



Tormead
SCHOOL

Safeguarding Policy

This policy also applies to the Prep School

Contents:

1. Introduction 3

2. Definition 4

3. Scope..... 4

4. Circulation 4

5. Legislation 5

6. Other Policies 6

7. Roles and Responsibilities..... 6

8. Recruitment 13

9. Inspection..... 13

10. Training 14

11. Teaching Safeguarding & Online Safety 16

12. Understanding and Identifying Abuse and Neglect 18

13. Specific Safeguarding Issues 19

14. Children Potentially at Greater Risk of Harm..... 31

15. Listening to Children and Early Help 31

16. Multi-Agency Working & Sharing and Withholding Information 32

17. Procedures 34

18. Reporting Concerns..... 35

19. Use of school premises for non-school activities..... 44

20. Alternative provision..... 45

21. Elective Home Education (EHE) 45

22. Monitoring and Review..... 45

APPENDIX 1: Useful Contacts..... 47

APPENDIX 2: The Types And Signs Of Abuse..... 50

APPENDIX 3: Action To Be Taken 53

APPENDIX 4: Specific Safeguarding Issues 54

APPENDIX 5: Further Information..... 67

1. Introduction

- 1.1 Tormead School is committed to providing a safe and secure environment for all its pupils and promoting a climate where all pupils feel safe and confident about sharing any concerns which they may have about their own safety or the well-being of others.
- 1.2 The Governing Body facilitates a whole school approach to safeguarding ensuring that safeguarding and child protection are at the forefront and that they underpin all relevant aspects of process and policy development which operate with the best interests of the child at heart. The Governing Body recognises that schools and their staff form part of the wider safeguarding system for children and takes seriously its responsibility under section 175 of the Education Act 2002 to safeguard and promote the welfare of children and to work together with other agencies (in line with statutory guidance outlined in *Working Together to Safeguard Children*) to ensure adequate arrangements exist within our school to identify, assess, and support those children who are suffering harm, including providing a co-ordinated offer of early help when a need is identified and contributing to inter-agency plans where necessary. The Governing Body understands its duty to ensure that there is an effective safeguarding policy in place and that the arrangements stipulated therein must also be implemented fully in practice. It also ensures that our safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the Surrey Safeguarding Children Partnership, (henceforth referred to as SSCP), which is comprised of three statutory partners: Surrey County Council; Surrey Heartlands Integrated Care System; Surrey Police Force. This includes understanding and reflecting local protocols for assessment and the SSCP's threshold document along with supplying information as requested by the SSCP.
- 1.3 Where there is a safeguarding concern, governing bodies and school leaders will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems are in place, and they are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
- 1.4 Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families and carers has a role to play in safeguarding children and an attitude of 'it could happen here' is encouraged amongst all staff. In order to fulfil this responsibility effectively, all staff should make sure their approach is child-centred and coordinated. This means that they should consider, at all times, what is in the best interests of the child and take action to enable all children to have the best outcomes. No single professional can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.
- 1.5 With regards to safeguarding we will consider our duties under the [Equality Act 2010](#) and our general and specific duties under the [Public Sector Equality Duty](#). General duties include:
- a) Eliminate discrimination, harassment, victimisation, and other conduct that is prohibited by the Equality Act 2010.
 - b) Advance equality of opportunity between people who share a protected characteristic and people who do not share it.

- c) Foster good relations across all protected characteristics between people who share a protected characteristic and people who do not share it
- d) Tormead also adheres to the principals of and promotes anti-oppressive practice in line of the [United Nations Convention of the Rights of the Child](#) and the [Human Rights Act 1998](#).

1.6 *Keeping Children Safe in Education (KCSIE) 2023* is provided as an appendix to this policy and Parts One, Five and Annex B must be read to ensure a full understanding of safeguarding issues (governors are also required to read Part Two). Upon each revision of *KCSIE*, it is re-issued and all staff sign to indicate that they have read and understood it.

2. Definition

2.1 Safeguarding and promoting the welfare of children is defined for the purposes of this policy as: protecting children from maltreatment; preventing impairment of children’s mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. It also covers broader duties such as making reports to the DBS and pre-appointment checks and checks for volunteers, staff of contractors and other non-school or supply staff according to the requirements of *KCSIE*. Children includes everyone under the age of 18.

2.2 It should be understood that greater prominence is now given to mental health in the context of safeguarding and that all those responsible for safeguarding and promoting the welfare of children should make use of the systems and processes in place for identifying possible mental health problems.

3. Scope

3.1 This policy applies to everyone who works in the school, whether in a teaching or non-teaching capacity, including volunteers and governors. Everyone who comes into contact with children and their families has a role to play in safeguarding children. School and college staff are particularly important as they are in a position to identify concerns early and provide help for children, to prevent concerns from escalating. Schools and colleges and their staff form part of the wider safeguarding system for children. This system is described in statutory guidance *Working Together to Safeguard Children 2018* and *Keeping Children Safe in Education 2023*. Schools and colleges should work with social care, the police, health services and other services to promote the welfare of children and protect them from harm.

4. Circulation

4.1 This policy is available in OneDrive/ allstaff/ policies. It is also available on the website. Current or prospective parents wishing to read the Staff Code of Conduct should contact the Bursar, to request a copy to be sent.

5. Legislation

5.1 Statutory guidance

- DfE (2015) 'The Prevent duty'
- DfE (2018) 'Working Together to Safeguard Children'
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- DfE (2023) 'Keeping children safe in education 2023'
- [Behaviour in Schools Guidance –September 2022](#)
- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2021) 'Channel Duty Guidance: Protecting people vulnerable to being drawn into terrorism'
- Home Office and Foreign, Commonwealth and Development Office(2023) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'

5.2 Non-statutory guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2017) 'Child sexual exploitation'
- DfE (2018) 'Information sharing'
- DfE (2020) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'
- DfE (2021) 'Teachers' Standards'
- DfE (2022) 'Recruit teachers from overseas'
- DfE (2022) 'Working together to improve school attendance'
- DfE (2023) 'Meeting digital and technology standards in schools and colleges'
- Department of Health and Social Care (2022) 'Virginity testing and hymenoplasty: multi-agency guidance'

5.3 Other guidance

- Children Act 1989
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Anti-social Behaviour, Crime and Policing Act 2014
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018

- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Marriage and Civil Partnership (Minimum Age) Act 2022

6. Other Policies

6.1 This policy should be read and understood in conjunction with the Safeguarding Appendix: *KCSIE*. All staff should read Parts One, Five and Annex B of this document, while governors should also read Part Two. It should also be read in conjunction with Tormead's:

- Accessibility Policy
- Anti-Bullying Policy
- Behaviour Policy
- Equal Opportunities Policy
- Pupils' Code of Conduct (Prep School)
- Pupils' Code of Conduct (Senior School)
- Pupils' E-safety and Acceptable Use of IT Policy (Prep School)
- Pupils' E-safety and Acceptable Use of IT Policy (Senior School)
- Cyber-security Policy
- Health & Safety Policy
- Mental Health with Counselling) Policy
- Photography Policy
- School Attendance and Pupil Absence Policy
- Recruitment and Selection Policy
- Remote Learning Policy
- Risk Assessment Policy
- Relationships and Sex Education (RSE) and Health Education Policy (RSHE)
- Special Educational Needs and Disability (SEND) Policy
- Staff Code of Conduct (Employment Manual)
- Staff E-safety and Acceptable Use of IT Policy (Employment Manual)
- Supervision, Dismissal and Collection of Pupils Policy
- Whistleblowing Policy (Employment Manual).

7. Roles and Responsibilities

7.1. All staff have a responsibility to:

- Consider, at all times, what is in the best interests of the pupil.
- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Provide a safe environment in which pupils can learn.
- Be prepared to identify pupils who may benefit from early help.

- Be aware of the school's systems which support safeguarding, including any policies, procedures, information and training provided upon induction.
- Be aware of the role and identity of the DSL and deputy DSLs.
- Undertake safeguarding training, including online safety training (which, amongst other things, includes an understanding of the expectations and responsibilities relating to filtering and monitoring), during their induction – this will be regularly updated.
- Receive and understand child protection and safeguarding (including online safety) via online and in person training and updates, e.g. via email, as required, and at least annually.
- Be aware of the local early help process and understand their role in it.
- Be aware of, and understand, the process for making referrals to Children Services, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Make a referral to Children Services and/or the police immediately, if at any point there is a risk of immediate serious harm to a child.
- Support social workers in making decisions about individual children, in collaboration with the Designated Safeguarding Lead (DSL).
- Be aware of and understand the procedure to follow in the event that a child confides they are being abused, exploited or neglected.
- Be aware that a pupil may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful.
- Maintain appropriate levels of confidentiality when dealing with individual cases.
- Reassure victims that they are being taken seriously, that they will be supported, and that they will be kept safe.
- Speak to the DSL if they are unsure about how to handle safeguarding matters.
- Be aware of safeguarding issues that can put pupils at risk of harm.
- Be aware of behaviours that could potentially be a sign that a pupil may be at risk of harm.

7.2. Teachers, including the Head, have a responsibility to:

- Safeguard pupils' wellbeing and maintain public trust in the teaching profession as part of their professional duties, as outlined in the 'Teachers' Standards'.
- Personally report any cases to the police where it appears that an act of FGM has been carried out, also referred to as 'known' cases, as soon as possible.

7.3 The governing board has a duty to:

- Take strategic leadership responsibility for the school's safeguarding arrangements.
- Ensure that the school complies with its duties under the above child protection and safeguarding legislation.
- Guarantee that the policies, procedures and training opportunities in the school are effective and comply with the law at all times.
- Guarantee that the school contributes to multi-agency working in line with the statutory guidance "Working Together to Safeguard Children".
- Confirm that the school's safeguarding arrangements take into account the procedures and practices of the LA as part of the inter-agency safeguarding procedures.

- Understand the local criteria for action and the local protocol for assessment, and ensure these are reflected in the school's policies and procedures.
- Comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.
- Ensure that staff working directly with children read at least Part One of KCSIE.
- Ensure that staff who do not work directly with children read either Part one or Annex A of KCSIE.
- Ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities in regard to safeguarding children.
- Ensure a senior board level lead takes leadership responsibility for safeguarding arrangements.
- Appoint a member of staff from the SMT to the role of DSL as an explicit part of the role-holder's job description.
- Appoint one or more deputy DSLs to provide support to the DSL, and ensure that they are trained to the same standard as the DSL and that the role is explicit in their job descriptions.
- Facilitate a whole-school approach to safeguarding; this includes ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- Where there is a safeguarding concern, ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Ensure systems are in place, children to confidently report abuse, knowing that their concerns will be treated seriously, and they can safely express their views and give feedback; these systems will be well-promoted, easily understood, and easily accessible.
- Ensure that staff have due regard to relevant data protection principles that allow them to share and withhold personal information.
- Ensure that a member of the governing board is nominated to liaise with the LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the headteacher or another governor.
- Guarantee that there are effective and appropriate policies and procedures in place.
- Ensure all relevant persons are aware of the school's local safeguarding arrangements, including the governing board itself, the SMT and DSL.
- Make sure that pupils are taught about safeguarding, including protection against dangers online (including when they are online at home), through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Adhere to statutory responsibilities by conducting pre-employment checks on staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensure that staff are appropriately trained to support pupils to be themselves at school, e.g. if they are LGBTQ+.
- Ensure the school has clear systems and processes in place for identifying possible mental health problems in pupils, including clear routes to escalate concerns and clear referral and accountability systems.
- Guarantee that volunteers are appropriately supervised.

- Make sure that at least one person on any appointment panel has undertaken safer recruitment training.
- Ensure that all staff receive safeguarding and child protection training updates, e.g. emails, as required, but at least annually.
- Ensure that all governors receive appropriate safeguarding and child protection training upon their induction and that this training is updated regularly.
- Certify that there are procedures in place to handle allegations against staff, supply staff, volunteers and contractors.
- Confirm that there are procedures in place to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Guarantee that there are procedures in place to handle pupils' allegations against other pupils.
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of pupils and staff.
- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to child-on-child abuse.
- Guarantee that there are systems in place for pupils to express their views and give feedback.
- Establish an early help procedure and ensure all staff understand the procedure and their role in it.
- Appoint a designated teacher to promote the educational achievement of Looked After Children (LAC) and ensure that this person has undergone appropriate training.
- Ensure that the designated teacher works with the Virtual School Head (VSH) to discuss how the pupil premium funding can best be used to support Looked After Children (LAC).
- Introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities.
- Make sure that staff members have the skills, knowledge and understanding necessary to keep Looked After Children (LAC) safe, particularly with regard to the pupil's legal status, contact details and care arrangements.
- Put in place appropriate safeguarding responses for pupils who become absent from education, particularly on repeat occasions and/or for prolonged periods, to help identify any risk of abuse, neglect or exploitation, and prevent the risk of their disappearance in future.
- Ensure that all members of the governing board have been subject to an enhanced DBS check.
- Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.
- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), the Data Protection Act 2018, the UK GDPR and the local multi-agency safeguarding arrangements.

7.4 The Head has a duty to:

- Ensure that the policies and procedures adopted by the governing board, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff.

- Provide staff with the appropriate policies and information upon induction.

7.5 The Designated Safeguarding Lead (DSL)

7.5.1 The DSL has a duty to:

- Take lead responsibility for safeguarding and child protection, including online safety and understanding the filtering and monitoring systems and processes in place. At times, the DSL may designate certain responsibilities to Deputy DSLs with responsibility for particular areas in school. In Tormead, the DSL has delegated the role of Online Safety to the Deputy Head (Pastoral) and E-Safety Coordinator.
- Provide advice and support to other staff on child welfare, safeguarding and child protection matters.
- Take part in strategy discussions and inter-agency meetings, and/or support other staff to do so.
- Contribute to the assessment of children, and/or support other staff to do so.
- During term time, be available during school hours for staff to discuss any safeguarding concerns.
- Arrange, alongside the school, adequate and appropriate cover for any activities outside of school hours or terms.
- Refer cases:
 - i) To Children Services where abuse and neglect are suspected, and support staff who make referrals to Children Services
 - ii) To the Channel programme where radicalisation concerns arise, and support staff who make referrals to the Channel programme.
 - iii) To the DBS where a person is dismissed or has left due to harm, or risk of harm, to a child.
 - iv) To the police where a crime may have been committed, in line with the National Police Chiefs' Council (NPCC) guidance.
- Act as a source of support, advice and expertise for all staff.
- Act as a point of contact with the safeguarding partners.
- Liaise with the headteacher to inform them of issues, especially regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with the deputy DSLs to ensure effective safeguarding outcomes.
- Liaise with the case manager and the LA designated officers (LADOs) for child protection concerns in cases concerning staff.
- Liaise with staff on matters of safety, safeguarding and welfare, including online and digital safety.
- Liaise with staff when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically.
- Liaise with the Wellbeing Team and School Counsellors where safeguarding concerns are linked to mental health.
- Promote supportive engagement with parents in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- Work with the Head and relevant strategic leads, including Deputy Head (Pastoral) taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and

identifying the impact that these issues might be having on their attendance, engagement and achievement at school. This includes:

- i) Ensuring that the school knows which pupils have or had a social worker.
 - ii) Understanding the academic progress and attainment of these pupils.
 - iii) Maintaining a culture of high aspirations for these pupils.
 - iv) Supporting teachers to provide additional academic support or reasonable adjustments to help these pupils reach their potential.
 - v) Helping to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues these pupils are experiencing with teachers and the SMT.
- Ensure that child protection files are kept up-to-date and only accessed by those who need to do so.
 - Ensure that a pupil's child protection file is transferred as soon as possible, and within five days, when transferring to a new school, and consider any additional information that should be shared.
 - Ensure each member of staff has access to and understands the school's Safeguarding Policy and procedures – this will be discussed during the staff induction process.
 - Work with the governing board to ensure the school's Safeguarding Policy is reviewed annually, and the procedures are updated and reviewed regularly.
 - Ensure the school's Safeguarding Policy is available publicly, and parents are aware that the school may make referrals for suspected cases of abuse or neglect, as well as the role the school plays in these referrals.
 - Link with safeguarding partner arrangements to make sure that staff are aware of the training opportunities available and the latest local policies on safeguarding.
 - Undergo training, and update this training at least every two years.
 - Obtain access to resources and attend any relevant or refresher training courses.
 - Encourage a culture of listening to children and taking account of their wishes and feelings; this includes understanding the difficulties pupils may have in approaching staff about their circumstances and considering how to build trusted relationships that facilitate communication.
 - Support and advise staff and help them feel confident on welfare, safeguarding and child protection matters: specifically, to ensure that staff are supported during the referrals processes; and to support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.
 - Understand the importance of information sharing, including within school, with other schools, and with the safeguarding partners, other agencies, organisations and practitioners.
 - Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK GDPR.
 - Keep detailed, accurate, secure written records of concerns and referrals, and understand the purpose of this record-keeping.

The designated teacher has a responsibility for promoting the educational achievement of Looked After Children (LAC) and Previously Looked After Children (PLAC), and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales

7.6 The Designated Safeguarding Lead (DSL) with ultimate lead responsibility is:

Hannah Andrews, Designated Safeguarding Lead
(external: 01483 575101; internal 215)

DSL mobile contact 07508 916255

7.7 The Deputy Designated Safeguarding Leads are:

Mr Tony Breslin, Deputy Head (Pastoral)
(external: 01483575101; internal: 257)

Mrs Mary Price, Prep School Deputy Head
(external: 01483 796073; internal 289)

Mrs Kim Flack
Acting SENCO and Class Teacher (Prep)
(also Designated Safeguarding Lead for EYFS)
(external: 01483 796073; internal 254)

Mrs Emily Gibbons, Pastoral Officer
(external: 01483 575101; internal 273)

Mrs Lucy Burrell, Health Care Lead
(external: 01483575101; internal 233)

Mrs Heather Southwell, Assistant Head: Wellbeing & Transition
(external: 01483 575101; internal 207)

Mr Assaf De Coursey Arbiser, Head of IT and E-Safety Coordinator
(external: 01483 575101; internal 209)

7.8 The E-Safety Coordinator is:

Mr Assaf De Coursey Arbiser
(external: 01483 796058; internal 209)

7.9 The designated governor with responsibility for safeguarding and welfare is Dr Kate Jefferies (contactable via email at clerk@tormeadschool.org.uk) The designated governor for EYFS is Dr Caroline Kissin, and the designated governor with responsibility for online safety, is Miss Anna Spender (contactable via email at clerk@tormeadschool.org.uk). However, safeguarding - and its annual review - remains the responsibility of the governing body as a whole.

8. Recruitment

- 8.1 Tormead is committed to following safe recruitment procedures as set out in *KCSIE* and all staff recruited to the School will be subject to the appropriate identity, qualification and health checks. All new employees are made aware that online searches are being completed at the shortlisted stage. Please see the Recruitment, Selection and Disclosure Policy for further details.
- 8.2 A single central register is maintained by the Human Resources Officer to record all checks completed on staff, volunteers and governors.
- 8.3 Visitors to the school are required to sign in and out at reception, where they will be given an identity badge and signposted to safeguarding information. Appropriate controlled conditions are put in place for the supervision of visitors, with all external speakers supervised by a member of staff throughout their visit. Balance is sought in the recruitment of external speakers to ensure their suitability, whether invited by staff or pupils, and all speakers are vetted via an internet search before arrival.

Students are responsible for organising their own work experience placements. They have to upload details to Unifrog. The employers have to upload their insurance documents, confirm their risk assessment documents are up to date and the date they were last reviewed, and agree to their safeguarding responsibilities. Parents review the details and confirm their consent for the placement to go ahead. The School has the final check to ensure that health and safety, risk assessment and safeguarding procedures are in place, and approves or declines the placement. Placements where there will only be one adult present are declined by the School

- 8.5 Host families are used occasionally for foreign residential visits; these are recruited by an educational travel company on the School's behalf. On these occasions, the School requires a statement from the company organising the families to outline its procedures for selection. The host families are provided with a letter outlining our expectations for the visits and pupils are also given a document outlining our expectations for supervision which states clearly whom they should approach in the event of any concern. Tormead would not normally directly arrange host family accommodation for visiting pupils; however, in the event of its so doing, an enhanced DBS check (with barring information) would be requested for at least the host adult, the main carer.

9. Inspection

- 9.1 Upon inspection, the Independent Schools Inspectorate (ISI) will report on safeguarding arrangements.

10. Training

10.1 All staff (including the Head, temporary staff and volunteers)

10.1.1 Before commencing employment, all staff are required to attend an in-person Safeguarding Training session or watch a recording of a training session if they join part way through the year. All staff are required to complete additional safeguarding and Prevent training via an online training courses provider, on annual basis and read the following:

- i) Tormead's Safeguarding Policy (which includes information about the identity and role of the DSLs, along with their contact details as well as the safeguarding response to children missing education);
- ii) Part One, Part 5 and Annex B of *KCSIE*;
- iii) The Staff Code of Conduct;
- iv) The Staff E-Safety and Acceptable Use of IT Policy
- v) The Behaviour Policy; and
- vi) The Whistleblowing Policy (Part of the Employment Manual)

i.

10.1.2 Staff must sign to confirm that they have read and understood these documents and will abide by their guidance. They must also complete the Channel online general awareness module on identifying, challenging and responding to the threat of radicalisation as part of the Prevent strategy. Upon arriving, all staff must attend a live induction training session delivered by the Lead DSL; this is scheduled for induction day and cover online safety and the procedures for children missing education.

10.1.3 In addition to the above, all staff are regularly trained and updated on safeguarding matters, including online safety which includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring, whether it be at the start of each term or during staff meetings. Termly training is followed up with a quiz and all staff must sign and confirm that they have read and understood documents and will abide by their guidance. Annually, staff also complete several safeguarding training courses via the online training provider.

10.2 Governors

10.2.1 Governors receive safeguarding and child protection (including online) training at induction. Governors are required to watch a recording of a training session as well as read: Tormead's Safeguarding Policy (which includes information about the identity and role of the DSLs, along with their contact details); Part One, Part Two and Annex A of *KCSIE*; the Staff Code of Conduct; the Behaviour Policy; and the Whistleblowing Policy. They must sign to confirm that they have read and understood these documents and will abide by their guidance. Governors receive regular training updates provided by the DSL, to maintain their understanding of the signs and indicators of abuse. This training should equip governors with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the school are effective and support the delivery of a robust whole-school approach to safeguarding.

10.2.2 The Chair of Governors and those with responsibility for Safeguarding and EYFS must also complete the Channel online general awareness module on identifying, challenging and responding to the threat of radicalisation as part of the Prevent strategy or provide evidence of having completed its equivalent.

10.3 Sixth Formers

10.3.1 Sixth formers employed as late stay supervisors, coach stewards or sports coaches are required to watch a recording of a training session as well as read: Tormead's Safeguarding Policy (which includes information about the identity and role of the DSLs, along with their contact details); Part One, Part 5 and Annex B of *KCSIE*; the Staff Code of Conduct; the Behaviour Policy; and the Whistleblowing Policy. They must sign to confirm that they have read and understood these documents and will abide by their guidance. They must also complete the Channel online general awareness module on identifying, challenging and responding to the threat of radicalisation as part of the Prevent strategy.

10.4 Lead DSL & Deputy DSLs

10.4.1 The Lead DSL and Deputy DSLs will undergo the relevant Local Authority training in child protection and inter-agency training every two years as well as undertake training in the Prevent strategy, according to SSCP recommendation and provision. They will supplement this training with informal updates in the form of, for example, area network meetings and e-bulletins. At times, the DSL may designate certain responsibilities to Deputy DSLs with responsibility for particular areas in school. In Tormead, the DSL has delegated the role of Online Safety to the Deputy Head (Pastoral) and E-Safety Coordinator.

10.4.2 Ongoing training and child protection updates, including Prevent and online safety, are delivered at least termly via whole school staff meetings, in excess of SSCP advice, and electronic copies of the content delivered in these sessions are disseminated to all staff. Staff are updated each time *KCSIE* is updated. Furthermore, all staff are required to undergo live refresher training every three years following induction. Training is organised by the Lead DSL or the Deputy DSL, as appropriate, and accurate training records kept.

10.4.3 The Lead DSL and Deputy DSLs will help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that pupils, including those with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff. This could include:

- i. ensuring that the school, and staff, know who these pupils are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort;
- ii. supporting teaching staff to identify the challenges that pupils in this group might face and the additional academic support and adjustments that they could make to best support them.

11. Teaching Safeguarding & Online Safety

The school will adhere to the policies related to online safety at all times.

- 11.1 As part of a broad and balanced curriculum, pupils are taught about safeguarding including on-line safety through both curriculum and pastoral sessions, including PSHE/RSHE. In IT lessons, they are taught to use digital equipment safely and use the internet responsibly and they are asked to sign the appropriate (Prep or Senior) Pupils' E-Safety and Acceptable Use of IT Policy. This policy amongst other things sets out expectations regarding the use of mobile technology. We aim to help pupils to adjust their behaviour to reduce risks and build resilience via our pastoral programme, as well as PSHE/RSHE throughout the school. Pupils understand 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. They are encouraged to talk about any concerns they might have, whether for themselves or others, with the school Health Care Lead, Form Tutors, Heads of Year or School Counsellors: indeed, anyone on the staff/ volunteer body with whom they feel comfortable. Members of staff who have any queries about safeguarding with regard to curriculum content (for example, in drama or English texts) should discuss their concerns with a DSL.
- 11.2 As schools and colleges increasingly work online, it is essential that the pupils are safeguarded from potentially harmful and inappropriate online material. This is done via our Smoothwall filtering system. Weekly reports of flagged search terms are used to monitor internet usage and followed up by the E-Safety Coordinator. The Deputy Head (Pastoral) regularly reviews the effectiveness of filtering and monitoring systems and includes this review in termly reports to the Governing Body. However, the School recognises that overzealous blocking might lead to unreasonable restrictions upon learning and seeks to strike an appropriate balance, with pupils encouraged to take an appropriate level of responsibility for their own safety. Additional information is available in KCSIE Annex D on how to support keeping children safe online, including when they are online at home. Parental newsletters to parents reinforce the importance of children being safe online and advise parents on appropriate online use, as well as its use in school.
- 11.3 The School recognises 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.
- 11.4 The School ensures compliance with the DfE's 'filtering and monitoring standards for schools' by;
- Identifying and assigning roles and responsibilities to manage filtering and monitoring systems.
 - Reviewing the filtering and monitoring provision at least annually.
 - Blocking harmful and inappropriate content without unreasonably impacting teaching and learning.
 - Having effective monitoring strategies in place that meet our safeguarding needs.

11.5 Staff will be aware of the filtering and monitoring systems in place and will know how to escalate concerns where they are identified. Staff will be made aware of their expectations and responsibilities relating to filtering and monitoring systems during their induction.

11.6 The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- i. **Content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- ii. **Contact:** being subjected to harmful online interaction with other users; for example: child on child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes’.
- iii. **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
- iv. **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If it is felt that pupils, students or staff are at risk, this can be reported to the Anti-Phishing Working Group ().

11.7 The School will liaise with parents to reinforce the importance of children being safe online and the systems the School uses to filter and monitor online use. Parents and carers will be made aware of what their children are being asked to do online when undertaking remote learning, including the sites they will be asked to access and who from the School their child is going to be interacting with online.

11.8 Opportunities to teach safeguarding.

11.8.1 This includes covering relevant issues for schools through Relationships Education (for all primary pupils) and Relationships and Sex Education (for all secondary pupils). Schools have flexibility to decide how they discharge their duties effectively within the first year of compulsory teaching and are encouraged to take a phased approach (if needed) when introducing these subjects. Tormead has taught the full RSHE statutory requirements to all pupils from September 2020. The statutory guidance can be found via the link below: [Relationships Education, Relationships and Sex Education \(RSE\) and Health Education](#)

11.8.2 The Department has produced a one-stop page for teachers on GOV.UK, which can be accessed here: [Teaching about relationships, sex and health](#)

11.8.3 The following resources may help schools and colleges:

- i. DfE advice for schools: [Teaching Online Safety in Schools](#)
- ii. UK Council for Internet Safety (UKCCIS) guidance: [Education for a Connected World](#)

- iii. UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)
- iv. The UKCIS [external visitors guidance](#) will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors;
- v. National Crime Agency's CEOP education programme: [Thinkuknow](#)
- vi. Public Health England: [Every Mind Matters](#)
- vii. [Harmful online challenges and online hoaxes](#) - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support

12. Understanding and Identifying Abuse and Neglect

- 12.1 Abuse is defined as a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. 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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.
- 12.2 There are four main categories of abuse: physical, emotional, sexual and neglect. Abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another. Please see Appendix 2 for more detailed definitions and indicators.
- 12.3 The warning signs and symptoms of child abuse and neglect can vary from child to child. Disabled children may be especially vulnerable to abuse. Children also develop and mature at different rates so what appears to be worrying for a younger child might be normal behaviour for an older child. Parental behaviours may also indicate child abuse or neglect, so staff should also be alert to parent-child interactions which are concerning and other parental behaviours. This could include parents who are under the influence of drugs or alcohol or a sudden change in their mental health. By understanding the warning signs, we can respond to problems as early as possible and provide the right support and services for the pupil and their family. It is important to recognise that a warning sign does not automatically mean a child is being abused.
- 12.4 Staff should maintain an attitude of 'it could happen here' where safeguarding is concerned and should be particularly vigilant for indicators of concern for abuse:
- i. Significant changes in a pupil's behaviour - they may become aggressive, challenging, disruptive, withdrawn or clingy.
 - ii. Lack of concentration or deterioration in academic performance.
 - iii. Appearing to be tired or hungry.
 - iv. Unexplained bruising, marks or signs of possible physical abuse.
 - v. Unwillingness to change clothes in front of others or participate in physical activities.
 - vi. Shying away from touch or flinching at sudden movements.

- vii. Signs of neglect (unkempt, consistently poor hygiene, hungry, ill-fitting clothes, dirty appearance etc).
- viii. Comments which give cause for concern: e.g. being left home alone with inappropriate carers or strangers, unexplained concern for younger siblings, talking about running away.
- ix. Reluctance to go home after school or strong efforts to avoid specific family members or friends.
- x. Poor attendance or punctuality, consistent lateness in adults picking up or regularly missing school.
- xi. Parents collecting children when drunk or under the influence of drugs.
- xii. Parents who are dismissive or unresponsive to concerns.

12.5 See Appendix 2 for more detailed information.

13. Specific Safeguarding Issues

13.1 All staff have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk. (Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive. [UKCIS](#) provides detailed advice about sharing of nudes and semi-nude images and videos.) Please see Appendix 4 of this policy for further information relating to specific safeguarding issues and Appendix 5 for links to further information. Annex B of KCSIE holds further important information.

13.2 Special educational needs and difficulties (SEND)

13.2.1 Staff are aware that children with special educational needs and disabilities (SEND) can face additional challenges and may be particularly vulnerable to bullying and abuse. They are alive to the possibilities that:

- i. They may have an impaired capacity to resist or avoid bullying and abuse;
- ii. There might be an assumption without further exploration that indicators of possible bullying and abuse such as behaviour, mood and injury relate to the child's disability;
- iii. Children with SEND might be disproportionately impacted upon by behaviours such as bullying and abuse, without outwardly showing any signs; and
- iv. They may have speech, language and communication needs which may make it difficult to tell others what is happening.

13.3 Children who are lesbian, gay, bi, or trans (LGBT)

13.3 1 The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

13.3.2 Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

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

13.4 Youth-produced sexual imagery / Sexting

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

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

13.4.3 If a member of staff becomes aware of an incident involving youth produced sexual imagery s/he should follow the child protection procedures and refer to a DSL as soon as possible. The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. It should then be handed to the DSL. Staff should not view, copy or print the youth-produced sexual imagery. If the situation does not require police involvement, the DSL will return the device but ask the pupil/ parent to delete the image(s).

13.4.4 The DSL will investigate by speaking to the pupil involved (if appropriate). Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving them would put the pupil at risk of harm. At any point in the process if there is concern that a young person has been harmed or is at risk of harm, or if an adult is involved, a referral should be made to the Surrey Children's Single Point of Access (SPA) or the police as appropriate.

13.4.5 The DSL may use their professional judgement to assess the risk to the pupil involved and may decide to respond to the incident without escalation to the SPA or the police. If any of these circumstances outlined below are present the situation will be escalated according to our child protection procedures, including reporting to the police or children's social care. Otherwise, the situation will be managed within the School.

- i. The child is under 13;
- ii. There is a significant age difference between the sender/receiver;
- iii. There is any coercion or encouragement beyond the sender/receiver;
- iv. The imagery was shared and received with the knowledge of the child in the imagery;
- v. The child is more vulnerable than usual i.e. at risk;
- vi. There is a significant impact on the children involved;
- vii. The image is of a severe or extreme nature;
- viii. The child involved understands consent;

- ix. Whether the situation is isolated or the image has been more widely distributed;
- x. There are other circumstances relating to either the sender or recipient that may add cause for concern i.e. difficult home circumstances;
- xi. The pupil has been involved in incidents relating to youth-produced imagery before;

13.5 Child sexual exploitation (CSE) and Child Criminal Exploitation (CCE)

13.5.1 Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

13.5.2 Child Sexual Exploitation and Child Criminal Exploitation do not always involve physical contact; it can also occur through the use of technology. There are clear links between both online safety and regular absence or truanting and the risks of CSE and/or CCE. The indicators of CSE and CCE are set out in Appendix 4. More information included definitions and indicators are included in Annex A.

13.6 Child Criminal Exploitation (CCE):

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

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

13.6.3 It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

13.7 Child Sexual Exploitation (CSE):

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

13.6.2 CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

13.6.3 CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

13.6.4 Any concerns that a pupil is being or is at risk of being sexually exploited should be reported according to normal child protection procedures to a DSL, who will then use the SSCP's CSE Screening Tool on all occasions when there is a concern that a pupil is being or is at risk of being sexually exploited. In all cases if the tool identifies any level of concern (green, amber or red) the DSL will refer to the SPA. If a child is in immediate danger the police should be called on 999.

13.7 Homelessness

13.67.1 Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL is aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

13.17 Female genital mutilation (FGM)

13.17.1 Female genital mutilation is a form of child abuse and violence against women which is illegal in England and Wales. Whilst all staff should speak to a DSL with regard to any concerns about female genital mutilation (FGM), there is a specific **legal** duty on **teachers**. If a **teacher**, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a pupil under the age of 18, the teacher **must** report this to the police. **See Annex A** for further details. The duty to make a report applies to the individual who becomes aware of the case: it should not be transferred to the DSL; however, a DSL should be informed and discuss the case with children's social care as appropriate.

13.17.2 If a teacher is informed by a pupil under 18 that an act of FGM has been carried out on them or a teacher observes physical signs which appear to show that an act of FGM has been carried out on a pupil under 18 and they have no reason to believe the act was necessary for the young person's physical or mental health or for purposes connected with labour or birth, the teacher should personally make a report to the police force in

which the pupil resides by calling 101. The report should be made by the close of the next working day.

13.17.3 School staff are trained to be aware of risk indicators of FGM which are set out in Appendix 4. Concerns about FGM outside of the mandatory reporting duty should be reported according to normal child protection procedures. Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including dialling 999 if appropriate.

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

13.18 Domestic Abuse

13.18.1 Domestic Abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected”.

13.18.2 Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home.

13.18.3 All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. 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). Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

13.18.4 Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as ‘teenage relationship abuse’. Depending on the age of the young people, this may not be recognised in law under the statutory definition of ‘domestic abuse’ (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

13.18.5 Living in a home where domestic abuse takes place is harmful to children and can have a serious impact on their behaviour, wellbeing and understanding of healthy, positive relationships. Children who witness domestic abuse and /or suffer it in an intimate personal relationship are at risk of significant harm.

13.18.6 Tormead School is a member of the SSCP's Operation Encompass scheme, a joint project between Surrey Police, Surrey Domestic Abuse Service and Surrey settings. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the DSL in the setting before the child or children arrive at the setting the following day. This ensures that the setting has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs.

13.19. Child-on-Child Abuse

13.19.1 In most instances, the conduct of pupils towards each other will be covered by our Behaviour and Anti-Bullying Policies. However, some allegations may be of such a serious nature that they may raise safeguarding concerns. All staff at Tormead recognise that children are capable of abusing other children and their peers, that it can happen both inside and outside of school as well as online, and are clear about Tormead's policy and procedures with regard to child-on-child abuse. Even if there are no reports in school it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse they should speak to a DSL.

13.19.2 **All** staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

13.19.3 **All** staff are aware that safeguarding issues can manifest themselves via child-on-child abuse. This is most likely to include, but may not be limited to:

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

- vii. Consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
- viii. Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- ix. Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

13.19.4 All staff are clear as to the school's policy and procedures with regards to child-on-child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

13.19.5 Tormead staff recognise the gendered nature of child-on-child abuse (i.e. that it is more likely that girls will be victims and boys perpetrators), but nevertheless is clear that all child-on-child abuse is unacceptable and will be taken seriously. Abuse is abuse and it will not be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up'. Where allegations of abuse or assault have been made against one or more Tormead pupils, a thorough risk assessment of the situation and risk-based decision-making (with the benefit of the advice of statutory authorities, where appropriate) will be carried out with a view to ensuring the safety of all pupils and that both alleged victims and perpetrator are treated as 'at risk' and receive appropriate support. This may take the form of follow up meetings with pastoral staff, referral to the school or external counselling provision, and/ or suggestions for early help strategies.

13.19.6 Allegations of child-on-child abuse will be investigated, recorded and dealt with in line with procedures set out in Tormead's Anti-Bullying Policy. Please also refer to this policy for details of how victims, perpetrators and any other child affected will be supported. All allegations will be recorded in the School's Bullying Log.

13.19.7 If there is reasonable cause to suspect that a pupil is suffering, or likely to suffer, significant harm, a DSL should be contacted; she/he will involve the SSCP and/or the Police as necessary, where it is clear that a crime has been committed or there is a risk of crime being committed. If pupils from other schools are involved, the other schools will be informed. The School will work with external agencies in order to respond to the unacceptable behaviour. If a pupil's behaviour negatively impacts upon the safety and welfare of other pupils then safeguards will be put in place to promote the wellbeing of the pupils affected and the victim and perpetrator will be provided with support, as outlined in the School's Anti-Bullying Policy.

13.19.8 Tormead School has a number of procedures in place to promote positive behaviour and relationships and minimise the risk of child-on-child abuse. These include but are not restricted to:

- i. Our ethos and values which prioritise respect and dignity;
- ii. High expectations of behaviour as set out in the Pupils' Code of Conduct and the Pupils' E-Safety and Acceptable Use of IT Policies;
- iii. Peer support schemes;
- iv. Encouragement of open relationships with staff, especially those in pastoral and welfare roles;
- v. Developmentally appropriate curriculum content delivered via IT and PSHE lessons.

- vi. Provide preventative education by creating a culture of zero tolerance for sexism, misogyny/ Misandry, homophobia, biphobia and sexual violence and sexual harassment.

13. 20 Sexual Violence and Harassment

13.20.1 Sexual violence and sexual harassment can occur between two children, or a group of children. Both sexes may be affected, although girls are more likely to be victims of sexual violence, and boys are more likely to be perpetrators of sexual harassment. Children with SEND are likely to be more vulnerable. All staff are clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable and it will not be tolerated.

- i. Sexual violence refers to rape, assault by penetration or sexual assault.
- ii. Sexual harassment includes such things as sexual comments; sexual jokes; physical behaviour such as deliberately brushing against someone, or displaying photos of a sexual nature; and online activity including sharing of images or video (sexting) or making inappropriate sexual comments (Note - this list is not exhaustive).

13.20.2 Harmful sexual behaviours (HSB) in children are those which are inappropriate, problematic, abusive and violent. When considering harmful sexual behaviour, the ages and developmental stages of the children involved should be considered.

13.20.3 Inappropriate language and behaviour will never be passed off as “banter”, “just having a laugh”, “a part of growing up” or “boys being boys”. We believe that failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.

13.20.4 All staff are aware of the scale of harassment and abuse and that even if there are not reports it does not mean it is not happening, it may be the case that it is just not being reported.

13.20.5 Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, adult students and school and college staff are supported and protected as appropriate. Tormead staff are trained in taking and responding to a disclosure of child sexual violence and harassment. Further information are in Appendix 4 of this policy.

13.21 Physical Abuse

13.21.1 While a clear focus of child-on-child abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from children to children can also be abusive.

13.21.2 These are equally not tolerated and if it is believed that a crime has been committed, will be reported to the Police.

13.21.3 The principles from the anti-bullying policy will be applied in these cases, with recognition that any Police investigation will need to take priority.

13.22 Anti-bullying

13.22.1 Our school policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. This includes all forms e.g. cyber, racist, homophobic and gender-related bullying. The Deputy Head (Pastoral) maintains a record of known bullying incidents within the Senior School; the Deputy Head of the Prep School maintains the record of incidents within the Junior School.

13.22.2 Staff should inform the Head of Year and act with reference to the Anti-Bullying Policy to address the situation should they become aware that a pupil has either sent or received inappropriate messages or been involved in inappropriate 'banter'. As outlined in the Anti-Bullying Policy, our emphasis in addressing conflict between pupils is on mediation and a 'no-blame' approach, with support given to both parties; however, it may be that sanctions are deemed necessary.

13.23 Gangs and serious youth violence

13.23.1 A gang is defined as a group of young people, especially young men, who spend time together, often fighting with other groups and behaving badly. Youth violence refers to harmful behaviours that can start early and continue into young adulthood. The young person can be a victim, an offender, or a witness to the violence. Youth violence includes various behaviours including some violent acts such as bullying, slapping, or hitting. These behaviours can cause more emotional harm than physical harm. Others, such as robbery and assault (with or without weapons) can lead to serious injury or even death.

13.23.2 Some indicators that a young person may be at risk from or involvement with serious violent crime may include:

- i. Increased absence from school;
- ii. A change in friendships or relationships with older individuals or groups;
- iii. A significant decline in performance;
- iv. Signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.
- v. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

13.23.3 The range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

13.24. Radicalisation, Extremism and Terrorism

- 13.24.1 Tormead School recognises its obligations under The Prevent Duty for England and Wales to have due regard to the need to prevent people from being drawn into terrorism.
- 13.24.2 Extremism is defined as ‘vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs’. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas. We seek to protect our pupils against the messages of all violent extremism including, but not restricted to, those linked to: Islamist ideology; far right / neo-Nazi / white supremacist ideology; Irish nationalist and loyalist paramilitary groups; and extremist animal rights movements.
- 13.24.3 Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes with an electronic system. The use or threat **must** be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.
- 13.24.4 School staff receive training to help identify early signs of radicalisation and extremism. Indicators of vulnerability to radicalisation are in detailed in Appendix 4. When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should follow normal safeguarding procedures and speak with a DSL in the first instance. If, however, the pupil is in danger or at risk of harm, then the police should be contacted immediately by dialing 999. The Surrey Police Prevent Supervisor can be contacted for advice (01483 632982 or 07795 043842 or claire.mcdonald@surrey.pnn.police.uk) as can the Surrey Prevent PC (01483 631565 or 07967 988988 or charles.harris@surrey.pnn.police.uk) and the DfE has also set up dedicated helplines for staff and governors for advice regarding extremism (020 7340 7264 or counter.extremism@education.gov.uk).

13.25 Children Absent from Education

- 13.25.1 The school will maintain vigilance over attendance and absence; staff are aware that a child going missing from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation.
- 13.25.2 Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual abuse and child criminal exploitation-particularly county lines. The School’s response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children’s social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.
- 13.25.3 The Lead DSL and Deputy Head (Pastoral) will monitor unauthorised, unexplained or prolonged absences and take appropriate action. Tormead School works cooperatively with the local authority in making returns for the admissions and departures of all pupils below compulsory school age at both standard and non-standard transitions.

13.25.4 Upon joining the School, parents provide details of two emergency contact numbers for each pupil, at least one of which will be a parent with whom the young person normally lives with. Where reasonably possible, parents may provide more than two emergency contact numbers and this is good practice when a child is identified as a welfare or safeguarding concern.

13.25.5 Please refer to the School Attendance and Pupil Absence Policy for further details.

13.26 Looked After Children and Previously Looked After Children

13.26.1 The most common reason for children becoming looked after is as a result of abuse and/or neglect. Should Tormead enrol a looked after child, the DSL will ensure that we have the information necessary in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The DSL should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

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

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

13.27 Mental Health

13.27.1 Schools and colleges have an important role to play in supporting the mental health and wellbeing of their pupils. All staff, temporary staff and volunteers are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

13.27.2 Only appropriately trained professionals will attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

13.27.3 Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Our governing body and proprietors ensure school has clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

- 13.27.4 Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.
- 13.27.5 If staff have a mental health concern about a pupil that is also a safeguarding concern, immediate action will be taken, following our child protection policy and speaking to the designated safeguarding lead or a deputy.
- 13.27.6 The Department has published advice and guidance on [Preventing and tackling bullying, mental health and behaviour in schools](#). The Mental Health and Behavior in Schools guidance sets out how schools and colleges can help prevent mental health problems by promoting resilience as part of an integrated, whole school/college approach to social and emotional wellbeing, which is tailored to the needs of their pupils.
- 13.27.7 Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the [Mental Health and Behaviour in Schools Guidance](#). Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children including its guidance [Promoting children and young people's emotional health and wellbeing](#). Its resources include social media, forming positive relationships, smoking and alcohol. See [Rise Above](#) for links to all materials and lesson plans. The Department has also published, [Every interaction matters](#), a pre-recorded webinar which provides staff with a simple framework for promoting wellbeing, resilience, and mental health. This sits alongside our [Wellbeing for education recovery](#) program content, which covers issues such as bereavement, loss, anxiety, stress and trauma.

13.28 Safeguarding Incidents and/or Behaviours.

- 13.28.1 Safeguarding incidents and/or behaviours can be associated with factors outside school and/or can occur between children outside Tornead. All staff, but especially the designated safeguarding lead (or deputy) will consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.
- 13.28.2 Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm. Additional information is available here: [Contextual Safeguarding](#).

14. Children Potentially at Greater Risk of Harm

- 14.1 Children who need a social worker (Child in Need and Child Protection Plans)
- 14.2 Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.
- 14.3 Local authorities should share the fact a child has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children.
- 14.4 Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).
- 14.5 Findings from the Children in Need review, ['Improving the educational outcomes of Children in Need of help and protection'](#) contains further information; the conclusion of the review, ['Help, protection, education'](#) sets out action Government is taking to support this.

15. Listening to Children and Early Help

- 15.1 Early help means providing support as soon as any needs emerge or are identified. All staff should be prepared to identify pupils who display emerging problems and may benefit from early help. In the first instance, staff should discuss early help requirements with the Head of Year; however, they should refer directly to a DSL in the event of a safeguarding concern. Staff may be required to support other agencies and professionals in an early help assessment.
- 15.2 The School encourages a culture of openness between pupil and staff. Posters in each form room list staff members whom pupils could approach; the School Health Care Lead and Counsellors are available for all pupils to access; Peer Mentors and Supportive Friends offer support from other pupils; and Form Tutors build strong relationships with their tutees via daily contact and half termly 1:1 meetings. Through these systems, we encourage a culture of listening to children.
- 15.3 Early help within School may take a number of different forms; in addition to the listening support services detailed above, we offer, for different year groups, yoga classes and mindfulness. Discussion will take place between the staff member concerned and the DSL to determine which course of action would be most appropriate and parents will be involved where possible.

15.4 Early help which involves external agencies may involve sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment. Advice can also be sought directly via an Early Help Co-Ordination Hub; the appropriate hub to contact is decided by the address at which the pupil in question lives. The contact numbers are:

- i. South West Hub (Guildford and Waverley) – 01483 519722
- ii. South East Hub (Tandridge, Reigate & Banstead, Mole Valley) – 01737 733944
- iii. North East Hub (Spelthorne, Elmbridge, Epsom & Ewell) – 01372 833133
- iv. North West Hub (Runnymede, Woking, Surrey Heath) – 01932 795522

15.5 **Any** child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:

- i. Is disabled and has specific additional needs;
- ii. Has special educational needs (whether or not they have a statutory education, health and care plan);
- iii. Is a young carer;
- iv. Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- v. Have family members in prison, or are affected by parental offending
- vi. Is frequently missing/goes missing from care or from home;
- vii. Is misusing drugs or alcohol themselves;
- viii. Is at risk of modern slavery, trafficking or exploitation;
- ix. Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse; has returned home to their family from care;
- x. Is showing early signs of abuse and/or neglect;
- xi. Is showing signs of fragile mental health;
- xii. Is at risk of being radicalised or exploited; is a privately fostered child;
- xiii. Are at risk of Female Genital Mutilation(FGM) or forced marriage;
- xiv. Are persistently absent from education, including persistent absences for part of the school day;
- xv. Show early signs of abuse and/or neglect in other ways.

16. Multi-Agency Working & Sharing and Withholding Information

16.1 Tormead will work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to multi-agency plans to provide additional support to children subject to child protection plans. The School allows access for children's social care from the host local authority and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment. Multi-agency working and

information sharing are vital in identifying and tackling all forms of abuse and clearly especially important to identify and prevent child sexual exploitation.

- 16.2 As part of meeting a child's needs, it is important to recognise the importance of information sharing between professionals and local agencies, which is an intrinsic part of any practitioner's role. Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. Schools and colleges have clear powers to share, hold and use information for these purposes. Whilst the Data Protection Act 2018 and the General Data Protection Regulation place duties on organisations and individuals to process personal information fairly and lawfully, this is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.
- 16.3 Decisions about how much information to share, with whom and when can have a profound impact on people's lives. Staff should weigh up what might happen if the information is shared against the consequences of not sharing the information. Early sharing of information is key to providing effective early help where there are emerging problems. At the other end of the continuum, sharing information can be essential to put in place effective child protection services. In the event of any queries regarding the sharing of information, staff should speak to a DSL.
- 16.4 Relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR.
- 16.5 This includes:
- i. Being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'.
 - ii. Understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
 - iii. For schools not to provide pupils' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, school must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the GDPR.
- 16.6 Further details on information sharing can be found:
- i. In Chapter one of Working Together to Safeguard Children, which includes a myth-busting guide to information sharing.
 - ii. At Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers. The seven golden rules for sharing

information will be especially useful [‘Information Sharing Advice for Practitioners’ \(DfE 2018\) guidance](#).

- iii. At The Information Commissioner’s Office (ICO), which includes ICO GDPR FAQs and guidance from the department.
- iv. In Data protection: toolkit for schools - Guidance to support schools with data protection activity, including compliance with the GDPR. <https://www.gov.uk/government/publications/data-protection-toolkit-for-schools>

17. Procedures

17.1 Child protection is the responsibility of every member of the Tormead staff. We all have a responsibility to protect our pupils from any form of abuse or significant harm and to provide a safe environment in which our pupils can learn. We therefore also have a responsibility to identify pupils who may be in need of early help or who are suffering, or are likely to suffer, significant harm and then to take appropriate action accordingly, working with other agencies as necessary. We must therefore all be alert to the possible signs of abuse and, if we have any concerns, report these according to the procedures below as soon as possible and certainly within 24 hours.

17.2 Staff conduct

17.2.1 Staff should be aware of, and abide by, the protocols set out in the Staff Code of Conduct and Staff E-safety and Acceptable Use of IT Policy, both of which can be found in the Employment Manual. They should be aware of the signs of abuse or neglect so that they are able to identify cases of pupils who may be in need of help or protection. They are advised to maintain an attitude of ‘it could happen here’ where safeguarding is concerned and always act in the best interests of the pupil when concerned about their welfare. Knowing what to look for is vital to the early identification of abuse and neglect. Types of abuse are detailed in Appendix 2 of this document but if staff members are unsure they should always speak to a DSL or children’s social care (please see Appendix 1 for contact information).

17.2.2 All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.

17.2.3 Staff are advised to ensure that their behaviour and actions do not place pupils or themselves at risk of harm or of allegations of harm. For their own safety and protection, staff should exercise caution in situations where they are alone with pupils. Most teaching rooms have clear and unobstructed glass panels in the doors; where this is not the case, the door to the room in which the 1:1 coaching, counselling or meeting is taking place should be left open.

17.2.4 School staff should also be alert to the possible risks that might arise from social contact with pupils outside of the School. Home visits to pupils or private tuition of pupils should only take place with the knowledge and approval of the pupil’s parents or carers and the Head. Similarly, visits/telephone calls by pupils to the homes of staff members should only occur in

exceptional circumstances and with the prior knowledge and approval of the Head. Contact with pupils on social media should be avoided.

17.2.5 Any unplanned contact of this nature or suspected infatuations or “crushes” must be reported to the Head. Staff should only use school communication systems with pupils or parents/carers, and only communicate with them on appropriate school business. Staff should not disclose their personal telephone numbers and home email addresses to pupils or parents. Staff supervising off-site activities or school journeys will be provided with a school mobile telephone as a point of contact for parents and carers.

17.2.6 Pupils in EYFS must only be photographed with the school’s owned Ipads and cameras. When teaching EYFS in their setting, staff must leave their mobile devices outside the setting (wherever that may be). Any staff who have mobile phones in the ground floor building of the EYFS setting, must store their phone in the locked room of that building. Parents are not permitted to take photographs at any events involving pupils in Reception. External companies may occasionally be used to take photographs/ video footage of pupils in EYFS; in these cases, the company in question should provide documentation making clear the date on which these images will be permanently deleted from their files.

17.3 Whistleblowing

17.3.1 Tornead is committed to establishing a culture of safety and raising concerns, where staff feel valued and practice reflectively. We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so. All staff and volunteers should feel able to report concerns, including those relating to poor or unsafe practice and/or potential failures in the School’s safeguarding regime. Staff should know that such concerns will be taken seriously by the Executive Group and that there exists provision for mediation and dispute resolution where necessary. If staff have any concerns regarding safeguarding, then they should take action in accordance with the School’s Whistleblowing Policy which outlines the stages of the process. Our aim is to create a culture of transparency and accountability in relation to how concerns are received and handled.

17.3.2 Where a staff member feels unable to raise an issue or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- i. General guidance can be found at [Advice on Whistleblowing](#).
- ii. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 from 8:00am to 8:00pm, Monday to Friday and email: help@nspcc.org.uk

18. Reporting Concerns

18.1 If staff have any concerns about a child’s welfare, they should act on them immediately, following Tornead’s Safeguarding Policy and speaking to a DSL. It is important that children receive the right help at the right time to address risks and prevent issues escalating; therefore it is important to act on and refer the early signs of abuse, neglect or radicalisation, keep clear records, listen to views of the child, reassess concerns when situations do not improve, share information quickly and challenge inaction. Research and Serious Case Reviews have repeatedly shown the dangers of failing to take effective action. Poor practice includes: failing

to act on and refer the early signs of abuse and neglect; poor record keeping; failing to listen to the views of the child; failing to re-assess concerns when situations do not improve; sharing information too slowly; and a lack of challenge to those who appear not to be taking action.

18.2 Any member of staff has the right to refer a case, should they feel they need to. They should contact the SPA, which is the single point of contact for reporting concerns about the safety of a child or young person, contactable via telephone: 0300 470 9100 or email: cspa@surrey.gov.uk.

18.3 Outside the hours of 9.00am-5.00pm Monday to Friday then calls should be made to the Emergency Duty Team (01483 517898) or the NSPCC (0808 8005000). The police can be contacted on 101 for non-urgent situations and 999 in an emergency. See Appendix 1 for full list of contact details. The SPA can also be contacted for informal advice on borderline cases. However, staff are encouraged where possible to follow the reporting procedures outlined below.

18.4 If the issue relates to, or arises, on a school-related activity out of normal school hours then the expectation is that a supervising member of staff would take appropriate action, in consultation with the duty officer as necessary.

18.5 Initial disclosure

18.5.1 When taking disclosures from pupils, staff:

- i. Must not ask leading questions and must limit questioning to the minimum necessary to seek clarification only.
- ii. Must not investigate the allegation themselves; this could prove detrimental to a later investigation.
- iii. Must not take a decision as to whether or not abuse has in fact taken place.
- iv. Must not give a guarantee of confidentiality as this may not be in the best interests of the pupil. Explain to the pupil involved that the information will need to be passed to a DSL who will ensure that the correct action is taken. Reassure them that the information will only be passed to the minimum number of people who must be told and have a clear need to know.
- v. Must keep a record of the conversation via CPOMS and sharing with the DSL using the alert function. The record should include the date of the conversation and the essence of what was said and done by whom and in whose presence. The record should use the pupil's own words where possible.
- vi. Any other evidence should be safeguarded and preserved.
- vii. Should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

18.6 If staff have a concern about a pupil:

18.6.1 If staff members have any concerns about a pupil, they should act on them immediately by following Tormead's Safeguarding Policy. Where possible, there should be a conversation

with a DSL to agree a course of action, although any staff member can make a referral to children's social care. Options will then include:

- i. Managing any support for the child internally via Tormead's pastoral support processes
- ii. An early help assessment
- iii. Referral to specialist services in accordance with the referral threshold set by the Local Safeguarding Children Partnership. A copy of the Levels of Need document can be accessed on the school secure drive.

18.6.2 Staff should not assume that another colleague will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision. *Information sharing* supports staff who have to make decisions about sharing information. This advice includes the seven golden rules for sharing information.

18.6.3 If anyone other than a DSL makes the referral, they should inform a DSL as soon as possible. The local authority should make a decision within one working day of a referral being made about what course of action they are taking and should let the referrer know the outcome. Staff should follow up on a referral should that information not be forthcoming.

18.6.4 If, after a referral, the pupil's situation does not appear to be improving, the DSL (or the person who made the referral) should press for reconsideration to ensure their concerns have been addressed and, most importantly, that the pupil's situation improves.

18.6.5 If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. Any such cases should be kept under constant review and consideration given to a referral to children's social care for assessment for statutory services, if the child's situation does not appear to be improving or is getting worse.

18.6.6 Where a pupil and family would benefit from early help, involving co-ordinated support from more than one agency (for example education, health, housing, police) there should be an inter-agency assessment to identify what help the family require to avoid reaching the point of intervention under the Children Act 1989. This may involve use of the Common Assessment Framework (CAF) and Team Around The Child (TAC) approaches. The early help assessment should be undertaken by the lead professional working with the family. In some instances, this may be the school.

18.6.7 See Appendix 3 for a flowchart setting out the process for staff when they have concerns about a pupil.

18.7 If pupil is in danger or at risk of harm

18.7.1 If a pupil is in immediate danger or at risk of harm, a referral should be made to the Surrey SPA and/or the police immediately. Anyone can make a referral. Where referrals are not made by a DSL, a DSL should be informed as soon as possible that a referral has been made. If the pupil's situation does not appear to be improving, the staff member with concerns should press for re-consideration. Concerns should always lead to help for the pupil at some point.

18.8 Record Keeping

18.8.1 All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing using CPOMS. Information will be kept confidential and stored securely. Records should include:

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

18.8.2 If in doubt about recording requirements, staff should discuss with a DSL.

18.9 Action by the DSL

18.9.1 The DSL will take a decision whether to refer to children's social care, though it is important to note that any staff member can refer. The action to be taken will take into consideration the thresholds set out by the SSCP's Effective Family Resilience Model:

- i. Universal - Personalised universal services.
- ii. Early Help - Additional needs met by universal and targeted services working together. Early Help Assessment not required but can be used.
- iii. Targeted Help - Multi-agency approach required using Early Help Assessment and Lead Professional Family team response.
- iv. Specialist - Specialist and high lever interventions often involving
- v. Statutory process

18.9.2 The DSL will also take into account:

18.9.3 The nature and seriousness of the suspicion or complaint. A complaint involving a serious criminal offence will always be referred to the SPA or the police without further investigation within the School.

18.9.4 The wishes of the pupil who has disclosed, provided that the pupil is of sufficient understanding and maturity and properly informed. This may depend upon whether or not the pupil is herself the victim or has disclosed concerns about another pupil but action will always be taken with the best interests of the pupil in mind.

- i. The wishes of the pupil's parents, provided they are properly informed, are not part of the issue, and have no interest which is in conflict with the pupil's best interests (NB: There is no requirement for this; if the grounds for suspecting significant harm are strong enough a referral should be made without parental consultation)
- ii. The risk to the pupil concerned.
- iii. The interests of the school community as a whole including its employees.
- iv. The local authority should make a decision, within one working day of a referral being made, about the type of response that is required and should let the referrer know the outcome. This will include determining whether:

- a. The child requires immediate protection and urgent action is required; whether the child is in need, and should be assessed under section 17;
 - b. There is reasonable cause to suspect the child is suffering, or likely to suffer, significant harm, and whether enquiries must be made and the child assessed under section 47;
 - c. Any services are required by the child and family and what type of services; and
 - d. Further specialist assessments are required in order to help the local authority to decide what further action to take.
- v. There is a difference between safeguarding pupils who have suffered or are likely to suffer significant harm and those who are in need of additional support in the form of early help from one or more agencies. If there is room for doubt as to whether a referral should be made, the DSL may consult with professionals via the C-SPA without identifying the family. However, as soon as sufficient concern exists that a child may be at risk of significant harm, a referral to the C-SPA will be made immediately.
 - vi. It is important to note that although decisions to support a pupil in need would normally be taken in consultation with parents and pupils, there is no need for their consent where there are reasonable grounds to believe that a pupil is at risk of significant harm.
 - vii. Safeguarding concerns and allegations of abuse made about staff, including supply teachers, volunteers and contractors
 - viii. Staff members must immediately report a concern that a teacher or member of staff (including temporary / supply staff and volunteers, the Head and the DSLs), has:
 - ix. Behaved in a way that has harmed a child, or may have harmed a child and/or;
 - x. Possibly committed a criminal offence against or related to a child; and/or
 - xi. Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
 - xii. Behaved or been involved in an incident outside of a setting which did not involve children but could impact on their suitability to work with children.
 - xiii. Whilst some behaviours may not constitute a criminal offence, and some may not reach the threshold of significant harm, consideration will need to be given as to whether they may indicate unsuitability to work with children. These include concerns relating to inappropriate relationships between members of staff and children or young people, for example:
 - Having a sexual relationship with a child under 18 if in a position of trust in respect of that child, even if consensual;
 - 'Grooming' i.e. meeting a child under 16 with intent to commit a relevant offence;
 - Other 'grooming' behaviour giving rise to concerns of a broader child protection nature e.g. inappropriate text/ e-mail messages or images, gifts, socialising etc;

18.9.5 A concern should be reported **immediately** to the Head or, in his absence, to the Chair of Governors, (contactable via email at clerk@tormeadschool.org.uk). If the concern involves the Head, it should be reported to the Chair of Governors (contact as above).

18.9.6 The governing body ensures there are procedures in place to manage safeguarding concerns, or allegations against staff (including supply staff and volunteers) that might indicate they would pose a risk of harm to children.

18.9.7 Concerns including allegations that may meet the harms test should be addressed as set out in Part four KCSIE 2023.

18.9.8 When informed of a concern or allegation, the Head/Chair of Governors will not investigate the matter or interview the member of staff, child concerned or potential witnesses without prior consultation with the LADO, or in the most serious cases, the police, so as not to jeopardise statutory investigations. Instead, he/she will:

- i. Obtain written details of the concern/allegation, signed and dated by the person receiving (not the child/adult making the allegation);
- ii. Countersign and date the written details;
- iii. Record any information about times, dates and location of incident(s) and names of any potential witnesses;
- iv. Record discussions about the child and/or member of staff, any decisions made, and the reasons for those decision.

18.9.9 Within one working day, and as part of their mandatory duty, contact will be made with the local authority designated officer (LADO: 0300 123 1650) to discuss any allegation, to consider the nature, content and context of the allegation and to agree a course of action including any involvement of the police. Discussions should be recorded in writing, and any communication with both the individual and the parents of the pupil/ pupils agreed. GDPR will not stand in the way of safeguarding children. If an allegation requires immediate attention, but is received outside normal office hours, the Head/ Chair of Governors should consult the Children's Services Emergency Duty Team or the local police and inform the LADO as soon as possible. In borderline cases, discussions with the LADO may be held informally and without naming the school or individual.

18.9.10 Where an allegation is against the Head, he must not be informed of the allegation prior to contact with the Chair of Governors and the LADO.

18.9.11 Allegations against a teacher who is no longer teaching will be referred to the police. Historical allegations of abuse will also be referred to the police. The School recognises the importance of acting both quickly and fairly, and of striking a balance between the need to protect pupils from abuse and the need to protect staff and volunteers from false or unfounded allegations. A School employee who is the subject of an allegation may be asked to take leave of absence or may be suspended pending the outcome of an investigation; however, careful consideration will be given to the possibility of implementing alternative arrangements until the case is resolved and due weight will be given to the views of the LADO, KCSIE and WT when making a decision about suspension. All options to avoid suspension will be considered prior to taking this step.

18.9.12 Individuals who are subjects of allegations will be supported fully to manage the stress inherent within the allegation process. They will be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless there is an objection by children's social care or the police. The individual would be advised to contact their trade union representative, if they have one, or a colleague for support.

18.9.13 If suspended, the member of staff would be provided with a named representative to keep the person who is the subject of the allegation informed of the progress of the case and consider what other support might be appropriate. Particular care would be taken when

employees are suspended to ensure that they are kept informed of both the progress of their case and current work-related issues. Social contact with colleagues and friends would not be prevented unless there were evidence to suggest that such contact would be likely to be prejudicial to the gathering and presentation of evidence.

18.9.14 If an allegation is made, the School will make every effort to maintain confidentiality and guard against unwanted publicity while the allegation is being investigated or considered up to the point where the accused person is charged with an offence or the DfE/ Teaching Regulation Agency (TRA) publish information about an investigation or decision in a disciplinary case arising from the allegation. Apart from keeping the child, parents and accused person up to date with progress of the case, information should be restricted to those who have a need to know in order to protect children, facilitate enquiries, manage related disciplinary or suitability processes.

18.9.15 Tormead will report promptly to the DBS anyone (whether employed, contracted, a volunteer or a student) whose services are no longer used for regulated activity who has met the criteria for DBS referral: that is, they have caused harm, or posed a risk of harm, to a child.

18.9.16 Ceasing to use a person's services includes: dismissal; non-renewal of a fixed-term contract; no longer engaging/refusing to engage a supply teacher provided by an employment agency; terminating the placement of a student teacher or other trainee; no longer using staff employed by contractors; no longer using volunteers; resignation; and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training, or volunteering. Reports will include as much evidence about the circumstances of the case as possible. The School is aware that failure to make a report when required constitutes an offence. 'Compromise agreements' will not be used to prevent a referral being made to the DBS when it is legally required, nor will an individual's refusal to cooperate with an investigation. Proprietors of independent schools have a legal duty to respond to requests from the DBS for information they hold already, but they do not have to find it from other sources.

18.9.17 Tormead will also consider making a referral to the TRA where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. The reasons such an order would be considered are: 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'. Advice about whether an allegation against a teacher is sufficiently serious to refer to the TRA will be sought from the TRA website and *Teacher misconduct: the prohibition of teachers (October 2018)*.

18.10 Concerns that do not meet the harm threshold

18.10.1 Concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken. It is important that schools manage and record any such concerns and take appropriate action to safeguard children.

18.10.2 As part of our whole school approach to safeguarding, we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. **All** concerns about adults (including allegations that do not

meet the harms threshold) will be shared responsibly and with the right person, recorded and dealt with appropriately. This will continue to encourage an open and transparent culture; enabling the school to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with our ethos and values.

18.10.3 Ensuring concerns are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

18.11 What is 'low level concerns'

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

- i. Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- ii. Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

- i. Being over friendly with children;
- ii. Having favourites;
- iii. Taking photographs of children on their mobile phone, contrary to school policy
- iv. engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- v. humiliating pupils

18.12 Sharing low-level concerns

18.12.1 Low-level concerns about a member of staff, supply staff, volunteer or contractor should be reported as per above, **immediately** to the Head or, in his absence, to the DSL. If the concern involves the Head, it should be reported to the Chair of Governors (contactable via email at clerk@tormeadschool.org.uk). Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified. The Head is the ultimate decision maker in respect to all low-level concerns but may wish to consult the Deputy Head (Pastoral) or the DSL depending on the nature of some low-level concerns and take a collaborative decision.

18.12.2 These records will be kept confidential and held securely in the Head's Office.

18.12.3 Low level concerns will be reviewed by the Head, DSL and Deputy Head (Pastoral) each half term and as any new concerns are raised, so that any potential patterns of concerning, problematic or inappropriate behaviour can be identified and responded to with a course of action. This might include internal disciplinary procedures, or referral to the LADO if the harms threshold is met. The school must consider and record if there were any wider cultural issues in the school that enabled the behaviour to occur and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence. When a low-

level concern has been raised by a third party, the Head should collect as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved and to any witnesses. Reports of low-level concerns should be recorded in writing, with details of the concern, the context in which it arose and action taken. The name of the person reporting should be noted, respecting wishes to remain anonymous as far as reasonably possible.

18.12.4 If there is any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, the Head should consult with their LADO.

18.12.5 Torread creates an environment where staff are encouraged and feel confident to self-refer where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

18.12.6 Further details regarding the management of allegations can be found in Part Four of *KCSIE* and the Surrey Safeguarding Children Partnership Procedures Manual, both of which outline the process and timescales to be followed.

18.13 Supply teachers

18.13.1 In some circumstances schools and colleges will have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency or business (referred to in this section as 'the agency').

18.13.2 Whilst schools and colleges are not the employer of supply teachers, they should ensure allegations are dealt with properly. In no circumstances should a school or college decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome. Governing bodies and proprietors should discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

18.13.3 Agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services. The school or college will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. Supply teachers, whilst not employed by the school or college, are under the supervision, direction and control of the governing body or proprietor when working in the school or college. They should be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the school during the investigation.

18.13.4 When using an agency, schools and colleges should inform the agency of its process for managing allegations. 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.

18.14 Complaints/ allegations made against pupils

18.14.1 If an allegation involves a pupil this must be reported to a DSL as soon as possible and certainly within 24 hours. The School recognises the importance of striking a balance between the need to protect pupils from abuse and the need to protect other pupils from false or unfounded allegations and in these situations all pupils involved will be treated as 'at risk'; a pupil who is the subject of an allegation may therefore be asked to take leave of absence or may be suspended pending the outcome of investigation. In a case where one pupil is deemed to be at risk from another, the pupils may be required to remain separate from one another to safeguard the interests of both parties. The DSL will decide on the best course of action in dealing with the case, seeking the advice of the SSCP (and potentially other local agencies) as she/he deems necessary, particularly if there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm. She/he will then take any necessary steps to protect and support all the children involved, taking their wishes fully into account.

19. Use of school premises for non-school activities

- 19.1 In the event that school facilities/premises are rented out to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities), appropriate arrangements will be put in place to keep children safe.
- 19.2 When services or activities are provided under the direct supervision or management of Tormead staff, the school arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. The school will seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school on these matters where appropriate. This applies regardless of whether or not children who attend any of these services or activities are children on the school roll. Safeguarding requirements will be included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement. The guidance on Keeping children safe in out-of-school settings details the safeguarding arrangements that schools and colleges should expect these providers to have in place. settings details the safeguarding arrangements that schools and colleges should expect these providers to have in place.
- 19.3 Schools and colleges may receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, schools and colleges should follow their safeguarding policies and procedures, including informing the LADO

20. Alternative provision

- 20.1 The school recognise that the cohort of pupils in Alternative Provision often have complex needs and is aware of additional risk of harm that pupils may be vulnerable to. The Department has issued two pieces of statutory guidance to which commissioners of Alternative Provision should have regard:
- i. [Alternative provision - DfE Statutory Guidance](#) and
 - ii. [Education for children with health needs who cannot attend school - DfE Statutory Guidance](#)

21. Elective Home Education (EHE)

- 21.1 Whilst we recognise that many home educated children have an overwhelmingly positive learning experience and we would expect the parents' decision to home educate to be made with their child's best education at the heart of the decision, we remain aware that home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs.
- 21.2 We will continue to inform our Local Authority (LA) of all deletions from the school admission register when a child is taken off roll, as per the Education Regulations of 2006.
- 21.3 Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, it is recommended that LAs, schools, and other key professionals work together to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker or EHCP.
- 21.4 The school is familiar with the DfE guidance for local authorities on [Elective home education](#) which sets out the role and responsibilities of LAs and their powers to engage with parents in relation to EHE.

22. Monitoring and Review

- 22.1 The Lead DSL will monitor the operation of this policy as well as its procedures and their implementation; these will be reviewed at least annually as per the review programme in consultation with the Governing Body. Any deficiencies or weaknesses will be dealt with without delay once identified. The policy will also be updated whenever there are updates to *KCSIE*.
- 22.2 The Governing Body will ensure that a designated governor, who has received appropriate training, acts as its champion for child protection. The designated governor will report to a full council meeting on a termly basis. The Governing Body will ensure that the school contributes to inter-agency working in line with *Working Together to Safeguard Children* through effective implementation of the child protection policy and procedures as well as effective communication and good cooperation with local agencies. Evidence used to review the policy and its implementation might cover training

records; referral information in respect of requests for help and support for individual children; issues and themes which may have emerged in the school and how these have been handled; the contribution the school is making to multi-agency working in individual cases or local discussions on safeguarding matters. Minutes should therefore be sufficiently detailed to demonstrate both breadth and depth of the review.

Date of Last Review: 31st August 2023

By Resolution of the Governing Body:

MR M HOWSE
Chair of Governors

MR BOYD
Head

September 2023

APPENDIX 1: Useful Contacts

Within Tormead

The Designated Safeguarding Lead (DSL) *with ultimate lead responsibility* is:

Miss Hannah Andrews, Pastoral Officer
(external: 01483 575101; internal 215)

DSL mobile contact 07508 916255

The Deputy Designated Safeguarding Leads are:

Mr Tony Breslin, Deputy Head (Pastoral)
(external: 01483 575101; internal 257)

Mrs Mary Price, Prep School Deputy Head
(also Deputy Designated Safeguarding Lead for EYFS)
(external: 01483 796073; internal 289)

Mrs Kim Flack
Acting SENCo and Class Teacher (Prep)(also Designated Safeguarding Lead for EYFS)
(external: 01483 796073; internal 254)

Mrs Emily Gibbons, Pastoral Officer
(external: 01483 575101; internal 270)

Mrs Heather Southwell, Assistant Head:Wellbeing and Transition
(external: 01483 575101; internal 207)

Mrs Lucy Burrell, Health Care Lead
(external: 01483575101; internal 233)

Mr Assaf De Courcy Arbiser, Head of IT and E-Safety Coordinator
(external: 01483 575101; internal 209)

E-safety Coordinator:

Mr Assaf de Courcy Arbiser, Head of IT Curriculum (external: 01483 796058; internal: 209)

Governors:

Mr Matthew Howse , Chair of Governors
(contactable via email at clerk@tormeadschool.org.uk)

Dr Kate Jefferies, Designated Governor for Safeguarding

(contactable via email at clerk@tormeadschool.org.uk)

Dr Caroline Kissin, Governor for EYFS

(contactable via email at clerk@tormeadschool.org.uk)

Mrs Anna Spender , Designated Governor for Online Safety (contactable via email at clerk@tormeadschool.org.uk)

External Agencies

For concerns and referrals (Monday - Friday 9.00am - 5.00pm)

Surrey Children's Single Point of Access (SPA)

Tel: 0300 470 9100

Email: @surreycc.gov.ukcspa@surreycc.gov.uk

For out of hours referrals

Surrey Emergency Duty Team

Tel: 01483 517898

For advice and support (Monday - Friday 9.00am - 5.00pm)

Schools and Early Years Child Protection Consultation Line

Tel: 0300 470 9100

For reporting allegations against staff (Monday - Friday 9.00am - 5.00pm)

LADO Service

Tel: 0300 123 1650

Email: LADO@surreycc.gov.uk

Operation Encompass advice and helpline for all staff members who may be concerned about children who have experienced domestic abuse.

Tel: 0204 513 9990 (8am-1pm Mon-Fri)

Police

Tel: 101 (non-urgent) or 01483 571212 (Surrey Police)

Tel: 999 (emergency)

NSPCC

Tel: 0808 8005000

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

NSPCC Whistleblowing Helpline

Tel: 0800 028 0285 (8:00am to 8:00pm Monday to Friday)

Email: help@nspcc.org.uk

Surrey Counter-Terrorism Security Advice

Tel: 01483 639671

Email: ctsa@surrey.pnn.police.uk

Surrey Prevent Supervisor – Claire McDonald

Tel: 01483 632982 or 07795 043842

Email: claire.McDonald@surrey.pnn.police.uk
preventreferrals@surrey.pnn.police.uk

Surrey Prevent PC – Charles Harris

Tel: 01483 631565 or 07967 988988

Email: charles.harris@surrey.pnn.police.uk

DfE Non-Emergency Advice Regarding Extremism

Tel: 0207 340 7264

Email: counter.extremism@education.gov.uk

Early Help Coordination Hubs

South West Hub (Guildford and Waverley)

Tel: 01483 519722

South East Hub (Tandridge, Reigate & Banstead, Mole Valley)

Tel: 01737 733944

North East Hub (Spelthorne, Elmbridge, Epsom & Ewell)

Tel: 01372 833133

North West Hub (Runnymede, Woking, Surrey Heath)

Tel: 01932 795522

Domestic Abuse Outreach Services

East Surrey (Reigate and Banstead, Mole Valley and Tandridge)

Tel: 01737 771350

Your Sanctuary (Woking, Runnymede and Surrey Heath)

Tel: 01483 776822

North Surrey (Epsom and Ewell, Elmbridge, and Spelthorne)

Tel: 01932 260690

South West Surrey (Guildford and Waverley)

Tel: 01483 898884

TRA

<https://www.gov.uk/government/organisations/teaching-regulation-agency>

DBS

<https://www.gov.uk/government/organisations/disclosure-and-barring-service>

APPENDIX 2: The Types And Signs Of Abuse

1. Abuse

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

1.2 Physical Abuse

1.3 Physical abuse is 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.

1.4 The following may be indicators of physical abuse:

- i. An explanation which is inconsistent with an injury;
- ii. Several different explanations provided for an injury;
- iii. Unexplained delay in seeking treatment;
- iv. The parents / carers are uninterested or undisturbed by an accident or injury;
- v. Parents are absent without good reason when their child is presented for treatment;
- vi. Repeated presentation of minor injuries (which may represent a 'cry for help' and if ignored could lead to a more serious injury);
- vii. Family use of different doctors and A&E departments;
- viii. Reluctance to give information or mention previous injuries.

1.5 Sexual Abuse

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

1.7 The following may be indicators of sexual abuse:

- i. Inappropriate sexual conduct;
- ii. Sexually explicit behaviour, play or conversation, inappropriate to the child's age;
- iii. Continual and inappropriate or excessive masturbation;
- iv. Self-harm (including eating disorder), self-mutilation and suicide attempts;
- v. Involvement in sexual exploitation or indiscriminate choice of sexual partners;

- vi. An anxious unwillingness to remove clothes for - e.g. sports events (but this may be related to cultural norms or physical difficulties).
- vii. Pain or itching of genital area;
- viii. Blood on underclothes;
- ix. Pregnancy in a younger girl where the identity of the father is not disclosed;
- x. Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted infections, presence of semen on vagina, anus, external genitalia or clothing.

1.8 Emotional Abuse

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

1.10 The following may be indicators of emotional abuse:

- i. Developmental delay;
- ii. Abnormal attachment between a child and parent/carer e.g. anxious, indiscriminate or no attachment;
- iii. Indiscriminate attachment or failure to attach;
- iv. Aggressive behaviour towards others;
- v. Scapegoated within the family;
- vi. Frozen watchfulness, particularly in preschool children;
- vii. Low self-esteem and lack of confidence;
- viii. Withdrawn or seen as a 'loner' - difficulty relating to others.

1.11 Neglect

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

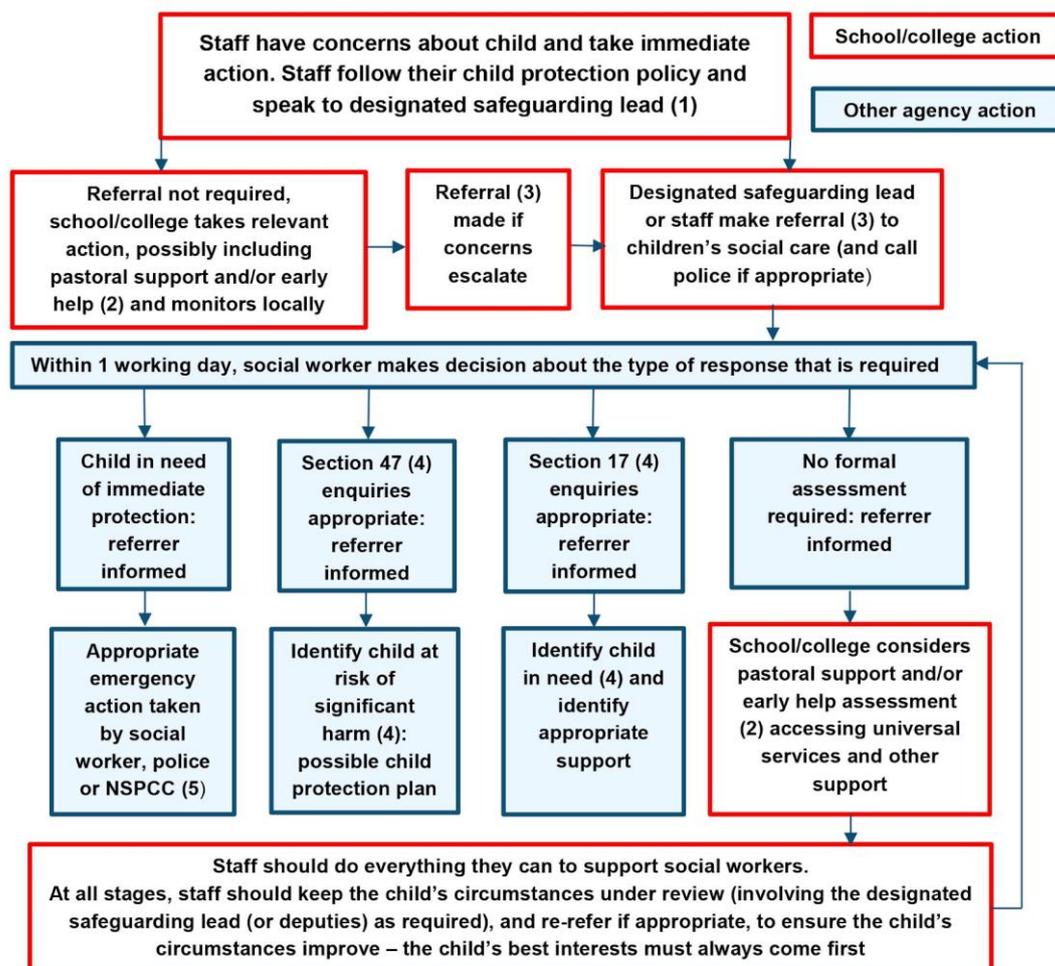
The following may be indicators of neglect:

- i. Failure by parents or carers to meet the basic essential needs e.g. adequate food, clothes, warmth, hygiene and medical care;
- ii. A child seen to be listless, apathetic and unresponsive with no apparent medical cause;
- iii. Failure of child to grow within normal expected pattern, with accompanying weight loss;
- iv. Child thrives away from home environment;
- v. Child frequently absent from school;
- vi. Child left with adults who are intoxicated or violent;
- vii. Child abandoned or left alone for excessive periods.

APPENDIX 3: Action To Be Taken

- 1.1 This diagram illustrates what action should be taken and who should take it when there are concerns about a child. If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children’s social care immediately. **Anybody can make a referral.**

Actions where there are concerns about a child



(1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

(2) Early help means providing support as soon as a problem emerges at any point in a child’s life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of [Working Together to Safeguard Children](#) provides detailed guidance on the early help process.

(3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of [Working Together to Safeguard Children](#).

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child’s welfare. Full details are in Chapter one of [Working Together to Safeguard Children](#).

(5) This could include applying for an Emergency Protection Order (EPO).

- i. In cases which also involve an allegation of abuse against a staff member, see Part Four of *KCSIE*.
- ii. Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of *Working together to safeguard children* provides detailed guidance on the early help process.
- iii. Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. This can include s17 assessments of children in need and s47 assessments of children at risk of significant harm. Full details are in Chapter one of *Working together to safeguard children*
- iv. This could include applying for an Emergency Protection Order (EPO).

APPENDIX 4: Specific Safeguarding Issues

1.1 The following lists of indicators for specific safeguarding issues is not exhaustive or definitive but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of abuse. Please also refer to Annex B of *KCSIE* for further information.

1.2 Child Abduction and Community Safety Incidents

1.3 Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. We regularly send out messages to pupils and parents on advice about keeping pupils safe during their commute and encourage parents and pupils to report any incidents that occur to the police and school as soon as they happen. We regularly meet with our School Liaison Officer and at these meetings local safety incidents can be discussed. As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. This could include outdoor-safety lessons run by teachers or by local police staff. It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: www.actionagainstabduction.org and www.clevernevergoes.org.

1.4 Children and the Court System

1.5 Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate

guides to support children 5-11 year olds and 12-17 year olds. The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

1.6 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

1.7 Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim. Signs include:

- i. Going missing from home or school
- ii. Regular school absence/truanting
- iii. Underage sexual activity
- iv. Inappropriate sexual or sexualised behaviour
- v. Sexually risky behaviour, 'swapping' sex
- vi. Repeat sexually transmitted infections
- vii. In girls, repeat pregnancy, abortions, miscarriage
- viii. Receiving unexplained gifts or gifts from unknown sources
- ix. Having multiple mobile phones and worrying about losing contact via mobile
- x. Online safety concerns such as youth produced sexual imagery or being coerced into sharing explicit images.
- xi. Having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- xii. Changes in the way they dress
- xiii. Going to hotels or other unusual locations to meet friends
- xiv. Seen at known places of concern
- xv. Moving around the country, appearing in new towns or cities, not knowing where they are getting in/out of different cars driven by unknown adults
- xvi. Having older boyfriends or girlfriends
- xvii. Contact with known perpetrators
- xviii. Involved in abusive relationships, intimidated and fearful of certain people or situations
- xix. Hanging out with groups of older people, or anti-social groups, or with other vulnerable peers
- xx. Associating with other young people involved in sexual or criminal exploitation
- xxi. Recruiting other young people to exploitative situations
- xxii. Truancy, exclusion, disengagement with school, opting out of education altogether
- xxiii. Going missing for periods of time or regularly coming home late
- xxiv. Unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- xxv. Mood swings, volatile behaviour, emotional distress, changes in emotional wellbeing
- xxvi. Self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders

- xxvii. Drug or alcohol misuse
 - xxviii. Getting involved in crime
 - xxix. Police involvement, police records
 - xxx. Involved in gangs, gang fights, gang membership
 - xxxi. Injuries from physical assault, physical restraint, sexual assault.
- 1.8 Further information on signs of a child’s involvement in sexual exploitation is available in Home Office guidance: Child sexual exploitation: guide for [practitioners](#)
- 1.9 County Lines
- 1.10 County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.
Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.
- 1.11 A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:
- i. Go missing and are subsequently found in areas away from their home;
 - ii. Have been the victim or perpetrator of serious violence (e.g. knife crime);
 - iii. Are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
 - iv. Are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection;
 - v. Are found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’ or hotel room where there is drug activity;
 - vi. Owe a ‘debt bond’ to their exploiters;
 - vii. Have their bank accounts used to facilitate drug dealing.
- 1.12 Further information on the signs of a child’s involvement in county lines is available in guidance published by the [Home Office](#)
- 1.13 Modern Slavery and the National Referral Mechanism

- 1.14 Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk)
- 1.15 Cybercrime
- 1.16 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;
- i. Unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
 - ii. 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,
 - iii. 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
- 1.17 Children with particular skill and interest in computing and technology may inadvertently or deliberately online stray into cyber-dependent crime.
- 1.18 If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme which 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, [NSPCC When to call the Police](#) and [The National Cyber Security Centre](#) The National Cyber Security Centre
- 1.19 Female Genital Mutilation (FGM)
- 1.20 Circumstances and occurrences that may point to FGM happening are:
- i. Girl talking about getting ready for a special ceremony
 - ii. Family taking a long trip abroad

- iii. Girl's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leone, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistani, Indonesian and Pakistani)
- iv. Knowledge that the child's sibling has undergone FGM
- v. Girl talks about going abroad to be 'cut' or to prepare for marriage

1.21 Signs that may indicate a girl has undergone FGM:

- i. Prolonged absence from school and other activities
- ii. Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued
- iii. Bladder or menstrual problems
- iv. Finding it difficult to sit still and looking uncomfortable
- v. Complaining about pain between the legs
- vi. Mentioning something somebody did to them that they are not allowed to talk about
- vii. Secretive behaviour, including isolating themselves from the group
- viii. Reluctance to take part in physical activity
- ix. Repeated urinal tract infection
- x. Disclosure

1.22 Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. Any form of marriage for someone under 18 is illegal, even when violence, threats or another form of coercion are not used.

1.23 Honour-Based Abuse (HBA)

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

- i. Become involved with a boyfriend or girlfriend from a different culture or religion;
- ii. Want to get out of an arranged marriage; become involved with a boyfriend or girlfriend from a different culture or religion;

- iii. Want to get out of an arranged marriage;
 - iv. Want to get out of a forced marriage
 - v. Wear clothes or take part in activities that might not be considered traditional within a particular culture
 - vi. It is considered a violation of human rights and may be a form of domestic and/or sexual abuse
- 1.25 Radicalisation, Extremism and Terrorism
- 1.26 Children may be susceptible to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' safeguarding approach.
- i. **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
 - ii. **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
 - iii. **Terrorism** is an action that endangers or causes serious violence to a person/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.
- 1.27 There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).
- 1.28 However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.
- 1.29 There is no such thing as a "typical extremist": those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity. It is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.
- 1.30 Indicators of vulnerability include:
- i. Identity Crisis – the student / pupil is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
 - ii. Personal Crisis – the student / pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;

- iii. Personal Circumstances – migration; local community tensions; and events affecting the student / pupil’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
 - iv. Unmet Aspirations – the student / pupil may have perceptions of injustice; a feeling of failure; rejection of civic life;
 - v. Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration;
 - vi. Special Educational Need – students / pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.
- 1.31 However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.
- 1.32 More critical risk factors could include:
- i. Being in contact with extremist recruiters;
 - ii. Accessing violent extremist websites, especially those with a social networking element;
 - iii. Possessing or accessing violent extremist literature;
 - iv. Using extremist narratives and a global ideology to explain personal disadvantage;
 - v. Justifying the use of violence to solve societal issues;
 - vi. Joining or seeking to join extremist organisations; and
 - vii. Significant changes to appearance and / or behaviour;
 - viii. Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.
- 1.33 The Prevent duty
- 1.34 All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty.
- 1.35 Preventing Radicalisation
- 2.35 Children may be susceptible to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools or colleges safeguarding approach.
- 3.35 **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- 4.35
- 5.35 **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- 6.35
- 7.35 **Terrorism** is an action that endangers or causes serious violence to a person/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.

- 1.36 Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.
- 1.37 The current threat level in the UK and for Surrey is 'substantial'.
- 1.38 Child-on-Child Sexual Violence & Sexual Harassment
- 1.39 Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment.
- 1.40 Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable. Failure to recognise, acknowledge or understand the scale of harassment and abuse and/or downplaying some behaviours related to abuse can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. The school will take a calm, considered and appropriate response to any reports in line with our policies.
- 1.41 Reports of sexual violence and sexual harassment are extremely complex to manage. It is important that all victims are taken seriously and offered appropriate support. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, adult students and school and college staff are supported and protected as appropriate.
- 1.42 Sexual violence and sexual harassment can be between two children, or a group of children. Both sexes may be affected, although girls are more likely to be victims of sexual violence, and boys are more likely to be perpetrators of sexual harassment. Children with SEND are likely to be more vulnerable.
- i. Sexual violence refers to rape, assault by penetration or sexual assault.
 - ii. Sexual harassment includes such things as sexual comments; sexual jokes; physical behaviour such as deliberately brushing against someone, or displaying photos of a sexual nature; and online activity including sharing of images or video (sexting) or making inappropriate sexual comments (Note - this list is not exhaustive).
- 1.43 Harmful sexual behaviours (HSB) in children are those which are inappropriate, problematic, abusive and violent. When considering harmful sexual behaviour, the ages and developmental stages of the children involved should be considered.
- 1.44 Responding to Reports of Sexual Violence and Sexual Harassment
- 1.45 The starting point regarding any report should always be that there is a zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and it will not be tolerated.

1.46 The initial response to a report from a child is incredibly important as it can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. It is essential that **all** victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school or college should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

1.47 A child may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report or a member of school staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. If staff have any concerns about a child's welfare, they should act on them immediately.

2.47

1.48 All staff are trained to manage a report. Local policies (and training) will dictate exactly how reports should be managed. Paragraph 52 and Annex A in the [Sexual Violence and Sexual Harassment Between Children in Schools and Colleges](#) advice provides detailed information and links to resources. However, effective safeguarding practice includes:

- i. Managing reports with two members of staff present is preferable, with one of them being a DSL if possible; however, this might not always be possible;
- ii. Where the report includes an online element, **the key consideration is for staff not to view or forward illegal images of a child.** [Searching, screening and confiscation at school](#) and [sharing nudes and semi-nudes: advice for education settings working with children and young people](#) provide more details on what to do when viewing an image is unavoidable.
- iii. Not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to;
- iv. Recognising that a child is likely to disclose to someone they trust: this could be **anyone** on the school staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child;
- v. Recognising that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse;
- vi. Keeping in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation;
- vii. Listening carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where,

- when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was;
- viii. Considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made. This should be recorded on CPOMS.
 - ix. Only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Schools and colleges should be aware that notes of such reports could become part of a statutory assessment by children’s social care and/or part of a criminal investigation; and
 - x. Informing the designated safeguarding lead (or deputy), as soon as practically possible, if the designated safeguarding lead (or deputy) is not involved in the initial report.
- 1.49 Risk Assessment
- 1.50 When there has been a report of sexual violence, the DSL or a deputy will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:
- i. The victim, especially their protection and support;
 - ii. Whether there may have been other victims,
 - iii. The alleged perpetrator(s); and
 - iv. All the other children (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.
- 1.51 Risk assessments will be recorded on CPOMS and kept under review. At all times, Tormead will be actively considering the risks posed to all the pupils and putting adequate measures in place to protect them and keep them safe.
- 1.52 The DSL or a deputy will engage with children’s social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. The risk assessment above is not intended to replace the detailed assessments of expert professionals. Any such professional assessments will be used to inform Tormead’s approach to supporting and protecting its pupils and updating its own risk assessment.
- 1.53 Action following a report of sexual violence and/or sexual harassment
- 1.54 As set out above, sexual violence and sexual abuse can happen anywhere, and all staff working with children are advised to maintain an attitude of **‘it could happen here’**. Schools and colleges should be aware of, and respond appropriately to all reports and concerns about

sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the school/college. The DSL or a deputy is likely to have a complete safeguarding picture and be the most appropriate person to advise on the school or college's initial response. Important considerations will include:

2.54

- i. The wishes of the victim in terms of how they want to proceed. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's duty and responsibilities to protect other children;
- ii. The nature of the alleged incident(s), including: whether a crime may have been committed and/or whether HSB has been displayed;
- iii. The ages of the children involved;
- iv. The developmental stages of the children involved;
- v. Any power imbalance between the children. For example, is the alleged perpetrator(s) significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?;
- vi. If the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature);
- vii. That sexual violence and sexual harassment can take place within intimate personal relationships between peers;
- viii. Importance of understanding intra familial harms and any necessary support for siblings following incidents
- ix. Are there ongoing risks to the victim, other children, adult students or school or college staff; and
- x. Other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.
- xi. There are four likely routes to consider when managing a report of sexual violence and/or sexual harassment:
 - xii. Managing internally
 - xiii. Early help
 - xiv. Referrals to children's social care
 - xv. Reporting to the police

1.55 Refer to KCSIE 2022 'options to manage the report' for further details.

Ongoing Response:

- The DSL will manage each case individually and will ensure the risk assessment is reviewed regularly with relevant partner agencies, for example the Police and social care.
- Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, settings should be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately.
- Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim.
- The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart on the setting premises and on transport where appropriate.
- Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the setting will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and may lead to the view that allowing the perpetrator to remain in the same setting would seriously harm the education or welfare of the victim (and potentially themselves and other children).
- Where a criminal investigation into sexual assault leads to a conviction or caution, the setting will, if it has not already, consider any suitable sanctions in light of their behaviour policy, which may include consideration of permanent exclusion. Where the perpetrator is going to remain at the setting, the Headteacher/Principal should continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on setting premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.
- The victim, alleged perpetrator and any other children and adults affected will receive appropriate support and safeguards on a case-by-case basis.
- The setting will take any disciplinary action against the alleged perpetrator in accordance with the setting behaviour policy.

- The setting recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.
- The setting will consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.
- The setting recognises that children who have experienced sexual violence display a wide range of responses to their experiences including clear signs of trauma, physical and emotional responses, or no overt signs at all.

1.56 As set out in this policy, all concerns, discussions and decisions made, and the reasons for those decisions, will be recorded in writing. Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified, and addressed.

1.57 Unsubstantiated, unfounded, false or malicious reports:

1.58 If a report is determined to be unsubstantiated, unfounded, false 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.

1.59 If a report is shown to be deliberately invented or malicious, the school will consider whether any disciplinary action is appropriate against the individual who made it as per our Behaviour Policy.

1.60 School is aware that sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre (SARC), which offers confidential and non-judgemental support to victims and survivors of sexual assault and abuse. They provide medical, practical, and emotional care and advice to all children and adults, regardless of when the incident occurred. Other support can include:

- i. Early help and children's social care
- ii. Children and Young People's Independent Sexual Violence Advisors (ChISVAs). Contact detail can be found at Rape Crisis and The Survivors Trust
- iii. Child and adolescent mental health services (CAMHS)
- iv. NHS –Help after rape and sexual assault
- v. Sexual assault referral centres (SARCs)
- vi. Childline

- vii. Childline / Internet Watch Foundation: Remove a nude image shared online ‘Report Remove’ is a free tool that allows children to report nude or sexual images and videos of themselves that they think might have been shared online, to see if they can be removed from the internet.
 - viii. Further information and sources of support can be found in Appendix 5
- 1.61 As always when concerned about the welfare of a child, all staff will act in the best interests of the child. **Immediate** consideration will be given as to how best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted). The starting point regarding any report will always be that sexual violence and sexual harassment is not acceptable and will not be tolerated. Especially important is not to pass off any sexual violence or sexual harassment as ‘banter’, ‘part of growing up’ or ‘having a laugh’. Where an incident between two pupils takes place away from the school, the school’s duties remain the same.
- 1.62 In all cases, Tormead will follow general safeguarding principles as well as guidance set out in Part Five of KCSIE.

APPENDIX 5: Further Information

- 1.1 Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example, information for schools and colleges can be found on the [TES](#), [MindEd](#) and the [NSPCC](#) websites.
- 1.2 Schools and colleges can also access government guidance as required on the issues listed below via the GOV.UK and other government websites.
- i. [bullying including cyberbullying](#)
 - ii. [Channel Guidance \(Prevent\)](#) – and Annex A
 - iii. [children missing education](#) – and Annex A
 - iv. [child missing from home or care](#)
 - v. [child sexual exploitation \(CSE\)](#) – and Annex A
 - vi. [domestic abuse](#)
 - vii. [drugs](#)
 - viii. [fabricated or induced illness](#)
 - ix. [faith abuse](#)
 - x. [female genital mutilation \(FGM\)](#) – and Annex A
 - xi. [forced marriage](#) - and Annex A
 - xii. [gangs and youth violence](#)
 - xiii. [gender-based violence/violence against women and girls \(VAWG\)](#)
 - xiv. [hate](#)
 - xv. [mental health](#)
 - xvi. [missing children and adults](#)

- xvii. [NSPCC Learning - Harmful sexual behaviour framework](#)
- xviii. [NSPCC Learning -Protecting children from harmful sexual behaviour](#)
- xix. [NSPCC- UK domestic abuse Signs Symptoms Effects](#)
- xx. [private fostering](#)
- xxi. [preventing radicalisation](#) – and Annex A
- xxii. [Refuge what is domestic violence/effects of domestic violence on children](#)
- xxiii. [relationship abuse](#)
- xxiv. [safeLives: young people and domestic abuse](#)
- xxv. [sexting](#)
- xxvi. [Sexual violence and sexual harassment between children in schools and colleges](#)
- xxvii. [Safeguarding children who may have been trafficked : practice guidance](#)
- xxviii. [trafficking](#)
- xxix.

- xxx. Annex B of *KCSIE* contains important additional information about specific forms of abuse and safeguarding issues.

1.3 Additional advice and support

1.4 **Abuse**

- i. [Supporting practice in tackling child sexual abuse](#) - CSA Centre Centre of Expertise on Child Sexual Abuse has free evidence-based practice resources to help professionals working with children and young people to identify and respond appropriately to concerns of child sexual abuse
- ii. [What to do if you're worried a child is being abused](#) – DfE advice
- iii. [Domestic abuse: Various Information/Guidance](#) - Home Office (HO)
- iv. [Faith based abuse: National Action Plan](#) - DfE advice
- v. [Relationship abuse: disrespect nobody](#) - Home Office website
- vi. [Tackling Child Sexual Abuse Strategy](#) - Home Office
- vii. [Together we can stop child sexual abuse](#) - HM Government Campaign

1.5 **Bullying**

- i. [Preventing bullying including cyberbullying](#) - DfE advice
- ii. [Preventing and Tackling Bullying](#), DfE advice

1.6 **Children Missing from Education, Home or Care**

- i. [Children missing education](#) - DfE statutory guidance

- ii. [Child missing from home or care](#) - DfE statutory guidance
- iii. [Children and adults missing strategy](#) - Home Office strategy

1.7 Children with Family Members in Prison

- i. [National Information Centre on Children of Offenders](#) - Barnardo's in partnership with HM Prison and Probation Service

1.8 Child Exploitation

- i. [Trafficking: safeguarding children](#) - DfE and HO guidance
- ii. [Care of unaccompanied and trafficked children](#) - DfE statutory guidance
- iii. [Modern slavery: how to identify and support victims](#) - HO statutory guidance
- iv. [Criminal Exploitation of children and vulnerable adults: County Lines guidance](#) - Home Office
- v. [County Lines Toolkit For Professionals](#) - The Children's Society in partnership with Victim Support and National Police Chiefs' Council
- vi. [Multi-agency practice principles for responding to child exploitation and extra-familial harm – non-statutory guidance for local areas, developed by the Tackling Child Exploitation \(TCE\) Support Programme, funded by the Department for Education and supported by the Home Office, the Department for Health and Social Care and the Ministry of Justice](#)
- vii.

1.9 Drugs

- i. [Drug strategy 2017](#) - Home Office strategy
- ii. [Information and advice on drugs](#) - Talk to Frank website
- iii. [Drug and Alcohol education - teacher guidance & evidence review](#) - PSHE Association website
- iv. [ADEPIS platform sharing information and resources for schools: covering drug \(& alcohol\) prevention](#) - Website by Mentor UK

1.10 (so called) "Honour Based Abuse" including FGM and Forced Marriage

- i. [Female genital mutilation: information and resources](#) - Home Office guidance
- ii. [Female genital mutilation: multi agency statutory guidance](#) - DfE, DH, and HO statutory guidance
- iii. [Forced](#) - Forced Marriage Unit (FMU) statutory guidance unit (FMU) statutory guidance
- iv. [Forced marriage](#) - Government multi-agency practice guidelines and multi-agency statutory guidance
- v.
- vi. [FGM resource](#) - HM Government guidance Government guidance

1.11 Health and Wellbeing

- i. [Fabricated or induced illness: safeguarding children](#) - DfE, DH, HO

- ii. [Rise Above: Free PSHE resources on health, wellbeing and resilience](#) - Public Health England
 - iii. [Medical conditions: supporting pupils at school](#) - DfE statutory guidance
 - iv. [Mental health and behaviour](#) - DfE advice
- 1.12 **Homelessness**
- i. [Homelessness: How local authorities should exercise their functions](#) - Ministry of Housing, Communities & Local Government guidance
- 1.13 **E-Safety / Online (see also Annex D of KCSIE)**
- i. [Sexting: responding to incidents and safeguarding children](#) - UK Council for Internet Safety
- 1.14 **Private Fostering**
- i. [Private fostering: local authorities](#) - DfE statutory guidance
- 1.15 **Radicalisation**
- i. [Prevent duty guidance](#) - Home Office guidance
 - ii. [Prevent duty: additional advice for schools and childcare providers](#) - DfE advice
 - iii. [Educate Against Hate website](#) - DfE and Home Office advice
 - iv. [Prevent for FE and Training](#) - Education and Training Foundation (ETF)
- 1.16 **SEND**
- a) [SEND Code of Practice 0 to 25 years](#), and
 - b) [Supporting Pupils at School with Medical Conditions](#).
 - c) The Special Educational Needs and Disabilities Information and Support Services (SENDIASS). SENDIASS offer information, advice and support for parents and carers of children and young people with SEND. All local authorities have such a service: [Find your local IAS service \(councilfordisabledchildren.org.uk\)](#)
 - d) [Mencap](#) - Represents people with learning disabilities, with specific advice and information for people who work with children and young people
 - e)
- 2.16 **Upskirting**
- i. [Upskirting know your rights](#) – UK Government
- 1.17 **Violence, Including Sexual Violence and Sexual Harassment**
- i. [Serious violence strategy](#) - Home Office Strategy
 - ii. [Factors linked to serious violence and how these factors can be used to identify individuals for intervention](#) - Home Office
 - iii. [Youth Endowment Fund](#) - Home Office
 - iv. [Gangs and youth violence: for schools and colleges](#) - Home Office advice
 - v. [Ending violence against women and girls 2016-2020 strategy](#) - Home Office strategy

- vi. [Violence against women and girls: national statement of expectations for victims](#) - Home Office guidance
- vii. [Sexual violence and sexual harassment between children in schools and colleges](#) - DfE advice
- viii. [Harmful Sexual Behaviour Toolkit](#) -The Lucy Faithful Foundation
- ix. [NSPCC Learning -Protecting children from harmful sexual behaviour](#)
- x. [NSPCC - Harmful sexual behaviour framework](#)
- xi. [Contextual Safeguarding Network - Beyond Referrals \(Schools\)](#)
- i. LGFL 'Undressed' – Advice for schools

