



# The Bridewell Schools' Child Protection and Safeguarding Policy

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## Safeguarding Directory for adults (KESW)

For safeguarding and child protection concerns and when you know something is wrong. If you think that a child is in immediate danger, or that a crime has been committed, ring 999 before doing anything else.

**Any safeguarding or child protection concerns should be raised with the Designated Safeguarding Lead (DSL), any of the Deputy DSLs or the external agencies listed on this page. Even minor concerns should be raised because they may be part of a bigger picture unknown to staff members.**

### DSL

Mr Zak Siva [sivaz@kesw.org](mailto:sivaz@kesw.org) 07497 093502 (ext 715)  
(Director of Safeguarding)

### Deputy DSLs

(Head of Classics)

Mr David Corran [corrاندp@kesw.org](mailto:corrاندp@kesw.org) 01428 686748 (ext 748)  
(Deputy Head) 07460 173023

Mr Nick Emsley [emsleyn@kesw.org](mailto:emsleyn@kesw.org) 01428 483359 (home)  
(Senior HsM) 01428 686368 (ext 368)  
07508 947289

All the DSLs can be reached via the generic email address [safeguarding@kesw.org](mailto:safeguarding@kesw.org) and can be contacted by using extension 777 from a school phone

|                          |                            |                                                            |                                                  |
|--------------------------|----------------------------|------------------------------------------------------------|--------------------------------------------------|
| Principal & Head of KESW | <b>Mrs Joanna Wright</b>   | <a href="mailto:wrightj@kesw.org">wrightj@kesw.org</a>     | 01428 686743 (ext 743)<br>01428 686721 (ext 721) |
| CFOO*                    | <b>Mr Dan Rogers</b>       | <a href="mailto:rogersd@kesw.org">rogersd@kesw.org</a>     | 01428 686778 (ext 778 or 414)                    |
| Head of HR               | <b>Mrs Caroline Gallop</b> | <a href="mailto:gallop@kesw.org">gallop@kesw.org</a>       | 01428 686744                                     |
| Treasurer                | <b>Mrs Justine Voisin</b>  | <a href="mailto:voisinj@kesw.org">voisinj@kesw.org</a>     |                                                  |
| Safeguarding Governor    | <b>Mr Mike Chadwick</b>    | <a href="mailto:chadwickm@kesw.org">chadwickm@kesw.org</a> |                                                  |

\* CFOO: Chief Finance and Operations Officer

Anyone with a concern about a child can get advice from, or make a referral to, the local authority:

**Surrey County Council Children's Services** 0300 470 9100, or  
**Multi-Agency Partnership** 01483 517898 (emergency out-of-hours team)  
**Single Point of Access (C-SPA) and Early Help Hub** [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk)  
NSPCC helpline: 0800 800 5000 or email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

For allegations against staff working in School, normal procedure is to refer to DSL or Head (as per Safeguarding policy), but anyone may make an independent referral to the **Local Authority Designated Officer (LADO)** 0300 123 1650 (option 3) [LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk)

**What to do if you feel your concerns are not being acted upon, or if you are concerned about unsafe practice or malpractice by the DSL or wider safeguarding team?**

A member of staff who has raised a concern with the DSL or DDSs, DOFO, Head, Treasurer, governor, or the local authority, should expect a confirmatory response within one working day. Should that not be forthcoming, staff should seek it out. In addition, they should press for further consideration if the child is at risk or if the situation is not improving. If staff feel their concerns have not been fully addressed (having paid due regard to the need for professional confidentiality), or that actions taken are partly or completely ineffective, they should speak to the Head in the first instance and then the Treasurer if they are still not satisfied. Further details can be found in the Whistleblowing Policy, as quoted in the Staff Employment Handbook, which is available on the Schools' electronic systems or as a hard copy on request from HR.

Staff who do not feel able to speak up about child protection failures internally, or who think their concerns about the safeguarding regime are not being addressed, may seek advice from, or pass concerns to, the LADO, C-SPA or the NSPCC (all as listed above, as appropriate) at any time.

## Safeguarding Directory for adults (BHS)

For safeguarding and child protection concerns and when you know something is wrong. If you think that a child is in immediate danger, or that a crime has been committed, ring 999 before doing anything else.

**Any safeguarding or child protection concerns should be raised with the Designated Safeguarding Lead (DSL), any of the Deputy DSLs or the external agencies listed on this page. Even minor concerns should be raised because they may be part of a bigger picture unknown to staff members.**

### DSL

|                                  |                                                                |                                        |
|----------------------------------|----------------------------------------------------------------|----------------------------------------|
| Mr Paul Crisell<br>(Deputy Head) | <a href="mailto:pdcc@barrowhills.org">pdcc@barrowhills.org</a> | 01428 683639 (ext 814)<br>07940 708732 |
|----------------------------------|----------------------------------------------------------------|----------------------------------------|

### Deputy DSLs

|                                                     |                                                              |                        |
|-----------------------------------------------------|--------------------------------------------------------------|------------------------|
| Mrs Lesley Barnett<br>(Head of Pre-Prep & EYFS DSL) | <a href="mailto:lab@barrowhills.org">lab@barrowhills.org</a> | 01428 683639 (ext 824) |
| Mr John Towers<br>(Head of BHS)                     | <a href="mailto:jft@barrowhills.org">jft@barrowhills.org</a> | 01428 683639 (ext 807) |
| Miss Amber Tyrell<br>(Head of Middle Prep)          | <a href="mailto:alt@barrowhills.org">alt@barrowhills.org</a> | 01428 683639 (ext 823) |

|                                       |                                     |                                                                                                                        |                                                  |
|---------------------------------------|-------------------------------------|------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------|
| Principal of Bridewell<br>Head of BHS | Mrs Joanna Wright<br>Mr John Towers | <a href="mailto:wrightj@kesw.org">wrightj@kesw.org</a><br><a href="mailto:jlt@barrowhills.org">jlt@barrowhills.org</a> | 01428 686743 (ext 743)<br>01428 683639 (ext 807) |
| CFOO*                                 | Mr Dan Rogers                       | <a href="mailto:rogersd@kesw.org">rogersd@kesw.org</a>                                                                 | 01428 686778 (ext 778 or 414)                    |
| Head of HR                            | Mrs Caroline Gallop                 | <a href="mailto:gallogp@kesw.org">gallogp@kesw.org</a>                                                                 | 01428 686744 (ext 744)                           |
| Treasurer                             | Mrs Justine Voisin                  | <a href="mailto:voisinj@kesw.org">voisinj@kesw.org</a>                                                                 |                                                  |
| Safeguarding Governor                 | Mr Iain Turner                      | <a href="mailto:turneri@kesw.org">turneri@kesw.org</a>                                                                 |                                                  |
| EYFS Governor                         | Mrs Fiona Gibbons                   | <a href="mailto:fgibbons@longacreschool.co.uk">fgibbons@longacreschool.co.uk</a>                                       |                                                  |

\* CFOO: Chief Finance and Operations Officer

Anyone with a concern about a child can get advice from, or make a referral to, the local authority:

|                                                          |                                                                |
|----------------------------------------------------------|----------------------------------------------------------------|
| <b>Surrey County Council Children's Services</b>         | 0300 470 9100, or                                              |
| <b>Multi-Agency Partnership</b>                          | 01483 517 898 (emergency out-of-hours team)                    |
| <b>Single Point of Access (C-SPA) and Early Help Hub</b> | <a href="mailto:cspa@surreycc.gov.uk">cspa@surreycc.gov.uk</a> |
| NSPCC helpline: 0808 800 5000 or email:                  | <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>       |

For allegations against staff working in the Schools, normal procedure is to refer to DSL or Head (as per Safeguarding policy) but anyone may make an independent referral to the **Local Authority Designated Officer (LADO)**, 0300 123 1650 (option 3) [LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk)

### What to do if you feel your concerns are not being acted upon, or if you are concerned about unsafe practice or malpractice by the DSL or wider safeguarding team?

A member of staff who has raised a concern with the DSL or DDSs, DOFO, Head, Treasurer, governor, or the local authority, should expect a confirmatory response within one working day. Should that not be forthcoming, staff should seek it out. In addition, they should press for further consideration if the child is at risk or if the situation is not improving. If staff feel their concerns have not been fully addressed (having paid due regard to the need for professional confidentiality), or that actions taken are partly or completely ineffective, they should speak to the Head in the first instance and then the Treasurer if they are still not satisfied. Further details can be found in the Whistleblowing Policy, as quoted in the Staff Employment Handbook, which is available on the Schools' electronic systems or as a hard copy on request from HR.

Staff who do not feel able to speak up about child protection failures internally, or who think their concerns about the safeguarding regime are not being addressed, may seek advice from, or pass concerns to, the LADO, C-SPA or the NSPCC (all as listed above, as appropriate) at any time.

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# Child Protection and Safeguarding Policy

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## General Points

1. This is the Child Protection and Safeguarding Policy of the Bridewell Schools ("The Schools"). The Schools comprise King Edward's School, Witley ("KESW"), and Barrow Hills School ("BHS").
2. All the Schools' systems and procedures operate with the best interests of the child at heart; we will work hard to enable children to be heard, know that they are heard and to let us know what is happening to them.
3. The Schools undertake to remedy any deficiencies or weaknesses in child protection arrangements without delay.

## Confidentiality, Sharing and Withholding Information

4. All matters relating to safeguarding and child protection will be treated as confidential and only shared as per the 'Information sharing: advice for practitioners providing safeguarding services' guidance. The Schools will refer to the guidance in the "[Data Protection Toolkit for Schools](#)" to support the Schools with data protection activity, including compliance with General Data Protection Regulation (GDPR). to support the setting with data protection activity, including compliance with General Data Protection Regulation (GDPR).
5. Information will be shared with staff within the setting who 'need to know'.
6. Relevant staff have due regard to GDPR principles which allow them to share (and withhold) information.
7. 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 and GDPR are not a barrier to sharing information where a failure to do so would place a child at risk of harm. There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.
8. All staff will always endeavour to gain parent/carers consent to refer a child to social care unless to do so could put the child at greater risk of harm or impede a criminal investigation.

## Recognising and acting to protect children from abuse

9. All adults working at the Schools, including governors, contractors and volunteers, have a responsibility for safeguarding and promoting the welfare of children in the child's best interests. They should:
  - know the name of the Designated Safeguarding Leads (DSLs) and the Deputy DSLs (DDSLs)
  - know, understand and follow the relevant sections of *KCSiE* (2024), the Schools Child Protection Policy and related procedures.

All staff have a duty to report any child protection concerns to one of the DSLs.

10. Anyone who has concerns or is in doubt should refer to one of the people named in the 'Safeguarding Directory for Adults', on pages 3 and 4 of this policy. Referrals will normally be managed by them, but anyone can refer a child to children's Local Authority Children's Social Care, if necessary. Referrals to statutory agencies do not always require parental consent.
11. The governing body ensures that all pupils are taught about safeguarding, including online safety, through the curriculum and PSHE to help children to adjust their behaviours, both inside and

outside of school, in order to reduce risks and build resilience, including to radicalisation. This includes teaching pupils about the safe use of electronic equipment and the internet, and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults. The Schools recognise that a "one size fits all" approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.

12. Internet safety (including when children are online at home) is an integral part of the Schools ICT curricula and is also embedded in PSHE and Relationships Education and/or Relationships and Sex Education ("RSE").
13. The Schools have appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online when using IT systems. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate or harmful materials online (content risk); reduce the risk of children being subjected to harmful online interaction with others including commercial advertising and grooming (contact risk); restrict access to online risks such as online gambling, phishing or financial scams (commerce risk); and help manage online behaviour that can increase a child's likelihood of, or causes, harm, for example making, sending and receiving explicit images. The Schools recognise however that children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G) which means that children may consensually and/or non-consensually share indecent images, sexually harass their peers via mobile and smart technology, and view and share pornography and other harmful content whilst at school undetected. Further detail of the Schools policies and procedures in relation to online safety can be found in the Schools E-Safety Policy which also includes detail on the use of mobile and smart technology in the Schools, including the Schools management of the associated risks, and the Schools IT arrangements to ensure that children are safe from harmful and inappropriate content, including terrorist and extremist material when accessing the internet through the Schools systems. These systems will be reviewed periodically. The Schools' systems are as:
  - a. **(KESW)** Filtering of internet use is managed using SonicWall, with reports run as concerns are flagged by the firewall, to DSLs and ICT staff. This might include inappropriate search terms or blocked URLs. Monitoring of school devices is managed using Securus, with screenshots obtained of any suspicious activity.
  - b. **(BHS)** Filtering and monitoring across school devices and pupil Chromebooks is managed by SENSO, with reports run as concerns are flagged by the firewall, to DSLs and ICT staff. This might include inappropriate search terms or blocked URLs.

## Relationships and Sex Education ("RSE")

14. RSE became compulsory from September 2020. The Schools understand that preventative education is most effective in the context of a whole-school approach that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic, and sexual violence/harassment.
15. The Schools will have regard to the DfE's statutory guidance *Relationships Education, Relationships and Sex Education (RSE) and Health Education* when making arrangements for and teaching RSE, which form part of the Schools PSHE curricula.

## Looked after children

16. The governing body ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority.

17. The designated members of staff are Mr Zak Siva(KESW) and Mr Paul Crisell (BHS). They have responsibility for the welfare and progress of looked after children. The Schools ensure that the designated member of staff receives appropriate training in order to carry out their role.

## The meaning of 'safeguarding' and 'child protection'

18. Safeguarding and promoting the welfare of children is defined in *Working Together to Safeguard Children (2023)* as:
- a. Providing help and support to meet the needs of children as soon as problems emerge;
  - b. Protecting children from maltreatment, whether that is within or outside the home, including online;
  - c. Preventing impairment of children's mental and physical health or development;
  - d. Making sure that children grow up in circumstances with the provision of safe and effective care;
  - e. Taking action to enable all children to have the best outcomes.
19. 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
20. The Schools recognise that children have a right to feel safe and secure and cannot learn effectively unless they do. We also recognise the statutory responsibility of each and every member of staff to provide a safe environment for children, and that this principle is especially important in a boarding school and in caring for vulnerable children according to the Schools mission. In this sense 'safeguarding' is an overarching concept incorporating a number of areas covered in separate policies including our recruitment methods, security arrangements, health & safety practice, the management of our computer network.
21. We also aim to teach our pupils how to look after themselves and each other. To that end we use tutorials or form times, assemblies, PSHE (Personal, Social and Health Education) and Relationship and Sex Education (RSE) and Health Education sessions to educate pupils about safeguarding, consent, and how they can recognise and build resilience to various forms of bullying and abuse, including child-on-child abuse. We aim to teach them about the risks posed by adults and children who use methods including the internet, mobile technology and social media to bully, groom, exploit, abuse or radicalise other people. We also aim to teach our pupils to understand and appreciate the fundamental values of democracy, the rule of law, individual liberty, and mutual respect for and tolerance of those with different faiths and beliefs. Finally, we aim to help pupils make a safe transition to the next phase of their education. Additionally, we aim to listen to our pupils' views about their safeguarding, and to respond accordingly. In order to do this, KESW use surveys, pupil forums and tutorials, and the Peer Listening initiative, whilst BHS use the School Council, peer mentors and School captains.
22. The Schools' approach to child protection issues is in accordance with the inter-agency procedures in Surrey between Local Authority Children's Social Care, the police and health services and this policy is available to parents on the website. It fully recognises its duties to both children in need and children at risk by co-ordinating help in a common assessment framework.
23. The 'Children's Safeguarding Partnership' in Surrey is established and led, jointly and equally, by Surrey County Council, Surrey Police, and Guildford & Waverley Clinical Commissioning Group (on behalf of all NHS providers in Surrey). Schools (including independent schools) have become 'Relevant Agencies', and as such are required to act in accordance with the Partnership's arrangements and to contribute to their operation. At the moment the Surrey Safeguarding



Children Partnership ('SSCP') is based at SSCP Team, Quadrant Court, 35 Guildford Road, Woking, Surrey GU22 7QQ, and can be reached at [partnership.team@surreycc.gov.uk](mailto:partnership.team@surreycc.gov.uk). DSLs will liaise with the Safeguarding Partners and work with other agencies. They are familiar with the document "NPCC – When to call the police" and will use it for guidance when considering when to call the police and what to expect when they do so. For the time being the SSCP is continuing to use the web address of the old safeguarding board's *Procedures Manual*: <http://surreyscb.procedures.org.uk/page/contents>

24. The Schools have Pastoral Committees that meet weekly to ascertain pupils' wellbeing and levels of need; procedures and systems relating to this document and approach are described in [Appendices 3 & 4](#).
25. The Schools will always take into account the context within which such incidents and/or behaviours occur so that wider environmental factors present in a child's life that could impact on their safety and welfare are given due consideration. Pastoral staff consider this contextual approach to safeguarding regularly, both informally and formally. At KESW this includes weekly Housemaster/mistress meetings, Pupil Wellbeing Committee, SLT and SMT meetings. At BHS, this takes the form of staff briefings, SMT meetings, and Pastoral Committee meetings. The outcomes and actions resulting are recorded.
26. All staff have been made aware that SEND pupils (and others as detailed in the following paragraph) may be at additional risk of harm and can be more prone to peer group isolation or bullying (including prejudice-based bullying) than other children. There is potential for children with SEND or certain medical conditions to be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs and there are associated communication barriers and difficulties in managing or reporting these challenges. In order to minimise these risks, DSLs work closely with Pastoral staff and the SENDCOs to consider children holistically.
27. The Bridewell Schools are co-educational schools and are committed to fostering a safe and inclusive learning environment for all pupils, regardless of gender, gender identity or gender questioning. We recognise that gender-based bullying, harassment, and discrimination can have a significant negative impact on students' well-being and academic achievement. To address this, we will implement further procedures to prevent and respond to such incidents promptly and effectively. These measures may include: providing further training to staff on gender-based bullying and harassment and offering support and resources to students who have experienced such incidents.

## Barriers to reporting

28. All staff should be aware that children may delay in reporting a concern or prevent a concern from being raised, they 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. For example, pupils may feel embarrassed, humiliated, or worry about being threatened ("*snitches get stitches*", "*snake*" and other such terms, any of which should be reported by any staff who hear them, and dealt with appropriately). This could be due to their vulnerability, disability and/or sexual orientation, difficulties in communication or language barriers. They may also worry that school staff will overreact (this was a fear expressed in a recent survey). None of these should prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a pupil. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication. Pupils from a social background that makes them vulnerable (whether by perception or by circumstances) may well worry further that they will be victims of discrimination on the basis of race, sexuality, disability or academic



attainment. Across the Schools, we are particularly sensitive to the greater vulnerabilities of Foundationers and children on the SEND register.

29. There may be barriers to reporting that affect staff and other adults. In particular, a lack of faith in the system and associated belief that the damage caused by a process will outweigh any benefit to a child. Also, many adults believe (in error) that GDPR concerns are a barrier to sharing personal information. The legislation is clear that fears about sharing information **must not** be allowed to stand in the way of acting to safeguard children.
30. Reporting concerns: The “Safeguarding Directory for Adults” explicitly and clearly addresses this matter. Staff must report all concerns about pupils to the DSL or DDSLs at the earliest opportunity using CPOMS or the contact details provided in the Directory on pages 3 or 4. Pupils, parents and others should contact the DSL or DDSLs in a timely fashion.
31. Staff must never cover up concerns about children, delay reporting them or ignore them. Teachers’ professional responsibilities include the safeguarding of children. However, their role is not to investigate safeguarding issues or make judgements about them. Their job is to share concerns quickly. They may need to use their professional judgement to determine whether explanations provided to them satisfactorily account for what they have observed. This is why all staff must have a good understanding of the sorts of concerns that may be presented, as fully explained in KCSIE (2024).
32. Local authorities should share the fact that a child has a social worker. In this situation, the DSL(s) will hold and use the information so that decisions can be made in the best interests of the child’s safety, welfare and educational outcomes.
33. In addition to this Policy and advice, reference can be made to *Keeping Children Safe in Education*, DfE September 2024 (KCSIE 2024) and *Working Together to Safeguard Children* (WTSC June 2023) which give detailed help and advice. Reference can also be made to the Schools’ “Sex Education and Relationships Education” Policies. The Prevent Duty Guidance for England and Wales (March 2015) also contains important advice. Staff should be aware of the situations in which their actions have the potential to be misinterpreted and which might then give rise to child protection concerns. These matters are more fully covered in the Staff Behaviour Policy (available on the internal networks or by application to Human Resources: [GallopC@kesw.org](mailto:GallopC@kesw.org)). These documents provide details but, briefly, staff should exercise particular care in settings of the following nature:
  - social events
  - the giving of gifts
  - pupils in distress
  - PE, games and other physical activities
  - showers and changing
  - one-to-one situations
  - educational visits
  - home visits
  - transporting pupils
  - use of photography and other electronic media, including ICT
  - boarding environment (KESW)
  - use of mobile devices in EYFS (BHS)

## Management of Safeguarding

34. **Zak Siva** (Director of Safeguarding) is the DSL at KESW.  
**Paul Crisell** (Deputy Head) is the DSL at BHS.
- They take overall responsibility for the Schools' child protection and safeguarding procedures and systems. **Children's safety, welfare and wellbeing remain the responsibility of all staff, however.**
  - The DSL and DDSLs contact details can be found on the Key Contacts page at the start of this policy.
35. Mr Mike Chadwick has been appointed by the governing body as the Governor with special responsibility for child protection matters for KESW;; he can be contacted at [chadwickm@kesw.org](mailto:chadwickm@kesw.org). Mr Iain Turner has been appointed by the governing body as the Governor with special responsibility for child protection matters for BHS; he can be contacted at [turneri@kesw.org](mailto:turneri@kesw.org). The DSLs meet with their respective Governor at least once a term, and report annually to the Governing Body on child protection issues in order that it can undertake a review of the Schools' child protection policies and procedures and the efficiency with which the related duties have been discharged. KCSIE (2024) is clear that the governing body has strategic responsibility for safeguarding arrangements at the Schools. The Principal and Head of BHS are responsible for ensuring staff understand and follow the procedures agreed by the governing body.
36. The DSL's role is to take lead responsibility for safeguarding and child protection matters in the Schools. The DSL's responsibilities are to maintain an overview of safeguarding within the Schools, to open channels of communication with local statutory agencies, refer incidents to third parties (including the local authority children's services, the DBS, Channel and the police) where appropriate, to support staff in carrying out their safeguarding duties and to monitor the effectiveness of the Schools policies and procedures in practice. The DSLs work with the governors to review and update the Schools' safeguarding policy.
37. Where a pupil leaves the School, including for in-year transfers, the DSL will also ensure their child protection file is transferred to the new school (separately from the main pupil file) as soon as possible and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL will ensure secure transit and obtain confirmation of receipt. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any additional information with the new school in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school.
38. The DSLs regularly review the Schools and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in the absence of action, directly to local children's services.
39. During term time, the DSL and/or a DDSL at KESW will always be available between 07:00 and 22:30 for staff in the School to discuss any safeguarding concerns. If a DSL or DDSL is not available in person, they can be contacted using their mobile phone numbers. For out of hours/out of term activities, the DSLs remain contactable by mobile phone or email. Where the DSL is unavailable, **Mr David Corran** (Deputy Head) will assume lead responsibility.
40. During term time, the DSL and/or a DDSL at BHS will always be available in person (during school hours) for staff in the School to discuss any safeguarding concerns. If a DSL or DDSL is not available

in person, they can be contacted via mobile phone or email. For out of hours/out of term activities, the DSL or DDSLs remain contactable via email. Where the DSL is unavailable, **Mr John Towers** (Head) will assume lead responsibility.

41. The DSL or DDSL should liaise with the three safeguarding partners and work with other agencies in line with *WTSC*. “*NPCC - When to call the police*” can assist the DSL {or DDSL} understand when they should consider calling the police and what to expect when they do. If the School has questions about any police investigation, it will ask the police. The DSL or DDSL will also be responsible for liaising with the counsellor where safeguarding concerns are linked to mental health. The DSL and DDSL should be confident as to what local specialist support is available to support all children involved in sexual violence and sexual harassment and be confident as to how to access this support when required.
42. Whilst the Principal and Head of BHS should ensure that the policies and procedures adopted, particularly those concerning referrals of cases of suspected abuse, neglect or exploitation, are understood and followed by all staff, and the Governors are ultimately responsible for ensuring staff are competent, supported and regularly reviewed in relation to safeguarding, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.
43. Full details of the DSL’s role can be found at Annex C of *KCSIE*.

## Training

44. Induction and training are in line with advice from Surrey Safeguarding Children’s Partnership.
45. Staff must read and understand Keeping Children Safe in Education (September 2024) as follows:
  - **Everyone** should read and understand their responsibilities as described in part 1 and Annex A;
  - **All staff with direct contact** with children should additionally read part 5 and Annex B;
  - **Members of SMT, SLT and DSLs** should read the whole document (DSLs should ensure Annex C is included in their job description);
  - **Governors** should read part 2 as a minimum, but be aware they are responsible for compliance in parts 3, 4, and 5;
  - **Designated safeguarding governors** should read the whole of the guidance;
  - Anyone involved in **recruitment and / or SCR** (including recruiters / managers of volunteers should read part 3 and Annex E;
  - Anyone involved in **MFL / other school exchanges** should read part 3 paras. 334-339 and Annex D;
  - **HR Department** should read it all but concentrate on parts 3 & 4, and Annex F;
  - Anyone in **classroom-based** roles, **ICT, network staff** should read Annex D;
  - **WRL (Work Related Learning) Coordinators** should read part 3 paras. 328-333 and Annex E.

The Treasurer, additionally, undertakes to read the whole of KCSIE.

46. Staff may NOT:

- use their position to gain access to information for their own advantage and/or a pupil's or family's detriment;
- use their power to intimidate, threaten, coerce or undermine pupils;
- use their status and standing to form or promote relationships with children, which are of a sexual nature or which might become so.

47. Where no specific guidance exists about particular situations or where staff are worried about how their actions might be interpreted staff are advised that they should:

- discuss the circumstances that informed their action, or their proposed action, with a senior colleague or one of the DSL's. This will help to ensure that the safest practices are employed and reduce the risk of actions being misinterpreted.
- always discuss any misunderstanding, accidents or threats with a senior colleague or the DSL's.
- always record discussions and actions taken with their justifications.

Further details on staff behaviour protocols can be found in Appendix 1 of this document.

48. All staff (including the Principal, Head of BHS, and those who are temporary or volunteers) are required to receive child protection training and advice as part of the induction process and thereafter on an annual basis and occasional staff and volunteers (who will have been vetted in accordance with the Schools recruitment procedures) are made aware of child protection arrangements. Ongoing safeguarding CPD is provided by the DSLs on a monthly basis, focusing on specific contextual safeguarding issues. Feedback from such training and awareness, together with regular training of the DSLs, allow for amendments to the Policy where weaknesses and deficiencies are identified. All staff are required to read the Child Protection and Safeguarding Policy (including appendices) and those elements listed above, to sign to show that they have done so, and complete a written task to show that they have understood it. Updates are issued when necessary. Induction training for all staff makes reference to this Child Protection and Safeguarding Policy which contains staff behaviour protocols, whistleblowing procedures, online safety (including arrangements and expectations in relation to online filtering and monitoring), and the identity and role of the Safeguarding Leads. All staff are trained to manage a report of child-on-child sexual violence and sexual harassment. The training for the Safeguarding Leads includes both child protection and inter-agency working and takes place at least every two years on recommended courses to cover inter agency working, case conferences, support for children in need, record keeping, promotion of a culture of listening to children, on-line safety and the Prevent duties.

## Safer Recruitment

49. The Schools operate safe recruitment procedures in accordance with the requirements of the Disclosure and Barring Service as laid down in KCSIE 2024; these procedures are also in accordance with the Independent School Standards Regulations. NSPCC and Channel on-line

training has been completed by key members of staff. The Schools also seek to ensure that employees of another employer who are working on the Schools' site and who have contact with, or responsibility for, pupils have had all the necessary recruitment checks made by their employer or other agency; in cases of doubt the Schools would not use the services of such people. Full details of the recruitment procedures can be found in a separate policy.

## Managing Allegations against Staff, including supply teachers, volunteers and contractors

50. The Schools' procedures for managing concerns or allegations against staff (including supply staff, volunteers and contractors) who are currently working in the School whether in a paid or unpaid capacity follows DfE statutory guidance and Surrey Safeguarding Children's Partnerships arrangements. In this section reference to 'allegations' also covers concerns. Allegations that do not meet the above harm test<sup>1</sup> should be dealt with using the School's procedure for handling low level concerns set out below.
51. Allegations against a teacher who is no longer teaching should be referred to the police. Historical (non-recent) allegations of abuse should be referred to the police and also the LADO. Non-recent allegations made by a child will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children's social care and the police.
52. If an allegation is made against anyone working with children in the School, before contacting the LADO, the School will conduct a basic enquiry in line with local procedures to establish the facts in order to determine whether there appears to be any foundation to the allegation. The Schools should not undertake their own investigation of the allegation(s) without prior consultation with the LADO or, in the most serious cases, the police, so as not to jeopardise statutory investigations.
53. When dealing with an allegation about a staff member the Schools will apply common sense and judgment, deal with allegations quickly, fairly and consistently and will support the person subject to the allegation.
  1. Allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is the Principal (KESW), the Head (BHS) or to one of the DSL's. If an allegation is reported to a DSL, the DSL will keep the Principal or Head informed respectively. Where the Principal, Head of BHS, or DSLs are absent or are the subject of the allegation, reports should be made to the Treasurer, Mrs Justine Voisin. Where the Principal or Head of BHS are the subject of the allegation, they must not be informed of the allegation prior to contact with the Treasurer and LADO. However, staff may consider discussing any concerns/allegations with the DSL and may make any referral via them.
  2. The case manager should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the police. (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, or it is an emergency situation, the case manager should contact children's social care

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<sup>1</sup> **Allegations that may meet the harm threshold.**

These are allegations that a person who works with children has behaved in a way that has 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 they 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.

An allegation may relate to an adult's behaviour outside school.

and as appropriate the police immediately.) All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The LADO should be informed within one working day of all allegations that come to the Schools attention and appear to meet the criteria or that are made directly to the police and/or children's social care. The DSL is responsible for ensuring the child is not at risk.

3. Where the case manager is concerned about the welfare of other children in the community, or the member of staff's family, they will discuss these concerns with the LADO and make a risk assessment of the situation. It may be necessary for the LADO to make a referral to children's social care.
4. When to inform the individual who is the subject of the allegation will be considered on a case-by-case basis and with guidance from the LADO, and if appropriate, the police and/or children's social care. Subject to any objection, the case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.
5. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension from contact with children at the School or whether alternative arrangements should be put in place until the allegation is resolved. The following alternative arrangements should be considered by the case manager before suspending a member of staff:
  - redeployment within the School so that the individual does not have direct contact with the child or children concerned;
  - providing an assistant to be present when the individual has contact with children;
  - redeploying to alternative work in the School so the individual does not have unsupervised access to children;
  - moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes account of their views. It should be made clear that this is not a punishment and parents have been consulted; or,
  - temporarily redeploying the member of staff to another role in a different location, for example to an alternative School where available.

These alternatives allow time for an informed decision regarding the suspension, this will, however, depend upon the nature of the allegation.

Suspension should not be an automatic response when an allegation is reported. It should be considered only in cases where there is cause to suspect a child or other children at the School is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. The case manager will give due weight to the views of the LADO, WTSC and KCSIE when making a decision about suspension (including with respect to considering alternatives). Where the individual is suspended, the case manager will confirm the decision within one working day and will ensure they know who their point of contact is in the School and shall provide them with their contact details. The

case manager will also record the rationale and justification for the suspension, including what alternatives were considered and why they were rejected.

6. Where a member of boarding staff is suspended pending an investigation, the case manager will consider whether arrangements for alternative accommodation away from children should be made.
7. Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. The LADO will provide advice and guidance to the School to ensure that an appropriate investigation is carried out. In straightforward cases, the investigation should usually be undertaken by a senior member of staff at the School. Where there is lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed to undertake the investigation.
8. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the police. Parents and others will be made aware that there are restrictions on publishing information which may lead to the identification of the teacher subject to the allegation.
9. The case manager will monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process. The outcome of the investigation of an allegation will record whether it is substantiated (sufficient evidence to prove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it), malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive or cause harm to the person subject of the allegation) or unfounded (to reflect cases where there is no evidence or proper basis which supports the allegation being made).
10. Reviews are conducted at fortnightly or monthly intervals, depending on the complexity of the case. The first review will take place no later than four weeks after the initial assessment and subsequent review dates will be set at the review meeting.
11. The case manager will discuss with the LADO whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).
12. On conclusion of the case, the case manager should review the circumstances of the case with the LADO to determine whether there are any improvements to be made



to the School's safeguarding procedures or practices to help prevent similar events in the future. Learning lessons where the allegation is concluded to be either unfounded, false, malicious or unsubstantiated, the case manager (and if they have been involved, the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

54. Where an individual is removed from regulated activity, or would have been removed had the individual not left, including when they are suspended, redeployed to work that is not regulated activity, are dismissed, or have resigned, and the individual has engaged in relevant conduct in relation to children and/or adults, and/or satisfied the harm test in relation to children and/or vulnerable adults, and/or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence, the School will make a referral to the DBS.
55. The School has a duty of care to its staff, and whilst the welfare of a child is paramount, the school must offer appropriate welfare support to the adult subject to the investigation and potentially their family. The School will also make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. Information will also not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.
56. Where initial discussions lead to no further action, the case manager and the LADO should record the decision and justification for it and agree on what information should be put in writing to the individual concerned, and by whom.
57. Allegations found to be malicious or false will be removed from the individual's personnel records unless the individual gives consent for retention of the information. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned. The information to be kept on file includes a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, a note of any action taken, decisions reached and the outcomes, and a declaration on whether the information will be referred to in any future reference. Schools have an obligation to preserve records which contain information about allegations of sexual abuse for the duration of the inquiry in accordance with the guidelines of the Independent Inquiry into Child Sexual Abuse ("IICSA"). All other records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer.
58. Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against a pupil who made it in accordance with the School's behaviour policy; or whether the police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.
59. In all cases where there are concerns or allegations of abuse, the School will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

## Dealing with safeguarding concerns and allegations about supply teachers and contractors

60. The School's procedures for managing allegations against staff above also apply to staff not directly employed by the School, for example, supply teachers provided by an employment agency or business ('the agency'). The School will usually take the lead, but agencies should be fully involved (because they have their own policies and procedures) and co-operate with any enquiries from the LADO, police and/or children's social care. In no circumstances will the School decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The School will discuss with the agency (or agencies where the supply teacher is working across a number of schools) whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the School, whilst they carry out their investigation.
61. When using an agency, the School should inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

## Low-level concerns

62. The Schools wish to create and maintain a culture and procedures in which all concerns about adults, including allegations that do not meet the harm threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately. Such concerns are known as "low-level concerns". The Principal, Deputy Head and DSL (KESW) inform and consult each other on all low-level concerns with appropriate confidentiality; similarly, the Head of BHS and DSL inform and consult each other on all low-level concerns with appropriate confidentiality. They record concerns in a secure area, record any investigations, upload relevant documents and produce reports when necessary. This is in the interests of maintaining a full picture of behaviour, to inform consultation with the LADO and other external agencies, and to identify concerning, problematic or inappropriate behaviour early. It will also guard against 'drift', in which one aspect of the Schools gradually slips away from approaches agreed by the organisation as a whole and ensures that adults working in the organisation are clear about professional boundaries and act within them in accordance with our ethos and values.
63. The term "low-level concern" does not mean that the concern is "insignificant" but that it does not clearly meet the "harm" threshold (quoted above) and/or that it is inconsistent with the School's Code of Conduct, ethos and values and/or that it is of concern, causes unease or a 'nagging doubt'. Such concerns should be reported to the DSLs, the Principal, or to the Head of BHS, who will record it, log any subsequent actions and their rationale.
64. Staff do not need to be able to determine in each case whether their concern is a low-level concern, or if it is not serious enough to merit a referral to the LADO, or whether it meets the threshold of an allegation. Once staff share what they believe to be a low-level concern, that determination should be made by the Head, Deputy Head and/or the DSL.
65. Examples of low-level concerns might include (but are not limited to): being over-friendly with children; having favourites; engaging with a child one-to-one in a secluded area; using humiliating language (e.g. sexualised, intimidating or offensive language). These examples exist on a wide spectrum, from behaviour that is seemingly harmless, to seemingly inappropriate behaviour that is innocent in its intention. However, on the other end of the spectrum, it could be behaviour that is intended to enable abuse and grooming in the future.

66. The Schools will exercise its responsibility to report within one month of leaving the School any person (employed, contracted, a volunteer or a pupil) whose services are no longer required because that person is considered to be unsuitable to work with children. A report will also be made to the DBS if the Schools believe that the person has harmed or poses a risk of harm to a child or vulnerable adult, satisfies the harm test or has received a caution or conviction for a relevant offence. The report will be made even if the person to be dismissed or removed has resigned first. The Schools will exercise its duty to consider making a referral to The Teaching Regulation Agency where a teacher has been dismissed or would have been dismissed if he or she had not resigned, and a prohibition order may be appropriate. Examples would include unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence, in accordance with *Teacher misconduct; the prohibition of teachers (DfE 2014)*. Failure to make a report constitutes an offence.
67. The Schools take extremely seriously their responsibilities for the care and safety of pupils. These are undertaken in the Schools' environment by having clear procedures for safer recruitment and for dealing with any form of child abuse. These reinforce this sense of responsibility by ensuring that the staff of another organisation have been checked for suitability if they supervise the Schools' pupils on other sites.

**"Someone may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm."**

68. Because we are in regular and frequent contact with pupils, School staff are particularly well placed to observe outward signs of abuse or unexplained changes in behaviour or performance which may indicate abuse, either at home or at school. It is also important to recognise that we are also in a privileged position with regard to pupils and we must be careful not to give grounds for any potential allegation of inappropriate conduct.
69. It is also necessary to bear in mind that a change in behaviour may have a number of causes, not least a change in family circumstances, hormones or others such as drug or alcohol use.

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## What is Child Abuse?

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70. Abuse is a form of maltreatment of a child. Somebody may abuse, neglect or exploit a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting or by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.
71. Useful information can be found in *What to do if you are worried a child is being abused* (DfE March 2015).
72. Abuse can be defined under four categories [taken from *Working together to Safeguard Children* (DfE June 2023) and *Child Sexual Exploitation, definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation* (DfE February 2017)]. In addition to these definitions, it should be understood that children can also

be abused by being sexually exploited, honour-based violence, forced marriage or female genital mutilation. To support the local context, all staff have access to Surrey's *Continuum of Need Matrix*.

## Physical abuse

73. 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.
74. Typical symptoms to look out for:
- bruises and abrasions – especially about the face, head, genitals or other parts of the body where they would not be expected to be given the age of the child. Be particularly concerned when the nature of the injury does not match the child's explanation;
  - slap marks;
  - twin bruises on either side of the mouth indicative of force feeding or stopping a child from speaking;
  - grip marks on the arms or trunk are usually an indication of shaking but can also be indicative of sexual abuse;
  - bruised eyes are usually caused by a fist;
  - damage to the mouth;
  - bite marks;
  - Fractures;
  - poisoning and misuse of drugs;
  - burns and scalds can indicate misuse of aerosols or cigarettes.

## Emotional abuse

75. The persistent emotional ill treatment of a child such as to cause severe and persistent adverse effects on a child's emotional development. It may involve conveying to children 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 over-protection 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 someone else. It may involve serious bullying, including cyber-bullying, causing children to feel frightened or in danger, the exploitation or corruption of children or the exchange of banter. Any form of initiation ritual would be regarded as child-on-child abuse. Some level of emotional abuse is present in all types of ill treatment of a child although it may occur alone.
76. Things to look out for:
- children who feel that they are unloved and unlovable;
  - inability to form good relationships;
  - overburdened by ambitious, unrealistic parents.

## Sexual abuse

77. Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
78. Typical symptoms to look out for:
- a detailed sexual knowledge inappropriate to the age of the child;
  - behaviour that is excessively affectionate or sexual towards other children or adults;
  - victims will often make a limited disclosure to an adult but will often be preoccupied with secrecy and will try to convince the adult to keep dangerous information secret;
  - fear of medical examinations;
  - a fear of being alone with particular adults;
  - a sudden loss of appetite, compulsive eating, anorexia nervosa or bulimia nervosa;
  - excessive masturbation, especially worrying if it takes place in public;
  - promiscuity;
  - sexual approaches or assaults on adults or other children;
  - pregnancy, urinary tract infections or sexually transmitted diseases are all immediate causes of concern;
  - bruises to the breast, buttocks, lower abdomen, thighs, genital and rectal areas;
  - discomfort or pain in the anal area;
  - the drawing of sexually explicit or pornographic images;
  - the need to change underwear excessively.
79. It should be remembered that all of the above are typical but may have other causes.

## Neglect

80. The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment; or provide suitable education. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
81. The Schools use the [Graded Care Profile 2](#) tool to support better identification and intervention in cases of neglect. The Surrey [Neglect Risk Assessment Tool](#) is used to support with the initial identification of neglect.
82. Typical signs to look out for:
- persistent stomach aches
  - if a child is seriously underweight and is stealing food;
  - inadequately clad in that they are dirty or smell.

83. If a child is suffering from any of the above, they are likely to also exhibit signs of stress and distress, for instance:
- a lack of concentration and reduction in performance;
  - aggressive or hostile behaviour;
  - moodiness, depression, irritability, listlessness, fearfulness, tiredness, temper tantrums, short concentration span, acting withdrawn or crying at minor occurrences;
  - difficult relationships with peers;
  - regression to more immature forms of behaviour e.g. thumb sucking;
  - self-harming or suicidal behaviour;
  - low self-esteem;
  - running away and being inexplicably absent from school and so missing education.

## Children with Special Educational Needs and Disabilities or Health Issues

84. Children with SEND or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. These can include:
- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
  - these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children, the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs, and communication barriers and difficulties in managing or reporting these challenges.
  - cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in settings or the consequences of doing so.
- 85.. Any reports of abuse will require close liaison with the DSL and the SENDCO. The setting will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

## Children Absent from Education

86. All children are entitled to an efficient, full-time education which is suitable to their age, ability, aptitude, and any SEND they may have.
87. The Schools recognise that when children are absent from education, this can be a vital warning sign of a range of safeguarding possibilities. They are also at significant risk of underachieving, being victims of abuse and harm, exploitation, radicalisation, and not being in education, employment or training (NEET) later in life.
88. Where possible the Schools will hold more than one emergency contact number for each child.
89. The Schools will ensure that there is a record of joiners and leavers as defined in The Education (Pupil Registration) (England) 2006 (amended 2016).

90. When removing a child's name, the Schools will notify the Surrey County Council of: (a) the full name of the child, (b) the full name and address of any parent with whom the child normally resides, (c) at least one telephone number of the parent, (d) the child's future address and destination setting, if applicable, and (e) the ground in regulation 8 under which the child's name is to be removed from the setting register.
91. The Schools will make reasonable enquiries to establish the whereabouts of a child jointly with the Local Authority, before deleting the child's name from the setting register if the deletion is under regulation 8(1), sub-paragraphs (f) (iii) and (h) (iii) of The Education (Pupil Registration) (England) 2006 (amended 2016).
92. The Schools will:
- Enter children on the admissions register on the first day on which the setting has agreed, or has been notified, that the child will attend the setting.
  - Notify Surrey County Council within five days of adding a child's name to the admission register. The notification must include all the details contained in the admission register for the new child.
  - Monitor each child's attendance through their daily register and follow Surrey County Council procedure in cases of unauthorised absence.
  - Remove a child's name from the admissions register on the date that the child leaves the setting.
  - The setting will notify Surrey County Council when they are about to remove a child's name from the setting register under any of the fifteen grounds listed in the regulations, no later than the date that the child's name is due to be removed.
93. Where parents/carers notify the Schools, in writing, of their intention to Electively Home Educate (EHE) the setting will forward a copy of the letter to the Surrey County Council Inclusion Team.
94. Where parents/carers orally indicate that they intend to withdraw their child to EHE and no letter has been received, the Schools will not remove the child from roll and will notify the Inclusion Team at the earliest opportunity.

## Attendance and Behaviour

95. Additional policies and procedures are in place regarding school attendance and behaviour.
96. The Schools recognise that children being absent, particularly repeatedly and/or for prolonged periods and exclusion from may be indicators of abuse and neglect, including the exploitation of children. The DSL will regularly liaise with members of staff with responsibility for behaviour and attendance to ensure risk is identified and appropriate intervention is in place to protect children from harm.
97. The School will work in partnership with Surrey Police and other partners for reporting children that go missing from the setting site during the setting day. Staff will be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.



## Child Sexual Exploitation

98. Child sexual exploitation, including violence and harassment, is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.
99. No school is immune to the risk of child sexual exploitation including online and it can affect both boys and girls. Children can be perpetrators as well as victims.
100. Signs of Child Sexual Exploitation may include:
- unexplained gifts and new possessions;
  - association with young people involved in exploitation;
  - having much older boyfriends or girlfriends;
  - suffering from sexually transmitted infections;
  - suffering changes in emotional well-being;
  - drug and alcohol misuse;
  - being absent for periods of time and regularly reaching home late;
  - missing education.
101. The same indicators may suggest that children have been approached by or are involved with individuals associated with criminal networks or gangs. These children are at risk of involvement in serious violent crime. Further advice can be found in the DfE publications Preventing youth violence and gang involvement and Criminal exploitation of children and vulnerable adults, county lines.
102. The Schools will provide sensitive education on all aspects of abuse, appropriate to the age, on these issues in PSHE lessons, assemblies, external talks and tutor / form periods. Themes are also shared with parents so that they can support the Schools. At KESW, the staff in the Medical Centre are also available to help raise awareness and provide guidance on issues surrounding sexual exploitation.

## Female Genital Mutilation

103. Staff must be aware of the requirement for teachers to report to the police where they discover, either through disclosure by the victim or through visual evidence, that female genital mutilation appears to have been carried out on a girl under the age of 18. It will be rare to see evidence of it, as staff should not be routinely examining pupils. Unless there is good reason not to, the case should be discussed with the DSL so that involvement of external agencies can be sought. Failing to report such cases is a criminal offence. Further useful information can be found in *Mandatory Reporting of Female Genital Mutilation – procedural information*, published by The Home Office in October 2015, updated December 2016.

## Sharing of nudes and/or semi-nudes

104. This is the sending or posting of nude or semi-nude images, videos, or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging

or via group chats and closed social media accounts and may include images or footage of more than one child or young person.

105. Alternative terms used by children and young people may include 'dick pics' or 'pics' or may be referred to by adults or professionals as 'youth produced/involved sexual imagery', 'indecent imagery', 'image based sexual abuse' or 'sexting'.
106. The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:
- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
  - children and young people digitally manipulate an image of a young person into an existing nude online
  - images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame
107. For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The DDCMS / UKIS guidance "Sharing nudes and semi-nudes: advice for education settings working with children and young people" sets out the classification of incidents, and how each should be handled.
108. Any direct disclosure by a child will be taken seriously and staff will ensure the child is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them.
109. If staff are notified or become aware of an incident of nudes or semi-nudes being shared by a pupil or of a pupil, they should refer the incident to the DSL as soon as possible.
110. The DSL will follow the DDMSC / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" (December 2020) when responding to a report of sharing nudes and/or semi-nudes. This will include:
- Holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns;
  - carrying out interviews with the children involved (if appropriate);
  - Informing parents and carers at an early stage and keep them involved in the process in order to best support the pupil unless there is good reason to believe that involving them would put the child at risk of harm. Any decision not to inform them should be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when they should be informed;
  - Carrying out a risk assessment to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process;
  - If not, the incident can be handled in school in accordance with the "sharing nudes" guidance and the School's Child Protection and Behaviour policies;
  - If it is determined that there is a risk of harm, the DSL must make a referral to children's social care and/or the police immediately.
111. All incidents relating to nudes and semi-nudes being shared need to be recorded, whether they have been referred externally or not. schools must record the reason for not reporting incidents

externally and ensure it is signed off by the Principal or Head of BHS. Records will be kept in line with statutory requirements set out in KCS/E and local safeguarding procedures. No copies of imagery will be taken or retained.

112. This guidance does not apply to the sharing of images of children under 18 by an adult over 18 as this constitutes child sexual abuse. In the event that staff become aware of such an incident, they should notify the DSL immediately, who should always inform the police as a matter of urgency.

## Other Specific Safeguarding issues

113. All responsible adults in School should be aware of further, specific forms of abuse and safeguarding issues as follows:

- Child abduction and community safety incidents which may be committed by parents or other family members, by people known but not related to the victim and by strangers;
- Other community safety incidents should raise concerns, e.g. people loitering nearby or unknown adults engaging children in conversation. In PSHE lessons, tutor / form periods and other assemblies, pupils receive practical advice on how to keep themselves safe.
- **Children in the court system:** the Schools are ready to provide support to children of all ages when they are required to give evidence in criminal courts.
- **Children with family members in prison:** the Schools unique foundation means that we have had to give specific thought to this question. We are aware that such children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. We are ready to provide support and links to support professionals, to help mitigate negative consequences for those children.
- **Modern Slavery** and the National Referral Mechanism: Modern Slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further support is available at [www.gov.uk](http://www.gov.uk), “modern slavery; how to identify and support victims”.
- **Homelessness:** the Schools are aware of the risks and the reality of children’s homelessness. The DSL will make referrals to the Local Housing Authority and/or Children’s Local Authority Children’s Social Care and Social Services.
- **Forced marriage:** adopting the mantra that “it could happen here”, we are aware of the physical, emotional and psychological threats involved in forced marriage. Forced marriage is one entered into without the full and free consent of one or both parties, and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage.
- **Cybercrime** is criminal activity committed using computers and/or the internet. It is broadly categorised as either ‘cyber-enabled’ (crimes that can happen off-line but are enabled at scale and at speed on-line) or ‘cyber dependent’ (crimes that can be committed only by using a computer). Cyber Dependent crimes include;
  - unauthorised access to computers (illegal ‘hacking’), for example accessing a School’s computer network to look for test paper answers or change grades awarded;
  - denial of Service (Dos or DDoS) attacks or ‘booting’. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

- Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the DSL (or DDSL), 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.]
- **Domestic abuse:** domestic abuse involves the use of power and control by one person over another and includes elements of all other forms of abuse. It 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. Children who witness domestic abuse are at risk of significant harm to their wellbeing and understanding of healthy, positive relationships. The School is enrolled onto the Surrey Operation Encompass scheme and is alerted every day to all domestic abuse incidents that have been reported to Surrey Police so that the right support can be put in place at the right time for children who are experiencing domestic abuse.

## Child-on-child abuse

114. Child on child abuse is abuse by one or more children against another child. It can be standalone or as part of wider abuse and can happen both inside and outside of school, and online. It can manifest itself in many ways and can include abuse within intimate partner relationships, bullying (including cyber bullying, prejudice-based and discriminatory bullying), abuse within intimate partner relationships between peers, physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm), initiation/hazing type violence and rituals, upskirting, sexting, consensual and non-consensual sharing of nudes and/or semi-nudes, sexual assault, gender-based issues, sexual behaviours including child on child sexual violence and sexual harassment, 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. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
115. These arrangements apply to all reports and concerns of child-on-child abuse, whether they have happened in school or outside of it, and/or online. Abuse that occurs online or outside of school should not be downplayed and should be treated equally seriously.
116. The Schools take a zero-tolerance approach and abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours, including sexual comments, remarks or jokes and online sexual harassment, be dismissed as the same or "just having a laugh" or "boys being boys". Staff will also challenge physical behaviours (that are 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.

117. The Schools acknowledge that even if there have been no reported cases of child-on-child abuse in relation to pupils within the Schools, such abuse may still be taking place and is simply not being reported. The Schools will ensure that children are aware of how they can report abuse, and that they are aware of the procedures that the Schools will follow once a report has been made. These procedures will be well promoted and in a format that is easily accessible and easily understood by children.
118. The Schools recognise that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust. The Schools also recognise that children may not find it easy to tell staff about their abuse verbally and that instead they may show signs or act in ways they hope adults will notice and react to. It is also recognised that an incident may come to a member of staff's attention through a report of a friend, or by overhearing conversations. It is therefore important that all staff are clear on the Schools' policy and procedures with regards to child on child abuse, and can recognise the indicators and signs of child on child abuse and know how to identify it and how to respond to reports.
119. The Schools recognise that a first disclosure to a trusted adult may only be the first incident reported. It is not necessarily representative of a singular incident. Staff will take all reports of abuse seriously regardless of how long it has taken for the child to come forward. Staff will act immediately and will support the victim when they raise a concern.
120. The Schools recognise that children with special educational needs and disabilities (SEND) or certain health conditions are three times more likely to be abused by their peers, can face additional safeguarding challenges and may be more prone to peer-on-peer group isolation or bullying (including prejudice-based bullying) than other children. The Schools will consider extra pastoral support for those children via Counsellor, Tutors, or Housemasters/mistresses (KESW). The Schools also recognise that certain children may face additional barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.
121. The Schools recognise that children can be particularly vulnerable in residential settings and are alert to the potential for child-on-child abuse. As for day pupils, any concerns raised by KESW boarding staff will be shared with the DSL in person or via the Schools management system. The Schools will comply with its obligations as set out in the National Minimum Standards in relation to safeguarding at all times.
122. Where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, harm', staff should follow the procedures below rather than the School's Anti-Bullying and Behaviour policies.
123. A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The Schools will take advice from the Surrey Safeguarding Children's Partnership on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator(s). If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of the SSCP, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for

the Schools and advice will be sought as necessary from the SSCP and/ or the police as appropriate. The Schools will have regard to the procedures set out in *KCSIE* at all times.

124. The victim may ask the School not to tell anyone about the sexual violence or sexual harassment. Advice should be sought from the DSL or DDSL who should consider: parents or carers should normally be informed unless doing so would put the victim at greater risk; the basic safeguarding principle that if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care; and whether a crime has been committed. Ultimately, the DSL or DDSL will balance the victim's wishes against their duty to protect the victim and other children.
125. Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. Where a report has been made to the police, the School will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. If the DSL decides to make a referral to children's social care and/or a report to the police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered. The DSL may also decide that the children involved may benefit from early help and may make the necessary referral in accordance with the SSCP referral process.
126. In the event of disclosures about child-on-child abuse, all children involved (both victim(s) and perpetrator(s)) will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by relevant Pastoral Staff, either Form Tutors (BHS) or Housemaster/mistress (KESW) and support from external agencies will be sought, as appropriate.
127. When there has been a report of sexual violence, the DSL 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 should consider:
  - the victim;
  - whether there may have been other victims;
  - the alleged perpetrator(s); and
  - all the other children (and, if appropriate, staff) at the Schools especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.
128. Risk assessments will be recorded (written or electronic) and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL (and indeed all staff) will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be made to feel ashamed for making a report nor will they be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report or have their experience minimised. The School will explain to the child in a way that avoids alarming or distressing them that the law is in place to protect children rather than to criminalise them. The School will consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. The Schools acknowledge that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s). The DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe and to ensure their educational attainment is not adversely affected as far as is possible. This may include careful

consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing School premises (including during any before or after school-based activities), and School transport. The Schools will also consider the risks posed to the victim from other health needs, including physical, mental and sexual health problems, as well as unwanted pregnancy which may arise as a result of the incident, and will consider recommending additional support. The Schools will keep a written record of all concerns, discussions and decisions made.

129. The Schools will reflect on reported concerns, including the decisions made and actions taken, in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the Schools' safeguarding system which may require additional training or amendments to relevant policies. Where a pattern is identified the Schools will decide on an appropriate course of action.
130. In the event that a report is proven to be false, unsubstantiated, unfounded or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any sanction is appropriate against the individual who made it in accordance with the Schools' behaviour policy.

## What to do if you become aware of abuse

131. Care must be taken when recognising abuse and neglect in pupils with special educational needs or disabilities as they can be disproportionately impacted by things such as bullying. Additional barriers could be the assumption that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
132. In a boarding environment (KESW), there is likely to be an enhanced risk that inappropriate relationships could develop. The School will be alert to any potential abuse by peers and may consider some aspects of bullying as a child protection matter. There may be reasonable cause to suspect that a child is suffering or is likely to suffer significant harm. In such cases it is probable that House Staff will be in the best position to assess the situation, as will House Prefects, Peer Listeners, and Mediators.
133. In the EYFS environment (BHS), there is also likely to be an enhanced risk that inappropriate relationships could develop. The School will be alert to any potential abuse by peers and may consider some aspects of bullying as a child protection matter. There may be reasonable cause to suspect that a child is suffering or is likely to suffer significant harm. In such cases it is probable that EYFS Staff will be in the best position to assess the situation, as will the Head of Pre-Prep.
134. If you (or a pupil) have any worries or concerns share them immediately with one of the DSL's. Early help in identifying emerging problems and sharing information is crucial. If you do not, you could be allowing the child to be put at further risk, and vital information may not come to light. Staff **MUST NOT** keep secrets or make promises to the pupil that other appropriate adults (e.g. Local Authority Children's Social Care or police) will not be involved. Even if a pupil later retracts their statement, the referral could still be made. Particular attention to the potential need for early help should be given to a child who:
  - is disabled and/or has specific additional needs;
  - has special educational needs (whether or not they have a statutory Education, Health and Care Plan);



- has a mental health need;
  - is a young carer;
  - has a parent or carer in custody, or is affected by parental offending;
  - shows signs of being drawn into anti-social or criminal behaviour;
  - is frequently missing/goes missing from education, home or care;
  - 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 and/or alcohol;
  - is a privately fostered child;
  - is at risk of radicalisation or exploitation.
135. Ensure that the pupil is in a safe place and encourage them to stay in school until all information has been collected.
136. At all times staff will consider the welfare of the children involved in any allegation or investigation as well as pursuing an investigation. When information is being gathered the Safeguarding Leads will be present, to support the pupil and explain what is taking place.
137. One of the Safeguarding Leads will liaise with the Head and telephone the appropriate services for advice; such contact will be made within 24 hours especially in the case of those who have suffered or who are likely to suffer significant harm. Children in need will be referred to the child's Local Authority Children's Social Care by one of the Safeguarding Leads, but this will be done immediately in the case of children at risk so that inter-agency assessments can take place. The police will be contacted if a crime has been committed. Contact may also need to be made if the case involves one of abuse perpetrated by one or more pupils against another.
138. If it is thought that there is a case to pursue, the police or other agency will come to the School and interview the pupil in an appropriate location. It is most important that a trusted member of staff is present, acting as guardian.
139. Staff **MUST** remember:
- that the priority is to protect the child;
  - to take the matter seriously in a supportive way;
  - when initially talking to the child not to ask leading questions or "put words in their mouth";
  - to gather information on a "need to know" basis; you do not need the whole story, just sufficient to take the next step;
  - that the child is very vulnerable and to reassure the child that you have taken what they had to say seriously;
  - keep a record of the facts of the matter to pass on to the DSL.
140. Staff **MUST NOT**:
- contact the parents any further;
  - interrogate the child or ask leading questions;
  - speak to anyone about whom the allegations are made;
  - promise to keep secrets or maintain confidentiality;
  - ask the child outright if they have suffered abuse.
141. **One of the most important things to do is to LISTEN to what a young person is telling you. They may want to tell you about abuse and your reaction to this is vital. Remain non-judgmental.**

## Whistleblowing

142. The Schools recognises that workers who disclose certain types of information to certain individuals in certain circumstances are protected by the Public Interest Disclosure Act 1998. This enables a worker to raise reasonable concerns internally and in a confidential fashion about safeguarding, fraud, malpractice, health and safety, criminal offences, miscarriages of justice, failure to comply with legal obligations or environmental damage. The policy also provides, if necessary, for such concerns to be raised outside the Schools. The Schools will not tolerate malpractice and seeks to provide a clear, simple and confidential procedure for raising concerns, which is accessible to all members of staff. A qualifying disclosure is likely to show, in the reasonable belief of the worker, one or more of the following:
- that a criminal offence has been committed, is being committed or is likely to be committed;
  - that a person has failed, is failing, or is likely to fail to comply with a particular legal obligation;
  - that a miscarriage of justice has occurred, is occurring or is likely to occur;
  - that the health and safety of any individual has been, is being or is likely to be endangered;
  - that the environment has been, is being or is likely to be damaged;
  - that information indicating the occurrence of any of the above has been, is being or is likely to be concealed;
  - that safeguarding issues are not being taken seriously.
143. To be protected, a disclosure must be made 'in the public interest' and must be:
- to the employer, or the person legally authorised by the employer to receive disclosures. (In this school, the Governors are the employer and the Principal, Head of BHS and the Director of Finance and Operations are authorised to receive disclosures). In the case of a child protection or a safeguarding issue, the disclosure can be made to any member of the team of staff named in the policy or
  - to a 'Prescribed Person' or
  - to an individual unconnected with the organisation ('External Disclosure') or
  - undertaken in exceptionally serious cases.
144. 'Prescribed Persons' are those bodies prescribed by an order made by the Secretary of State. The Public Interest Disclosure (Prescribed Persons) Order 1999 lists more than 30 regulatory bodies to whom protected disclosures may be made. These include the Data Protection Registrar, the Environment Agency and the Health and Safety Executive. Disclosure may also be to a legal adviser.
145. Workers who make 'External Disclosures' are expected to have previously raised the matter with the employer or a 'Prescribed Person' or have not done so because they reasonably believe that they will be subjected to a detriment or that a complaint to the employer would result in evidence being concealed or destroyed. The worker must also make the disclosure in the reasonable belief that the allegations are substantially true and must not act for personal gain. It must also be 'reasonable in all the circumstances' of the case to make the disclosure.
146. Employees who wish to raise a concern under this procedure are entitled to have the matter treated confidentially and their name will not be disclosed to the alleged perpetrator of malpractice without their prior approval. It may be appropriate (to preserve confidentiality) that concerns are raised orally rather than in writing, although members of staff are encouraged to express their concern in writing wherever possible. If there is evidence of criminal activity, then the police will be informed.

147. Additionally, a member of staff is at liberty to express any concern to the Principal, Head of BHS or the Director of Finance and Operations. Any concern raised will be investigated thoroughly and in a timely manner, and appropriate corrective action will be pursued. The member of staff making the allegation will be kept informed of progress and, when possible (subject to third party rights), will be informed of the resolution. A member of staff who is not satisfied that their concern is being properly dealt with by the Head or Director of Finance and Operations will have a right to raise it in confidence with the governing body.
148. No member of the staff will suffer a detriment or be disciplined for raising a genuine and legitimate concern, providing that they do so in good faith and following the whistle-blowing procedures.
149. **The NSPCC whistleblowing helpline is available for staff. Calls can be made to 0800 028 0285, and the email address is [help@nspcc.org.uk](mailto:help@nspcc.org.uk).**
150. Surrey is deemed a low-risk county for terrorist activity, but there remains the possibility of some suspicious behaviour in this regard. Concerns can be reported in a number of ways:
- Surrey Police non-emergency number: 101
  - DfE dedicated helpline for non-emergency advice: 0207 340 7264
  - DfE email: [counter-extremism@education.gsi.gov.uk](mailto:counter-extremism@education.gsi.gov.uk)
  - Anti-terrorism hotline: 0800 789 321
  - **If it is an emergency dial 999**
151. All children must receive the right help at the right time to prevent issues from escalating. Although the expectation is that referrals will be made by any one of the Safeguarding Leads, anyone can make a referral if necessary.
152. This policy is reviewed annually or more frequently if required by the Senior Management Teams, the DSLs, the Governors' Safeguarding & Pastoral Group, the Governors responsible for Child Protection and Safeguarding, and then also by the full governing body at the Summer Term meeting to ensure its efficiency. At that meeting, the Treasurer will sign a declaration that the policy has been reviewed.

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## Appendix 1 – Staff Behaviour Protocols

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### Underlying principles

153. The welfare of the child is paramount; all staff have a duty to keep children safe and to protect them from harm
- Staff are responsible for their own actions and should avoid any conduct which would lead a reasonable person to question their motivation and intentions; their behaviour must reflect integrity, maturity and good judgement;
  - Staff should take advice from their line manager or a senior member of staff over any behaviour or incident that gives a cause for concern;
  - Professional standards and judgements should be applied consistently towards all pupils;
  - Behaviour which might be misinterpreted by others must be avoided;
  - Staff are aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action against them, for instance, in the case of an allegation that they have:
    - behaved in a way that has harmed a child, or may have harmed a child;
    - possibly committed a criminal offence against or related to a child;
    - behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
    - behaved or may have behaved in a way that indicates they may not be suitable to work with children.
154. The Schools will refer the allegation to the LADO. This procedure relates to members of staff, supply staff, volunteers working in any school or college regardless of whether the School or college is where the alleged abuse took place. Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police.

### Position of trust

155. As a result of the knowledge, position and authority invested in their role, all adults working with children are in positions of trust in relation to a child in their care or who has recently left the Schools. A relationship between a member of staff and a pupil is not a relationship between equals. There is the possibility of exploitation and harm of vulnerable young people, and staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. When a person aged 18 or over is in a position of trust with a child under 18 or a member of the Schools over 18, it is an offence for that person to engage in sexual activity with or in the presence of that child or to cause or incite that child to engage in or watch sexual activity.

### Propriety and behaviour

156. Staff should:
- never make sexual remarks to a pupil, including in an e-mail, text message or any other electronic form of communication;
  - never discuss their own personal relationships with or in the presence of pupils;
  - never humiliate or demean pupils;

- not seek to establish social contact with pupils in any way and in particular via electronic communication and social media. (Conferring special attention upon a child might be construed as being part of a grooming process);
- not give their personal details such as phone numbers or e-mail addresses unless a specific need to do so has been agreed with the Head or Deputy Head.

## Physical contact

157. There are occasions when it is appropriate for staff to have physical contact with pupils, but this must be in a way appropriate to their professional role. When physical contact is made with pupils, this should be in direct response to their needs at the time, limited in duration and appropriate given their age, gender, ethnicity and background. Physical contact should never be secretive or for the gratification of the adult or represent a misuse of authority.
158. If it is necessary to restrain or control a pupil, the amount of force used must be proportionate to allow the individual to regain control of themselves. At KESW, please refer to the School's "Use of Reasonable Force" Policy for further details.

## Working in one-to-one situations with a pupil

159. Staff should recognise the added vulnerability of the one-to-one situation and plan accordingly. The safety of both the child and the adult is vital in such circumstances. The following principles should help:
- Such meetings should take place in an open area and not in remote, secluded parts of the campus;
  - The venue should allow others to see into the room;
  - The door should be left open, if appropriate;
  - Another adult should be informed about the meeting beforehand and about the likely venue for it;
  - If the situation becomes difficult, the matter should be reported to a line manager.
160. Prearranged meetings with pupils away from the Schools' campuses are not acceptable unless approval has been obtained from the pupil's parent and a senior member of staff. At KESW, this also applies to staff accommodation in the boarding houses and around the campus.

## Use of Mobile Phones in EYFS

161. Members of staff should not use personal mobile phones during direct contact time with any pupil, unless it is for the purposes of contacting either the School and/or the emergency services.
162. Mobile phones and personal cameras must not be used for taking photographs which may include images of pupils.
163. Staff authorised by the school may capture images and recordings only using secure, approved devices (such as school tablets, laptops, or a Marketing Department smartphone) for the purpose of recording and monitoring pupil progress. These may be shared with parents via learning platforms. In addition, with parental permission, images and recordings may also be taken with these approved devices for official school newsletters, marketing materials, and social media.

164. Any queries should be discussed with the DSL.

## Summary

165. These behaviour protocols apply at all times and are not restricted to times when the Schools are formally in session. In particular, they apply on all school trips and especially those of a residential nature.

166. In addition to the information that is contained within this policy, the Schools have other policies to which reference can be made to show the standards of professional behaviour that are expected of its staff. Policies are available on the School's individual websites, or can be obtained from the School Offices ([info@kesw.org](mailto:info@kesw.org) or [info@barrowhills.org](mailto:info@barrowhills.org)) upon request. Policies include, though are not limited to:

- Alcohol (KESW)
- Anti-Bullying and Cyberbullying
- Equal Opportunities
- Health and Safety Policy
- ICT Acceptable Use Policy
- Staff Employment Handbook - especially sections v and vi and the appendices of the Staff Handbook
- Supervision of Pupils

167. If staff have any concerns about a colleague, they may refer to the whistleblowing protocols of this policy document for advice on ways to report reasonable concerns.

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## Appendix 2 – Prevent Duty Guidance

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168. This statement takes into account the following documents:

- *Prevent Duty Guidance*: for England and Wales, issued by HM Government in June 2015, updated March 2016 to reflect the duty in the Counter Terrorism and Security Act 2015 and its later revision
- *Keeping Children Safe in Education*, DfE September 2024
- *Working Together to Safeguard Children*, DfE June 2023
- *The Use of Social Media for Online Radicalisation*, DfE July 2015

169. Further information on certain aspects of this guidance can be found in:

- *Child Protection and Safeguarding Policy*
- *Curriculum Policy*
- *Anti-Bullying and Cyberbullying Policy*
- *E-safety and ICT acceptable use Policy*
- *Attendance Policy (KESW) or Supervision of Pupils Policy (BHS)*

170. The Principal, Head of BHS, and DSLs are responsible for:

- Understanding the risk of radicalisation;
- Ensuring that staff understand the risk and build the capability to deal with it;
- Communicating and promoting the importance of the Prevent duty;
- Ensuring that staff implement the Prevent duty effectively to avoid pupils being drawn into terrorism. This is achieved through staff training so that, as in all child protection matters, the staff have the confidence to identify pupils at risk of, or susceptible to, being drawn into terrorism;
- Providing a safe environment in which pupils can understand and discuss sensitive topics, including terrorism and extremist ideals that are part of terrorist ideology.

171. Key definitions are:

- **Extremism** = the 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. Also included in this definition is the call for the death of members of the armed forces, whether in this country or overseas. For example, currently, Islamist extremists regard Western intervention in Muslim-majority countries as a “war with Islam”. In their view people cannot be both Muslim and British and Muslims living in this country should not participate in our democracy. Islamist extremists specifically attack the principles of civic participation and social cohesion.
- **Interventions** = projects intended to divert people who are being drawn into extreme activity. They can include monitoring, counselling, theological support, encouraging civic engagement and developing support networks, such as peer structures and communities with the boarding houses.
- **Prevention** = reducing or eliminating the risk of individuals becoming involved in extremism. It also includes but is not confined to the identification and referral of those at risk of being drawn into extremism into appropriate interventions. These interventions aim to divert vulnerable people from radicalisation.
- **Radicalisation** = the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

- **Terrorism** = an extremist action that endangers or causes serious violence to a person or people, causes serious damage to property, or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause. The most significant terrorist threat is presently from Syria and Iraq and Al Qa'ida associated groups. However, terrorists linked with the extreme right also pose a threat to safety and security.

172. The Schools will fulfil their duty under the terms of the Prevent Guidance. This will be achieved in a number of ways:

- The Schools provide a broad and balanced curriculum which promotes, amongst other things, the spiritual, moral, cultural and social development of pupils and prepares them for their responsibilities in adult life.
- A spirit of community cohesion is promoted. This begins at the level of the major pastoral unit, the boarding house (KESW) or the pupil's form (BHS), in which all members know each other well, and widens to the whole school community. The Schools are of such a size that all members of the community can be known by each other.
- The promotion of fundamental British values is encouraged as part of the education that is provided. This is manifest in PSHE lessons, tutorial / form discussions, assemblies and, at KESW, in Chapel services.
- Open discussion is encouraged in a number of places so that extreme ideas can be freely challenged. It is a requirement that all teachers present political issues in a balanced way that forbids political indoctrination. Staff are reminded of these responsibilities as part of the child protection training that they receive and are required to challenge extremist ideas.
- The Schools have robust safeguarding policies, reviewed annually by the SMT and governors, to identify pupils at risk and to supply the necessary intervention. The nature of the governing body, with its strong association with The City of London and firm adherence to the concept of fundamental British values, provides a clear filtering mechanism.
- Visiting speakers are invited by staff, perhaps at the suggestion of pupils, but their suitability is always assessed, and they are appropriately supervised at all times.
- Every effort will be made to ensure that groups with links to terrorism do not use the School's buildings and resources.
- The Schools will always take into account the advice that is given by local and other counter terrorism agencies and will work in partnership with them whenever any concerns arise.
- The Director of ICT (KESW) and Head of ICT & Communications (BHS) have clear policies and practice in place to ensure that pupils are safe from terrorist and extremist material, through appropriate filtering and monitoring as described previously.

173. Copies of exemplar risk assessments which demonstrate due consideration given to the Prevent duty may be requested from the DSL's. Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (HM Government, updated April 2015) will be followed in consideration of the risk of a pupil being drawn into radicalisation. On balance, after due consideration by the Senior Management Team it is agreed that the net level of risk is one that can be managed.



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## Appendix 3 - “Levels of Need” (KESW)

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174. Surrey Children's Safeguarding Partnership publishes a document called Effective Family Resilience (known as 'Levels of Need') which sets out in detail the indicators, symptoms and behaviours which people who work with children must look out for constantly. It divides those into five levels of need. Every single person in Surrey who is under 18 will fit within one of the five levels.
175. Concerns about the wellbeing of any pupils should be shared with DSL or DDSL (in person or via CPOMS) and will then be discussed at the Pupil Wellbeing Committee which meets once per week in term time with the following members:
- DSL; DDSL's; Deputy Head (Academic); Housemasters/mistresses; School Counsellor; Medical Centre Manager; SENDCO; Chaplain
176. Discussion within this body, and effective use of CPOMS, should minimise the 'jigsaw' effect in which a number of colleagues hold information that, individually, may seem trivial but which, once put together become significant.
177. **Level One:** the large majority of children at KESW (and in Surrey more generally) are said to be at Level One, the lowest of the four Levels of Need, because they are developing and achieving outcomes as expected. As part of growing up, many children will have health concerns, family issues, academic worries or problems with peer relationships. It is a key part of the role of HsMs, and their teams to offer children and their families advice and information on support which is universally open to all pupils: Tutors and Matrons, the Special Educational Needs department, the Chaplaincy, the Medical Centre, Counsellor, NHS services, and so forth.
178. **Level Two:** if the DSL, working with the Pupil Wellbeing Committee (PWC), judges that the child's situation requires a more formal coordination of the Schools internal services, he or she is said to be at Level Two. The Committee will identify a 'Lead Professional' who will have responsibility for assessing the pupil's needs and then writing, implementing and reviewing a Pastoral Care Plan (KESW's version of an Early Help Plan). The plan will be shared with the pupil and their parents, and others on a need-to-know basis, and with HsM whenever possible. The purpose of a PCP is to improve the child's situation by formulating a response, coordinating the work of colleagues, and regularly reviewing progress. If, on review, the pupil's situation does not seem to be improving, the Committee will consider escalation.
179. **At Level Three,** the child's needs are moving beyond what the School alone can provide. For example, the School's Medical Officer may have referred the pupil to CAMHS, or the SENDCO may have decided that specialised external support is required. If the DSL, working with the PWC and the Safeguarding Partnership's Effective Family Resilience document, judges that the child's needs might best be met by a mixture of the School's internal services working together with the targeted help provided by specialised exterior services, then the DSL will refer the child to Surrey Council's Early Help Hub using the Children's Single Point of Access (contact details on the Safeguarding directory for adults) or to services provided within the pupil's home area (if not Surrey). In most cases, written consent for a referral must be provided by parents, guardian or social worker, and the resulting Early Help Plan (local authority version) must include and be shared with them and the child. An Early Help review at which the parents and the professionals who are offering support to the pupil meet is called a TAF ('Team around the Family') meeting. Pupils with SEND whose needs cannot be met by the support at school may be most effectively helped through the creation of an EHCP (Education, Health and Care Plan)

written by the Local Authority with substantial input from members of staff at the School. Such plans are based on decisions made openly with parents, children and young people.

180. **Level Four**, the highest level of need, is a legal designation defined by Sections 17 and 47 of the Children Act 1989. The School must pass on to the local authority any possible Level Four concerns. Section 17 of that Act safeguards children who are 'in need', because their health or development would be weakened if they were not supported by specialised services. This includes children with serious disabilities or complex special educational needs. Under Section 47 of the Children Act, which covers **child protection**, the local authority must investigate when it becomes aware that a child is suffering (or is likely to suffer) significant harm.
181. **Level Five**, Accessing statutory services such as Police (999) intervention, A&E, Family Safeguarding Teams, HOPE and CWD Teams. Support from these services can be acquired in an acute manner with no prior Level noted by the School to achieve this support. Following support from statutory services, the child may then be assigned a Level of Need (1-4) as appropriate for ongoing monitoring and support.

## Appendix 4 - “Levels of Need” (BHS)

182. Concerns about the wellbeing of any pupils should be shared with DSL or DDSL (in person or via CPOMS) and will then be discussed at the Pastoral Committee which meets once per week in term time with the following members:
- DSL; Head; SENDCO; Head of Pre-Pre; Head of Middle Prep; Head of Upper Prep; School Secretary; Director of Teaching & Learning
183. Discussion within this body, and effective use of CPOMS, should minimise the ‘jigsaw’ effect in which a number of colleagues hold information that, individually, may seem trivial but which, once put together become significant.

| Level of need  | Level descriptor                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
|----------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Level 1</b> | Monitoring - ‘keeping an eye on pupil’, behaviour out of the ordinary for that child                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Level 2</b> | High level of need<br><br>Parents may have got in touch with form teacher<br><br>More than one teacher has got into contact with HOD<br><br>Above monitoring due to high level of parent involvement                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Level 3</b> | Refer to CPOMS - the following may also be included as appropriate: HOD will look to introduce a care plan to aid the pastoral care of this pupil (shown to pupils and parents on a need to know basis)<br>Face-to-face meeting with parents may be required<br><br>Potential safeguarding concern<br><br>The purpose of a PCP is to improve the child’s situation by formulating a response, coordinating the work of colleagues, and regularly reviewing progress. If, on review, the pupil's situation does not seem to be improving, the Committee will consider escalation.<br><br>Deputy Head may be involved, may involve a meeting with HOD and DH<br><br>Other agencies may be involved (Ed Psych, CAMHS etc) |
| <b>Level 4</b> | Refer to CPOMS - the following may also be included as appropriate: Potential for escalation to Head for further addressing<br><br>Potential serious safeguarding concern (although should direct to DSL as appropriate)<br><br>Potentially other agencies involved                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Level 5</b> | Accessing statutory services for immediate support such as: Police, A&E, Family Safeguarding team, HOPE and CWD teams.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

## Appendix 5 – Managing Low Level Concerns

### Managing low level concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors

