



## **Child Protection and Safeguarding Policy**

This Child Protection and Safeguarding Policy  
has been approved and adopted by the Xavier Catholic Education Trust in July 2023 and will be  
reviewed in July 2024.

Committee Responsible: Audit and Risk Committee

This policy should be read in conjunction with the “Safeguarding Definitions, Vulnerabilities and Procedures” document which can be accessed using the link [here](#).

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## Safeguarding Statement 2023

### “It could happen here”

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children.

We make every effort to provide an environment in which children and adults feel safe, secure, valued and respected, and feel confident to talk if they are worried, believing they will be effectively listened to.

The purpose of this policy is to provide staff, volunteers and governors with the framework they need in order to keep children safe and secure in our school. The policy also informs parents and carers how we will safeguard their children whilst they are in our care.

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## Terminology

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

- protecting children from maltreatment;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- taking action to enable all children to have the best outcomes.

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

**Early Help** means providing support as soon as any needs emerge or are identified at any point in a child's life.

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

**Child(ren)** includes everyone under the age of 18. On the whole, this will apply to pupils of our school; however the policy will extend to visiting children and students from other establishments

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

**Local Authority Children's Social Care** refers to Children's Services in the area in which the child is resident, unless a child is a Child Looked After then this will be the Children's Services in their home authority.

**MAP** refers to the Surrey Multi-Agency Partnership.

**C-SPA** refers to the Children's Single Point of Access and the Child Protection Consultation Line.

## Introduction

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002 (as amended), and in line with statutory guidance: 'Working Together to Safeguard Children' 2018, Revised Safeguarding Statutory Guidance 'Framework for the Assessment of Children in Need and their Families' 2000, 'What to do if You are Worried a Child is Being Abused' 2015, 'Early Years Foundation Stage Framework 2021' and Education and Training (Welfare of Children) Act 2021.

The policy also reflects, both statutory guidance 'Keeping Children Safe in Education' 2023 (KCSIE), and [Surrey Safeguarding Children Partnership \(SSCP\) Procedures](#).

The Governing body takes seriously its responsibility under section 175/157 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure there are robust arrangements within our school to identify, assess, and support those children who are suffering harm or at risk of suffering harm.

This policy applies to all members of staff, governors and volunteers in the school

## Guidance and documents referred to in this policy

- [Surrey Safeguarding Children Partnership protocols, guidance and procedures](#)
- [Working Together to Safeguard Children 2018](#)
- [Keeping Children Safe in Education 2023](#)
- [Disqualification under the Childcare Act 2006 \(updated 2019\)](#)
- [FGM Act 2003 Mandatory Reporting Guidance 2020](#)
- ['What to do if you are worried a child is being abused' 2015](#)
- [Teacher Standards 2011](#)
- [Information Sharing Advice for Practitioners' guidance 2018](#)
- [SCC Touch and the use of restrictive physical intervention when working with children and young people](#)
- [The Equality Act 2010](#)
- [Statutory framework for the early years foundation stage \(publishing.service.gov.uk\)2021](#)

## Equalities Statement

With regards to safeguarding we will consider our duties under the Equality Act 2010 and our general and specific duties under the Public Sector Equality Duty. General duties include:  
Eliminate discrimination, harassment, victimisation, and other conduct that is prohibited by the Equality Act 2010.

Advance equality of opportunity between people who share a protected characteristic and people who do not share it.

Foster good relations across all protected characteristics between people who share a protected characteristic and people who do not share it.

Details of our specific duties are published under the school equality statement and measurable objectives.

Staff are aware of the additional barriers to recognising abuse and neglect in children with Special Educational Needs and Disabilities (SEND). This will be in line with our Special Educational Needs and Disability Policy.

The school also adheres to the principles of and promotes anti-oppressive practice in line with the United Nations Convention of the Rights of the Child and the Human Rights Act 1998.

## Policy Principles & Values

The welfare of the child is paramount

Maintain an attitude of “It could happen here”

Children have a right to feel safe and secure, they cannot learn effectively unless they do so.

All children have a right to be protected from harm and abuse.

All staff have a role in the prevention of harm and abuse and an equal responsibility to act immediately on any suspicion or disclosure that may indicate a child is at risk of harm, either in the school or in the community, taking into account contextual safeguarding, in accordance with statutory guidance.

We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working to protect and safeguard children.

Whilst the school will work openly with parents as far as possible, it reserves the right to contact Local Authority Children’s Social Care or the police, without notifying parents if this is believed to be in the child’s best interests.

We will always act in the best interests of the child and ensure that our decisions around safeguarding take a child-centred and coordinated approach

## Policy Aims

To demonstrate the school's commitment with regard to safeguarding and child protection to pupils, parents and other partners.

To provide staff with the framework to promote and safeguard the wellbeing of children and in doing so ensure they meet their statutory responsibilities.

To develop knowledge, understanding and skills and raise the awareness of all staff and volunteers of their responsibilities to safeguard children through identifying and reporting safeguarding issues.

To ensure early identification of need for vulnerable learners and provision of proportionate interventions to promote their welfare and safety.

To provide robust school systems and procedures that are followed by all members of the school community in cases of suspected abuse.

To develop and promote effective working relationships with other agencies, in particular Early Help providers, the Police, Health and Local Authority Children's Social Care.

To ensure that all staff working within our school who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory DBS check (according to KCSIE 2023 guidance), and a single central record is kept for audit.

We comply with the Disqualification under the Childcare Act 2006 guidance issued in August 2018.

### Supporting Children

We recognise that school may provide a safe place and the only stability in the lives of children who have been abused or who are at risk of harm.

We recognise that a child who is abused or witnesses abuse and/or violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth.

We recognise that 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.'

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

Our school will support all children:

We will promote a caring, safe and positive environment within the school.

We will encourage self-esteem and self-assertiveness, through the curriculum and through positive relationships within the school community.

We will ensure children are taught to understand and manage risk through personal, social, health and economic (PSHE) education and Relationship and Sex Education (RSE) and through all aspects

of school life. This includes online safety.

We will encourage the promotion and protection of a good mental wellbeing culture.

We will respond sympathetically to any requests for time out to deal with distress and/or anxiety.

We will offer details of helplines, counselling or other avenues of external support.

We will liaise and work in partnership with other support services and agencies involved in Early Help and the safeguarding of children.

We will notify Local Authority Children's Social Care immediately if there is a significant concern.

We will provide continuing support to a child about whom there have been concerns who leaves the school by ensuring that information is shared confidentially with the child's new setting and ensure the school records are forwarded as a matter of priority and within statutory timescales.

## **Prevention / Protection**

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

The school will:

Establish and maintain an ethos where children feel safe and secure, are encouraged to talk and are always listened to.

Include regular consultation with children e.g. through questionnaires, participation in anti-bullying activity, asking children to report whether they feel safe in the setting.

Ensure that all children know there is and can access an adult in the school whom they can approach if they are worried or in difficulty.

Ensure all children have access to a trained Mental Health Lead in the school.

Include safeguarding across the curriculum, including PSHE, opportunities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help. In particular this will include anti-bullying work, online-safety, accessing emergency services, road safety, pedestrian and cycle training. Also focussed work in Year 6 to prepare for transition to Secondary school and more personal safety/independent travel. It is also recognised that effective education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs and disabilities.

Ensure all staff are aware of school guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks



## Safe School, Safe Staff

We will ensure that:

The school operates safer recruitment procedures in line with KCSIE 2023 and that it includes statutory checks on staff suitability to work with children.

All staff receive information about the school's safeguarding arrangements, the school's safeguarding statement, Xavier Code of Conduct, Child Protection and Safeguarding Policy, the role and names of the Designated Safeguarding Lead and their deputy(ies), and [Keeping Children Safe in Education part 1 and Annex B](#).

All staff receive safeguarding and child protection training, including online safety which includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring, at induction in line with advice from Surrey Safeguarding Children Partnership . Training is regularly updated and receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually.

All members of staff are trained in and receive regular updates in online safety and reporting concerns.

All members of staff maintain a zero-tolerance approach to sexual violence and sexual harassment.

All staff and governors have regular safeguarding and child protection awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse.

The Child Protection and Safeguarding Policy is made available via the school website and that parents/carers are made aware of this policy.

All parents/carers are made aware of the responsibilities of staff members with regard to safeguarding and child protection procedures through the publication of the Child Protection and Safeguarding Policy.

We provide a coordinated offer of Early Help when additional needs of children are identified and contribute to early help arrangements and inter-agency working and plans.

Appropriate filters and monitoring systems are in place on school devices and school networks and regularly review their effectiveness.

Our Lettings Policy will seek to ensure the suitability of adults working with children on school sites at any time and ensure that any groups who use the school premises have child protection policies and procedures in place.

Community users organising activities for children are aware of the school's Child Protection Policy, guidelines and procedures.

The name of the designated members of staff for child protection, the Designated Safeguarding Lead and deputy(ies), are clearly advertised in the school with a statement explaining the school's role in referring and monitoring cases of suspected harm and abuse.

All staff will be given a copy of Part 1 of Keeping Children Safe in Education 2023 and will sign to say they have read and understood it. This applies to the Governing Body in relation to part 2 of the same guidance.

All staff will be provided with appropriate supervision and support to ensure that they are competent to carry out their responsibilities for safeguarding and promoting the welfare of children and are supported in their safeguarding role.

## **Roles and Responsibilities**

### **All School Staff:**

Have a key role to play in identifying concerns early and in providing help for children. To achieve this they will:

Provide a safe environment in which children can learn.

Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to.

Ensure children know that there are adults in the school who they can approach if they are worried or have concerns.

Plan opportunities within the curriculum for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe.

Attend training in order to be aware of and alert to the signs of abuse. Maintain an attitude of “it could happen here” with regards to safeguarding.

Understand that safeguarding is ‘everyone’s responsibility’.

Be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

Be able to identify vulnerable learners and take action to keep them safe. Information or concerns about learners will be shared with the DSL where it includes those:

- Who may need a social worker and may be experiencing abuse or neglect.
- Requiring mental health support
- May benefit from early help
- Where there is a radicalisation concern
- Where a crime may have been committed

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

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

Be aware of how abuse, neglect and other potentially traumatic adverse childhood experiences can impact on children's mental health, behaviour and education.

Take immediate action if they have a mental health concern about a child that is also a safeguarding concern, following the Child Protection and Safeguarding Policy and speaking to the designated safeguarding lead or a deputy designated safeguarding lead.

Know how to respond to a pupil who discloses harm or abuse following training of 'Working together to Safeguard Children', and 'What to do if you are worried a child is being Abused' (2015).

Record their concerns if they are worried that a child is being abused and report these to the DSL immediately that day. If the DSL is not contactable immediately a Deputy DSL should be informed.

Be prepared to refer directly to the Children's Single Point of Access (C-SPA), and the police if appropriate, if there is a risk of significant harm and the DSL or their deputy is not available. Understand their role in multi-agency safeguarding arrangements and ensure the school contributes to multi-agency working in line with statutory guidance, Working Together to Safeguard Children 2018.

Follow the allegations procedures if the disclosure is an allegation against a member of staff, including supply teachers and volunteers.

Report low-level concerns about any member of staff/supply staff, volunteer or contractor to the Headteacher. Low-level concerns about the Headteacher should be shared with the Xavier Safeguarding Compliance Director.

A 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the allegation/harm threshold. 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 Xavier code of conduct, including inappropriate conduct outside of work, and
- Does not meet the allegation/harm threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- humiliating pupils

Follow the procedures set out by the Surrey Safeguarding Children Partnership and take account of guidance issued by the Department for Education to safeguard children.

Provide support for children subject to Early Help, Child in Need or Child Protection and be involved where appropriate, in the implementation of individual plans to further safeguard vulnerable learners and understand their academic progress and attainment and maintain a culture of high aspirations for this cohort.

A member of staff who is approached by a child should listen positively and try to reassure them. They cannot promise confidentiality and should explain the need to pass information to other professionals to help keep the child and/or other children safe.

Notify the DSL or their Deputy of any child on a child protection plan or child in need plan who has unexplained absence.

Understand early help and be prepared to identify and support children who may benefit from early help.

Identify children who may benefit from early help, liaising with the DSL in the first instance. (Options may include managing support for the child internally via the school's pastoral support process or an Early Help Assessment). In some circumstances it may be appropriate for a member of school staff to act as the lead professional in early help cases.

Liaise with other agencies that support pupils and provide early help. Know who the DSL and Deputy DSL are and know how to contact them.

Have an awareness of the role of the DSL, the school's Child Protection and Safeguarding Policy, Behaviour Policy and Xavier Code of Conduct, and procedures relating to the safeguarding response for children who go missing from education.

Be mindful that the Teacher Standards states that teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

Assist the Governing Body and Headteacher in fulfilling their safeguarding responsibilities set out in legislation and statutory guidance.

## **The Headteacher**

In addition to the role and responsibilities of all staff the Headteacher will ensure that:

The school fully contributes to inter-agency working in line with Working Together to Safeguard Children 2018 guidance.

The Child Protection and Safeguarding Policy and procedures are implemented and followed by all staff.

The school has appropriate policies in place that make it clear that sexual harassment, online sexual abuse and sexual violence (including sexualised language) is unacceptable, with appropriate sanctions and support in place.

The school staff have appropriate knowledge of part 5 of Keeping Children Safe in Education 2023.

All children are supported to report concerns about harmful sexual behaviour freely. That concerns are taken seriously and dealt with swiftly and appropriately, and children are confident that this is the case. Comprehensive records of all allegations are kept.

All staff are aware of the role of the designated safeguarding lead (DSL), including the identity of the DSL and any deputies.

Sufficient time, training, support, funding, resources, including cover arrangements where necessary, is allocated to the DSL to carry out their role effectively, including the provision of advice and support to school staff on child welfare and child protection matters, to take part in strategy discussions/meetings and other inter-agency meetings and/or support other staff to do so; and to contribute to the assessment of children.

Opportunities are provided for a co-ordinated offer of early help when additional needs of children are identified.

Deputy DSLs are trained to the same standard as the DSL and the role is explicit in their job description.

Adequate and appropriate DSL cover arrangements are in place for any out of hours/out of term activities.

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

Child-centred systems and processes are in place for children to express their views and give feedback.

All staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle-blowing procedures.

Children are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.

That allegations or concerns against staff, supply staff and volunteers are dealt with in accordance with guidance from the Department for Education (DfE), Surrey Safeguarding Children Partnership (SSCP) and Surrey County Council (SCC).

'Low-level concerns' are recorded in cases which concern a member of staff, supply staff, contractor or a volunteer. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous that will be respected as far as reasonably possible.

When a low-level concern is raised by a third party they will collect as much evidence as possible by speaking directly to the person who raised the concern, unless it has been raised anonymously, to the individual involved and any witnesses.

That statutory requirements are met to make a referral to the Disclosure and Barring Service and

additionally in the case of teaching staff the Teacher Regulation Agency where they think an individual has engaged in conduct that harmed (or is likely to harm) a child; or if the person otherwise poses a risk of harm to a child.

## **The Designated Safeguarding Lead:**

In addition to the role and responsibilities of all staff the DSL will:

Hold the lead responsibility for safeguarding and child protection (including online safety) in the school, this responsibility is not able to be delegated.

Have an “it could happen here” approach to safeguarding.

Liaise with the three safeguarding partners and work in partnership with other agencies in line with Working Together to Safeguard Children (2018).

Where necessary contact Children’s Single Point of Access Child Protection Consultation Line for advice and support (0300 420 9100 option 3),

Manage and submit a Request for Support Form for a child if there are concerns about suspected harm or abuse, to the Children’s Single Point of Access (C-SPA), and act as a point of contact and support for school staff. Requests for support should be made securely by email to [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk) using the [Request for Support Form](#). Urgent referrals should be made by telephone 0300 470 9100.

Report concerns that a pupil may be at risk of radicalisation or involvement in terrorism, following the [Prevent referral process](#) and use the Prevent referral form to refer cases by e-mail to [preventreferrals@surrey.pnn.police.uk](mailto:preventreferrals@surrey.pnn.police.uk). If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101 or 07795043842 or 01865555618 and ask to speak to the Prevent Supervisor for Surrey.

The Department of Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).

Refer cases where a crime may have been committed to the Police as required. The National Police Chiefs’ Council guidance for schools and colleges When To Call The Police should help DSL’s understand when they should consider calling the police and what to expect when they do.

Liaise with the “case manager” and Local Authority Designated Officer (LADO) for child protection concerns in cases which concern a member of staff, supply staff, contractor or a volunteer; and refer cases where a person is dismissed or left service due to risk/harm to a child to the Disclosure and Barring Service and Teaching Regulation Agency, as required.

Follow KCSIE 2023 guidance on ‘Child on Child Abuse’ when a concern is raised that there is an allegation of a child abusing another child within the school.

When there has been a report of sexual violence, make an immediate risk and needs assessment.

Additionally, where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis and be put in place as required.

Be available during term time (during school hours) for staff in school to discuss any safeguarding concerns. Appropriate and adequate cover arrangements will be arranged by the DSL and the school leadership for any out of hours/term activities.

Act as a source of support and expertise in carrying out safeguarding duties for the whole school community.

Encourage and promote a culture of listening to children and taking account of their wishes and feelings, amongst all staff.

Access training and support to ensure they have the knowledge and skills required to carry out the role. DSL training should be updated at least every two years and their knowledge and skills refreshed at regular intervals but at least annually.

Have a secure working knowledge of Surrey Safeguarding Children Partnership procedures and understand the assessment process for providing early help and statutory intervention, including the Effective Family Resilience Levels of Need document and referral arrangements.

Have a clear understanding of access and referral to the local Early Help offer and support and advise members of staff where early help intervention is appropriate.

Have a working knowledge of how Surrey County Council conduct an initial child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.

Understand the lasting impact that adversity and trauma can have, including on the children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes.

Understand and support the school delivery with regards to the requirements of the Prevent duty and provide advice and guidance to staff on protecting children from radicalisation.

Understand and evaluate the filtering and monitoring systems and processes in place.

Liaise with school staff (especially pastoral support, behaviour leads, school health colleagues and the SENDCO) on matters of safety and safeguarding and consult the SSCP Effective Family Resilience Levels of Need document to inform decision making and liaison with relevant agencies.

Be alert to the specific needs of children in need, those with SEND and young carers.

Understand the risks associated with online activity and be confident that they have the up to date knowledge and capability to keep children safe whilst they are online at school; in particular understand the additional risks that children with SEND face online and the associated and appropriate support they require.

Keep detailed, accurate records (either written or using appropriate secure online software), that include all concerns about a child even if there is no need to make an immediate referral and record

the rationale for decisions made and action taken.

Ensure that an indication of the existence of the additional child protection file is marked on the pupil school file record.

Ensure that when a pupil transfers school (including in-year), their child protection file is passed to the new school as soon as possible, and within five school days for an in-year transfer or within the first five days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit and confirmation of receipt should be obtained.

Ensure that where a pupil transfers school and is on a child protection plan or is a child looked after, their information is passed to the new school immediately and that the child's social worker is informed. In addition, consideration should be given to a multi-agency schools transition meeting if the case is complex or on-going.

Consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard the child.

If the transit method requires that a copy of the Child Protection file is retained until such a time that the new school acknowledges receipt of the original file, the copy should be securely destroyed on confirmation of receipt.

Ensure that all appropriate staff members have a working knowledge and understanding of their role in case conferences, core groups and other multi-agency planning meetings, to ensure that they attend and are able to effectively contribute when required to do so; where a report is required, this should be shared with the parents prior to the meeting.

Report to the Headteacher any significant issues for example, use of Surrey's FaST Resolution Process enquiries under section 47 of the Children Act 1989 and Police investigations. This should include being aware of the requirement for children to have an Appropriate Adult.

Ensure that the case holding Social Worker is informed of any child currently with a child protection plan who is absent without explanation.

Ensure that the case holding social worker is informed of any child currently with a child protection plan who is absent without explanation.

Ensure that all staff sign to say they have read, understood and agree to work within the School's Child Protection and Safeguarding Policy, Xavier Code of Conduct and Keeping Children Safe in Education (KCSIE) Part 1 and Annex B and ensure that the policies are used effectively.

Organise Child Protection and Safeguarding induction, regularly updated training and a minimum of annual updates (including online safety) for all school staff, keep a record of attendance and address any absences.

Ensure that in collaboration with the school leadership and governors, the Child Protection and Safeguarding Policy is reviewed annually and the procedures and implementation are updated and reviewed regularly.

Ensure that the Child Protection and Safeguarding Policy is available publicly and that parents are



aware that referrals about suspected harm and abuse will be made and the role of the school in this.

Establish and maintain links with the Local Authority safeguarding partners to make sure staff are aware of training opportunities and the latest policies on local safeguarding arrangements.

Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff.

Contribute to and provide, with the Headteacher and Chair of Governors, the “Audit of Statutory Duties and Associated Responsibilities” to be submitted biennially to the Surrey County Council, Education Safeguarding Team.

Ensure that the names of the Designated Safeguarding Lead and Deputy Designated Safeguarding Lead/s, are clearly advertised, with a statement explaining the school’s role in referring and monitoring cases of suspected abuse.

Meet all other responsibilities as set out for DSLs in Keeping Children Safe in Education 2023.

### **The Deputy Designated Safeguarding Lead(s):**

In addition to the role and responsibilities of all staff the Deputy DSL will:

Be trained to the same standard as the Designated Safeguarding Lead and the role is explicit in their job description.

Provide support and capacity to the DSL in carrying out delegated activities of the DSL; however, the lead responsibility of the DSL cannot be delegated.

In the absence of the DSL, carries out the activities necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the DSL the deputy will assume all of the functions above.

### **All members of The Governing Body understand and fulfil their responsibilities to ensure that:**

There is a whole school approach to safeguarding, involving everyone in the school and ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

The school has effective safeguarding policies and procedures including a Child Protection and Safeguarding Policy, a Xavier Code of Conduct, a Behaviour Policy and a response to children who go missing from education.

Policies are consistent with Surrey Safeguarding Children’s Partnership (SSCP) and statutory requirements and that the Child Protection and Safeguarding Policy is reviewed annually and available on the school website.

The SSCP is informed in line with local requirements about the discharge of duties via the biennial

safeguarding audit.

The school operates a safer recruitment procedure that includes statutory checks on staff suitability to work with children.

The school is committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006

There is at least one person on every recruitment panel who has completed safer recruitment training, if there is not a panel conducting interviews then the individual will have completed the safer recruitment training.

At least one member of the governing body has completed safer recruitment training to be repeated every three years.

There is a nominated link governor for safeguarding.

Governors have received appropriate safeguarding and child protection training at induction. The training equips them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the setting are effective and support the delivery of a robust whole school approach to safeguarding. Training will be regularly updated.

Staff have been trained appropriately and this is updated in line with guidance and all staff have read Keeping Children Safe in Education (2023) part 1 and that mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance.

All staff including temporary staff, supply staff, contractors and volunteers are provided with the school's Child Protection and Safeguarding Policy and if applicable the Xavier Code of Conduct.

The school has procedures for dealing with allegations of abuse against staff (including the Headteacher), supply staff and volunteers and against other children and that a referral is made to the DBS and/or the Teaching Regulation Agency (as applicable) if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have had they not resigned.

Policies and processes are in place to deal with concerns (including allegations) which do not meet the harm threshold, 'low-level concerns' as defined in KCSIE 2023.

A nominated governor for safeguarding is identified.

A member of the senior leadership team has been appointed by the Governing Body as the Designated Safeguarding Lead (DSL) who will take lead responsibility for safeguarding and child protection and that the role is explicit in the role holder's job description.

On appointment, the DSL and deputy(ies) undertake interagency training (SSCP Foundation Modules 1&2) and also undertake DSL 'New to Role' with 'Refresher' training every two years as well as attending DSL network events, to refresh knowledge and skills.

Children are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through personal, social, health and economic education (PSHE)

and relationships and sex education (RSE).

The child's wishes and feelings are considered when determining what action to take and what services to provide.

Application filters and monitoring systems are in place to safeguard children online and their effectiveness is regularly reviewed.

Appropriate safeguarding arrangements are in place to respond to children who are absent from education, particularly on repeat occasions and/or for prolonged periods.

There are clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.

The school will comply with DfE and Surrey County Council Children Missing Education and Education Other Than at School.

The school will comply with regular data returns requested by the Local Authority, regarding all pupils, of statutory school age, attending alternative provision and/or on a reduced or modified timetable.

Enhanced DBS checks (without barred list checks, unless the governor is also a volunteer at the school) are in place for all Governors.

Ensure where schools hire or rent out school facilities/premises to organisations or individuals that appropriate arrangements are in place to keep children safe.

Any weaknesses in Safeguarding are remedied immediately.

## **Confidentiality, Sharing and Withholding Information**

All matters relating to child protection will be treated as confidential and only shared as per the 'Information Sharing Advice for Practitioners' (DfE 2018) guidance.

The school will refer to the guidance in the in the data protection: toolkit for schools - <https://www.gov.uk/government/publications/data-protection-toolkit-for-schools> to support schools with data protection activity, including compliance with General Data Protection Regulation GDPR.

Information will be shared with staff within the school who 'need to know'. Relevant staff will have due regard to Data Protection principles which allow them to share (and withhold) information.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act 1998 and General Data Protection Regulations are not a barrier to sharing information where a failure to do so would place a child at risk of harm. There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.

All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing.

All staff will always undertake to gain parent/carers consent to refer a child to Local Authority Children's Social Care unless to do so could put the child at greater risk of harm, or impede a criminal investigation.

## **Reporting and responding to safeguarding concerns**

The following procedures apply to all staff working in the school and will be covered by training to enable staff to understand their role and responsibility.

The aim of our procedures is to provide a robust framework which enables staff to take appropriate action when they are concerned that a child is being harmed or abused or is at risk of harm or abuse.

The prime concern at all stages must be the interests and safety of the child. Where there is a conflict of interest between the child and an adult, the interests of the child must be paramount.

All staff are aware that very young children and those with disabilities, special needs or with language delay may be more likely to communicate concerns with behaviours rather than words. Additionally, staff will question the cause of knocks and bumps in children who have limited mobility.

### **If a member of staff suspects abuse, spots signs or indicators of abuse, or they have a disclosure of abuse made to them they must:**

1. Make an initial record of the information related to the concern.
2. Report it to the DSL immediately.
3. The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available.
4. Make an accurate record (which may be used in any subsequent court proceedings) as soon as possible and within 24 hours of the occurrence, of all that has happened, including details of:
  - Date, time, place and who was present
  - A clear and comprehensive summary of the concern
  - Any injuries
  - Explanations given by the child / adult
  - Rationale for decision making and action taken
  - Any actual words or phrases used by the child
5. The records must be signed and dated by the author or / equivalent on electronic based records
6. In the absence of the DSL or their Deputy, staff must be prepared to refer directly to C-SPA (and the police if appropriate) if there is the potential for immediate significant harm.

## **Following a report of concerns the DSL must:**

1. Using the Effective Family Resilience Levels of Need document decide whether or not there are sufficient grounds for suspecting significant harm, in which case a request for support must be made to the C-SPA and the police if it is appropriate.
2. If there are grounds to suspect a child is suffering, or is likely to suffer, significant harm or abuse the DSL must contact the C-SPA by sending a Request for Support Form by secure email to: [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk) . If a child is in immediate danger and urgent protective action is required, the Police (dial 999) must be called. The DSL must also notify the C-SPA of the occurrence and what action has been taken.
3. Consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available.
4. Normally the school should try to discuss any concerns about a child's welfare with the family and where possible to seek their agreement before making a referral to the C-SPA. However, this should only be done when:
  - it will not place the child at increased risk
  - or sexual/organised abuse is suspected
  - or the fabrication of an illness is suspected
  - or where the discussion could impede a police investigation or social work enquiry
5. If the DSL feels unsure about whether a referral is necessary they can phone the C- SPA to discuss concerns
6. If there is not a risk of significant harm, the DSL will either actively monitor the situation or consider offering early help.
7. Where there are doubts or reservations about involving the child's family, the DSL should clarify with the C-SPA or the police whether the parents should be told about the referral and, if so, when and by whom. This is important in cases where the police may need to conduct a criminal investigation.
8. When a pupil is in need of urgent medical attention and there is suspicion of abuse the DSL or their Deputy should take the child to the accident and emergency unit at the nearest hospital, having first notified the C-SPA. The DSL should seek advice about what action the C-SPA will take and about informing the parents, remembering that parents should normally be informed that a child requires urgent hospital attention.
9. The exception to this process will be in those cases of known FGM where there is a mandatory requirement for the teacher to report directly to the police where they either are informed by a girl under 18 that an act of FGM has been carried out on her; or they observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18. The DSL should also be made aware.

## **Safeguarding concerns and allegations against adults who work with children – referral to the Local Authority Designated Officer (LADO)**

This procedure should be used in all cases in which it is alleged a member of staff, including supply staff and volunteers in a school, or another adult who works with children has:

- 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; or
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children;
- behaved or been involved in an incident outside of a setting which did not involve children but could impact on their suitability to work with children.

The last bullet point above includes behaviour that may have happened outside of the school, that make an individual unsuitable to work with children, this is known as transferable risk.

The school may also receive an allegation relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children.

In dealing with allegations or concerns against an adult, staff must:

- Report any concerns about the conduct of any member of staff, supply staff or volunteer to the Headteacher immediately.
- If an allegation is made against the Headteacher, the concerns need to be raised with the Xavier Safeguarding Compliance Director or CEO Xavier Catholic Education Trust as soon as possible.
- There may be situations when the Headteacher or CEO Xavier Catholic Education Trust will want to involve the police immediately if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.
- Once an allegation has been received by the Headteacher, Xavier Safeguarding Compliance Director or CEO Xavier Catholic Education Trust, they will contact the LADO (as part of their mandatory duty) on 0300123 1650 option 3 LADO or Email: [LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk) immediately and before taking any action or investigation.
- When the allegation involves an agency member staff, ensure agencies are informed of the process for managing allegations and invite the agency's human resource manager or equivalent to meetings.
- Following consultation with the LADO inform the parents of the allegation unless there is a good reason not to

In liaison with the LADO, the school will determine how to proceed and if necessary the LADO will refer the matter to Local Authority Children's Social Care and/or the police.

If the matter is investigated internally, the LADO will advise the school to seek guidance from local authority colleagues in following procedures set out in part 4 of 'Keeping Children Safe in Education'

(2023) and the SSCP procedures.

Detailed information regarding staff allegations and low-level concerns can be found within our Allegations and low-level concerns raised in relation to staff, supply staff, contractors and volunteers policy.

## **Sexual Violence and Sexual Harassment between children in schools**

### **Child on Child Abuse – Policy**

Sexual violence and sexual harassment can occur between children of any age and sex. It can occur through a single child or a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will find the experience stressful and distressing. This will, in all likelihood, adversely affect their education attainment as well as their emotional well-being. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support and kept safe.

Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, adults, and school/college and college staff are supported and protected as appropriate.

We believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults and other children in school.

All members of staff at the school recognise that children are capable of abusing other children and this will be dealt with under our Child Protection and Safeguarding Policy and in line with KCSIE 2023.

All victims will be taken seriously and both victims and perpetrators will be offered support, regardless of where the abuse takes place.

The school recognises that child on child abuse can take many forms, including but not limited to:

- bullying, including cyberbullying, prejudice-based and discriminatory bullying
- abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’)
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party

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

We recognise that some child on child abuse issues may be affected by gender, age, ability and culture of those involved (i.e. for gender based abuse, girls are more likely to be victims and boys more likely to be perpetrators) however, all child on child abuse is unacceptable and all reports will be taken seriously

We will minimise the risk of child-on-child abuse by:

- Making it clear that there is a zero tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It will never be passed off as "banter", "just having a laugh", "a part of growing up" or "boys being boys". We believe that failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.
- Recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported.
- Challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. As we believe that dismissing or tolerating such behaviours risks normalising them.

## **Ongoing Response:**

The DSL will manage each case individually and will ensure the risk assessment is reviewed regularly with relevant partner agencies, for example the Police and Local Authority Children's Social Care.

Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim.

The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart on school/college premises and on transport where appropriate.

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the school/college will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of the behaviour policy and may lead to the view that allowing the perpetrator to remain in the same school/college would seriously harm the education or welfare of the victim (and potentially themselves and other children).



Where a criminal investigation into sexual assault leads to a conviction or caution, the school/college will, if it has not already, consider any suitable sanctions in light of their behaviour policy, which may include consideration of permanent exclusion. Where the perpetrator is going to remain at the school/college, the Headteacher/Principal should continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on school/college premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

The victim, alleged perpetrator and any other children & adults affected will receive appropriate support and safeguards on a case-by-case basis.

The school will take any disciplinary action against the alleged perpetrator in accordance with the school behaviour policy.

The school recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.

## **Prevention**

In order to minimise the risk of child on child abuse, the school will:

- Take a whole school approach to safeguarding and child protection
- Provide training to staff
- Provide a clear set of values and standards, underpinned by the school's Behaviour Policy and Anti-Bullying Policy and pastoral support
- Provide a broad and balanced age appropriate RSE and PHSE curriculum which includes:
  - healthy and respectful relationships
  - boundaries and consent
  - stereotyping
  - prejudice and equality
  - body confidence and self-esteem
  - how to recognise an abusive relationship, including coercive and controlling behaviour, relevant laws, what sexual violence and sexual harassment are and why these are always unacceptable
- Engage with specialist support and interventions
- Provide a range of reporting processes online reporting options.
- *Add any others relevant to your school*

## **Responding to reports of sexual violence and sexual harassment**

Children making any report of sexual violence or sexual harassment including 'upskirting' (The Voyeurism Offences Act 2019) will be taken seriously, kept safe and be well supported

All allegations of child on child abuse will be recorded, investigated and dealt with in line with associated policies including the Child Protection and Safeguarding Policy, Behaviour Policy and Anti-Bullying Policy.

If the report includes an online element staff will be mindful of the Searching, Screening and Confiscation: advice for schools 2022 guidance.

Staff taking the report will inform the DSL or the Deputy DSL immediately.

Staff taking a report will never promise confidentiality

Parents or carers will be informed unless this would put the child at greater risk.

If a child is at risk of harm, is in immediate danger, or has been harmed, a Request for Support will be made to the C-SPA securely email: [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk) or telephone 0300 470 9100, as appropriate.

Whilst we encourage children to report concerns and complaints directly to us, we recognise this may not always be possible. Children, young people, and adults who have experienced abuse at school can contact the NSPCC 'Report Abuse in Education' helpline on 0800 136 663.

## **Risk Assessment**

Following a report, the DSL will make an immediate risk and needs assessment on a case-by-case basis.

The risk assessment will consider;

- The victim, especially their protection and support.
- Whether there may have been other victims
- The alleged perpetrator, their support needs and any sanctions required.
- All other children at the school (and, if appropriate, staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator, or from future harms.
- How best to keep the victim and alleged perpetrator(s) a reasonable distance apart on school or college premises (including during any before or after school-based activities) and on transport to and from the school or college, where appropriate.

The risk assessment will be recorded and kept under review.

Where there has been other professional intervention and/or other specialist risk assessments, these professional assessments will be used to inform the school/college's approach to supporting and protecting children.

Support regarding risk assessments can be accessed from the Education Safeguarding Team – [education.safeguarding@surreycc.gov.uk](mailto:education.safeguarding@surreycc.gov.uk)

## **Action: The DSL will consider**

- The wishes of the victim.
- The nature of the incident including whether a crime has been committed and the harm caused.

- Ages of the children involved.
- Developmental stages of the children.
- Any power imbalance between the children.
- If the alleged incident is a one-off or a sustained pattern of abuse
- Any previous incidents.
- That sexual violence and sexual harassment can take place within intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’)
- Ongoing risks to the victim, other children or school staff
- Other related issues and wider context, including any links to CSE and CCE.

The school will consider every report on a case-by-case basis. Careful consideration will be given on when to inform the alleged perpetrator. When a referral is going to be made to Children’s Services and/or the police the school should speak to the relevant agency and discuss next steps and how the alleged perpetrator will be informed of the allegations. This does not and should not stop the school taking immediate action to safeguard children, where required.

All decisions and actions will be regularly reviewed and relevant policies updated to reflect lessons learnt. The school will look out for potential patterns of concerning, problematic or inappropriate behaviour and where a pattern is identified, the school will decide on a course of action.

### **Options:**

- Manage internally
- Early Help intervention
- Request for support to the C-SPA

Report to the Police (generally in parallel with a request for support to the C-SPA)

### **Sharing Nudes and Semi Nudes Images and/or Videos (also known as Youth produced sexual imagery or Sexting)**

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

Sharing nudes/semi nudes refers to both images and videos where:

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

All incidents of this nature should be treated as a safeguarding concern and in line with the UKCCIS guidance: ‘Sharing nudes and semi-nudes: advice for education settings working with children and

young people' (updated December 2020)

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

If a member of staff becomes aware of an incident involving youth produced sexual imagery they should follow the child protection procedures and refer to the DSL immediately.

The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff must not view, copy, print, share, store or save the youth produced sexual imagery.

The member of staff should not say or do anything to blame or shame any children involved.

The member of staff should explain to the child/ren involved that they will report the issue to the DSL and reassure them that they will receive appropriate support and help.

The DSL should hold an initial review meeting with appropriate school staff and subsequent interviews with the children involved (if appropriate).

Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the child at risk of harm.

At any point in the process if there is concern a child has been harmed or is at risk of harm a request for support should be made to the C-SPA and/or the Police as appropriate.

Immediate request for support at the initial review stage should be made to Local Authority Children's Social Care and/or the police if:

The incident involves an adult;

There is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, age or SEND);

What you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent;

The imagery involves sexual acts;

The imagery involves anyone aged 12 or under;

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

If none of the above apply then the DSL will use their professional judgement to assess the risk to pupils involved and may decide, with input from the Headteacher, to respond to the incident without referral to the C-SPA and/or the Police.

During the decision making the DSL will consider if:

- There is a significant age difference between the sender/receiver.
- There is any coercion or encouragement beyond the sender/receiver.
- The imagery was shared and received with the knowledge of the child in the imagery.
- The child is vulnerable, for example subject to Child in Need, Child Protection or Early Help plans, Looked After, SEND.
- There is a significant impact on the children involved.
- The image is of a severe or extreme nature.
- The child involved understands consent.
- The situation is isolated or if the image been more widely distributed.
- There other circumstances relating to either the sender or recipient that may add cause for concern.
- The children have been involved in incidents relating to youth produced sexual imagery previously.

If any of these circumstances are present the situation will be referred according to our child protection procedures, including referral to the C-SPA or the Police.

The DSL will record all incidents of youth produced sexual imagery, including the actions taken, rationale for actions and the outcome.

## **Physical Abuse**

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

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

The principles from the Anti-Bullying Policy will be applied in these cases, with recognition that any police investigation will need to take priority.

### *References:*

*DFE Keeping Children Safe in Education 2023*

## **Harmful Sexual Behaviour**

The Brook Traffic Light Tool uses a traffic light system to categorise the sexual behaviours of young people and once Brook training has been undertaken it can be used to help professionals:

- Make decisions about safeguarding children and young people
- Assess and respond appropriately to sexual behaviour in children and young people
- Understand healthy sexual development and distinguish it from harmful behaviour

By categorising sexual behaviours, the school can work with other agencies to the same standardised criteria when making decisions and can protect children and young people with a multi-agency approach.

The school recognises that it is vital that professionals agree on how behaviours should be categorised regardless of culture, faith, beliefs, and their own experiences or values.

## Children who are absent from education

All children are entitled to an efficient, full time education which is suitable to their age, ability, aptitude and any special educational needs they may have.

The school recognises that children who are absent from education, particularly repeatedly and /or for prolonged periods, and children missing education can be a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may also indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, so called 'honour'-based abuse or risk of forced marriage. They are also at significant risk of underachieving, and not being in education, employment or training (NEET) later in life.

The school will ensure all staff are aware of the school's unauthorised absence procedures and children missing education procedures.

Where possible the school will hold more than one emergency contact number for each pupil.

The school will ensure that there is a record of joiners and leavers as defined in [The Education \(Pupil Registration\) \(England\) 2006 \(amended 2016\)](#).

When removing a child's name, the school will notify the Local Authority of: (a) the full name of the child, (b) the full name and address of any parent with whom the child normally resides, (c) at least one telephone number of the parent, (d) the child's future address and destination school, if applicable, and (e) the ground in regulation 8 under which the child's name is to be removed from the school register.

The school will make reasonable enquiries to establish the whereabouts of a child jointly with the Local Authority, before deleting the child's name from the school register if the deletion is under regulation 8(1), sub-paragraphs (f) (iii) and (h) (iii) of [The Education \(Pupil Registration\) \(England\) 2006 \(amended 2016\)](#).

The school will:

- Enter children on the admissions register on the first day on which the school has agreed, or has been notified, that the child will attend the school.
- Notify the Local Authority within five days of adding a child's name to the admission register. The notification must include all the details contained in the admission register for the new child.
- Monitor each child's attendance through their daily register and follow the SCC procedure in cases of unauthorised absence.
- Remove a child's name from the admissions register on the date that the child leaves the school.
- The school will notify the Local Authority when they are about to remove a child's name from the school register under any of the fifteen grounds listed in the regulations, no later than the date that the child's name is due to be removed.
- Where parents notify the school, in writing, of their intention to electively home educate (EHE) the school will forward a copy of the letter to the Local Authority Education Inclusion Team.

Where parents orally indicate that they intend to withdraw their child to be home educated and no letter has been received, the school will not remove the child from roll and will notify the Education Inclusion Team at the earliest opportunity.

## **Pupils Missing Out on Education**

Most children engage positively with school and attend regularly. However, in order to flourish, some children require an alternative education offer or may require a modified timetable to support a return to full time education provision. It is recognised that children accessing alternative provision or a reduced or modified timetable may have additional vulnerabilities. Ofsted refer to these as Pupils Missing Out On Education

(PMOOE), because they are not accessing their education in school in the 'usual way'.

The school will gain consent (if required in statute) from parents to put in place alternative provision and/or a reduced or modified timetable.

The school will ensure that parents (and the local authority where the pupil has an EHCP) are given clear information about alternative provision placements and reduced or modified timetables: why, when, where, and how they will be reviewed;

The school will keep the placement and timetable under review and involve parents in the review. Reviews will be frequent enough to provide assurance that the off-site education and/or modified timetable is achieving its objectives and that the pupil is benefitting from it;

The school will monitor and track children attending alternative provision to ensure that the provision meets the needs of the child. The school continues to be responsible for the safeguarding of that pupil. The school will obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment.

The school will comply with regular data returns requested by the Local Authority, regarding all children, of statutory school age, attending alternative provision and/or on a reduced or modified timetable.

The school leadership will report to governors of any formal direction of a pupil to alternative provision to improve behaviour.

The school leadership will report to governors information regarding the use and effectiveness of alternative provision and modified timetables.

## **Attendance and Behaviour**

Additional policies and procedures are in place regarding school attendance and behaviour.

The school recognises that absence from school, particularly repeatedly and/or for prolonged periods and exclusion from school may be indicators of abuse and neglect, including the exploitation of children. The DSL will regularly liaise with members of school staff with responsibility for behaviour and attendance to ensure risk is identified and appropriate intervention is in place to protect children from harm.

The school will work in partnership with Surrey Police and other partners for reporting children that go missing from the school site during the school day. Staff will be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

## **Restrictive Physical Intervention**

We acknowledge that staff must only ever use physical intervention as a last resort, when a child is at immediate risk of harming him/herself or others, and that at all times it must be the minimal force necessary to prevent injury to another person. Such events should be fully recorded and signed by a witness.

Staff who are likely to need to use physical intervention will be appropriately trained in Crisis Prevention Institute (CPI) techniques.

Staff understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection and/or disciplinary procedures.

We recognise that sometimes touch is appropriate in the context of working with children, and all staff have been given safe practice guidance to ensure they are clear about their professional boundaries.

When applying disciplinary measures such as physical intervention or isolation for children with SEND the school will consider the risks, given the additional vulnerabilities of these children.

## **Police and Criminal Evidence (PACE) Act (1984) – Code C**

The Designated Safeguarding Lead and their deputy(ies) are aware of the requirement for children to have an appropriate adult when in contact with Police officers who suspect them of an offence.

PACE states that anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child for the purposes of this Code and any other Code.

PACE also states that if at any time an officer has any reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an appropriate adult at any point.

The Designated Safeguarding (or deputy) will communicate any vulnerabilities known by the school to any police officer who wishes to speak to a pupil about an offence they may suspect. This communication will be recorded on CPOMS.

If, having been informed of the vulnerabilities, the designated safeguarding lead (or deputy) does not feel that the officer is acting in accordance with PACE, they should ask to speak with a supervisor or contact 101 to escalate their concerns.

A child suspected of an offence must be cautioned<sup>1</sup> before being questioned about that offence<sup>2</sup> or being

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<sup>1</sup> The police caution is: *"You do not have to say anything. But it may harm your defence if you do not mention when questioned something which you later rely on in Court. Anything you do say may be given in evidence."*

<sup>2</sup> A person need not be cautioned if questions are for other necessary purposes, e.g.: (a) solely to establish their identity or ownership of any vehicle; to obtain information in accordance with any relevant statutory requirement; in furtherance of the proper and effective conduct of a search, e.g. to determine the need to search in the exercise of powers of stop and search or to seek co-operation while carrying out a search; or to seek verification of a written record.



further questioned if the answers provided give grounds for suspicion, or if there is a failure or refusal to answer or answer satisfactorily, and the answers or silence are to be given in evidence to a court in a prosecution.

A Police Officer must not caution a child unless the appropriate adult is present. If a child is cautioned in the absence of the appropriate adult, the caution must be repeated in the appropriate adult's presence.

### **The appropriate adult means, in the case of a child:**

1. The parent, guardian or, if the child is in the care of a local authority or voluntary organisation, a person representing that authority or organisation.
2. A social worker of a local authority
3. Failing these, some other responsible adult aged 18 or over who is not:
  - a. a police officer;
  - b. employed by the police;
  - c. under the direction or control of the chief officer of a police force; or
  - d. a person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions,

Further information can be found in the statutory guidance - [PACE Code C 2019](#).

<https://www.gov.uk/government/publications/pace-code-c-2019/pace-code-c-2019-accessible>

## **Whistleblowing**

We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.

All members of staff are made aware of the Xavier CET Whistleblowing Policy. All staff are made aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the school's safeguarding arrangements. The leadership team will take all concerns or allegations received seriously.

As a first step, a member of staff should normally raise concerns with his/her immediate line manager, the Headteacher or the DSL where this is appropriate to the nature of the concern.

Whistleblowing regarding the Headteacher should be raised with the XCET CEO.

Whistleblowing regarding the Xavier CEO should be raised with the XCET Chair of the Board of Directors.

While the School encourages members of staff to raise their concerns internally, the School also recognises that some staff may feel unable to do this and that they may therefore wish to contact an independent, external organisation.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about a way a concern is being handled by their school. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

## **Appendix**

### **Links with other school policies**

Anti-bullying Policy  
Behaviour Policy  
Equality Policy  
Online Safety Policy  
Recruitment Policy  
Attendance Policy  
Relationships and Sex Education Policy  
Xavier Code of Conduct  
Teaching and Learning Policy Whistleblowing Policy

### **Additional Resources**

[Surrey County Council Education Safeguarding Team webpages](#)  
[NSPCC webpages](#)  
[Childline webpages](#)  
[CEOP ThinkuKnow webpages](#)  
[Anti-Bullying Alliance webpages](#)  
[Childnet International](#)  
[Safer Internet Centre webpages](#)  
[Contextual Safeguarding Network webpages](#)  
[Surrey Safeguarding Children Partnership webpages](#)  
[Lucy Faithfull Foundation webpages](#)  
[Graded Care Profile 2](#)

### **Further advice on safeguarding and child protection is available from:**

[Surrey County Council Education Safeguarding Team](#)

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

ChildLine: <http://www.childline.org.uk/pages/home.aspx>

CEOP Thinkuknow: <https://www.thinkuknow.co.uk/>

Anti-Bullying Alliance: <http://anti-bullyingalliance.org.uk/>

Childnet International –making the internet a great and safe place for children. Includes resources for professionals and parents <http://www.childnet.com/>

Safer Internet Centre <http://www.saferinternet.org.uk/>

