



Policy 7A & B - Safeguarding Policy

including EYFS

(Review every year)

The policy is available on the School website

Date	Reviewed by	Date approved SMT	Date approved by sub-committee	Date approved Governors	Next review date
October 2021	P Oldroyd	4.10.21	5.10.21 Education & ICT	Category 3 Policy for 24.11.21 Bridewell Court Meeting	May 2022 for June 2022 Bridewell Court Meeting
March 2022	P. Crisell	8.3.22	23.2.22 F and GP	16.3.22 Bridewell Court Meeting	May 2022 for June 2022 Bridewell Court Meeting
June 2022	P. Oldroyd & P. Crisell	15.06.22		Category 3 Policy for 22.06.22 Bridewell Court Meeting	May 2023 for June 2023 Bridewell Court Meeting
September 2022	P.Crisell		Category 3 Policy for 11.10.22 Education & ICT		

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Safeguarding Directory for adults

For safeguarding and child protection concerns and when you know something is wrong

If you think that a child is in immediate danger, or that a crime has been committed, ring (9) 999 before doing anything else.

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

DSL Mr Paul Crisell	pdc@barrowhills.org	01428 683 639 07940 708732 01483 239 962 (home)
DDSL & EYFS DSL Mrs Rachel E Harris	reh@barrowhills.org	01428 683 639 07790 706 841
DDSL Miss Amber Tyrrell	alt@barrowhills.org	01428 683 639

Head Mr Philip Oldroyd	pjo@barrowhills.org	01428 683 639 07765 705 447
DOFO* Mr Dan Rogers		01428 686 778 (ext 778 / 414)
Treasurer Mrs Justine Voisin	rogersd@kesw.org	
Safeguarding Governor Mr Iain Turner	treasurer@kesw.org iturner@stgeorgesweybridge.com	

*DOFO: Director of Finance and Operations

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

Surrey County Council Children's Services 0300 470 9100, or

Multi-Agency Partnership 01483 517 898 (emergency out-of-hours team)

Single Point of Access (C-SPA) and Early Help Hub cspa@surreycc.gov.uk

National Society for the Prevention of Cruelty to Children (NSPCC)

helpline: 0808 800 5000 or email: help@nspcc.org.uk

For allegations against staff working in schools, normal procedure is to refer to DSL or Head (as per Safeguarding policy) but anyone may make an independent referral to the LADO:

Local Authority Designated Officer (LADO) 0300 123 1650 (option 3)
LADO@surreycc.gov.uk

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

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

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

Child Protection and Safeguarding Policy:

Recognising and Acting to Protect Children from Abuse

1. All adults working in Barrow Hills School, including governors, contractors and volunteers, have a responsibility for safeguarding and promoting the welfare of children in the child's best interests. They should know the name of the School's Designated Safeguarding Lead (DSL) and the Deputy DSLs, and know, understand and follow the relevant sections of KCSIE (2022) Child Protection Policy and related procedures. All staff have a duty to report any child protection concerns to one of the DSLs.
2. Anyone who has concerns or is in doubt should refer to one of the people named below. Referrals will be managed by them normally, but anyone can refer a child to children's, Local Authority Children's Social Care, if necessary. The 'Safeguarding Directory for Adults', on page 3 of this policy, explains how to do this in further detail.
3. Barrow Hills School takes extremely seriously all its responsibilities in relation to child protection and safeguarding matters. The School takes its responsibility seriously to ensure that children are educated in ways to keep themselves safe. This is done in different ways and at different times through tutor groups, assembly, curriculum lessons in Relationships and Sex Education and Health Education, PSHE and in ICT. Particular attention is given to the safe use of electronic devices and the internet.

General points

4. Paul Crisell, Deputy Head (pdc@barrowhills.org), is the DSL and therefore takes overall responsibility for the School's Child Protection and Safeguarding procedures and systems. Children's safety, welfare and wellbeing remain the responsibility of all staff however.

5. All the School's systems and procedures operate with the best interests of the child at heart; we will work hard to enable children to be heard, know that they are heard and to let us know what is happening to them.
6. Mr Iain Turner has been appointed by the governing body as the Governor with special responsibility for child protection matters. He can be contacted at: iturner@stgeorgesweybridge.com the Venerable Stuart Beake has been appointed Deputy Safeguarding Governor. He can be contacted at StuartBeake@guildford-cathedral.org. One or both of these meet each term with the Deputy Head and report annually to the Governing Body on child protection issues in order that it can undertake a review of the School's child protection policies and procedures and the efficiency with which the related duties have been discharged. KCSIE (2022) is clear that the governing body has strategic responsibility for safeguarding arrangements at the School. The Head is responsible for ensuring staff understand and follow the procedures agreed by the governing body.
7. The School undertakes to remedy any deficiencies or weaknesses in child protection arrangements without delay.
8. The above named people receive regular training every two years, the DSL and deputies (2-yearly, including inter-agency working and Prevent, plus informal updates to enable them to be kept fully informed and up to date with the latest regulations and procedures.

The meaning of 'safeguarding' and 'child protection'

9. There are **four** elements within the government's definition of safeguarding. **Two** of them, **(a)** "Ensuring that children grow up in circumstances consistent with the provision of safe and effective care" and **(b)** "taking action to enable all children to have the best outcomes", refer to the general activity of safeguarding and promoting the welfare of every single one of our children.
10. The School recognises that children have a right to feel safe and secure and cannot learn effectively unless they do. We also recognise the statutory responsibility of each and every member of staff to provide a safe environment for children. In this sense 'safeguarding' is an overarching concept incorporating a number of areas covered in separate policies including our recruitment methods, health & safety practice, and the management of our computer network.
11. We also aim to teach our children how to look after themselves and each other. To that end we use form times, assemblies, PSHE (Personal, Social and Health Education) and Relationship and Sex Education (RSE) to educate children about safeguarding, consent, and how they can recognise and build resilience to various forms of bullying and abuse, including child-on-child abuse. We aim to teach them about the risks posed by adults and children who use methods including the internet, mobile technology and social media to bully, groom, exploit, abuse or radicalise other people. We also aim to teach our children to understand and appreciate the fundamental values of democracy, the rule of law, individual liberty, and mutual respect for and tolerance of those with different faiths and beliefs. Finally, we aim to help children make a safe transition to their destination schools. Additionally, using the School Council, Peer Mentors and School Captains we aim to listen to our children's views about their safeguarding, and to respond accordingly.
12. The **second two** of the four parts within the definition of safeguarding are **(c)** "protecting children from maltreatment" and **(d)** "preventing impairment of children's mental and physical health and development". These relate to the more

specific activity of child protection, which means working to protect particular children from abuse and neglect. This is sometimes predictive, meaning identifying children at risk and addressing their needs before they become serious problems, and sometimes reactive, meaning responding quickly and effectively to the needs of children who have already been identified as suffering.

13. The School's approach to child protection issues is in accordance with the inter-agency procedures in Surrey between. Local Authority Children's Social Care, the police and health services and this policy is available to parents on the website. It fully recognises its duties to both children in need and children at risk by co-ordinating help in a common assessment framework:
14. The old county safeguarding children boards have been replaced by new 'Children's Safeguarding Partnerships'. The Partnership in Surrey is now established and led, jointly and equally, by Surrey County Council, Surrey Police, and Guildford & Waverley Clinical Commissioning Group (on behalf of all NHS providers in Surrey). Schools (including independent schools) have become 'Relevant Agencies', and as such are required to act in accordance with the Partnership's arrangements and to contribute to their operation. At the moment the Surrey Safeguarding Children Partnership ('SSCP') is based at SSCP Team, Quadrant Court, 35 Guildford Road, Woking, Surrey GU22 7QQ, and can be reached at partnership.team@surreycc.gov.uk. DSLs will liaise with the Safeguarding Partners and work with other agencies. They are familiar with the document "NPCC – When to call the police" and will use it for guidance when considering when to call the police and what to expect when they do so. For the time being the SSCP is continuing to use the web address of the old safeguarding board's *Procedures Manual*: <http://surreyscb.procedures.org.uk/page/contents>
15. The School has a pastoral committee that meets weekly to ascertain children's wellbeing and level of need. The School's procedures and systems relating to this are described in [Appendix 4](#). If a member of staff has a mental health concern about a child it is taken to this committee, however, if the matter is also a safeguarding concern, immediate action should be taken, following the procedures within this policy and speaking to the DSL.
16. The School will always take into account the context within which such incidents and/or behaviours occur so that wider environmental factors present in a child's life that could impact on their safety and welfare are given due consideration. Pastoral staff consider this contextual approach to safeguarding regularly, both informally and, formally, in staff briefings, SMT meetings and in the pastoral committee meetings. The outcomes and actions resulting are recorded in minutes and the pastoral weekly notes.
17. All staff have been made aware that SEND children (and others as detailed in the following paragraph) may be at additional risk of harm and can be more prone to peer group isolation or bullying (including prejudice-based bullying) than other children. There is potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs and there are associated communication barriers and difficulties in managing or reporting these challenges. In order to minimise this risk, the DSL works closely with the SENCO both formally and informally to consider children holistically.

18. **Barriers to reporting:** staff should be aware that children may delay in reporting a concern or prevent a concern from being raised. This could be because they are embarrassed, afraid they will not be believed, struggle with communication for reasons of unfamiliarity with English or for more fundamental problems with communications, fear the consequences of speaking up ("*snitches get stitches*" and other such phrases, any of which should be reported by any staff who hear them, and dealt with appropriately) or worry that the School will overreact. Children from a social background that makes them vulnerable (whether by perception or by circumstances) may well worry further that they will be victims of discrimination on the basis of race, sexuality, disability or academic attainment. At Barrow Hills we are particularly sensitive to the greater vulnerabilities of very young children (especially in EYFS) who may not be able to report themselves and children on the SEND register.
19. There may be barriers to reporting that affect staff and other adults. In particular, a lack of faith in the system and associated belief that the damage caused by a process will outweigh any benefit to a child. Also, many adults believe (in error) that GDPR concerns are a barrier to sharing personal information. The legislation is clear that fears about sharing information **must not** be allowed to stand in the way of acting to safeguard children.

Reporting concerns: Staff must report all concerns about children to the DSL or Deputy DSL at the earliest opportunity or refer to the contact details provided in the Directory on page 3. Parental consent is not required for referrals to statutory agencies. Children, parents and others should contact the DSL or Deputy DSLs in a timely fashion.

Staff must never cover up concerns about children, delay reporting them or ignore them. Teachers' professional responsibilities include the safeguarding of children. However, their role is not to investigate safeguarding issues or make judgements about them. Their job is to share concerns quickly. They may need to use their professional judgement to determine whether explanations provided to them satisfactorily account for what they have observed. This is why all staff must have a good understanding of the sorts of concerns that may be presented, as fully explained in KCSIE (2022).

20. Local authorities should share the fact that a child has a social worker. In this situation, the DSL(s) will hold and use the information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.
21. In addition to this Policy and advice, reference can be made to *Keeping Children Safe in Education*, DfE September 2022 (KCSIE 2022) and *Working Together to Safeguard Children* (WTSC July 2020) which give detailed help and advice. Reference can also be made to the school's statutory PSHE/RSE Policy (RSHE 2019). The Prevent Duty Guidance for England and Wales (March 2015) also contains important advice. Staff should be aware of the situations in which their actions have the potential to be misinterpreted and which might then give rise to child protection concerns. The staff code of conduct should also be referred to. These documents provide details but, briefly, staff should exercise particular care in settings of the following nature:
- social events

- the giving of gifts
 - children in distress
 - PE, games and other physical activities
 - showers and changing
 - one-to-one situations
 - educational visits
 - home visits
 - transporting children
 - use of photography and other electronic media, including ICT
 - use of mobile devices in EYFS
22. Staff must read and understand Keeping Children Safe in Education (September 2022) as follows:
- **All staff** - should read & understand their responsibilities as described in part 1
 - **All staff with direct contact** with children should read annex B and should also have read '[Sexual Violence & Sexual Harm between children in schools & colleges](#)' (DfE May 2018)
 - **Heads and DSLs** should read the whole thing (DSLs should ensure annex C is included in their job description)
 - **SMT and Pastoral staff** should read part 5
 - **Governors** should read part 2 as a minimum, but be aware they are responsible for compliance in Parts 3,4,5
 - **Designated safeguarding governors** should read the whole of the guidance
 - Anyone involved in **recruitment and / or SCR** (including recruiters / managers of volunteers should read part 3 + annex F
 - Anyone involved in **MFL / other school exchanges** should read part 3 paras 335-336 and annex D
 - **HR Department** should read it all but concentrate on parts 3 & 4 and annex F. Treasurer, additionally undertakes to read the whole of KCSiE
 - Anyone in **classroom based** roles, **ICT, network staff** should read annex D
23. Staff may NOT:
- use their position to gain access to information for their own advantage and/or a child's or family's detriment
 - use their power to intimidate, threaten, coerce or undermine children
 - use their status and standing to form or promote relationships with children, which are of a sexual nature or which might become so
24. Where no specific guidance exists about particular situations or where staff are worried about how their actions might be interpreted staff are advised that they should:
- discuss the circumstances that informed their action, or their proposed action, with a senior colleague or one of the Safeguarding Leads. This will help to ensure that the safest practices are employed and reduce the risk of actions being misinterpreted.
 - always discuss any misunderstanding, accidents or threats with a senior colleague or the Safeguarding Leads
 - always record discussions and actions taken with their justifications

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

25. All staff (including the Head and those who are temporary or volunteers) are required to receive child protection training and advice as part of the induction process and thereafter on an annual basis and occasional staff and volunteers (who will have been vetted in accordance with the School's recruitment procedures) are made aware of child protection arrangements. Updated information is passed on regularly, and at least annually. Feedback from such training and awareness, together with regular training of the Safeguarding Leads, allow for amendments to the Policy where weaknesses and deficiencies are identified. All staff are required to read both the Child Protection and Safeguarding Policy (including appendices) and those elements of KCSIE listed above, to sign to show that they have done so and complete a written task to show that they have understood it. Updates are issued when necessary. Induction training for all staff makes reference to this Child Protection and Safeguarding Policy which contains staff behaviour protocols, whistleblowing procedures and the identity and role of the Safeguarding Leads. All staff should be trained to manage a report of child-on-child sexual violence and sexual harassment. The training for the Safeguarding Leads includes both child protection and inter-agency working and takes place at least every two years on recommended courses to cover inter agency working, case conferences, support for children in need, record keeping, promotion of a culture of listening to children, on-line safety and the Prevent duties.
26. The School operates safe recruitment procedures in accordance with the requirements of the Disclosure and Barring Service as laid down in KCSIE (2022); these procedures are also in accordance with the Independent School Standards Regulations. The School also seeks to ensure that employees of another employer who are working on the School site and who have contact with, or responsibility for, Barrow Hills children have had all the necessary recruitment checks made by their employer or other agency; in cases of doubt the School would not use the services of such people. Full details of the recruitment procedures can be found in the separate Recruitment Policy.
27. The School has clear procedures in place to deal promptly with allegations of abuse that meet the 'harm test' that are made against members of staff, volunteers or the Head. There are occasions where a person may not have engaged in relevant conduct but there are still serious concerns which satisfy the harm test. To satisfy the harm test there needs to be credible evidence of a risk of harm to children or vulnerable adults such as statements made by an individual regarding conduct/behaviour, etc. For a case to be considered as a risk of harm, relevant conduct would not have occurred but there must be tangible evidence rather than a "feeling" that a person represents a risk to children and / or vulnerable adults. For example, a teacher who confides in their head teacher that they are sexually attracted to children (but who had not engaged in 'relevant conduct') would satisfy the harm test. In summary, such allegations would normally be directed to the Head in the case of any member of staff or volunteer, and to the Treasurer (Chair of Governors) in the case of the absence of the Head, or an allegation against the Head. The Head will not be informed of this referral if the allegation is against the Head. Where there is a conflict of interest in reporting the matter to the Head, the allegation should be made directly to the LADO. If the allegation is against one of the Safeguarding Leads, it should be made to the Head without informing the

Safeguarding Leads. Following the guidance of Part 4 of KCSIE (2022), the Head is required to consult with The Local Authority Designated Officer on any matters relating to allegations against a member of staff within 24 hours and before any investigation is undertaken. In the most serious cases the police are also informed. All discussions will be recorded in writing, and due weight will be given to the view of The Local Authority Designated Officer when a decision is being made about the suspension of a member of staff. If the Head is suspended pending investigation of a child protection nature, arrangements for accommodation will be made away from children.

Low-level concerns:

The School wishes to create and maintain a culture and procedures in which all concerns about adults, including allegations that do not meet the harm threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately. Such concerns are known as "low-level concerns". The Head and DSL inform and consult each other on all low-level concerns with appropriate confidentiality. They record concerns in a secure area, record any investigations, upload relevant documents and produce reports when necessary. This is in the interests of maintaining a full picture of behaviour, to inform consultation with the LADO and other external agencies, and to identify concerning, problematic or inappropriate behaviour early. It will also guard against 'drift', in which one aspect of the School gradually slips away from approaches agreed by the organisation as a whole, and ensure that adults working in the organisation are clear about professional boundaries and act within them in accordance with our ethos and values.

Any concern that does not meet the harm threshold (quoted below) but which nevertheless is inconsistent with the School's Code of Conduct, ethos and values and/ or which is of concern, causes unease or a 'nagging doubt', should be reported to the DSL or to the Head who will record it, log any subsequent actions and their rationale.

Staff do not need to be able to determine in each case whether their concern is a low-level concern, or if it is not serious enough to merit a referral to the LADO, or whether it meets the threshold of an allegation. Once staff share what they believe to be a low-level concern, that determination should be made by the Head or the DSL.

Examples of low-level concerns might include (but are not limited to): being over-friendly with children; having favourites; engaging with a child one-to-one in a secluded area; using humiliating language (e.g sexualised, intimidating or offensive language). These examples exist on a wide spectrum, from behaviour that is seemingly harmless, to seemingly inappropriate behaviour that is innocent in its intention. However, on the other end of the spectrum, it could be behaviour that is intended to enable abuse and grooming in the future.

28. The School will exercise its responsibility to report within one month of leaving the School any person (employed, contracted, a volunteer or a child) whose services

are no longer required because that person is considered to be unsuitable to work with children. A report will also be made to the DBS if the School believes that the person has harmed or poses a risk of harm to a child or vulnerable adult, satisfies the harm test or has received a caution or conviction for a relevant offence. The report will be made even if the person to be dismissed or removed has resigned first. The School will exercise its duty to consider making a referral to The Teaching Regulation Agency where a teacher has been dismissed or would have been dismissed if he or she had not resigned and a prohibition order may be appropriate. Examples would include unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence, in accordance with *Teacher misconduct; the prohibition of teachers (DfE 2014)*. Failure to make a report constitutes an offence.

29. The School takes extremely seriously its responsibilities for the care and safety of children. This is undertaken in the School environment by having clear procedures for safer recruitment (see separate Recruitment Policy) and for dealing with any form of child abuse. It reinforces this sense of responsibility by ensuring that the staff of another organisation have been checked for suitability if they supervise the School's children on a site other than the School.

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

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

What is Child Abuse?

32. 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 by those known to them or by strangers via the internet. The abuse may be inflicted by an adult or another child. In many cases, issues overlap with one another. 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. Mental health problems can also be a sign of abuse, neglect or exploitation.
33. Useful information can be found in *What to do if you are worried a child is being abused* (DfE March 2015).
34. Abuse can be defined under four categories [taken from *Working together to Safeguard Children* (DfE July 2018) and *Child Sexual Exploitation, definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation* (DfE February 2017)]:

Physical abuse:

35. When adults deliberately inflict injuries on a child or, knowingly, do not prevent them. It includes hitting, kicking, shaking, biting, hair pulling, throwing, poisoning,

burning or scalding and otherwise causing physical harm to a child. It also includes excessive force. Giving a child poisonous substances, inappropriate drugs or alcohol, and attempting to suffocate or drown a child are also examples of physical abuse. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a child whom they are looking after. This situation is commonly described using terms such as factitious illness by proxy or Munchausen's Syndrome by proxy. "Honour based" abuse of all types includes crimes and violent crimes which have been committed to protect or defend the honour of the family and/or the community, including forced marriage and practices such as breast ironing.

36. Typical symptoms to look out for: -

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

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

38. Things to look out for:-

- children who feel that they are unloved and unlovable
- inability to form good relationships
- overburdened by ambitious, unrealistic parents

39. Sexual abuse:

involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is fully aware of what is happening. The activities may involve inappropriate physical contact, including penetrative (e.g. rape or buggery) or non-penetrative acts (e.g. kissing, rubbing, masturbation and touching the outside of clothing). This may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways. Sexual abuse can take place online and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Grooming a child in preparation for abuse including via the internet is also a matter of sexual abuse.

40. Typical symptoms to look out for:-

- a detailed sexual knowledge inappropriate to the age of the child
- behaviour that is excessively affectionate or sexual towards other children or adults
- victims will often make a limited disclosure to an adult but will often be preoccupied with secrecy and will try to convince the adult to keep dangerous information secret
- a fear of medical examinations
- a fear of being alone with particular adults
- a sudden loss of appetite, compulsive eating, anorexia nervosa or bulimia nervosa
- excessive masturbation, especially worrying if it takes place in public
- promiscuity
- sexual approaches or assaults on adults or other children
- pregnancy, urinary tract infections or sexually transmitted diseases are all immediate causes of concern
- bruises to the breast, buttocks, lower abdomen, thighs, genital and rectal areas
- discomfort or pain in the anal area
- the drawing of sexually explicit or pornographic images
- the need to change underwear excessively

41. It should be remembered that all of the above are typical, but may have other causes

Neglect

42. 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. It may start with substance abuse by mother during pregnancy, involve a parent or carer failing to provide adequate food, shelter and clothing, including exclusion from home or abandonment, failing to protect a child from physical and emotional harm or danger, or the failure to ensure adequate supervision or access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

43. Typical signs to look out for:-

- persistent stomach aches
- if a child is seriously underweight and is stealing food
- inadequately clad in that they are dirty or smell

44. If a child is suffering from any of the above, they are likely to also exhibit signs of stress and distress.

45. Typical signs to look for:-

- a lack of concentration and falling off of school performance
- aggressive or hostile behaviour
- moodiness, depression, irritability, listlessness, fearfulness, tiredness, temper tantrums, short concentration span, acting withdrawn or crying at minor occurrences
- difficult relationships with peers
- regression to more immature forms of behaviour e.g. thumb sucking
- self harming or suicidal behaviour
- low self-esteem
- running away and being inexplicably absent from School and so missing education; there are clear protocols for dealing with this in the Supervision of Pupils Policy, Section 9, Missing Pupils. Missing education can be a sign of child criminal exploitation including involvement in [county lines](#).

Attendance, absence and exclusions are closely monitored.

A child going missing from education is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation.

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

46. **Child Sexual Exploitation:** Child sexual exploitation, including violence and harassment, is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

47. No school is immune to the risk of child sexual exploitation including online and it can affect both boys and girls. Children can be perpetrators as well as victims.

48. Signs of Child Sexual Exploitation may include:-

- unexplained gifts and new possessions
- association with young people involved in exploitation
- having much older boyfriends or girlfriends
- suffering from sexually transmitted infections
- suffering changes in emotional well-being
- drug and alcohol misuse
- being absent for periods of time and regularly reaching home late
- missing education

49. The same indicators may suggest that children have been approached by or are involved with individuals associated with criminal networks or gangs. These

children are at risk of involvement in serious violent crime. Further advice can be found in the DfE publications Preventing youth violence and gang involvement and Criminal exploitation of children and vulnerable adults, county lines.

50. The School will provide sensitive education on all aspects of abuse appropriate to the age on these issues in PSHE lessons, e-safety talks, form periods and assemblies. These themes are also shared with parents so that they can support the School.

Female Genital Mutilation:

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

51. **Youth-involved sexual images (sexting):** Sexting is the generation of images by or of children under the age of 18 of a sexual, indecent nature. Young people who share such images may be committing a criminal offence, as it is a crime to:-

- take an indecent photograph or to allow an indecent photograph to be taken
- make an indecent photograph, including downloading or opening an image that has been sent by email
- distribute or show such an e-mail
- possess with the intention of distributing images
- possess such images

52. Any disclosure relating to sexting should be treated as any other safeguarding disclosure. Staff may confiscate an electronic device if they have good reason to do so, but must not view, copy or print any such imagery. Material should not be removed from one device to another, printed or saved. The necessary referrals to the police or Local Authority Children’s Social Care will be made. Support for the victim, including counselling will be offered. Parents and carers will be informed about the incident and the way in which it is being managed. Further information can be found in the School’s Anti-Bullying and Cyberbullying Policy.

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

- Child abduction and community safety incidents which may be committed by parents or other family members, by people known but not related to the victim and by strangers.,

Other community safety incidents should raise concerns, e.g. people loitering nearby or unknown adults engaging children in conversation. In PSHE lessons, form periods and other assemblies, pupils receive practical advice on how to keep themselves safe.

- Children in the court system; the School is ready to provide support to children of all ages when they are required to give evidence in criminal courts.

- Children with family members in prison; the School's unique foundation means that we have had to give specific thought to this question. We are aware that such children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. We are ready to provide support and links to support professionals, to help mitigate negative consequences for those children.
- Modern Slavery and the National Referral Mechanism; Modern Slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further support is available at www.gov.uk, "modern slavery; how to identify and support victims".
- Homelessness; the School is aware of the risks and the reality of children's homelessness. The DSL will make referrals to the Local Housing Authority and/or Children's Social Care Local Authority Children's Social Care and Social Services.
- Forced marriage; adopting the mantra that "it could happen here" we are aware of the physical, emotional and psychological threats involved in forced marriage. Forced marriage is one entered into without the full and free consent of one or both parties, and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage.

Child-on-child abuse:

53. Whether inside or outside school or online child-on-child abuse is any form of physical abuse, which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm, sexual, emotional and financial abuse, and coercive control exercised between children, and within children's relationships (both intimate and non-intimate), friendships, and wider peer associations. Child-on-child abuse can take various forms, including (but not limited to): serious bullying (including cyberbullying, prejudice-based and discriminatory bullying), relationship abuse, domestic violence and abuse, child sexual exploitation, upskirting, initiation/ hazing-type rituals and violence, youth and serious youth violence, harmful sexual behaviour and/or prejudice-based violence including, but not limited to, gender-based violence. Online child-on-child abuse is any form of child-on-child abuse with a digital element, for example, sexting, online abuse, coercion and exploitation, child-on-child grooming, threatening language delivered via online means, the distribution of sexualised content, and harassment. Even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported
54. It is difficult to distinguish child-on-child abuse from bullying and other forms of unacceptable behaviour but as a working definition at Barrow Hills School, behaviour that results in the victim displaying signs of abuse is deemed to be child-on-child abuse even if the behaviour could have been considered by some to be 'banter' or simply a childish joke. It is more likely, but not universally true, that girls will be victims and boys the perpetrators. All such abuse is unacceptable and will be treated seriously by the School, with a zero tolerance approach. Due attention will be paid to the successful resolution of the situation.

55. Children who are victims of sexual violence and sexual harassment are likely to find the situation stressful in a way that will adversely impact on their education attainment as well as their emotional well-being. Sexual violence and sexual harassment exist on a continuum and may overlap; they occur online and offline, both physically and verbally. This can include consensual and non-consensual sharing of nude and semi-nude images and /or videos (also known as sexting or youth-produced sexual imagery), 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. Also, upskirting, which typically involves taking a picture under a person's clothing without their knowledge and/or permission to view their genitals or buttocks (with or without underwear) for sexual gratification or to cause humiliation, distress or alarm to the victim. Victims must be taken seriously and offered full support to avoid disruption to their education. Other children and staff should also be supported and protected as appropriate. The School's response will be risk assessed on a case-by-case basis by the DSL or the DDSL. The options include managing the matter internally, seeking Early Help intervention, referring to Surrey C-SPA and reporting to the police. Whenever staff respond to incidents of abuse in any form, they must reassure the victim that they are being taken seriously, they will be supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. No victim should be made to feel ashamed to make a report. The School provides a clear set of values and standards, as outlined in the behaviour policy, pastoral support and a planned programme of evidence-based content delivered through the curriculum. The matter could constitute a serious breach of the behaviour policy and lead to permanent exclusion. All staff are clear that sexual violence and sexual harassment are not acceptable and not an inevitable part of growing up; they will not tolerate instances of these behaviours or dismiss them as "banter", "having a laugh", or "boys being boys". Developmentally inappropriate sexualised behaviours will always be challenged as soon as staff become aware of them.
56. Further details can be found in [*Sexual Violence and Sexual Harassment between Children in Schools and Colleges*](#), (DfE May 2018).
57. **Domestic abuse:** domestic abuse involves the use of power and control by one person over another and includes elements of all other forms of abuse. Children who witness domestic abuse are at risk of significant harm to their wellbeing and understanding of healthy, positive relationships. The School is enrolled onto the Surrey Operation Encompass scheme and is alerted every day to all domestic abuse incidents that have been reported to Surrey Police so that the right support can be put in place at the right time for children who are experiencing domestic abuse.

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

- Child abduction and community safety incidents which may be committed by parents or other family members, by people known but not related to the victim and by strangers, other community safety incidents should raise concerns, e.g. people loitering nearby or unknown adults engaging children in conversation. In PSHE lessons, form periods and other assemblies, children receive practical advice on how to keep themselves safe.

- Children in the court system; the School is ready to provide support to children of all ages when they are required to give evidence in criminal courts.
- Children with family members in prison; the School's unique foundation means that we have to give specific thought to this question. Barrow Hills has had and will have foundation children attending our school. We are aware that such children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. We are ready to provide support and links to support professionals, to help mitigate negative consequences for those children.
- Modern Slavery and the National Referral Mechanism; Modern Slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further support is available at www.gov.uk, "modern slavery; how to identify and support victims".
- Homelessness; the School is aware of the risks and the reality of children's homelessness. The DSL will make referrals to the Local House Authority and/or Children's Social Care and Social Services.
- Forced marriage; adopting the mantra that "it could happen here" we are aware of the physical, emotional and psychological threats involved in forced marriage. Forced marriage is one entered into without the full and free consent of one or both parties, and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage.
- Additional Support; children identified with additional educational or medical needs can be prone to child-child abuse.

58. **Cybercrime** is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber Dependent crimes include;
- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
 - denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above. Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or DDSL), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety. Additional advice can be found at: Cyber

59. **Domestic Abuse**

Domestic abuse involves the use of power and control by one person over another and includes elements of all other forms of abuse. It can encompass a wide

range of behaviours and may be a single incident or a pattern of incidents.

That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional.

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

Children who witness domestic abuse are at risk of significant harm to their wellbeing and understanding of healthy, positive relationships.

The School is enrolled onto the Surrey Operation Encompass scheme and is alerted every day to all domestic abuse incidents that have been reported to Surrey Police so that the right support can be put in place at the right time for children who are experiencing domestic abuse.

What to do if you become aware of abuse

60. Care must be taken when recognising abuse and neglect in children with special educational needs or disabilities as they can be disproportionately impacted by things such as bullying. Additional barriers could be the assumption that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
61. In the EYFS environment, there is likely to be an enhanced risk as children of these ages will be unable to distinguish inappropriate behaviour. The School will be alert to any potential abuse.—There may be reasonable cause to suspect that a child is suffering or is likely to suffer significant harm. In such cases it is probable that EYFS staff will be in the best position to assess the situation; the Head of Pre-Prep will also be well-placed.
62. If you (or a child) have any worries or concerns share them immediately with one of the Safeguarding Leads. Early help in identifying emerging problems and sharing information is crucial. If you do not, you could be allowing the child to be put at further risk, and vital information may not come to light. Staff **MUST NOT** keep secrets or make promises to the children that other appropriate adults (e.g. Local Authority Children's Social Care or police) will not be involved. Even if a child later retracts their statement, the referral could still be made. Particular attention to the potential need for early help should be given to a child who:
 - is disabled and/or has specific additional needs
 - is a young carer
 - shows signs of being drawn into anti-social or criminal behaviour
 - is frequently missing
 - is misusing drugs and/or alcohol
 - is at risk of exploitation

63. Ensure that the child is in a safe place, encourage the child to stay in School until all the information has been collected.
64. At all times staff will consider the welfare of the children involved in any allegation or investigation as well as pursuing an investigation. When information is being gathered the Safeguarding Leads will be present, to support the children and explain what is taking place.
65. One of the Safeguarding Leads will liaise with the Head and telephone the appropriate services for advice; such contact will be made within 24 hours especially in the case of those who have suffered or who are likely to suffer significant harm. Children in need will be referred to the child's Local Authority Children's Social Care by one of the Safeguarding Leads, but this will be done immediately in the case of children at risk so that inter-agency assessments can take place. The police will be contacted if a crime has been committed. Contact may also need to be made if the case involves one of abuse perpetrated by one or more children against another.
66. If it is thought that there is a case to pursue, the police or other agency will come to the School and interview the children. It is most important a trusted member of staff is present, acting as guardian.
67. Staff **MUST** remember:-
- that the priority is to protect the child
 - to take the matter seriously in a supportive way
 - when initially talking to the child not to ask leading questions or "put words in their mouth"
 - to gather information on a "need to know" basis; you do not need the whole story, just sufficient to take the next step
 - that the child is very vulnerable and to reassure the child that you have taken what they had to say seriously
 - keep a record of the facts of the matter to pass on to the Designated Safeguarding Lead
68. Staff **MUST NOT**:-
- contact the parents any further
 - interrogate the child or ask leading questions
 - speak to anyone about whom the allegations are made
 - promise to keep secrets or maintain confidentiality
 - ask the child outright if they have suffered abuse
69. One of the most important things to do is to LISTEN to what a young person is telling you. He or she may want to tell you about abuse and your reaction to this is vital. Remain non-judgmental.

Whistle-blowing

70. The School recognises that workers who disclose certain types of information to certain individuals in certain circumstances are protected by the *Public Interest Disclosure Act 1998*. This enables a worker to raise reasonable concerns internally and in a confidential fashion about safeguarding, fraud, malpractice, health and safety, criminal offences, miscarriages of justice, failure to comply with legal obligations or environmental damage. The policy also provides, if necessary, for such concerns to be raised outside the School. The School will not tolerate

malpractice and seeks to provide a clear, simple and confidential procedure for raising concerns, which is accessible to all members of staff. A qualifying disclosure is likely to show, in the reasonable belief of the worker, one or more of the following:

- that a criminal offence has been committed, is being committed or is likely to be committed
- that a person has failed, is failing, or is likely to fail to comply with a particular legal obligation
- that a miscarriage of justice has occurred, is occurring or is likely to occur
- that the health and safety of any individual has been, is being or is likely to be endangered
- that the environment has been, is being or is likely to be damaged
- that information indicating the occurrence of any of the above has been, is being or is likely to be concealed
- that safeguarding issues are not being taken seriously

71. To be protected, a disclosure must be made 'in the public interest' and must be:

- to the employer, or the person legally authorised by the employer to receive disclosures. (In this School, the Governors are the employer and the Head and the Director of Finance and Operations are authorised to receive disclosures). In the case of a child protection or a safeguarding issue, the disclosure can be made to any member of the team of staff named in the policy or
- to a 'Prescribed Person' or
- to an individual unconnected with the organisation ('External Disclosure') or
- undertaken in exceptionally serious cases.

72. 'Prescribed Persons' are those bodies prescribed by an order made by the Secretary of State. The Public Interest Disclosure (Prescribed Persons) Order 1999 lists more than 30 regulatory bodies to whom protected disclosures may be made. These include the Data Protection Registrar, the Environment Agency and the Health and Safety Executive. Disclosure may also be to a legal adviser.

73. Workers who make 'External Disclosures' are expected to have previously raised the matter with the employer or a 'Prescribed Person', or have not done so because they reasonably believe that they will be subjected to a detriment or that a complaint to the employer would result in evidence being concealed or destroyed. The worker must also make the disclosure in the reasonable belief that the allegations are substantially true and must not act for personal gain. It must also be 'reasonable in all the circumstances' of the case to make the disclosure.

74. Employees who wish to raise a concern under this procedure are entitled to have the matter treated confidentially and their name will not be disclosed to the alleged perpetrator of malpractice without their prior approval. It may be appropriate (to preserve confidentiality) that concerns are raised orally rather than in writing, although members of staff are encouraged to express their concern in writing wherever possible. If there is evidence of criminal activity, then the police will be informed.

75. Additionally, a member of staff is at liberty to express any concern to the Head or the Director of Finance and Operations. Any concern raised will be investigated thoroughly and in a timely manner, and appropriate corrective action will be pursued. The member of staff making the allegation will be kept informed of progress and, when possible (subject to third party rights) will be informed of the

resolution. A member of staff who is not satisfied that their concern is being properly dealt with by the Head or Director of Finance and Operations will have a right to raise it in confidence with the governing body.

76. No member of the staff will suffer a detriment or be disciplined for raising a genuine and legitimate concern, providing that they do so in good faith and following the whistle-blowing procedures.
77. **The NSPCC whistleblowing helpline is available for staff. Calls can be made to 0800 028 0285, and the email address is help@nspcc.org.uk.**

CONTACT TELEPHONE NUMBERS

	Mobile	School
Designated Safeguarding Lead: Mr Paul Crisell	07940 708 732	01428 683 639
EYFS Designated Safeguarding Lead: Mrs Rachel E Harris	07990 706 841	01428 683 639
Head: Mr Philip Oldroyd	07765 705 447	01428 683 639

Surrey Safeguarding Children Partnership ([SSCP](#))

The Surrey Safeguarding Children Partnership co-ordinates how children are safeguarded and protected from harm. Their website provides guidance and protocols for professionals as well as details of child protection courses available.

- Normal: 0300 470 9100
- Out of hours: 01483 517898
- Email: partnership.team@surreycc.gov.uk

Local Area contact for Waverley

- Duty Desk : 0300 123 1640

LADO

- Duty Desk: 0300 123 1650
- Email: LADO@surreycc.gov.uk

Useful contact

- SSCP Support Team partnership.team@surreycc.gov.uk

Surrey is deemed a low-risk county for terrorist activity, but there remains the possibility of some suspicious behaviour in this regard. Concerns can be reported in a number of ways:

- Surrey Police non-emergency number 101
- DfE dedicated helpline for non-emergency advice 0207 340 7264
- DfE email counter-extremism@education.gsi.gov.uk
- Anti-terrorism hotline 0800 789 321
- If it is an emergency dial 999

78. All children must receive the right help at the right time to prevent issues from escalating. Although the expectation is that referrals will be made by any one of the Safeguarding Leads, anyone can make a referral if necessary.
79. This policy is reviewed annually or more frequently if required by the Senior Management Team, the Deputy Head, the Governors' Pastoral Working Group, the Governor responsible for Child Protection and Safeguarding and then also by the full governing body at the Summer Term meeting to ensure its efficiency. At that meeting, the Treasurer will sign a declaration that the policy has been reviewed.

Appendix 1

Staff behaviour protocols

Underlying principles

- The welfare of the child is paramount; all staff have a duty to keep children safe and to protect them from harm
- Staff are responsible for their own actions and should avoid any conduct which would lead a reasonable person to question their motivation and intentions; their behaviour must reflect integrity, maturity and good judgement
- Staff should take advice from their line manager or a senior member of staff over any behaviour or incident that gives a cause for concern
- Professional standards and judgements should be applied consistently towards all children.
- Behaviour which might be misinterpreted by others must be avoided
- Staff are aware that breaches of the law and other professional guidelines could result in criminal or disciplinary action against them.
In the case of an allegation about a colleague that they have:
 - behaved in a way that has harmed a child, or may have harmed a child;
 - possibly committed a criminal offence against or related to a child;
 - behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
 - behaved or may have behaved in a way that indicates they may not be suitable to work with children

The School will refer the allegation to the LADO. This procedure relates to members of staff, supply staff, volunteers working in any school or college regardless of whether the school or college is where the alleged abuse took place. Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police.

Position of trust

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

Propriety and behaviour

- Staff should never make sexual remarks to a child, including in an e-mail, text message or any other electronic form of communication

- Staff should never discuss their own personal relationships with or in the presence of children
- Staff should never humiliate or demean children
- Staff should not seek to establish social contact with children in any way and in particular via electronic communication and social media; conferring special attention upon a child might be construed as being part of a grooming process
- Staff should not give their personal details such as phone numbers or e-mail addresses unless a specific need to do so has been agreed with The Head or Deputy Head

Physical contact

There are occasions when it is appropriate for staff to have physical contact with children, but this must be in a way appropriate to their professional role. When physical contact is made with children, this should be in direct response to their needs at the time, limited in duration and appropriate given their age, gender, ethnicity and background. Physical contact should never be secretive or for the gratification of the adult or represent a misuse of authority.

If it is necessary to restrain or control a child, the amount of force used must be proportionate to allow the individual to regain control of themselves.

Working in one-to-one situations with a child

Staff should recognise the added vulnerability of the one-to-one situation and plan accordingly. The safety of both the child and the adult is vital in such circumstances. The following principles should help:-

- Such meetings should take place in an open area and not in remote, secluded parts of the campus
- The venue should allow others to see into the room
- The door should be left open, if appropriate
- Another adult should be informed about the meeting beforehand and about the likely venue for it
- If the situation becomes difficult, the matter should be reported to a line manager

Pre-arranged meetings with children away from the School are not acceptable unless approval has been obtained from the children's parent and a senior member of staff.

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

Mobile Phone Policy (including EYFS)

Members of staff should not use personal mobile phones during direct contact time with any children unless it is for the purpose of contacting either the school and/or the emergency services.

Mobile phones and personal cameras must not be used for taking photographs which may include images of Barrow Hills children.

Any queries should be discussed with the DSL.

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

In addition to the information that is contained within this policy, the School has other policies to which reference can be made to show the standards of professional behaviour that are expected of its staff. These policies and documents can be obtained from The School Office upon request.

- Staff Code of Conduct - including Use of Reasonable Force
- Anti-Bullying and Cyberbullying
- Equal Opportunities
- Health and Safety Policy
- ICT Acceptable Use Policy
- Supervision of Pupils
- E safety policy
- Staff Employment Handbook - especially sections v and vi and the appendices of the Staff Handbook

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

Appendix 2

Prevent duty guidance

This statement takes into account the following documents:-

- Prevent Duty Guidance: for England and Wales, issued by HM Government in June 2015, updated March 2016 and again in 2021 to reflect the duty in the Counter Terrorism and Security Act 2015 and its later revision
- Keeping Children Safe in Education, DfE September 2022
- Working Together to Safeguard Children DfE July 2018
- The Use of Social Media for Online Radicalisation DfE July 2015

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

- Child Protection and Safeguarding Policy
- Curriculum Policy
- Anti-Bullying and Cyberbullying Policy
- E-safety and ICT acceptable use Policy and Responsible Internet Usage Statement
- Supervision of Pupils Policy

The Head and Designated Safeguarding Lead for Child Protection and Safeguarding are responsible for:-

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

Key definitions are:-

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

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

Barrow Hills School will fulfil its duty under the terms of the Prevent Guidance. This will be achieved in a number of ways:-

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

A risk assessment to show that due consideration is given to the Prevent duty

Nature of the risks	Level of risk	Actions taken to minimise the risk
A child applying for admission to the School for motives other than education	Low	The Registrar and SMT pays close attention to all applications, but is even more precise in the review of applicants from Syria, Iraq or other predominantly Muslim areas. A business relationship is established with the family, agency or other charitable partners, and all protocols are followed precisely in the application for a visa. Staff are informed specifically of the needs of all children and the potential risks that they may face. There remains at all times the clear expectation that all applicants to the School will align with its clear Christian ethos.
Any child becoming indoctrinated whilst at School	Low	The checks that are in place on curriculum delivery, such as learning walks, lesson observations and the oversight of curriculum delivery by a Head of Subject should prevent problems in lessons. The level of IT protection should prevent research and communication on the school network. A climate of open discussion and the presence of a number of staff to whom children can speak provide the opportunity for concerns to be raised readily. Robust safeguarding policies are in place.
Any child becoming indoctrinated whilst at home	Medium	The School has less control over what children do at home under the care of parents/guardians. However, by building a good relationship with parents/guardians and encouraging conversation with them, significant information can be conveyed. Focussed safety meetings and regular communication in the Head's newsletter provide due awareness of the School's ethos and expectations. The liaison with partners provides understanding of the level of risk in the local area. Robust safeguarding policies are in place.
A child becoming indoctrinated during a holiday period	Medium	There is a clear risk that when children return to their home and the lower level of supervision that might be able to be provided by parents, the risk increases. Information to parents can help. Robust safeguarding policies are in place. Staff are alert to any changes in behaviour patterns that could be emerging.

Channel Duty Guidance: Protecting vulnerable people from being drawn into terrorism (HM Government, updated April 2015) will be followed in consideration of the risk of a children being drawn into radicalisation. On balance, after due consideration by the Senior Management Team it is agreed that the net level of risk is one that can be managed.

Appendix 3

Adaptation of Safeguarding and Child Protection procedures and systems in response to COVID-19

April 2020

Response to COVID-19

There have been significant changes at Barrow Hills School in response to the outbreak. Many young people are now at home and staffing is likely to be significantly affected through illness and self-isolation.

Despite the changes, the School's Child Protection Policy is fundamentally the same: **children and young people always come first, staff should respond robustly to safeguarding concerns and contact the Designated Safeguarding Lead (DSL), Head or LADO in line with our established safeguarding procedure.**

This appendix sets out some of the adjustments we are making in line with the changed arrangements in the School and following [advice from government](#) and local agencies. This appendix uses the terms "child" (or "children") and "pupils" in acknowledgement of the statutory duty to protect all children and young people from harm. Attempts have been made to distinguish between situations that are likely to involve children attending Barrow Hills School – "pupils" – and other children but, in all cases, the underlying assumption is that a duty of care exists from School staff to all children.

The School's current position and local advice

The needs of all children and young people, their views and those of their parents and carers are being actively monitored. Risk assessments will be undertaken where appropriate, to include

- the potential health risks to all members of the School community and those resident on site from COVID-19, bearing in mind any underlying health conditions. This must be on an individual basis with advice from an appropriate health professional where required
- the risk to children if some or all elements of their Early Help plan, or in-house equivalent (e.g. Pastoral Care Plan), cannot be delivered at all, and the risk if they cannot be delivered in the normal manner or in the usual setting
- the ability of the individual's parents or home to ensure their health and care needs can be met safely

(adapted from <https://www.gov.uk/government/publications/coronavirus-covid-19-guidance-on-vulnerable-children-and-young-people/coronavirus-covid-19-guidance-on-vulnerable-children-and-young-people>)

Reporting arrangements

The School arrangements continue in line with our child protection policy. The School aims to ensure the DSL or a deputy is always on site while the School is open. In any unusual circumstance where this is not possible the DSL or Deputy DSL (DDSL) will be contactable and the Head or a member of the Senior Management Team will email all staff by 9am to advise they are acting in an on-site safeguarding role together with contact details for the DSL or Deputy DSL.

Staff will continue to follow Child Protection procedures and advise the (D)DSL immediately about concerns they have about any child, whether in School or not. COVID-19 effectively requires increased vigilance due to the pressures on services, families and young people, rather than a reduction in our standards.

Children's services may be affected by the impact of the virus on staff and an increased demand for services. Where a child is at risk of significant harm there may be a need to be persistent in referring concerns to the local authority. The arrangements for contacting children's services and the LADO office are unchanged:

Surrey County Council Children's Services 0300 470 9100

Multi-Agency Partnership 01483 517 898 (emergency out-of-hours team)

Single Point of Access (C-SPA) csmash@surreycc.gov.uk

National Society for the Prevention of Cruelty to Children (NSPCC)

helpline: 0808 800 5000 or email: help@nspcc.org.uk

For allegations against staff working in Schools:

Local Authority Designated Officer (LADO) 0300 123 1650 (option 3)
LADO@surreycc.gov.uk

Should a child, in the School's view, be at risk of significant harm and local agencies are not able to respond, the School (usually the DSL) will immediately follow Surrey Safeguarding Children Partnership's escalation procedure. In these cases, escalation would be to the senior officers:

Executive director for nursing, quality and safeguarding in health

Chief Executive Officer in Surrey County Council

Chief Constable in Surrey Police

Independent Review Service - irunit.duty@surreycc.gov.uk

Child Protection Unit - cpunit.duty@surreycc.gov.uk

Identifying vulnerability

We have undertaken a scoping exercise to identify the most vulnerable children. Using the School's "Pastoral Weekly Notes" document as a basis, the Pastoral Committee (with further input from form teachers) the School has identified those children most likely to be affected by a prolonged stay at home or with carers.

There are two children at Barrow Hills School who are subject to a child protection plan or EHCP.

Holiday arrangements

Barrow Hills School provides care for the children of key workers.

Attendance

The School will follow the [attendance guidance issued by government](#). Where a child is expected and does not arrive, the School will follow our attendance procedure and make contact with the family. If contact is not possible by 9:30am the DSL must be informed. The DSL will attempt a range of methods to contact the parent (Skype, FaceTime, through a relative, etc.) but, if necessary, arrange a home visit by the School or another appropriate agency. A risk assessment will be undertaken to consider and manage the implications of

COVID-19 alongside other risks perceived to the child. The risk of COVID-19 **does not override** the duty on the School to ensure children and young people are safe.

The School will also follow the attendance procedure if contact proves impossible with children at home through close liaison and cooperation with external agencies including police and social services.

The School is aware of its obligations in respect of children and parents taken off roll for elective home education and to inform the Local Authority in case of a child missing in education.

Staff will be made aware of increased risk.

The pressures on children and their families at this time are significant. There will be heightened awareness of family pressures through being contained in a small area and financial or health anxiety. These areas are being considered in the context of any work for children to undertake at home (including recognising the impact of online learning – see below), and an appropriate remote curriculum drafted in anticipation of an extended period of remote learning. Staff will be aware of the mental health of both [children](#) and their [parents and carers](#), and ~~must inform the DSL of any concerns~~. If a member of staff has a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the procedures within this policy and speaking to the DSL.

Child-on-child abuse

We recognise the potential for abuse to go on between young people, especially in the context of a School closure or partial closure. Our staff (especially but not only form teachers) will remain vigilant to the signs of child-on-child abuse, including those between young people who are not currently attending our provision. Extra care will be taken where groups have mixed age, developmental stages, are attending other Schools as an interim measure and similar. When making contact with these families our staff will ask about relationships between learners.

The issue of child-on-child abuse is well addressed by staff through InSeT during the year and forms part of the School's ongoing PSHE curriculum. In the event of remote learning, PSHE is included in the remote learning curriculum.

Risk online

Young people will be using the internet more during this period. The School may also use online approaches to deliver training or support. Staff will be aware of the signs and signals of cyberbullying and [other risks online](#) and apply the same child-centred safeguarding practices as when children were learning at the School.

- The School continues to ensure [appropriate filters and monitors are in place for all applications used for remote learning](#). The Safeguarding governor will monitor this as part of an overarching responsibility to assess the effectiveness of all safeguarding procedures
- The School has taken on board guidance from the [UK Safer Internet Centre](#) on safe remote learning. We have issued a code of conduct for remote learning, accordingly.
- Staff have discussed the risk that professional boundaries could slip during this exceptional period and been reminded of the School's code of conduct and importance of using School systems to communicate with children and their families.

Barrow Hills School children have received guidance on keeping safe online and know how to raise concerns with the School. During this time of remote learning, the School will not ask children to interact with anyone from outside the School community.

In case of concern, other child-protection resources to contact include:

[Childline \(0800 1111\)](#)

[UK Safer Internet Centre](#) and

[CEOP](#).

In addition, parents and carers should make a note of the information made available to them on the school's remote learning web pages.

Allegations or concerns about staff

With such different arrangements young people could be at greater risk of abuse from staff or volunteers. We remind all staff to maintain the view that 'it could happen here' and to immediately report any concern, no matter how small, to the safeguarding team (as above and in the Safeguarding Directory).

Any staff or volunteers from outside our setting will complete an induction to ensure they are aware of the risks and know how to take action if they are concerned.

The School has confirmed that the arrangements to contact the LADO at the local authority remain unchanged (as above).

If necessary, the School will continue to follow the duty to refer to DBS any adult who has harmed or poses a risk of harm to a child or vulnerable adult, and to the Teacher Regulation Agency in line with paragraph 166 of KCSIE using the address Misconduct.Teacher@education.gov.uk.

New staff or volunteers

New starters must have an **induction** before starting or on their first morning with the DSL or a deputy. They must read the School Safeguarding Policy, the Behaviour Policy, the Whistleblowing Policy and the Staff Code of Conduct in the Employment Handbook. They should be given a copy of the Safeguarding Policy which includes policy and procedures for dealing with child-on-child abuse, on-line safety, role and identity of DSL and deputies, KCSIE (2022) part one or Annex A if determined by the governing body/proprietor as appropriate (all staff), KCSIE (2022) Annex B (leaders and those who work directly with children), pupil behaviour policy, which includes measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying, safeguarding response to children who go missing from education (CME), staff code of conduct (including whistleblowing and acceptable use of IT, staff/pupil relationships, low-level concerns and communications, including use of social media).

The (D)DSL will ensure new recruits know whom to contact if worried about a child and ensure the new starters are familiar with child protection procedures.

If staff or volunteers are transferring in from other registered education or childcare settings for a temporary period to support the care of children, we will seek evidence from their setting that:

- the member of staff has completed relevant safeguarding training in line with other similar staff or volunteers,
- they have read Part I and Annex A of KCSIE, and
- where the role involves regulated activity, and the appropriate DBS check has been undertaken by that setting, we will undertake a written risk assessment to determine whether a new DBS would need to be undertaken. It may be in these exceptional times we can rely on the DBS undertaken by their setting.

Our child protection procedures hold strong:

- Volunteers may not be left unsupervised with children until suitable checks have been undertaken. People supervising volunteers must be themselves in regulated

activity, able to provide regular, day to day supervision and reasonable in all circumstances to protect the children.

- The School will undertake a written risk assessment on the specific role of each volunteer to decide whether to obtain an enhanced DBS check (with barred list information) for all staff and volunteers new to working in regulated activity in line with [DBS guidance](#).
- When undertaking ID checks on documents for the DBS it is reasonable initially to [check these documents online](#) through a live video link and to accept scanned images of documents for the purpose of applying for the check. The actual documents will then be checked against the scanned images when the employee or volunteer arrives for their first day.
- The School will update the Single Central Record of all staff and volunteers working in the School, including those from other settings. This will include the risk assessment around the DBS. A record will be kept by the HR Department of who is working in the School each day.

New children at the School

In cases when children join our School from other settings, we will require confirmation from the DSL whether they have a Safeguarding File or SEN statement/EHCP, in the normal way. This file must be provided securely **before** the child begins at our School and a call made from our (D)DSLs to the placing School's DSL to discuss how best to keep the child safe. In some unusual circumstances this may not be possible. Information provided must include contact details for any appointed social worker and where relevant for the Virtual School Head. Safeguarding information about children placed in our School will be recorded on our safeguarding system, will be securely copied to the placing School DSL and will be securely returned to the placing School on completion of the child's placement with us so there is a continuous safeguarding record for the child.

The DSL will undertake a risk assessment in respect of any new information received, considering how risks will be managed and which staff need to know about the information. This will be recorded on our safeguarding recording system.

Appendix 4 "Levels of Need"

Weekly Pastoral Notes

Level of need	Level descriptor
<i>Writing has been struck through through Previously writing in green</i>	<p>Pupil has been removed from the pastoral register This will be seen as the square going white</p> <p>As part of growing up, many children will have health concerns, family issues, academic worries or problems with peer relationships. It is a key part of the role of Form Teachers and senior staff, to offer children and their families advice and information on support which is universally open to all pupils.</p>
Level 1	Monitoring - 'keeping an eye on pupil', behaviour out of the ordinary for that child
Level 2	<p>High level of need</p> <p>Parents may have got in touch with form teacher</p> <p>More than one teacher has got into contact with HOD</p> <p>Above monitoring due to high level of parent involvement</p>
Level 3	<p>HOD will look to introduce a care plan to aid the pastoral care of this pupil (shown to pupils and parents on a need to know basis)</p> <p>Face-to-face meeting with parents may be required</p> <p>Potential safeguarding concern</p> <p>The purpose of a PCP is to improve the child's situation by formulating a response, coordinating the work of colleagues, and regularly reviewing progress. If, on review, the pupil's situation does not seem to be improving, the Committee will consider escalation.</p> <p>Deputy Head pastoral may be involved, may involve a meeting with HOD and DH</p> <p>Other agencies may be involved (Ed Psych, CAMHS etc)</p>
Level 4	<p>Potential for escalation to Head for further addressing</p> <p>Potential serious safeguarding concern (although should direct to DSL as appropriate)</p> <p>Potentially other agencies involved</p>

Appendix 5

JOB DESCRIPTION - Designated Safeguarding Lead (DSL) and EYFS Designated Safeguarding Lead

Responsible to: Head and Governors

Main responsibility of the role:

Acting as the main point of contact within the school for safeguarding and child protection.

Skills required:

- The ability to foster good relationships with parents/carers, children and adults working/volunteering with children within the school.
- An interest in the well-being of children and in safeguarding and child protection matters.
- A willingness to challenge opinion, where necessary, and to drive the child protection agenda.
- Strong listening skills and the ability to deal with sensitive situations with integrity.
- The confidence and good judgement to manage situations relating to the poor conduct/behaviour of others towards a child.
- Sound understanding of the safeguarding agenda.

Main Tasks:

Safeguarding Children:

- Implementing, promoting and reviewing the Safeguarding and Child Protection Policies and Procedures within the setting
- Understand and be responsible for the risks associated with online safety and being confident to have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school.
- Acting as the main point of contact within the school, receiving and acting upon any reported concerns. This includes ensuring that the completed paperwork is accurate, correct, fully completed and reviewed as necessary and stored in a secure and safe place.
- Ensuring all staff are familiar with, and adhere to the Safeguarding and Child Protection Policy that is in place and know the procedures to follow and who to go to should the need arise. This should be included as part of the staff induction programme.
- Providing support, advice and guidance to any other staff on an ongoing basis or on any specific safeguarding issue as required.
- Implementing, maintaining and updating the policy and procedures on an annual basis or as required.
- Ensuring that all relevant contact names and numbers are known to staff and displayed in an accessible place at all times.
- Keeping abreast of developments and understanding the latest information on data protection, confidentiality and other legal issues that impact on the protection of children, including attending appropriate regular training and ensuring all staff have appropriate and up to date training.

- Ensuring all relevant information around Safeguarding and Child Protection is communicated to the staff team through staff meetings.
- Providing guidance on relevant matters to all staff members as appropriate and promoting best safeguarding practice at all times.
- Advocating the importance of Safeguarding and Child Protection to parents so that they know we have their child's best interests at the heart of our practice.
- Monitoring child attendance, including non attendance, accidents logs, pre-existing injury reports, concern forms and incident forms to exclude any possible child protection issues. Ensure any relevant information is recorded and acted upon accordingly.
- Representing the key link to statutory agencies (Social Care or Police) during and following any formal investigations that may have to take place. This includes maintaining confidential records of reported cases, action taken, liaising with the statutory agencies and ensuring they have access to all necessary information. Liaising with local children's services as necessary
- Advocating the importance of Safeguarding and Child Protection to parents, staff, volunteers and students. Ensuring that when on leave or absent from work for any significant period, that the role of DSL is suitably covered by the Deputy DSL or another suitably trained member of staff.

Appendix 6

Online safety

Online safety is considered as part of our whole school safeguarding approach and wider staff training and curriculum planning. Online safety is a running and interrelated theme which is reflected in our policies and procedures. Children are taught about safeguarding, including online safety. A personalised or contextualised approach is taken for more vulnerable children, victims of abuse and some children with SEND.

Barrow Hills acknowledges the fact many children have unlimited and unrestricted access to the internet via mobile phone networks. The school will follow its policy on the use of mobile and smart technology in school to safeguard children and will follow child-on-child abuse procedures if mobile phones are used by a child whilst in school to sexually harass their peers via their mobile and smart technology, share indecent images: consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content.

The school recognises that online risks arise when a child:

- engages with and/or is exposed to potentially harmful CONTENT;
- experiences and/or is targeted by potentially harmful CONTACT;
- witnesses, participates in and/or is a victim of potentially harmful CONDUCT;
- is party to and/or exploited by a potentially harmful embedded marketing content and data misuse (COMMERCE).

Appendix 7

'Lower level' concerns and allegations ('low level concerns').

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 at KCSiE 2022, paragraph 426. A low level concern is any concern no matter how small and even if no more than causing a sense of unease or a 'nagging doubt' that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the staff code of conduct including inappropriate conduct outside work
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

This approach is designed to create and embed a culture of openness, trust and transparency in which the school's values and expected behaviour, which are set out in the staff code of conduct, are constantly lived, monitored and reinforced by all staff.

Low level concerns should be reported to the Head or the Treasurer if the concern relates to the Head. Reports about supply staff and contractors should be notified to their employers so any potential patterns of inappropriate behaviour can be identified.

The procedure for responding to reports of low level concerns is set out in the flowchart below. Where the 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 witness. 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.

Records of low-level concerns should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and responded to.

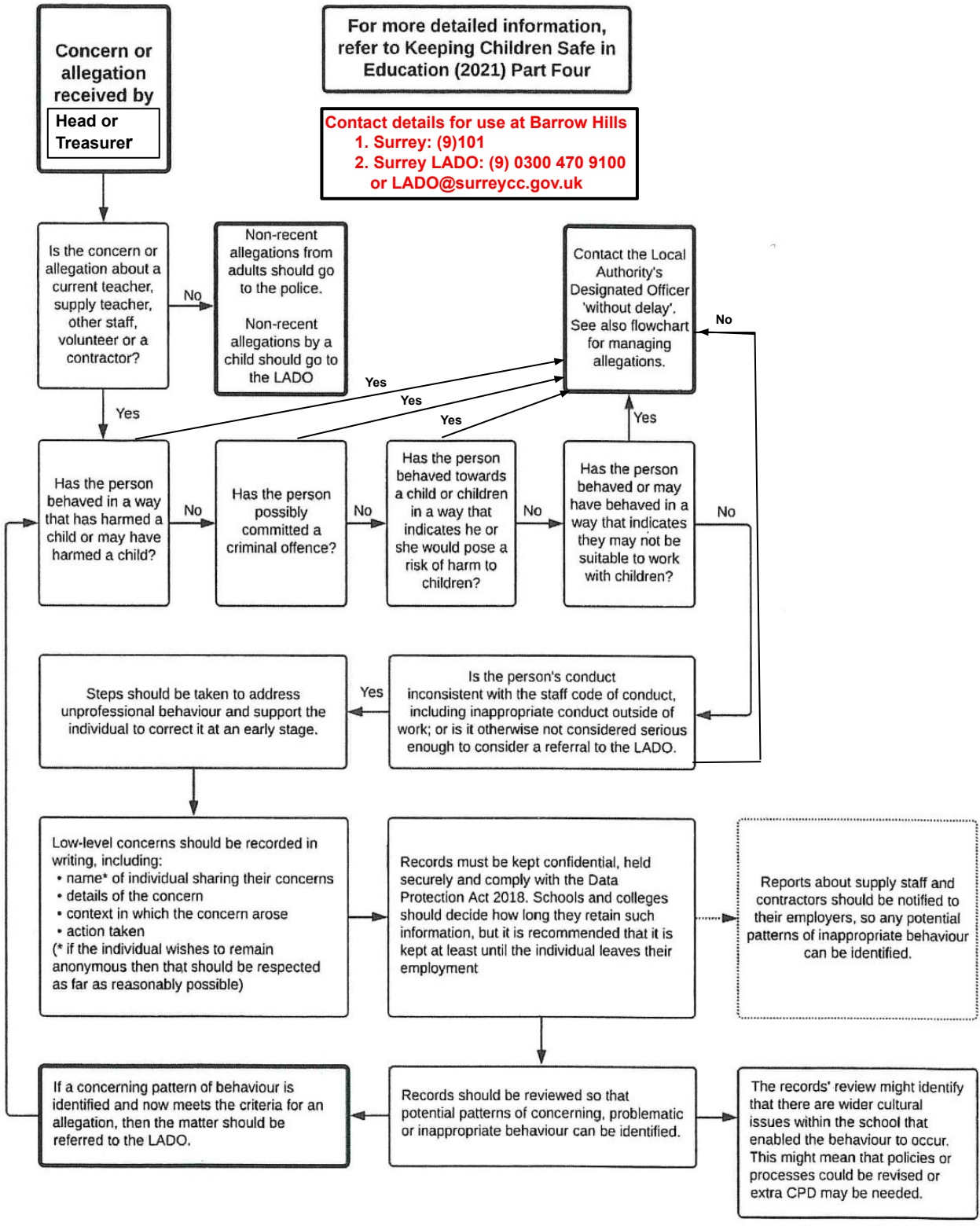
Where a pattern of behaviour is identified, the school should decide on a course of action. This might be internal disciplinary procedures, or referral to the LADO if the harms threshold is met.

The school must consider if any wider cultural issues in school that enabled the behaviour to occur and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence.

The rationale for all decisions and actions taken must be recorded.

Please refer to the flow chart below - Process to Follow when a low level Concern is Raised.

Process to follow when a Low-Level Concern is raised



For more detailed information, refer to Keeping Children Safe in Education (2021) Part Four

Contact details for use at Barrow Hills
 1. Surrey: (9)101
 2. Surrey LADO: (9) 0300 470 9100 or LADO@surreycc.gov.uk

Concern or allegation received by Head or Treasurer

Is the concern or allegation about a current teacher, supply teacher, other staff, volunteer or a contractor?

Non-recent allegations from adults should go to the police.
 Non-recent allegations by a child should go to the LADO

Contact the Local Authority's Designated Officer 'without delay'. See also flowchart for managing allegations.

Has the person behaved in a way that has harmed a child or may have harmed a child?

Has the person possibly committed a criminal offence?

Has the person behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children?

Has the person behaved or may have behaved in a way that indicates they may not be suitable to work with children?

Steps should be taken to address unprofessional behaviour and support the individual to correct it at an early stage.

Is the person's conduct inconsistent with the staff code of conduct, including inappropriate conduct outside of work; or is it otherwise not considered serious enough to consider a referral to the LADO.

Low-level concerns should be recorded in writing, including:
 • name* of individual sharing their concerns
 • details of the concern
 • context in which the concern arose
 • action taken
 (* if the individual wishes to remain anonymous then that should be respected as far as reasonably possible)

Records must be kept confidential, held securely and comply with the Data Protection Act 2018. Schools and colleges should decide how long they retain such information, but it is recommended that it is kept at least until the individual leaves their employment

Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

The records' review might identify that there are wider cultural issues within the school that enabled the behaviour to occur. This might mean that policies or processes could be revised or extra CPD may be needed.

What is a low level concern?
 The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out at KCSIE (2021) paragraph 338. 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:
 • is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
 • does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.