting to the Headmaster.

The School will ensure that any disciplinary proceedings against staff relating to child protection matters are concluded in full even when the member of staff is no longer employed at the School (for example, if they have resigned after the alleged event or moved to another School) and that notification of any concerns are made to the relevant authorities and professional bodies and included in references where applicable.

Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly, and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children are protected.

Communications with the School community about safeguarding related allegations will only be made by the Headmaster following consultation with Surrey Social Services Designated Officer, any investigating authorities and the Board of Governors.

Low-level concerns which are shared about supply staff and contractors will be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

### Levels of Allegation

Allegations against staff can be determined as Level 1 or 2 allegations, whereby the harms threshold has been met (Level 2) or the allegation has not (Low-level concern 1).

An adult will have met the harms threshold if they have:

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



As part of their whole school approach to safeguarding, Halliford ensures that it promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. This encourages an open and transparent culture; enabling Halliford to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the school.

### **What is a low-level concern?**

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out above. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the Safe Students Safe Staff Policy (staff code of conduct), including inappropriate conduct outside of work, and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- Being over friendly with children;
- Having favourites;
- Taking photographs of children on their mobile phone;
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- Using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. It is crucial that any such concerns, including those which do not meet the allegation/harm threshold are shared responsibly and with the **Headmaster**.

Further details are contained within the Staff Low-Level Concerns Policy which should be read in conjunction with this policy. Additional information is also available in the following document: [developing-and-implementing-a-low-level-concerns-policy.pdf \(farrer.co.uk\)](#)

### **Referral to the Teaching Regulation Agency**

If anyone who is employed, contracted, a volunteer or a member of staff or student working in the School is deemed unsuitable to work with children, and thus their services are no longer required, the Headmaster will report to the Teaching Regulation Agency within one month of that person leaving the School and inform the Chair of Governors. This now includes any teachers used as supply, or through agencies.

Any such report will include evidence about the circumstances as far as possible. If the referral relates to the Headmaster, the Chair of Governors is responsible for making this referral. The contact address is: Teacher Regulation Agency (TRA) Teaching Misconduct Unit, Teaching Regulation Agency, 53-55 Butts Road, Earlsdon Park, Coventry, CV1 3BH. E-mail: [misconduct.teacher@education.gov.uk](mailto:misconduct.teacher@education.gov.uk)

The School is aware that failure to make a report constitutes an offence, leading to its possible removal from the Department for Education register of Independent Schools. "Compromise agreements" cannot apply in this connection. It is an offence not to refer to the DBS details of anyone who is removed from regulated activity, or who leaves while under investigation for allegedly causing harm or posing a risk of harm.

The School will consider referring to the TRA and DBS where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate and should make reference to this in their policies. The reason such an order would be considered are: "unacceptable professional conduct", "conduct that may bring the profession into disrepute" or a "conviction at any time, for a relevant offence". 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.

## **REFERRING CONCERNS TO CHILDREN'S SOCIAL CARE**

### **Referral**

The decision to make a referral which could activate a child protection investigation, and the issue of gaining parental consent, are serious matters and require careful judgement. These decisions will usually be taken by the DSL or DDSLs, who will liaise with the Head as appropriate, following consultation with the Children's Social Care. In cases of serious harm, the police will be informed from the outset. All staff, however, are encouraged to make a referral themselves if they feel that there is an immediate need and a DSL/DSLs or the Headmaster is not available, or if they feel that inaction by the DSL/DSLs and the Headmaster are putting a child at risk. Referrals are made to the Surrey Children's Services (details in at the front of this document), or the Children's Board for the location the student resides.

Staff will report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss such a case with the School's DSL and involve Children's Social Care as appropriate.

### **Involvement and Briefing of Parents**

Subject to the above and the advice of the Children's Social Care, the consent of parents should be obtained before making a formal referral, unless to do so could place the child at risk of significant harm, in which case a referral would be made without any such consent. In the event of the School making a referral to Children's Social Care, they should agree with the recipient of the referral what exactly the child and parents will be told, by whom and when.

### **Liaison with Children's Social Care**

Children's Social Care are required to acknowledge written referrals within one working day, although Schools should expect a prompter response in cases which appear to be urgent. If the School has not heard from Children's Social Care after two working days, the School will contact Children's Social Care again. A record of each contact with Children's Social Care, including the name of the officer with whom the School has spoken should be kept. The relevant DSL/DSL should, in any case, ask to be kept informed of the timing of the strategy discussion between Children's Social Care and the police, which will decide whether and how to investigate. They need to be prepared to contribute to the strategy discussion.

## **PREVENT**

### **Responsibilities**

The DSL is responsible for ensuring that the School has procedures in place to fulfil the School's Prevent duty, to identify children at risk of radicalisation and extremism, to protect them and to make referrals as appropriate. The school will follow the information as updated by the Government and uses the current 'Revised Prevent duty guidance for England and Wales', April 2021 - [Revised Prevent duty guidance: for England and Wales - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/92121/Prevent-Duty-Guidance-for-England-and-Wales-2021.pdf) The DSL, the Headmaster and the designated Governor will complete appropriate "Prevent" awareness training and update all members of staff as required.

The School will:-

- Assess the risk of students being drawn into terrorism.
- Protect students from being drawn into terrorism by having robust safeguarding policies.
- Ensure that safeguarding arrangements take into account the policies and procedures of the Local Safeguarding Children Board.
- Make sure that staff have training that gives them the knowledge and confidence to identify students at risk of being drawn into terrorism, and to challenge extremist ideas which can be used to legitimise terrorism.
- Ensure staff are trained to identify the early signs of radicalisation.
- Ensure students are safe from terrorist and extremist material when accessing the internet in School.

### **Indicators**

The indicators for a child at risk of radicalisation are in Appendix F.

### **Making a Referral**

Any member of staff who identifies such concerns, for example as a result of observed behaviour or reports of conversations to suggest the child supports terrorism and/or violent extremism, must report these concerns to the DSL who will consider what further action is required.

The DSL will discuss any such concerns with the local police and will make a referral to Surrey Children's Services if necessary. Surrey Police will also be informed if a referral is made. All staff are encouraged to make a referral themselves if they feel that there is an immediate need and a DSL/DDSLs or the Headmaster is not available, or if they feel that inaction by the DSL/DDSLs and the Headmaster are putting a child at risk. Referrals are made to the Surrey Children's Services (details listed at the front of this document).

**If you have any concerns about our Prevent Duty discuss them with the DSL.**

## WHISTLEBLOWING

### Whistleblowing

The School recognises that children cannot be expected to raise concerns in an environment where staff fail to do so. Where staff or volunteers reasonably believe that safeguarding concerns exist, or where they have concerns regarding the management of safeguarding issues, it is their duty to raise concerns. The member of staff should bring their concerns however low-level to the attention of the Headmaster. If the concern is about the Headmaster, these should be brought immediately to the attention of the Chair of Governors.

If it becomes necessary to consult outside the School, the member of staff should also inform the Chairman of Governors. Although the usual route is to refer matters to the DSL or DDSL or Headmaster, anyone can make a direct referral to the appropriate authorities.

There is a national helpline run by the NSPCC which provides advice to employees who feel unable to raise concerns about suspected child abuse internally. The contact details are listed at the front of this policy.

### EQUAL OPPORTUNITIES AND EQUALITY

In meeting its safeguarding obligations, the School will be mindful of the obligations under the Equality Act 2010, which covers discrimination against a student or prospective student on grounds of sex, race, caste, disability, religion or belief, sexual orientation, gender reassignment, pregnancy or maternity. All staff, volunteers and governors with responsibilities under this Policy must take into account the School's commitment to equal opportunities when discharging their duties.

### SOME CONCLUDING POINTS

**All staff must ensure that** they are conversant with the contents of this policy and have familiarised themselves with the symptoms of possible abuse given in Appendix A. The following points are the essential ones to remember:

- a) The welfare of the student takes precedence over every other consideration.
- b) A member of staff with any concerns about possible abuse must inform the DSL/DDSL immediately.
- c) Under no circumstances must staff try to investigate or diagnose abuse themselves as this may prejudice subsequent enquiries.

## APPENDIX A

### IDENTIFYING POSSIBLE SIGNS AND SYMPTOMS OF ABUSE

#### The Context.

The identification of abuse is not a precise science. The lists below are not exhaustive. They are merely intended to provide some helpful indicators. Abuse usually presents a mixture of indicators. Some are present whatever the nature of the abuse. Given the close day-to-day contact that staff have with students the key warning signs to look for are:

- Significant, unaccountable changes in behaviour (eating disorders, self-harm, aggression).
- Evidence of neglect and failure to develop.
- Possible signs of physical abuse (e.g. bruises, cuts, self-harm).

**Some Statistics on Abuse.** The following statistics provide a helpful guide as to the frequency and breadth of abuse:

- 20% of girls and 14% of boys have been victims of sexual abuse by the age of 18.
- 30% of abuse is child to child.
- Most abuse takes place in the home or from those with regular access to the home.
- Children who are bullied are 3 times more likely to be abused than those not bullied.

#### Categories of Abuse

- Physical Abuse.
- Emotional Abuse. (including Domestic Abuse)
- Neglect.
- Sexual Abuse. (including child sexual exploitation)

#### Signs of Abuse in Children

The following non-specific signs may indicate something is wrong:

- Significant change in behaviour.
- Issues relating to mental health.
- Extreme anger or sadness.
- Aggressive and attention-seeking behaviour.
- Suspicious bruises with unsatisfactory explanations.
- Lack of self-esteem.
- Self-injury.
- Depression.
- Age inappropriate sexual behaviour.
- Child Sexual Exploitation.

#### Risk Indicators

The factors described in this section are frequently found in cases of child abuse. Their presence is not proof that abuse has occurred, but:

- Must be regarded as indicators of the possibility of significant harm.
- Justifies the need for careful assessment and discussion with the DSL.
- May require consultation with and/or referral to Children's Services.

The absence of such indicators does not mean that abuse or neglect has not occurred.

In an abusive relationship the child may:

- Appear frightened of the parent/s.
- Act in a way that is inappropriate to her/his age and development. (though full account needs to be taken of different patterns of development and different ethnic groups)

The parent or carer may:

- Persistently avoid child health promotion services and treatment of the child's episodic illnesses.
- Have unrealistic expectations of the child.
- Frequently complain about/to the child and may fail to provide attention or praise. (high criticism/low warmth environment)
- Be absent.
- Misusing substances.
- Persistently refuse to allow access on home visits.
- Be involved in domestic abuse.

Staff should be aware of the potential risk to children when individuals, previously known or suspected to have abused children, move into the household.

## PHYSICAL ABUSE

'Physically harmful action against a child including some or all of the following: bruises, burns, head injuries, fractures, abdominal injuries or poisoning.' CH Kempe

The key indicators for physical abuse include:

- Unexplained injuries or burns, especially if they are recurrent.
- Improbable excuses to explain injuries or a refusal to discuss them.
- Admission of punishment that appears excessive.
- Fear of parents being contacted and fear of returning home.
- Arms and legs kept covered in hot weather.
- Chronic truancy.
- Self-destructive tendencies and/or aggression towards others.
- Untreated injuries and fear of medical help.
- The parents/carers are uninterested or undisturbed by an accident or injury
- Repeated presentation of minor injuries (which may represent a “cry for help” and if ignored could lead to a more serious injury).
- Reluctance to give information or mention previous injuries.

Non-accidental injury to children by adults is often difficult to detect. Always remember that symptoms that are difficult to explain could be the result of inflicted injuries.

The following provides a guide to the more common non-accidental injuries – however colleagues are aware that no part of the body, not normally visible should be examined.

### Bruises

Most injuries to children are accidental and can be explained simply; all children receive bumps and bruises as a result of normal play or day to day activities. Most falls or accidents produce one bruise on a single surface, usually a bony surface.

Bruising in accidents is usually on the front of the body as children generally fall forwards; there may be marks on their hands where they have tried to break their fall.

Bruising may be faint or severe. Some skin shows bruising very easily, others do not; bruises on black children for instance are more difficult to detect.

There may be a pattern to bruising, e.g. after the weekend

### Unusual sites for accidental bruising

- Back, back of legs, buttocks.
- Mouth, cheeks, behind the ear.
- Stomach, chest.
- Under the arm.
- Genital or rectal areas (care if child is learning to ride a bike).
- Neck.

### Common types of non – accidental injuries

- Symmetrical black eyes are rarely accidental, although they may occur where there is a fracture of the head or nose. Careful consideration is required whenever there is an injury around the eye.
- Bruising in or around the mouth.
- Grasp marks on arms.



- Finger marks.
- Symmetrical bruising (especially on ears).
- Outline bruising (belt marks, hand prints).
- Linear bruising.
- Different age bruising on a child at any one time other than on common sites of accidental injury for a child of that age.

### **Bites**

These can leave clear impressions of teeth. Human bites are oval or crescent shaped. If the distance is more than 3 cm across, an adult or another child with permanent teeth must have caused them.

### **Burns**

It can be very difficult to distinguish between accidental and non-accidental burns, but as a general rule, burns with clear outlines are suspicious as are burns of uniform depth over a larger area and also splash marks above a main burn area (usually caused by hot liquid being thrown).

Remember also:

- A responsible adult checks the temperature of a bath before a young child gets in.
- A child is unlikely to sit down voluntarily in a bath which is too hot and cannot accidentally scald its bottom without also scalding its feet.
- A child getting into too hot water of its own accord will struggle to get out again and therefore there will be splash marks.
- Small round burns may be cigarette burns.

### **Scars**

Children may have scars, but notice should be taken of an exceptionally large number of scars, especially when coupled with different age bruising, unusual shaped scars, or large scars which did not receive medical treatment.

### **Fractures**

These should be suspected if there is pain, swelling and discolouration over a bone or joint. The most common non-accidental fractures are of long bones (arms, legs, ribs). It is rare for a parent to be unaware that a child has been hurt in this way, as the pain caused will cause the child to inform someone.

Factors associated with injuries that may arouse suspicion of being non-accidental are:

- Explanation not consistent with the injury.
- Changes of explanation.
- Unreasonable delay in seeking medical advice.
- A history of frequently repeated injury.
- Constant complaints about a child.
- Over-hasty or violent reaction to a child's naughty or annoying behaviour.
- Unrealistic expectations of a child's performance.

## EMOTIONAL ABUSE

'A child being continually terrorised, berated or rejected.' CH Kempe

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse. The indicators of emotional abuse are often also associated with other forms of abuse.

The following may be indicators of emotional abuse:

- Developmental delay.
- Abnormal attachment between a child and parent/carer e.g. anxious, indiscriminate or not attachment Indiscriminate attachment or failure to attach.
- Aggressive behaviour towards others.
- Scape-goated within the family.
- Frozen watchfulness, particularly in pre-School children.
- Low self esteem and lack of confidence.
- Withdrawn or seen as a "loner" – difficulty relating to others.

## NEGLECT

'The failure of parents to act properly in safe-guarding the health, safety and well-being of a child. It includes nutritional neglect, failure to provide medical care or to protect the child from physical and social danger.' CH Kempe

The key indicators of neglect include:

- Constant hunger and signs of emaciation.
- Constant tiredness and untreated medical problems.
- Poor personal hygiene and poor state of clothing.
- Compulsive stealing and scavenging for food and clothes.
- Destructive tendencies and low self-esteem.
- Chronic truancy and/or frequent lateness
- Neurotic behaviour (e.g. rocking, hair-twisting, thumb-sucking etc).
- Ineffective social relationships.

Warning signs apart from a child's obviously neglected appearance include:

- Inappropriate clothing or lack of clothing and an unawareness from the carer that the child is inadequately dressed.
- A child who appears underfed and is frequently unwell with a permanent runny nose.
- A child who is left unsupervised or with a variety of different carers.
- A child who thrives away from home.
- A child with poor language development or other developmental delays.
- A child whose parents persistently fail to seek or follow medical advice.

Non–Organic failure to thrive

- Children with poor weight gain.
- Poor growth, sparse hair, poor skin tone.
- Perverse eating habits, gorging, stealing food, enormous appetite.
- Poor sleeping patterns.
- Developmental delay.
- Solitary behaviours with poor peer group relationships.
- Attention seeking from adults.

## **SEXUAL ABUSE**

'The sexual exploitation of a child involving the misuse of conventional age, authority or gender differentials.' CH Kempe

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child to talk about and full account should be taken of the cultural sensitivities of any individual child/family.

Recognition can be difficult, unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional/behavioural.

The key indicators for sexual abuse include the following:

- Chronically depressed and suicidal.
- Withdrawn, isolated or excessively worried.
- Sudden change in School work and habits including chronic truancy and inability to concentrate.
- Use of drugs and excessive drinking.
- Self-mutilation and self-hatred.
- Eating disorders.
- Fearful about certain people and finding excuses not to go home or to certain places.
- Unexplained outburst of anger or emotion.

Some behavioural indicators associated with this form of abuse are:

- Inappropriate sexualised conduct.
- Sexually explicit behaviour, play or conversation, inappropriate to the child's age.
- Continual and inappropriate or excessive masturbation.
- Self-harm (including eating disorder), self-mutilation and suicide attempts.
- Involvement in prostitution or indiscriminate choice of sexual partners.
- An anxious unwillingness to remove clothes e.g. for sports events (but this may be related to cultural norms or physical difficulties).

Some physical indicators associated with this form of abuse are:

- Pain or itching of genital area.
- Blood on underclothes.
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing.

## **Mental Health**

Halliford plays an important role to play in supporting the mental health and wellbeing of their students. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the procedures in this policy and speaking to the DSL.

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

Halliford has clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems. We access a range of advice to help them identify children in need of extra mental health support; this includes working with external agencies and our own counsellor, who works one day and a half each week.

Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people.

## APPENDIX B

### Sexual Abuse by Young People – Harmful Sexual Behaviour

**NSPCC Hotline: 0800 136663**

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or children.

Developmental Sexual Activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

#### What is sexual violence and sexual harassment?

##### Sexual violence

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way and that it can happen both inside and outside of school.

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

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

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

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.) Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

What is consent?

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

It is important school staff (and especially designated safeguarding leads and their deputies) understand consent. This will be especially important if a child is reporting they have been raped or sexually assaulted in any way.

### **Sexual consent**

The age of consent is 16.

A child under the age of 13 cannot consent to any form of sexual activity; a child under the age of 16 cannot consent to sexual activity with a person aged 16 and over.

Sexual intercourse without consent is rape.

### **Sexual harassment**

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

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

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- Sexual "jokes" or taunting;
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature.
- 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.

### **Online sexual harassment.**

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

- Consensual and non-consensual sharing of nude and semi-nude images and/or videos;
- Sexualised online bullying;
- Unwanted sexual comments and messages, including, on social media;
- Sexual exploitation; coercion and threats.

It is important to differentiate between consensual sexual activity between children of a similar age and that which involves any power imbalance, coercion or exploitation. Due to their additional training, the designated safeguarding lead (or deputy) should be involved and generally speaking, leading the school or college response. If in any doubt, they should seek expert advice.

Project deSHAME from Childnet provides useful research, advice and resources regarding online sexual harassment.

**Consensual image sharing**, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive.

## Upskirting

The Voyeurism (Offences) Act 2019, which is commonly known as the Upskirting Act, came into force on 12 April 2019. '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 sex, can be a victim.

Inappropriate Sexual Behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is "acting out" which may derive from other sexual situations to which the child or young person has been exposed. If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

Abusive sexual activity includes any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base. In order to more fully determine the nature of the incident the following factors should be given consideration.

The presence of exploitation in terms of:

- Equality – consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies.
- Coercion – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance.
- Consent – agreement including all the following:
  - Understanding that is proposed based on age, maturity, development level, functioning and experience.
  - Knowledge of society's standards for what is being proposed.
  - Awareness of potential consequences and alternatives.
  - Assumption that agreements or disagreements will be respected equally.
  - Voluntary decision.
  - Mental competence.

## APPENDIX C

### Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

The following list of indicators is not exhaustive or definitive, but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation. This is now to be seen through the lens of the exploiter – further guidance can be found on the link below.

#### [Child sexual exploitation: guide for practitioners](#)

Signs include:

- going missing from home or School
- regular School absence/truancy
- underage sexual activity
- inappropriate sexual or sexualised behaviour
- sexually risky behaviour, 'swapping' sex
- repeat sexually transmitted infections
- in girls, repeat pregnancy, abortions, miscarriage
- receiving unexplained gifts or gifts from unknown sources
- having multiple mobile phones and worrying about losing contact via mobile
- online safety concerns such as youth produced sexual imagery or being coerced into sharing explicit images
- having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- changes in the way they dress
- going to hotels or other unusual locations to meet friends
- seen at known places of concern
- moving around the country, appearing in new towns or cities, not knowing where they are
- getting in/out of different cars driven by unknown adults
- having older boyfriends or girlfriends
- contact with known perpetrators
- involved in abusive relationships, intimidated and fearful of certain people or situations
- hanging out with groups of older people, or anti-social groups, or with other vulnerable peers
- associating with other young people involved in sexual exploitation
- recruiting other young people to exploitative situations
- truancy, exclusion, disengagement with School, opting out of education altogether
- unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- mood swings, volatile behaviour, emotional distress
- self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
- drug or alcohol misuse



- getting involved in crime
- police involvement, police records
- involved in gangs, gang fights, gang membership
- injuries from physical assault, physical restraint, sexual assault

## **APPENDIX D**

### **Female Genital Mutilation**

#### **Specific factors that may heighten a girl's or woman's risk of being affected by FGM**

There are a number of factors in addition to a girl's or woman's community or country of origin that could increase the risk that she will be subjected to FGM:

- The position of the family and the level of integration within UK society – it is believed that communities less integrated into British society are more likely to carry out FGM.
- Any girl born to a woman who has been subjected to FGM must be considered to be at risk of FGM, as must other female children in the extended family.
- Any girl who has a sister who has already undergone FGM must be considered to be at risk of FGM, as must other female children in the extended family.
- Any girl withdrawn from Personal, Social and Health Education may be at risk as a result of her parents wishing to keep her uninformed about her body and rights.

#### **Indications that FGM may be about to take place soon**

The age at which girls undergo FGM varies enormously according to the community. The procedure may be carried out when the girl is newborn, during childhood or adolescence, at marriage or during the first pregnancy. However, the majority of cases of FGM are thought to take place between the ages of 5 and 8 and therefore girls within that age bracket are at a higher risk.

It is believed that FGM happens to British girls in the UK as well as overseas (often in the family's country of origin). Girls of School age who are subjected to FGM overseas are thought to be taken abroad at the start of the School holidays, particularly in the summer holidays, in order for there to be sufficient time for her to recover before returning to her studies.

There can also be clearer signs when FGM is imminent:

- It may be possible that families will practise FGM in the UK when a female family elder is around, particularly when she is visiting from a country of origin.
- A professional may hear reference to FGM in conversation, for example a girl may tell other children about it.
- A girl may confide that she is to have a 'special procedure' or to attend a special occasion to 'become a woman'.
- A girl may request help from a teacher or another adult if she is aware or suspects that she is at immediate risk.
- Parents state that they or a relative will take the child out of the country for a prolonged period.
- A girl may talk about a long holiday to her country of origin or another country where the practice is prevalent.
- Parents seeking to withdraw their children from learning about FGM.

#### **Indications that FGM may have already taken place**

It is important that professionals look out for signs that FGM has already taken place so that:

- the girl or woman affected can be supported to deal with the consequences of FGM.
- enquiries can be made about other female family members who may need to be safeguarded from harm.
- criminal investigations into the perpetrators, including those who carry out the procedure, can be considered to prosecute those breaking the law and to protect others from harm.

There are a number of indications that a girl or woman has already been subjected to FGM:

- A girl or woman may have difficulty walking, sitting or standing and may even look uncomfortable.
- A girl or woman may spend longer than normal in the bathroom or toilet due to difficulties urinating. A girl may spend long periods of time away from a classroom during the day with bladder or menstrual problems.
- A girl or woman may have frequent urinary, menstrual or stomach problems.
- There may be prolonged or repeated absences from School or college.
- A prolonged absence from School or college with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return could be an indication that a girl has recently undergone FGM.
- A girl or woman may be particularly reluctant to undergo normal medical examinations.
- A girl or woman may confide in a professional.
- A girl or woman may ask for help, but may not be explicit about the problem due to embarrassment or fear.
- A girl may talk about pain or discomfort between her legs.

### **The Mandatory Reporting Duty**

From October 2015, 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 social workers and healthcare professionals, 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. Under the mandatory reporting requirements teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out (either through disclosure by the victim or visual evidence) on a girl under 18. Those failing to report such cases will face disciplinary sanctions.

### **The 'One Chance' rule**

As with Forced Marriage there is the 'One Chance' rule. It is essential that settings /Schools/colleges take action without delay and make a referral to children's services.

## **APPENDIX E**

### **Domestic Abuse**

#### **How does it affect children?**

Children can be traumatised by seeing and hearing violence and abuse. They may also be directly targeted by the abuser or take on a protective role and get caught in the middle. In the long term this can lead to mental health issues such as depression, self-harm and anxiety.

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. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Note that children will sometimes blame themselves when they hear or see violent words or actions in the home; just hearing a violent quarrel will seriously unsettle many children; staff should therefore be aware of the specific impact of domestic abuse on children and how it might affect them;

Staff training will include (in accordance with the latest edition of KCSIE): updated guidance on Operation Encompass which provides emotional and practical help to children e.g. in cases of Domestic Abuse.

#### **Operation Encompass**

Operation Encompass is a national system operating in the majority of police forces across England. When the police have been called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (the DSL) at Halliford. This ensure that the School has up to date information about the child's circumstances and can offer support to the child according to their needs.

#### **What are the signs to look out for?**

Children affected by domestic abuse reflect their distress in a variety of ways. They may change their usual behaviour and become withdrawn, tired, start to wet the bed and have behavioural difficulties. They may not want to leave their house or may become reluctant to return. Others will excel, using their time in your care as a way to escape from their home life. None of these signs are exclusive to domestic abuse so when you are considering changes in behaviours and concerns about a child, think about whether domestic abuse may be a factor.

## APPENDIX F

### Indicators of vulnerability to radicalisation

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

Extremism is defined by the Government in the Prevent Strategy 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. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

Extremism is defined by the Crown Prosecution Service as:

- The demonstration of unacceptable behaviour by using any means or medium to express views which:
  - Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
  - Seek to provoke others to terrorist acts;
  - Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
  - Foster hatred which might lead to inter-community violence in the UK.

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

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

Indicators of vulnerability include:

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

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

More critical risk factors could include:

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

The Home Office Revised Prevent duty guidance for England and Wales can be accessed at:

[Revised Prevent duty guidance: for England and Wales - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-revised-guidance-for-england-and-wales.pdf)

The Department of Education guidance The Prevent Duty can be accessed 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)

## APPENDIX G

### Child on Child Abuse

Identifying child on child abuse can be achieved by being alert to children's well-being and to general signs of abuse. Signs that a child may be suffering from child on child abuse overlap with those relating to other types of abuse (please see Appendix A of the Safeguarding Policy for indicators of abuse).

Halliford School does not tolerate hazing under the guise of 'banter' in any way. We recognise that abuse is abuse and should never be tolerated or passed off as 'banter', 'boys being boys' or 'just having a laugh' or 'part of growing up'. 'Banter' in any form will not be tolerated at Halliford, 'as this can lead to a culture of unacceptable behaviours and an unsafe environment for students'.

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

Signs can include:

- failing to attend school, disengaging from classes or struggling to carry out school related tasks to the standard you would ordinarily expect
- physical injuries
- having difficulties with mental health and/or emotional wellbeing
- becoming withdrawn, shy, experiencing headaches, stomach aches, anxiety, panic attacks, suffering from nightmares or lack of sleep or sleeping too much
- drugs and/or alcohol use
- changes in appearance and/or starting to act in a way that is not appropriate for the child's age.

Again, this list is not exhaustive and the presence of one or more of these signs does not necessarily indicate abuse.

*Are some children particularly vulnerable to abusing or being abused by their peers?*

Any child can be affected by child on child abuse and staff should be alert to signs of such abuse amongst all children. Research suggests that:

- child on child abuse is more prevalent amongst children aged 10 and older, although it also affects younger children, including by way of harmful sexual behaviour
- children who are particularly vulnerable to abuse or to abusing others include those who have
  - witnessed or experienced abuse or violence themselves
  - suffered from the loss of a close family member or friend
  - experienced considerable disruption in their lives.
- It is also recognised that child-on-child abuse can have a link to gender and staff and students are aware of this, in particular related to dealings with the Sixth Form. However, as a school we believe that all forms of child-on-child abuse are completely unacceptable and will be taken extremely seriously.

*How prevalent is child on child abuse?*

Recent research suggests that child on child abuse is one of the most common forms of abuse affecting children in the UK. For example, more than four in ten teenage schoolgirls aged between 13 and 17 in England have experienced sexual coercion (Barter et al 2015). Two thirds of contact sexual abuse experienced by children aged 17 or under was perpetrated by someone who was also aged 17 or under (Radford et al 2011) and over a third of young boys in England admitted to watching porn and having negative attitudes towards women (University of Bristol and University of Central Lancashire, 2015).

*What should I do if I suspect either that a child may be being abused, or that a child may be abusing others?*

If a member of staff thinks for whatever reason that a child may be at risk of abuse from another child or young person, or that a child may be abusing others, the member of staff should report their concern to the DSL without delay. If a child is in immediate danger, or at risk of harm, a referral to children's social care and/or the Police should be made immediately.

*How will the DSL respond to concerns of child on child abuse?*

The DSL will discuss the behaviour with the member of staff and will, where necessary, take any immediate steps to ensure the safety of the victim(s) or any other child.

Support will be offered to both the Victim and also the Perpetrator as appropriate.

- Where the DSL considers or suspects that the behaviour might constitute abuse, children's Social Care should be contacted immediately and in any event within 24 hours of the DSL becoming aware of it. The DSL will discuss the incident with children's Social Care. The DSL will be part of discussions with statutory safeguarding partners to agree the levels for the different types of assessment and services to be commissioned and delivered, as part of the local arrangements, which may include:
  - taking any steps to ensure the safety and wellbeing of any children affected
  - further investigation
  - referral to other agencies such as the Police (where a crime may have been committed), CAMHS, a specialist harmful sexual behaviour team and/or youth offending services
  - a strategy meeting

Any response should be decided in conjunction with children's Social Care and other relevant agencies and should:

- investigate the incident and the wider context and assess and mitigate the risk posed by the perpetrator(s) to the victim(s) and to other children
- consider that the abuse may indicate wider safeguarding concerns for any of the children involved
- treat all children (whether perpetrator or victim) as being at risk - while the perpetrator may pose a significant risk of harm to other children, s/he may also have considerable unmet needs and be at risk of harm themselves
- take into account the complexity of child on child abuse and of children's experiences and consider the interplay between power, choice and consent. While children may appear to be making choices, if those choices are limited they are not consenting
- take appropriate action in respect of the perpetrator – any action should address the abuse, the causes of it and attitudes underlying it. Factors to consider include: the risk the perpetrator(s) poses and will continue to pose to other children, their own unmet needs, the severity of the abuse and the causes of it.
- Understand the importance of understanding intra familial harms and any necessary support for siblings following incidents.

Disciplinary action may be appropriate, including:

- to ensure that the perpetrator takes responsibility for and realises the seriousness of his or her behaviour
- to demonstrate to the perpetrator and others that abuse can never be tolerated
- to ensure the safety and wellbeing of the victim and other children in the School.



Permanent exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the victim(s) and other children in the School. The School will provide on-going support to victim(s) including by:

- ensuring their immediate safety
- responding promptly and appropriately to the abuse
- assessing and addressing any unmet needs
- following the procedures set out in the Safeguarding Policy (including where the child is in need of early help or statutory intervention)
- monitoring the child's wellbeing closely and ensuring that s/he receives ongoing support from all relevant staff members within the School
- engaging with the child's parents and any external agencies to ensure that the child's needs are met in the long-term
- consider the lessons that can be learnt from the abuse and put in place measures to reduce the risk of such abuse recurring. This may include, for example: gender and equalities work, work around school safety, security and supervision, awareness raising for staff, students and parents about a particular form of abuse, training for staff on handling certain types of incidents or abuse.

*How does the School raise awareness of and reduce the risk of child on child abuse?*

Staff are trained on the nature, prevalence and effect of child on child abuse, how to prevent, identify and respond to it. The School actively seeks to prevent all forms of child on child abuse by educating students and staff, challenging the attitudes that underlie such abuse, encouraging a culture of tolerance and respect amongst all members of the school community, and responding to all cases of child on child abuse and any cases of bullying (no matter how trivial) promptly and appropriately.

Children are educated about the nature and prevalence of child on child abuse via PSHE and assemblies, they are told what to do if they witness or are victims of such abuse, the effect that it can have on the victims and the possible reasons for it, including vulnerability of the perpetrator. They are regularly informed about the School's approach to such issues, including its zero tolerance policy towards all forms of bullying and child on child abuse. A PSHE drop down morning is held that covers child on child abuse, coercive behaviour, harmful sexual behaviour and identifies clearly channels of reporting for young people.

## APPENDIX H

### Agreement by Staff to the Safeguarding and Welfare of Students Procedures at Halliford School.

Please sign and return to Jaymie Johnson as soon as you have read the following policies and completed the VVV On-Stream online training module in Safeguarding:

- Safeguarding and Child Protection
- Staff Low-Level Concerns Policy
- Safe Students Safe Staff Policy
- Keeping Children Safe in Education (2022) Part 1 & Annex B

Halliford School is committed to supporting all staff and volunteers to carry out their roles and responsibilities effectively and to ensure that the highest standards of professional conduct are maintained at all times. The School relies on its staff and volunteers to help in the safeguarding and promotion of the welfare of the students in its care.

- a. I have read the information in these documents. (This policy is kept updated on the School website and in the Safeguarding section for staff on Teams.)
- b. I will refer to the Halliford Safeguarding and Child Protection Policy document for clarification of any issues that may arise.
- c. I agree to work in accordance with the Halliford School Safeguarding and Child Protection Policy.
- d. I have received and read part 1 of Keeping Children Safe in Education. (September 2022) & Annex B
- e. I have raised any points I do not understand or require further clarification upon and received a satisfactory and clear explanation.

Signed .....

Date .....

Print Name .....

Role in the School .....

**APPENDIX I**



Halliford School

**Cause for Concern Form**

Logging a concern about a Student's safety and welfare

*To be completed by hand please*

Student's Name:	Form:
Today's date:	Time:
Staff raising concern:	Role within School:
Date of concern/incident:	Time of concern/incident:
<p>Describe the concern/incident as factually as possible. Include who was involved, where it happened, exactly what happened, etc. Remember to record any behaviour or physical signs you have observed. Please use the exact words that the Student uses. (continue overleaf if necessary)</p>	
<p>Check to make sure your report is as clear as possible – It may be read in the future by someone who doesn't know you or the Student concerned.</p>	
Action taken by you, if any:	Your signature:

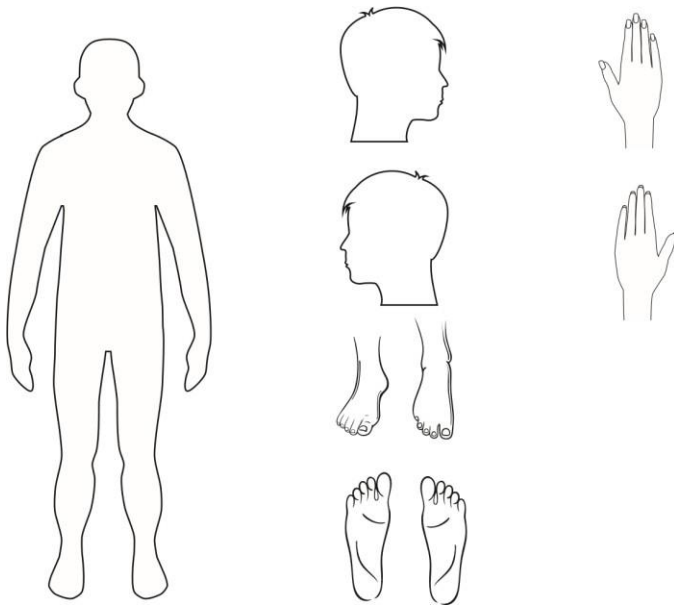
Now pass this form to the Designated Safeguarding Lead

Received by:	Your role:
Date:	Time:
Proposed action by the designated person:	
Follow-up:	
Links to Other Students:	

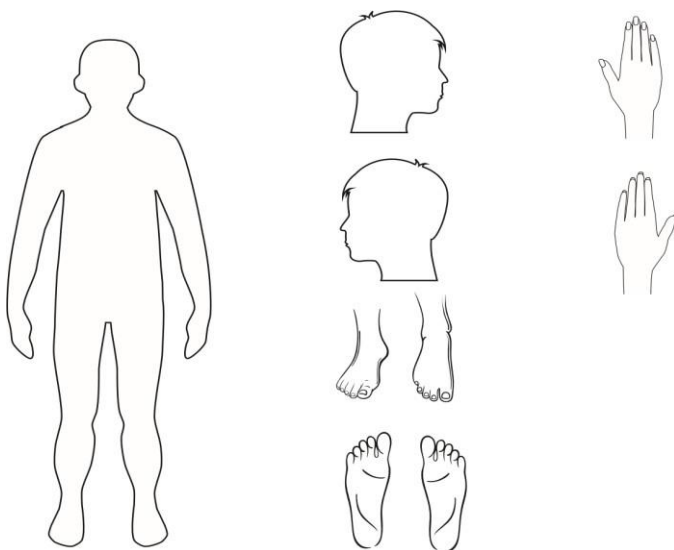
**Body Map**

Please circle and annotate areas where injuries noted and describe injuries

**Front**



**Back**



Please note that no colleague should examine any part of a student's body, without it being normally visible

## CPOMS Reporting

During the academic year 2022/23 in January 2023, Halliford School will be moving the reporting of Safeguarding concerns to CPOMS, whereby all staff can provide an online CPOMS incident report that immediately alerts the DSL. Training on how to complete this will be provided in the January INSET. Please find below details of the incident report form and guidelines on using CPOMS as a reporting mechanism.

The screenshot shows the CPOMS incident report form interface. At the top, there is a navigation bar with 'Halliford School' and various menu items: Dashboard, Reporting, Planner, Library, Admin, Account Settings. On the right side of the navigation bar, there are 'Add Incident', a notification bell icon, and 'LOGOUT'. The main form area is titled 'Form restored from previous session - Undo' with a 'Back' button. The form fields include: 'Student' (a dropdown menu with the placeholder 'Begin typing a student's name'), 'Incident' (a large text area), 'Categories' (a list of checkboxes: Attendance, Bullying, Cause for Concern, Child Contact - Student Voice, Child Protection, Contact with External Agency, Home Issues / Parenting Issues, Parental Contact, Safeguarding, School Counselling, SEND), 'Linked student(s)' (a dropdown menu with the placeholder 'Begin typing a student's name' and a note 'Type a student's name to link them to this incident.'), 'Maps' (an icon showing two human figures), 'Date/Time' (a date and time picker showing '24/08/2022 11:32'), 'Status' (a dropdown menu with 'Active'), 'Assign to' (a dropdown menu with the placeholder 'Begin typing a staff member's name'), 'Files' (a large area with a button 'Click to browse or drag a file to upload'), 'Alert Staff Members' (a dropdown menu with the placeholder 'Begin typing a staff member's name' and a note 'Type a colleague's name or select an alert group to alert them to this incident. Colleagues highlighted in red would not normally be able to view this incident.'), 'Agency Involved' (a text input field), and 'Add to planner' (a checkbox). At the bottom of the form is a 'Submit Incident' button.

### Using CPOMS to make an Incident Report – from January 2023

1. Staff will make observation/disclosure and take contemporaneous, written notes as normal with a safeguarding concern
2. If it is a significant concern see the DSL immediately
3. Log in to CPOMS and complete an incident report, following the guidelines of reporting described in training
4. Staff will ensure they click 'Cause for Concern' and 'Safeguarding'
5. Staff will ensure student names, times, those involved are completed accurately
6. Staff will assign and alert the DSL in the incident report
7. Staff will complete the body map if appropriate
8. Submit incident
9. As soon as possible hand the DSL any necessary documents or paperwork, so that they may be scanned in to CPOMS

## **APPENDIX J - CODE OF PRACTICE FOR THE USE OF PHOTOGRAPHIC MEDIA**

### **Parents Taking Images.**

Parents, carers, relatives or other visitors to the School may only take photographs or video recordings of students in School or on School-organised activities by arrangement and with the prior consent of the Headmaster.

### **Parental Permission for Images to be used by the School.**

Parents will be asked for permission for their children to be photographed or filmed, for the purposes of inclusion in School publications and promotional material. The use of these images will NOT include the name of the student with associated picture. Should a name be used in publications, then no image will be associated.

### **Responsibility of the Registrar.**

The Registrar is responsible for circulating all new parents with the photographic media permission form in order to allow parents to express their wishes about the use of pictures of their children by the School. The Registrar will also keep a record of those parents not wishing photographic images of their children to be used by the School.

Staff are to ensure that they consult this list before any images are used.

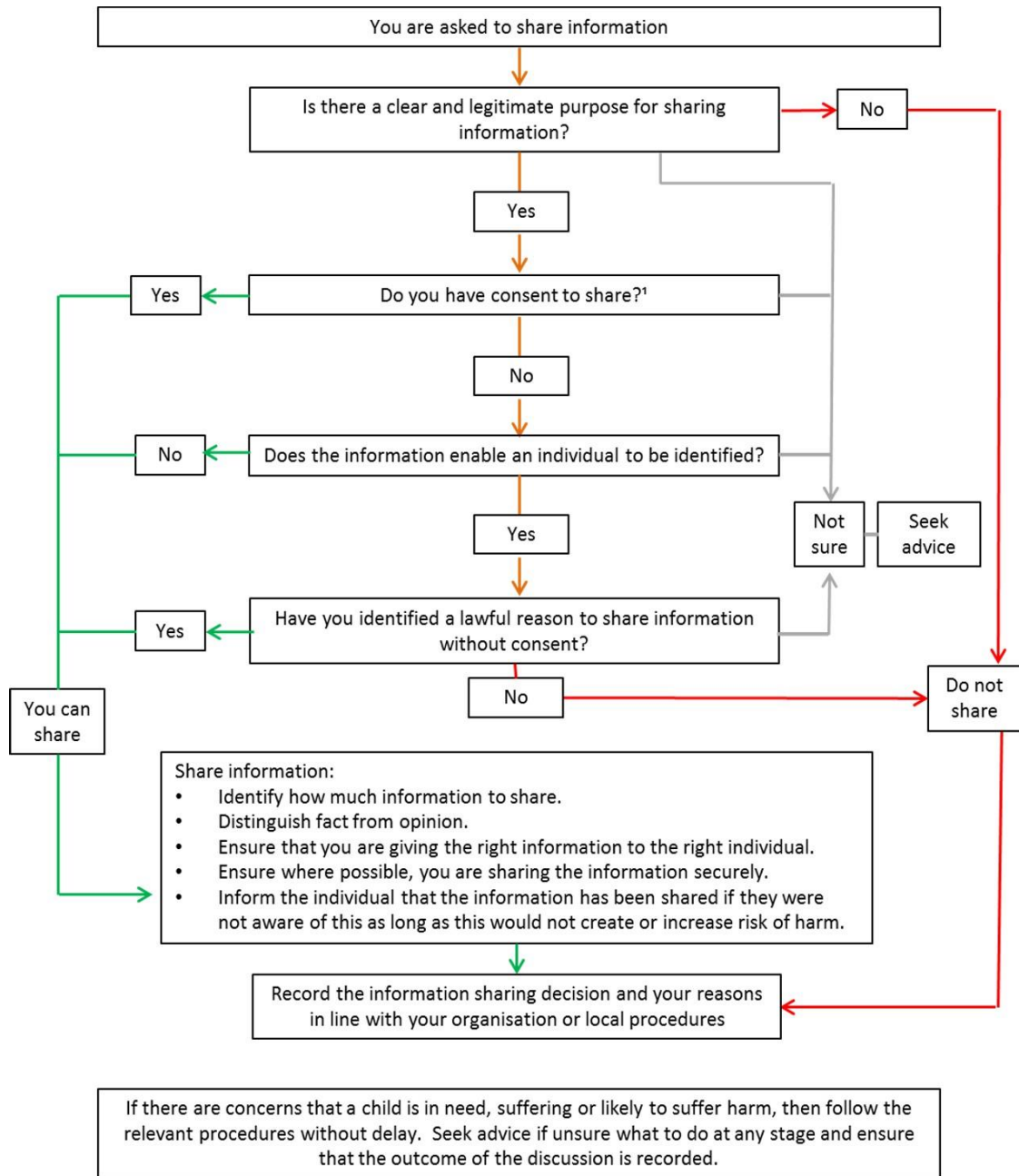
### **Recording of Images by the School.**

The recording of photographic and video evidence is used to demonstrate Student achievement and progress appropriate to the School's curriculum, and may be presented in students' books or development records. In all cases of recording such information, School cameras are to be used. These are only taken off-site to record evidence of out-of-School learning: for example, on a School trip.

### **Storage of Images Taken by the School.**

Film or photographs taken remain in electronic format on the School's IT system or are stored securely. Members of staff are not permitted to use their own mobile devices to record such evidence, or to record information such as Student telephone numbers or email addresses.

**APPENDIX K – FLOWCHART OF WHEN AND HOW TO SHARE INFORMATION**



## APPENDIX L – SURREY CSB LEVELS OF NEED GUIDANCE

Below is a guide to the assessment of need in Surrey. This is provided to further your understanding of the process and support available in the local setting. It is not to be used as a method for triaging your concerns – as stated in this policy, please pass on all concerns you have immediately to the DSL, through the appropriate Cause for Concern Form.

### The Surrey Effective Support Windscreen

