



St. Charles Borromeo  
CATHOLIC PRIMARY SCHOOL

# Child Protection and Safeguarding Policy

**This Child Protection and Safeguarding Policy  
has been approved and adopted by the Xavier Catholic Education Trust in September 2025  
and will be reviewed in July 2026.**

**Committee Responsible: Audit and Risk Committee**

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## Safeguarding Statement 2025

### “Safeguarding is Everyone’s Business”

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children. This includes how we protect children from harm and how we should respond when we suspect or confirm that a child is being harmed.

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.

#### Key Personnel

Designated Safeguarding Lead (DSL) is: Gemma Willcox  
Contact details: 01932 842 617/ [dsl@stcharlesb.surrey.sch.uk](mailto:dsl@stcharlesb.surrey.sch.uk)

Deputy DSL(s) is/are: Kathryn Bray and Helen Curtis  
Contact details: 01932 842 617/ [adsl@stcharlesb.surrey.sch.uk](mailto:adsl@stcharlesb.surrey.sch.uk)

Designated Teacher for Looked After Children is: Helen Curtis  
Contact details: 01932 842 617/ [helencurtis@stcharlesb.surrey.sch.uk](mailto:helencurtis@stcharlesb.surrey.sch.uk)

The nominated safeguarding governor is: Oscar Richards  
Contact details: [oscarrichards@stcharlesb.surrey.sch.uk](mailto:oscarrichards@stcharlesb.surrey.sch.uk)

The Head of School is: Gemma Willcox  
Contact details: 01932 842 617/ [head@stcharlesb.surrey.sch.uk](mailto:head@stcharlesb.surrey.sch.uk)

The Chair of Governors is: Chris Gaines  
Contact details: [chrisgaines@stcharlesb.surrey.sch.uk](mailto:chrisgaines@stcharlesb.surrey.sch.uk)

The online safety co-ordinator is: Amanda Bristow  
Contact details: 01932 842 617/ [amandabristow@stcharlesb.surrey.sch.uk](mailto:amandabristow@stcharlesb.surrey.sch.uk)

The Xavier Catholic Education Trust Safeguarding Compliance Director is: Anne Halliday  
Contact details: 07840 448692; email: [a.halliday@xaviercet.org.uk](mailto:a.halliday@xaviercet.org.uk)

The CEO Xavier Catholic Education Trust is: James Kibble  
Contact details: [j.kibble@xaviercet.org.uk](mailto:j.kibble@xaviercet.org.uk)

## Terminology

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

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing impairment of children's mental and physical health or development;
- making sure 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** is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse.

**The local safeguarding partnership** has three partners:

- Chief Executive of Surrey County Council (Children's Services)
- Chief Executives of Surrey Heartlands and Frimley Integrated Care Boards, and
- The Chief Constable of Surrey Police

**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.

**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.

**DSL** refers to Designated Safeguarding Lead (DSL).

**DDSL** refers to Deputy Designated Safeguarding Lead (DDSL).

## 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), the Education (Independent School Standards) Regulations 2014, the Non-Maintained Special Schools (England) Regulations 2015 and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended).

All action taken by the school will be in accordance with:

Statutory, national, and local guidance – this includes:

- [Working Together to Safeguard Children 2023](#) which sets out the multi-agency working arrangements to safeguard and promote the welfare of children and young people and protect them from harm; in addition, it sets out the statutory roles and responsibilities of settings.
- [‘What to do if you are Worried a Child is Being Abused’ 2015 - Advice for Practitioners](#)
- [Keeping Children Safe in Education \(KCSIE, 2025\)](#) is statutory guidance issued by the Department for Education (DfE) which all schools and colleges must have regard to when carrying out their duties to safeguard and promote the welfare of children.
- [Early years foundation stage \(EYFS\) statutory framework](#) is statutory guidance which sets standards that school and childcare providers must meet for the learning, development, and care of children from birth to 5 years in Ofsted registered settings.
- [Local Guidance from the Local Safeguarding Partnership: Surrey Safeguarding Children Partnership \(SSCP\) including SSCP Procedures.](#)

This policy applies to all members of staff, governors and volunteers in the school. Where extended school activities are provided and managed by the school, our own safeguarding and child protection policy and procedures apply. When our children attend off-site activities, we will ensure that effective child protection arrangements are in place.

## Guidance and documents referred to in this policy

- [Surrey Safeguarding Children Partnership protocols, guidance and procedures](#)
- [Working Together to Safeguard Children 2023](#)
- [Keeping Children Safe in Education 2025](#)
- [Disqualification under the Childcare Act 2006 \(updated 2018\)](#)
- [FGM Act 2003 Mandatory Reporting Guidance 2015 \(updated January 2020\)](#)
- [‘What to do if you are worried a child is being abused’ 2015](#)
- [Teachers' standards](#)
- [Information sharing: advice for practitioners providing safeguarding services](#)
- [The Equality Act 2010](#)
- [Early years foundation stage \(EYFS\) statutory framework](#)
- [UKCIS guidance: Sharing nudes and semi-nudes: advice for education settings](#)
- [Surrey County Council Safeguarding Children Missing Education \(CME\) Policy](#)
- [Surrey County Council Educated Other Than at School \(EOTaS\)](#)
- Surrey County Council Touch and The Use of Physical Intervention When Working With

Children And Young People

- [Working together to improve school attendance](#)
- [Relationships and sex education \(RSE\) and health education](#)

This policy should be read in conjunction with the following policies:

- Recruitment
- Whistleblowing
- Code of Conduct
- Behaviour
- Online Safety
- Attendance
- Health & Safety

## 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. These are available on our website.

Staff are aware of the additional barriers to recognising abuse, neglect and exploitation 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 principals 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 Aims

- 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 ensure consistent good practice across the setting and ensure that safeguarding follows a whole setting approach.
- Clarifying safeguarding expectations for members of the school's community, staff, Governing body, children, and their families.
- Contributing to the establishment of a safe, resilient, and robust safeguarding culture in the setting built on shared values; that children are treated with respect and dignity, taught to treat each other and staff with respect, feel safe, have a voice and are listened to.
- Supporting contextual safeguarding practice recognising that the setting's site can be a

location where harm can occur.

- Setting expectations for developing knowledge and skills within the setting's community (staff, children, parents/carers) to the signs and indicators of safeguarding issues and how to respond to them.
- Early identification of need for vulnerable learners and provision of proportionate interventions to promote their welfare and safety.
- Working in partnership with children, parents/carers, and other agencies in the Surrey Safeguarding Children's Partnership.

## **Policy Principles & Values**

- The welfare of the child is paramount.
- Maintain an attitude of "It could happen here".
- Maintain a "zero-tolerance" approach to sexual violence and sexual harassment.
- 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 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.

## **Supporting Children**

### **We will support all children by:**

Providing a safe place and 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. 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.

Promoting a caring, safe and positive environment within the school.

Encouraging self-esteem and self-assertiveness, through the curriculum and through positive relationships within the school community.

Ensuring children are taught to understand and manage risk through Personal, Social, Health and Economic (PSHE) education and Relationship and Sex Education (RSE) and Health Education through all aspects of setting life, including staying safe online.

Responding sympathetically to any requests for time out to deal with distress and/or anxiety.

Ensuring children are made aware of and have access to details of helplines, counselling, or other avenues of external support.

Liaising and working in partnership with support services and agencies involved in early help and the safeguarding of children.

Notifying children's social care without delay if there is an immediate risk of significant harm.

Providing continued support to children about whom they have concerns and those who leave the setting by ensuring that information is shared confidentially with the child's new setting. The setting will ensure records are forwarded as a matter of priority and within statutory timescale.

The designated safeguarding lead will 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 this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

## **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 they 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. 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 or disabilities.

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

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

## Professional Expectations, Roles and Responsibilities

### Role of the Setting

We will ensure that:

Details of the DSL and DDSL are available in the school website, our newsletter, and on display in reception.

The school operates safer recruitment procedures in line with KCSIE 2025 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 2025](#) part 1. This applies to the Governing body and Trustees in relation to part 2 of the same guidance.

All staff receive safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction in line with advice from [SSCP](#). Training is regularly updated as required, and at least annually to continue to provide them with relevant skills and knowledge to safeguard children effectively.

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 Safeguarding and Child Protection Policy is made available via the school website and a paper copy is available upon request for parents/carers.

All parents/carers are made aware of the responsibilities of staff members with regard to safeguarding and child protection procedures.

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 Safeguarding and Child Protection policies and procedures in place.

Community users organising activities for children are aware of the school's Safeguarding and

Child Protection Policy, guidelines and procedures.

The name of the designated members of staff for safeguarding and child protection, the Designated Safeguarding Lead and deputy(ies), are clearly advertised in the school.

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.

### **All School Staff will:**

Maintain an attitude of “It does happen here” with regards to safeguarding.

Understand that safeguarding is “everyone’s responsibility”.

Maintain a “zero-tolerance” approach to sexual violence and sexual harassment.

Read and understand Part 1 of statutory guidance KCSIE (2025). Those working directly with children will also read Annex B.

In addition to this all staff will be aware of the systems in place which support safeguarding including reading this Safeguarding and Child Protection Policy; the Behaviour Policy; Xavier code of conduct; safeguarding response to children who go missing from education; and the role of the DSL.

Know who and how to contact the DSL and DDSL, the Chief Executive Officer (CEO), the Safeguarding Compliance Director, the Chair of Governors, and the Governor responsible for safeguarding.

Be aware of indicators of abuse, neglect and exploitation understanding that children can be at risk of harm inside and outside of the setting, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse, neglect and exploitation so that staff are able to identify cases of children who may be in need of help or protection.

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

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.

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

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.

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.

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.

Know how to respond to a pupil who discloses harm or abuse following training on 'Working together to Safeguard Children' (2023), 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' (2023).

Follow the allegations procedures, as set out in this policy and KCSIE 2025, if the disclosure is an allegation against a member of staff, supply staff, volunteer or contactor.

Report low-level concerns (as defined in KCSIE 2025) about any member of staff/supply staff, volunteer or contractor to the Head of School. Low-level concerns about the Head of School should be shared with the Xavier Safeguarding Compliance Director or Chief Executive Officer.

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. The degree of confidentiality should always be governed by the need to protect the child.

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. Liaise with other agencies that support children and provide early help.

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

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.

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.

## **The Head of School**

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

The school fully contributes to inter-agency working in line with 'Working Together to Safeguard Children' (2023) guidance.

This policy and other safeguarding related policies and procedures are shared at induction, and annually thereafter, understood by all staff, including temporary staff and volunteers, and are implemented and followed by staff at all times.

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 2025.

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).

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.

Record low-level concerns 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.

**Early years providers and primary schools add:**

There are enough staff per child (staff ratios), where relevant and applicable.

**Early years only providers add:**

Each child in the Early Years Foundation Stage is assigned a key person.

Appropriate arrangements are put in place for the supervision of staff who have contact with children and families.

**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 and understanding the filtering and monitoring systems in place) in the school, this responsibility is not able to be delegated.

Liaise with the Surrey Country Council and work in partnership with other agencies in line with Working Together to Safeguard Children (2023).

Where necessary contact Surrey's Child Protection Consultation Line for advice and support (0300 470 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 or 03311 435554.

Report concerns that a pupil may be at risk of radicalisation or involvement in terrorism, 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 DSLs 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.

Follow KCSIE 2025 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.

Contribute to the assessment of children, including taking part and/or supporting staff to take part in strategy discussions, child protection conferences and meetings between multiple agencies.

Work together with and support parents/carers and families who may be facing challenging circumstances and, when there are safeguarding concerns, making parents/carers aware of the school's role in making referrals about suspected abuse, neglect and exploitation.

Understand the importance of sharing information, including making appropriate referrals to relevant agencies (for example, children's services, the police, the Channel Programme and/or the Disclosure and Barring Service (DBS)) and supporting staff who make referrals directly.

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.

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.

Have a secure working knowledge of Surrey Safeguarding Children Partnership procedures and understand the assessment process for providing early help and statutory intervention, in line with Surrey's [Continuum of Need Indicators](#).

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 Surrey's Continuum of Need Matrix 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.

DSL training should be updated at least every two years and their knowledge and skills refreshed at regular intervals but at least annually.

Work with the Head of School/Principal and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at the setting.

Keep detailed, accurate, secure records (either written or using appropriate secure online software) of all concerns, discussions and decisions about a child, including the rationale for those decisions and actions taken. This should include instances where referrals were or were not made to another agency such as Local Authority children's social care or the Prevent program etc.

Ensure that an indication of the existence of the additional safeguarding/child protection file is marked on the pupil's main file record.

Ensure that when a child transfers school (including in-year), their safeguarding/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.

If the transit method requires that a copy of the safeguarding/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 where a child 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.

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.

Ensure all adults who work in or for the school have an adequate and appropriate safeguarding induction, regularly updated safeguarding training and annually sign to say they have read and understood the relevant part of KCSIE and other relevant policies and procedures.

Report to the Head of School 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. Further information can be found in the [Statutory guidance - PACE Code C 2019](#).

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

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 all staff, especially new and part-time 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.

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

Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.

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

Establish and maintain links with the [SSCP](#) to make sure staff are aware of training opportunities and the latest policies on local safeguarding arrangements.

Contribute to and provide, with the Head of School and Chair of Governors, the biennial (s157 s175) Statutory Audit for Safeguarding Arrangements and Termly Safeguarding Data Collections via PHEW to Surrey County Council.

(Duties are further outlined in KCSIE (2025, Annex C)

### **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 of the DSL.

### **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.

There is a nominated link governor/trustee for safeguarding.

Governors have received appropriate safeguarding and child protection (including online) 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 school are effective and support the delivery of a robust whole school approach to safeguarding. Training will be regularly updated.

Safeguarding, and the child's best interests, wishes and feelings, are considered in everything the school does. Everyone at the school is involved in the whole school approach to safeguarding and online safety is a theme throughout.

The governing body takes into account children who are more at risk of harm and any barriers that can make it difficult to recognise abuse and/or neglect, for example children with special educational needs and disabilities (SEND).

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

website.

The school's policies, procedures and training follow the local safeguarding partnership arrangements and the law, including the school's duties under the Human Rights Act 1998, Data Protection Act 2018 and Equality Act 2010.

The SSCP is informed in line with local requirements about the discharge of duties via the Biennial (s 157 s 175) Statutory Audit for Safeguarding Arrangements and Termly Safeguarding Data Collections via [PHEW](#) to Surrey County Council.

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.

Staff have been trained appropriately and this is updated in line with guidance and all staff have read Keeping Children Safe in Education (2025) 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.

Ensure that, as part of the requirement for staff to undergo regular updated safeguarding training, including online safety and the requirement to ensure children are taught about safeguarding, is integrated, aligned, and considered as part of the whole setting safeguarding approach and wider staff training and curriculum planning.

Considering the above training requirements, governors should have regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all children.

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.

Take a proportionate risk-based approach to the level of information that is provided to temporary staff, volunteers and contractors.

The school has procedures for dealing with allegations of abuse against staff (including the Head of School), 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 2025.

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 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).

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.

Ensure that safeguarding and child protection files are maintained as set out in KCSIE 2025 Annex C.

The school will comply with DfE and Surrey County Council [Children Missing Education](#) and Education Other Than at School.

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

Ensure section 128 checks are undertaken as defined in KCSIE 2025.

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 safeguarding and child protection will be treated as confidential and only shared as per the ['Information Sharing Advice for Practitioners' \(DfE 2024\) guidance](#).

The government's information sharing advice for safeguarding practitioners supports staff who have to make decisions about sharing information. Staff are aware they can look at the data protection in schools toolkit or speak to a member of the safeguarding team if they are unsure about sharing information. Government guidance emphasises that: "The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to

promote the welfare and protect the safety of children.”

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 2018 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 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.

All staff are aware that they cannot make a promise to a child to keep secrets that might impact on the child’s safety or wellbeing. Instead, staff should tell the child that they may need to pass information on to others who can help and protect them

## **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. Call the police on 999 if a child is in immediate danger. Anyone can make a referral to children's services if a child is suffering or likely to suffer significant harm. Usually, the DSL/DDSL will make the referral. If you make a direct referral, you must update the DSL or a deputy as soon as is practically possible.

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

1. Use the Continuum of Support for Children and Families in Surrey and Continuum of Support Matrix to 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. 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
3. 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.
4. If it is suspected a child is suffering, or is likely to suffer, 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 the DSL feels unsure about whether a referral is necessary, they can phone the C- SPA to discuss concern.
5. 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/carers, remembering that parents/carers should normally be informed that a child requires urgent hospital attention.
6. If there is not a risk of significant harm, the DSL will either actively monitor the situation or consider offering early help.

7. The exception to this process will be in those cases of known FGM where there is a [mandatory reporting duty](#) for the teacher to report directly to the police where they are either:

- 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 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for the purposes connected with labour or birth.

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)**

[Surrey's LADO procedures](#) will be followed where it is alleged that anyone working in the school that provides education for children under 18 years of age, including supply staff, volunteers and contractors, 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, which 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 without delay:

- Report any concerns about the conduct of any member of staff, supply staff or volunteer to the Head of School immediately.
- If an allegation is made against the Head of School, 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 Head of School 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 Head of School, 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' (2025) 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.

### **Low-Level Concerns**

The term low-level concern does not mean that it is insignificant. 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 setting 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 harm threshold or is otherwise not serious enough to consider a referral to the LADO.

The purpose of reporting low-level concerns is to create and embed a culture of openness, trust and transparency in which the setting's values and expected behaviour set out in the staff code of conduct are lived, monitored and reinforced constantly by all staff.

The setting creates an environment where staff are encouraged and feel confident to self-refer where they have found themselves in a situation.

Low-level concerns about a member of staff, supply staff, contractor or a volunteer should be reported to the Head of School in a timely manner. Low-level concerns about the Head of School should be reported to the Chief Executive Officer (CEO) of Xavier Catholic Education Trust or XCET Safeguarding Compliance Director. If the Head of School, CEO or XCET Safeguarding Director has any doubt as to whether the low-level concern meets the harm threshold, they will consult the LADO.

## **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 2025.

We are clear that sexual violence and sexual harassment is not acceptable.

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 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.

## **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 pastoral support; and by a planned programme of evidence-based content delivered through the curriculum
- Engage with specialist support and interventions.

## **Responding Robustly 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.

If the report includes an online element staff will be mindful of the [Searching, Screening and Confiscation at school](#) guidance.

The key consideration is for staff not to view or forward illegal images of a child. The guidance provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection

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.
- All other children at the school.
- The victim and the alleged perpetrator sharing classes and space at the school.
- 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.

## **Action:**

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the setting should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

**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.
- Any previous incidents.
- That sexual violence and sexual harassment can take place within intimate personal relationships between.
- Ongoing risks to the victim, other children or school staff.
- Other related issues or wider context.

**Confidentiality:**

The victim may ask the setting not to tell anyone about the sexual violence or sexual harassment. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies. The DSL should consider:

- parents or carers should normally be informed (unless this would put the victim at greater risk)
- the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care, and
- rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.

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)

**Ongoing Response:**

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

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, settings should be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately.

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

The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart on 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 Head of School/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.

The setting will consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

The setting recognises that children who have experienced sexual violence display a wide range of responses to their experiences including clear signs of trauma, physical and emotional responses, or no overt signs at all.

## **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 children to children 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.

## **Harmful Sexual Behaviour (HSB)**

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. HSB can occur online and/or face-to-face and can also occur simultaneously between the two. HSB will be considered in a child protection context.

The school's response to HSB:

The Brook Traffic Light Tool uses a traffic light system to categorise the sexual behaviours of children 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.

## **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 March 2024)

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 Head of School, 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.

## **Children Absent from Education**

All staff are aware that children missing from education or persistently absent, without explanation and/or for prolonged periods can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. Further, it may also indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so called 'honour'-based abuse or risk of forced marriage. We are also aware that absence can increase any existing safeguarding risks.

Attendance is closely monitored to support us in identifying abuse and acting early. Our staff will be aware of our school's unauthorised absence and children missing education procedures. We notify children's services if a child who has a social worker is absent from school without a suitable explanation. To support the school's procedure for addressing children missing or absent from education, we make sure we have more than one emergency contact number for each child. We work in partnership with Surrey County Council Inclusion Service when patterns of absence give rise to concern, including notifying them when a child leaves our school without a new school being named.

Our attendance policy and procedures are set out in a separate document. The school follows the government's statutory guidance [Working together to improve school attendance](#) which sets out how schools must work with the local authority children's services where school absence indicates safeguarding concerns.

## **Pupils Missing Out on Education**

Most children engage positively with school and attend regularly. However, to flourish, some children require an alternative education provision 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 Education Health Care Plan (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 child 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/for the alternative provision. The school will also obtain written confirmation that the alternative provider will inform the school of any arrangements that may put the child at risk (i.e. staff changes), so the school can ensure itself that appropriate safeguarding checks have been carried out on new staff.

The school will comply with regular data returns requested by Surrey County Council, 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' information regarding the use and effectiveness of alternative provision and modified timetables. The school will also report to governors any formal direction of a pupil to alternative provision to improve behaviour.

## **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 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.

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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.

## **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](#).

## **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, including temporary staff/supply staff and volunteers, are made aware of their duty to raise concerns, where they exist, about the management of safeguarding and 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.

Whistleblowing regarding the Head of School, should be reported to the Xavier CET Chief Executive Officer (CEO) or the Safeguarding Compliance Director. If the allegations involve the CEO, the member of staff should raise the matter with the Xavier CET Board of Directors.

Staff are encouraged to use an external, independent and confidential service provided by Navex Global, who can be contacted on their freephone helpline number 0800 069 8180 and through the [Navex Global web pages](#).

The NSPCC whistleblowing helpline is also 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).

## **Additional Resources/Useful Links**

[Surrey Safeguarding Children Partnership webpages](#)

[Continuum of Support for children and families living in Surrey](#)

[Surrey Education Services \(surreycc.gov.uk\)](#)

[Graded Care Profile 2](#)

[NSPCC | The UK children's charity | NSPCC](#)

[CEOP Education](#)

[Anti Bullying Alliance webpages](#)

[Childnet International](#)

[Safer Internet Centre webpages](#)

[Contextual Safeguarding Network webpages](#)

[Lucy Faithfull Foundation webpages](#)

[Childline webpages](#)

[Check a teacher's record](#)

[Individuals prohibited from managing or governing schools](#)

[Education provision for SEND - Surrey County Council](#)

[Alternative Provision: Alternative Curriculum Pathways and Reintegration Support - Surrey County Council](#)

[Youth and school engagement | Surrey Police](#)

[Safer Communities Programme | Healthy Surrey](#)

[Surrey Healthy Schools | Healthy Surrey](#)

[Partner services | Surrey Police](#)

[Surrey Children's Services Procedure Manual Supporting the Education and Promoting the](#)

[Achievement of Children with a Social Worker, Looked After and Previously Looked After Children](#)

[Promoting the education of children with a social worker and children in kinship care](#)

[arrangements: virtual school head role extension](#)

[Plan technology for your school guidance](#)

[Information Sharing](#)

[Mindworks Surrey](#)

[Surrey Young Suicide Prevention Toolkit](#)

[The Surrey Self-Harm Protocol](#)

[Install - R;pple Suicide Prevention](#)

[Mandatory reporting of female genital mutilation: procedural information](#)

[Helping families early - Surrey County Council](#)

[Continuum of Need Indicators.](#)