# Safeguarding Policy

Safeguarding is everyone's responsibility

'It could happen here'

| Approved by | Trust Board | Date Approved | 29 August 2025 |
|---|---|---|---|
| Review cycle | Annual | Date of next review | July 2026 |

| Version | Author | Date | Changes |
|---------|--------|------|---------|
| 1.0 | Ant Marsh | 08.06.23 | New trust policy |
| 2.0 | Ant Marsh | 11.06.24 | Section1: Removal of reference to the Trust Safeguarding Lead.<br>Section 3: We have taken the definitions from KCSIE for the indicators of abuse, exploitation and neglect so that each colleague has an accurate understanding of the issues to inform expressions of concern.<br>Section 4: Increasing personalisation reflecting Trust wide practice. |
| 2.1 | Mike Boddington | 28/05/25 | 3. New paragraph added to address additional SEND barriers.<br>3.1 The Trust's response to serious violence<br>4.4 Record keeping<br>4.5 Guidance for child on child abuse<br>6.1 Filters and monitoring on Trust networks<br>8.1 Includes information on suspected private fostering and unaccompanied asylum seekers |
| 3.0 | Mike Boddington, Ali Morgan | 11/7/25 | **Updated Terminology:** All references now reflect KCSIE 2025.<br>**Online Safety:** Stronger emphasis on filtering, monitoring, and teaching pupils about the 4Cs of online risk: content, contact, conduct, and commerce.<br>**Mental Health:** Recognised as a safeguarding concern. Staff should be alert to signs and know how to escalate concerns.<br>**Low-Level Concerns:** Clearer procedures for reporting and recording concerns about staff conduct, even if they don't meet the harm threshold. Strengthened oversight of low-level concerns, requiring regular review by the DSL and safeguarding governor.<br>**Record Keeping:** Enhanced expectations for secure, detailed, and timely documentation of safeguarding concerns.<br>**Safer Recruitment:** Reinforced checks including Section 128 and online searches for leadership roles.<br>**Vulnerable Groups:** Greater focus on supporting children with social workers, those who are LGBTQ+, in kinship care, or electively home educated.<br>Appendix 2 – Visiting speaker protocol<br>Appendix 3 - Risk Assessment: Pupils Being Drawn into Terrorism or Supporting Extremist Ideas |

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## Contents

## 1. Policy Statement

This policy applies to anyone working for or on behalf of Enlighten Learning Trust (ELT) including the board of trustees, paid staff, volunteers, sessional workers, agency staff and students. Its purpose is to protect and enhance the safety and well-being of all children and young people by actively promoting awareness, good practice and sound procedures.

We believe the safety and well-being of children and young people is of the utmost importance and that they have a fundamental and equal right to be protected from harm regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation. We recognise our statutory responsibility for safeguarding: the safety, protection and well-being of all children and young people that the Trust supports and interacts with, is paramount and has priority over all other interests. This includes responding immediately and appropriately where there is a suspicion that any young person under the age of 18 years old may be a victim of abuse, exploitation or neglect.

*'Young Person' means those under 18 years old including all of those up to their 18th birthday- as designated a 'child' within the terms of the Children's Act 1989.*

The Trust Board and Local Governing Bodies of ELT are committed to safeguarding and promoting the welfare of children and young people and expect all staff and volunteers to share this commitment. Our academies are safe places for children, where our responsibilities for safeguarding children are taken seriously. ELT fully adopts Keeping children safe in education 2025 and 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 is underpinned by Keeping Children Safe in Education 2025 (KCSIE). This statutory guidance must be referred to in any instances where further assurance or guidance is required

The Trustee with responsibility for Safeguarding is Mr Hugh Betterton, who can be contacted by email at hbetterton@enlightenlt.education.

The Trust encourages a culture of listening to and engaging in dialogue, with children seeking their views in ways that are appropriate to their age, culture and understanding.

All Trust Schools have a Designated Safeguarding Lead (DSL) who is expected to understand and implement their role as required by Keeping Children Safe in Education 2025 (Appendix C of KCSIE).

All Trust schools use CPOMs for efficient and effective recording and management of safeguarding records.

This policy has been drawn up based on legislation, policy and guidance that seeks to protect children in England including the Children's Act 2004 and Working together to safeguard children 2023: statutory guidance The latter providing the key statutory guidance for anyone working with children and young people.

All procedures and policies pertaining to safeguarding are regularly reviewed and updated on an annual basis.

## 2. Organisational Responsibilities

The Trust is responsible for the implementation of the Safeguarding Policy and delegates operational responsibility to the DSL within each school to manage the Safeguarding Policy and its implementation.

It is the responsibility of the DSL to take and document (on CPOMS) appropriate action following any expression of concern and make referrals to the appropriate agency.

The Trust will ensure that the DSL participates in regular safeguarding training on an annual basis so that they are aware of the procedures of identifying and reporting suspected cases of abuse, exploitation and neglect and are up to date with any legal changes.

All staff/volunteers will be made aware of this Safeguarding Policy and related relevant procedures as part of their induction and their contract of employment. All staff are expected to acknowledge that they have read and understood KCSIE part one.

All staff/volunteers will be informed and have access to regular training as required to update their knowledge on safeguarding. More information can be found here; Training - Surrey Safeguarding Children Partnership (surreyscp.org.uk)

Please note that the safeguarding partnership training offer is available on Olive (Surrey's LMS). The link for registration and booking is here.

The Trust will work in accordance with guidance and good practice from the Surrey Safeguarding Children Partnership. More information can be found at: Surrey Safeguarding Children Partnership (surreyscp.org.uk)

## 2.1 Designated Safeguarding Leads Responsibilities

Each school's DSLs (and DDSLs) must have an active and working knowledge of KCSIE and refer to this to guide and inform safeguarding practice.

Each DSL will ensure that all members of staff/volunteers have timely and relevant safeguarding training and that all members of staff make effective and timely use of CPOMS as our reporting mechanism.

They will ensure that they, and all DDSLs, have read and signed a printed copy of the job description for the role of DSL as contained within KCSIE. They use the Trust DSL annual safeguarding planner to guide actions during the academic year.

They will ensure that procedures are in place to keep children safe during community activities, after-school clubs and tuition by adhering to the non-statutory guidance for providers running out of school settings.

They will ensure that the school website contains a page explaining how the school safeguards children.

Training for the DSL should be accessed from Surrey Safeguarding Children Partnership. Staff and volunteers can also access a range of multi-agency safeguarding training. More information can be found here; Surrey Children's Services Academy (SCSA) - Surrey County Council (surreycc.gov.uk)

The DSL will take appropriate action following any expression of concern, disclosure or reported incident and make referrals to the appropriate agency.

DSLs work with appropriate curriculum leads to ensure that Relationships, Sex and Health Education is taught proactively and delivered in line with statutory guidance. Where a scheme of work is being used, appropriate leaders must ensure that coverage within the scheme reflects that in the statutory guidance. If required, additional provisions should be put in place to deliver context specific content not covered by the scheme so that children are taught how to keep themselves and others safe.

## 2.2    Staff and Volunteer Responsibilities

Any new member of staff or volunteer with direct contact with young people will be taken through this policy as part of the induction process and offered training soon after commencing their post. All staff and volunteers are to participate in timely and relevant training.

All staff have a duty to ensure that any suspected incident, allegation, or other manifestation relating to child protection is reported using the procedures detailed below in this policy.

If in any doubt about what action to take, employees must seek advice from one of the named Safeguarding Leads or in their absence the School's Head Teacher or the CEO.

## 3.    Abuse, Neglect and Exploitation

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

All school staff should be aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.

All staff should 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. Staff are well placed to observe children day-to-day and identify those whose behaviour suggests they may be experiencing a mental health problem. Where staff have a mental health concern about a child that is also a safeguarding concern, they should take immediate action by speaking to the DSL or a deputy. Schools should ensure that appropriate support is in place, including liaison with mental health professionals and external agencies where necessary.

All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

## 3.1    Online Safety

All staff must understand the importance of online safety as a running and interrelated theme across all safeguarding practices. Children are at risk of abuse and other harms online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

Schools must ensure that appropriate filtering and monitoring systems are in place, and that staff are trained to understand the expectations, roles and responsibilities in relation to these systems. The DSL should ensure that online safety is reflected in the child protection policy and that staff receive regular training and updates. The school must also ensure that children are taught about online safety, including the risks associated with content, contact, conduct and commerce.

## 3.2    Vulnerable Groups

The Trust recognises that some children are potentially at greater risk of harm. This includes children with a social worker, those who are looked after or previously looked after, children with SEND, children who are LGBTQ+ or gender-questioning, those in kinship care, and those who are electively home educated. Staff should be alert to the additional barriers these children may face and ensure they receive appropriate support. Risk assessments and safeguarding plans should reflect the specific needs of these groups

Staff need to be aware that additional barriers can exist when recognising abuse, neglect and exploitation in this groups of children including:
- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

Any reports of abuse involving children with SEND will require close liaison with the DSL and SENCO.

## 3.3    Indicators of Abuse and Neglect

(taken directly from Keeping Children Safe in Education 2025)

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

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

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

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

Safeguarding issues: All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk. Any incidences of these that happen in school should be referred immediately to the safeguarding team who will triage the issue and decide the most effective course of action.

### 3.4    Child on Child Abuse

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school or college and online. All staff have an important role to play in preventing it and responding where they believe a child may be at risk from it.

All staff should understand that even if there are no reports in their school it does not mean it is not happening. It may be the case that abuse is not being reported. As such it is important that when staff have any concerns regarding child-on-child abuse they should speak to their designated safeguarding lead (or a deputy).

It is essential that all staff understand the importance of challenging inappropriate behaviours between children that are abusive in nature. Examples of which are listed below. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. Our schools have a zero-tolerance approach to sexual violence and sexual harassment.

All staff recognise that children can and do abuse other children both inside and out of school and online and that procedures for dealing with child-on-child abuse are the same as those contained below in section 4. This includes staff proactively challenging inappropriate behaviours between children.

Child-on-child abuse is most likely to include, but may not be 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 such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- 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 nude and semi-nude 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 a person into a group and may also include an online element).

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**The Brooks Traffic Light Tool**

| Behaviours: age 0 to 5 | | |
|---|---|---|
| All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary. | | |
| **What is a green behaviour?**<br>Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability. They are reflective of natural curiosity, experimentation, consensual activities, and positive choices.<br><br>**What can you do?**<br>Green behaviours provide opportunities to give positive feedback and additional information.<br>**Green behaviours**<br>• holding or playing with own genitals<br>• attempting to touch or curiosity about other children's genitals<br>• attempting to touch or curiosity about breasts, bottoms or genitals of adults<br>• games e.g. mummies and daddies,<br>• doctors and nurses<br>• enjoying nakedness<br>• interest in body parts and what they do<br>• curiosity about the differences between boys and girls | **What is an amber behaviour?**<br>Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration, or context in which they occur.<br><br>**What can you do?**<br>Amber behaviours signal the need to take notice and gather information to assess the appropriate action.<br>**Amber behaviours**<br>• preoccupation with adult sexual<br>• behaviour<br>• pulling other children's pants down/skirts up/trousers down against their will<br>• talking about sex using adult slang<br>• preoccupation with touching the genitals of other people<br>• following others into toilets or changing rooms to look at them or touch them<br>• talking about sexual activities seen on TV/online | **What is a red behaviour?**<br>Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental or power differences. They may pose a concern due to the activity type, frequency, duration, or the context in which they occur.<br><br>**What can you do?**<br>Red behaviours indicate a need for immediate intervention and action.<br>**Red behaviours**<br>• persistently touching the genitals of other children<br>• persistent attempts to touch the genitals of adults<br>• simulation of sexual activity in play<br>• sexual behaviour between young children involving penetration with objects<br>• forcing other children to engage in sexual play |
| **Behaviours: age 5 to 9 and 9 to 13** | | |
| All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary. | | |
| **What is a green behaviour?**<br>Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability and reflective of natural curiosity, experimentation, consensual activities and positive choices.<br><br>**What can you do?**<br>Green behaviours provide opportunities to give positive feedback and additional information.<br>**Green behaviours 5-9**<br>• feeling and touching own genitals<br>• curiosity about other children's genitals<br>• curiosity about sex and relationships, e.g. differences between boys and girls, how sex happens, where babies come from, same-sex relationships<br>• sense of privacy about bodies | **What is an amber behaviour?**<br>Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.<br><br>**What can you do?**<br>Amber behaviours signal the need to take notice and gather information to assess the appropriate action.<br>**Amber behaviours 5-9**<br>• questions about sexual activity which persist or are repeated frequently, despite an answer having been given<br>• sexual bullying face to face or through texts or online messaging<br>• engaging in mutual masturbation | **What is a red behaviour?**<br>Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental or power differences. They may pose a concern due to the activity type, frequency, duration or the context in which they occur.<br><br>**What can you do?**<br>Red behaviours indicate a need for immediate intervention and action.<br>**Red behaviours 5-9**<br>• frequent masturbation in front of others<br>• sexual behaviour engaging significantly younger or less able children<br>• forcing other children to take part in<br>• sexual activities<br>• simulation of oral or penetrative sex |

- telling stories or asking questions using swear and slang words for parts of the body

**Green behaviours 9-13**

- solitary masturbation
- use of sexual language including swear and slang words
- having girl/boyfriends who are of the same, opposite or any gender
- interest in popular culture, e.g. fashion, music, media, online games, chatting online
- need for privacy
- consensual kissing, hugging, holding hands with peers

- persistent sexual images and ideas in talk, play and art
- use of adult slang language to discuss sex

**Amber behaviours 9-13**

- uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- verbal, physical or cyber/virtual sexual bullying involving sexual aggression
- LGBT (lesbian, gay, bisexual, transgender) targeted bullying
- exhibitionism, e.g. flashing or mooning
- giving out contact details online
- viewing pornographic material worrying about being pregnant or having STIs

- sourcing pornographic material online

**Red behaviours 9-13**

- exposing genitals or masturbating in public
- distributing naked or sexually provocative images of self or others
- sexually explicit talk with younger children
- sexual harassment
- arranging to meet with an online acquaintance in secret
- genital injury to self or others
- forcing other children of same age, younger or less able to take part in sexual activities
- sexual activity e.g. oral sex or intercourse
- presence of sexually transmitted infection (STI)
- evidence of pregnancy

## Behaviours: age 13 to 17

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

### What is a green behaviour?

Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability and reflective of natural curiosity, experimentation, consensual activities and positive choices.

### What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

### Green behaviours

- solitary masturbation
- sexually explicit conversations with peers
- obscenities and jokes within the current cultural norm
- interest in erotica/pornography
- use of internet/e-media to chat online
- having sexual or non-sexual relationships
- sexual activity including hugging, kissing, holding hands
- consenting oral and/or penetrative sex with others of the same or opposite gender who are of similar age and developmental ability
- choosing not to be sexually active

### What is an amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.

### What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

### Amber behaviours

- accessing exploitative or violent pornography
- uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress,
- withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- concern about body image
- taking and sending naked or sexually provocative images of self or others
- single occurrence of peeping, exposing, mooning or obscene gestures
- giving out contact details online
- joining adult- only social networking sites and giving false personal information

### What is a red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental, or power differences. They may pose a concern due to the activity type, frequency, duration or the context in which they occur.

### What can you do?

Red behaviours indicate a need for immediate intervention and action.

### Red behaviours

- exposing genitals or masturbating in public
- preoccupation with sex, which interferes with daily function
- sexual degradation/humiliation of self or others
- attempting/forcing others to expose genitals
- sexually aggressive/exploitative behaviour
- sexually explicit talk with younger children
- sexual harassment
- non-consensual sexual activity
- use of/acceptance of power and control in sexual relationships
- genital injury to self or others
- sexual contact with others where there is a big difference in age or ability
- sexual activity with someone in authority and in a position of trust

| | • arranging a face to face meeting with an online contact alone | • sexual activity with family members<br>• involvement in sexual exploitation and/or trafficking<br>• sexual contact with animals<br>• receipt of gifts or money in exchange for sex |
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The Sexual Offences Act 2003 defines 'consent' as '*if one agrees by choice and has the capacity to make that choice'*. The Act, removes the element of consent for many sexual offences for:

- Children/young people under 16 (including under 13).
- Children/young people under 18 having sexual relations with a person of trust (for example: teachers, youth workers, foster carers, police officers).
- Children/young people under 18 involved with family members over 18.
- Persons with a mental disorder impeding choice or who are induced, threatened, or deceived.
- Persons with a mental disorder who have sexual relations with care workers.

In relation to young people under the age of 13, consent is irrelevant. The law says, 'a child under the age of 13 does not, under any circumstances, have the legal capacity to consent to any form of sexual activity'.
**The Police must be informed <u>immediately</u> of any sexual activity involving a child under 13 years of age.**
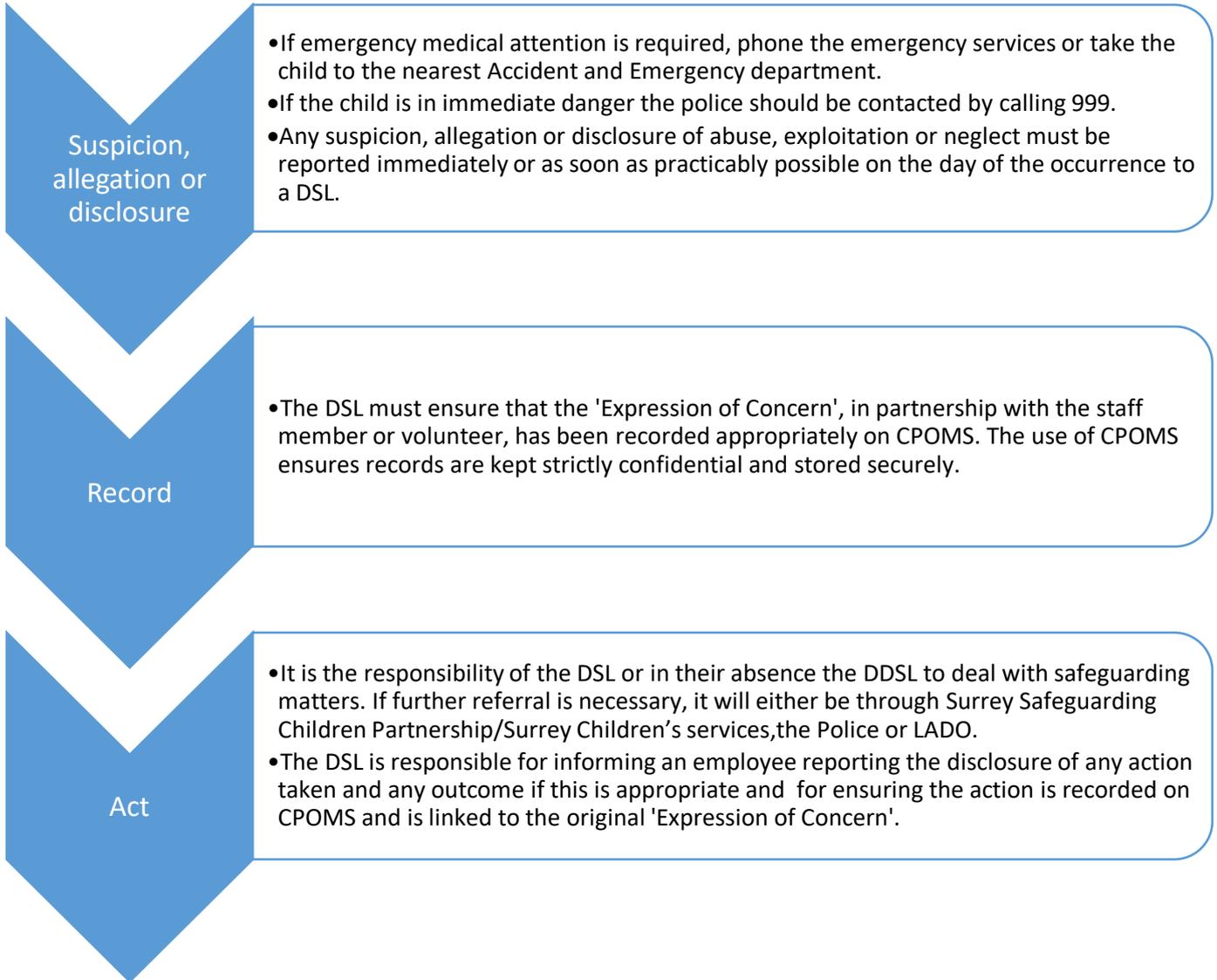
### 3.5    General safeguarding advice
- Remember not to be a young people's friend, always maintain a professional manner when working with them.
- Do not accept a young person as a friend on any social networking site that you use.

## 4.    Reporting Procedures

In all cases it is vital to take every action which is needed to safeguard the child, children and young person(s). *Immediate* action may be necessary in the following situations;

**Suspicion, allegation or disclosure**
- If emergency medical attention is required, phone the emergency services or take the child to the nearest Accident and Emergency department.
- If the child is in immediate danger the police should be contacted by calling 999.
- Any suspicion, allegation or disclosure of abuse, exploitation or neglect must be reported immediately or as soon as practicably possible on the day of the occurrence to a DSL.

**Record**
- The DSL must ensure that the 'Expression of Concern', in partnership with the staff member or volunteer, has been recorded appropriately on CPOMS. The use of CPOMS ensures records are kept strictly confidential and stored securely.

**Act**
- It is the responsibility of the DSL or in their absence the DDSL to deal with safeguarding matters. If further referral is necessary, it will either be through Surrey Safeguarding Children Partnership/Surrey Children's services,the Police or LADO.
- The DSL is responsible for informing an employee reporting the disclosure of any action taken and any outcome if this is appropriate and  for ensuring the action is recorded on CPOMS and is linked to the original 'Expression of Concern'.

It is the responsibility of the DSL, to ensure any partner agencies involved with the young person are made aware of the disclosure and the action taken where relevant and where information sharing guidance permits this.

It is important to remember that often only when information held by several workers is put together, that a picture of child abuse emerges. All staff & volunteers must adhere to the information sharing protocol published by HM Government, adopted by the Children's Trust, and endorsed by SSCP. Details can be found here; Information sharing: advice for practitioners (publishing.service.gov.uk). In addition to this, whilst respecting cultural differences, the basic requirement for children is that they are kept safe across social, ethnic, and cultural boundaries.

### 4.1    Responding to a disclosure

If the child or young person is not in immediate danger or requires immediate medical attention, contact the School's DSL or one of the DDSL's as soon as practical.

![ELT Together We Can logo] 26.docx

## 4.2 Other helpful contacts

**Children's Single Point of Access** (C-SPA), a front door to Surrey County Council services for children, provides residents and people who work with children in Surrey with direct information, advice and guidance about where and how to find the appropriate support for children and families.

C-SPA is available **9am-5pm, Monday – Friday**

**Phone: 0300 470 9100**          **Email:** cspa@surreycc.gov.uk
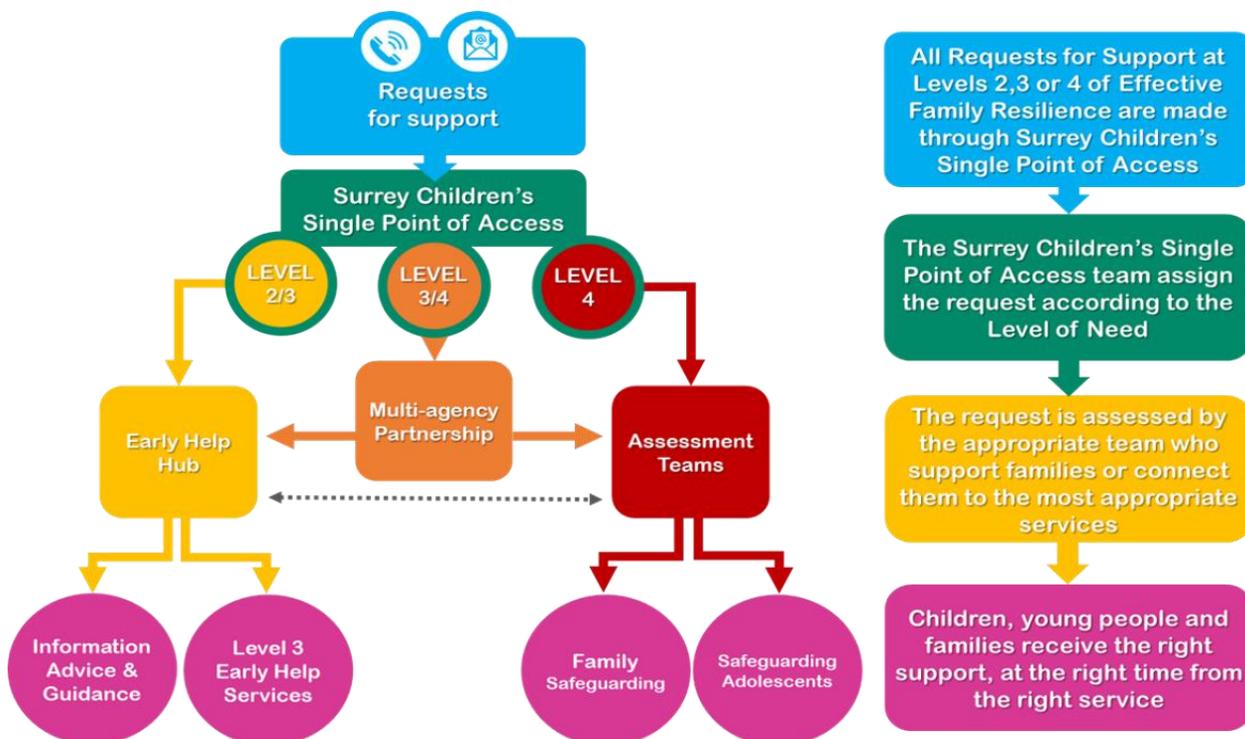


**Emergency Duty Team** (EDT), provides an emergency social care service for urgent situations which are out of normal office hours.  If your call is not answered, please do leave a message and your contact details for someone to get back to you.

EDT is available **5pm-9am, Monday – Friday, Weekends 24 hours a day.**

**Phone: 01483 517898**          **Email:** cspa@surreycc.gov.uk

The LADO Service manages allegations against individuals who work or volunteer with children in Surrey. If you have a concern regarding someone who works with children, please contact the LADO.

**Phone: 0300 123 1650** (option3)          **Email:** LADO@surreycc.gov.uk

**NSPCC Helpline 0808 800 5000**

## 4.3 Reacting to a disclosure

- Listen carefully rather than asking leading questions.
- Never promise any particular action or NOT to disclose any information shared.
- Allow silence and/or allow child, young person to be upset.
- Try to relate to the age, understanding or special needs of the child or young person.

- Record the information you have been given (on CPOMS) as soon as possible, preferably within 24 hours and only including what you have been told.
- Discuss this as soon as possible with the DSL.
- Any decision not to tell the parents must be discussed with the DSL unless the child or young person is in immediate danger.

## 4.4    Record Keeping

- Keep a record of any concern using the child's own language. Make sure it is a clear and comprehensive summary of the concern
- Always keep a record of any text or email exchanges with a young person (staff will use work telephones where available).
- Always be aware that your comments or actions may be perceived differently than intended, so be sensitive to the situation.
- Do not meet a young person alone, this is for the safety and well-being of the young person but also yourself. Where this is necessary, try to use public spaces for one-to-one meetings if you are not meeting in the school premises.
- Avoid detailed discussions about your personal experiences e.g. drugs, alcohol, sex.
- Never speak to the press about a child or young person without permission from the Head Teacher.

All concerns, discussions and decisions made, and the reasons for those decisions, must be recorded in writing. Records should include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved, and a note of any action taken, decisions reached and the outcome. Records must be kept confidential and stored securely. Child protection files should be transferred to a new school or college as soon as possible, and within five days for in-year transfers. The DSL should ensure that key staff in the receiving school are aware of the safeguarding needs of the child It is for DSL and school leaders to make sure that the victim's wishes are balanced against the responsibility to protect other children and the wider school community. This will vary on a case-by-case basis.

## 4.5    Guidance for child-on-child abuse within school

This is a difficult balancing act to consider, on one hand safeguarding the victim and wider student body, and on the other hand providing the alleged perpetrator an education, safeguarding support and any disciplinary action. These can, and should, occur at the same time if necessary.

Consider the proportionality of the response and that the victim and perpetrator should be kept apart on school premises, including before and after school activities and school transport. It should be communicated clearly to victims that the law is there to protect them, not criminalise them.

Social media is likely to play a central role in the fallout from any incident or alleged incident.

Intra-familial harms can and do occur and support for siblings is crucial – again on a case-by-case basis.

Regular reviews of actions taken should be initiated to review policy and lessons learned. Patterns of concerning, problematic or inappropriate behaviour should be identified and addressed and a suitable course of action chosen.

The fact that another body is investigating or has investigated an incident does not in itself prevent a school from coming to its own conclusion, on the balance of probabilities, about what happened, and imposing a penalty accordingly. This is a matter for the school and should be carefully considered on a case-by-case basis. The designated safeguarding lead (or a deputy) should take a leading role. The school

should consider if, by taking any action, it would prejudice an investigation and/or any subsequent prosecution.

Actions should be regularly reviewed and liaison with outside bodies and support sought and recorded.

### 4.6     Parents/ carers

It is good practice to be as open and honest as possible with parents/carers about any concerns. However, you must not discuss your concerns with parent's/carer's in the following circumstances:

- Where sexual abuse or exploitation is suspected.
- Where organised or multiple abuse is suspected.
- Where fabricated or induced illness is suspected.
- Where female genital mutilation is a concern.
- In cases of forced marriage.
- Where contacting parents/carers would place a child or others at immediate risk.

### 4.7     Finding a Solution Together (*FaST* process)

Effective working together depends upon an open approach and honest relationships between agencies and a belief in genuine partnership working. Any disputes about the safety and well-being of a child should be resolved in a timely way with all agencies working together in the best interests of the child so that the welfare of the child remains paramount.

Partners should recognise that complexity of need and range of intervention/support will not always fit into a simple formula that leads to 'the right solution'. Often there may be no right or wrong answer and quite legitimately practitioners may exercise their professional judgement differently. It is also the case that exceptionally, the needs of some young people and families may not easily fit within a conventional application of thresholds. The purpose of the SSCP Finding a Solution Together (FaST process) is to create a transparent process that enables multi-agency practitioners to exercise their professional judgement and provide the best possible service in a timely and safe way.

It is of vital importance that children; young people and their families do not become entangled in professional disagreements. Neither should disputes detract from the focus on the child, delay effective decision making, nor lead to protracted disputes that negatively impact upon the child and/or family and on inter-agency relationships and working practice.  In reaching resolution, it is always essential that disputes are approached in a considerate manner and one which both respects and seeks to understand the views and concerns of others from their experience and perspective when engaging with the young person/family.

The detailed policy can be accessed here: The Surrey FaST Resolution Process | Surrey Safeguarding Children Partnership (procedures.org.uk)

### 5.     Allegations Made Against Staff, Volunteers, Contractors, Organisations or Individuals using the school premises

When any form of complaint is made against an employee, volunteer or contractor, organisation or individual using the school premises, it must be taken seriously. The complaint should initially be dealt with by the Head Teacher or the most senior staff member on site at the time the complaint is made if the Head Teacher is not available. If the complaint is against the most senior member of staff on site, then the CEO must be contacted using the following email ceo@enlightenlt.education.  If the complaint is about the CEO, then the chair of Trustees must be contacted using the following email hcoulson@enlightenlt.education.

The senior staff member must report the complaint immediately to the Headteacher and the DSL giving details of the circumstances. The Headteacher, DSL, CEO or Chair of Trustees may contact the Local Authority Designated Officer. Further information can be found and in Part Four of KCSIE and here: Managing allegations against people that work or volunteer with children | Surrey Safeguarding Children Partnership (procedures.org.uk).They will attend the site of the allegation to gain an initial account of what has occurred from all relevant parties, including the person against whom the allegation has been made. If this is not possible, contact will be made by telephone.  The Trust reserves the right to suspend from duty and/or the premises, any person who is a party to the allegation until a full investigation has been made.

*This action does not imply in any way that the person suspended is responsible or is to blame for any action leading up to the complaint. The purpose of any such suspension is to enable a full and proper investigation to be carried out in a professional manner.*

It is the responsibility of the Head Teacher, DSL, CEO, or the Chair of Trustees to make the decision as to whether to inform Social Services and/or the Police Child Protection Unit, depending on the nature of the allegation. In matters of allegations against staff, volunteers, organisations, or individuals using the school premises working with children, information must be provided to the Local Authority Designated Officer.

## 5.1 Low Level Concerns

(refer to the Code of Conduct/Staff Behaviour Policy for further information)

The Trust promotes a culture of openness, trust and transparency in which the values and expected behaviour set out in the staff code of conduct are lived, monitored and reinforced. All staff are encouraged to report any low-level concerns about adults working in or on behalf of the school, including supply staff, volunteers and contractors. A low-level concern is any concern that an adult may have acted in a way that is inconsistent with the staff code of conduct, even if not serious enough to meet the harm threshold. Such concerns should be reported to the Headteacher and recorded in writing. The Headteacher will review records to identify any patterns and take appropriate action. Records of low-level concerns should be retained securely and confidentially at least until the individual leaves their employment.

Members of staff are able to identify concerns relating to the safety and welfare of children at an early stage, allowing for prompt investigation and intervention preventing concerns from escalating. It is vitally important that, if staff have any safeguarding concerns, however small, and even in no more than causing a sense of unease or 'nagging doubt' or if an allegation is made about another member of staff, this is referred to the Head Teacher promptly (or to the CEO in respect of the Head Teacher; or to the Chair of Trustees in respect of the CEO). We also encourage staff to self-refer in circumstances where, for example, they have found themselves in a situation which:
- Could be misinterpreted.
- Might appear compromising to others.
- On reflection they believe they may have behaved in such a way that they consider falls below the expected professional standards.

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.
- Humiliating children.

**Procedure**
- Tell the Head Teacher in all circumstances.

- If the concern has been raised via a third party, the Head Teacher should collect as much evidence as possible by speaking:
    - directly to the person who raised the concern, unless it has been raised anonymously, and
    - to the individual involved and any witnesses.
- The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken. This information needs to be recorded in writing along with the rationale for their decisions and action taken on the low-level concerns spreadsheet held within the confidential and secure HT HR area on Teams. The Head Teacher will monitor the spreadsheet in conjunction with HR and where patterns of low-level concerns are emerging will follow the procedure for managing allegations above.
- If there is any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, the Head Teacher should consult with the LADO.

Low-level concerns to reviewed half-termly by the DSL and included as part of the safeguarding governor's termly monitoring.

## 6.    Confidentiality And Whistle Blowing

The Trust has a proportionate and careful approach to confidentiality. The safety and welfare of a child or young person is paramount: concerns raised with an adult must be shared appropriately and from then on people will be informed of the situation on a need-to-know basis.

Any staff or volunteers with concerns about anybody providing services to children and young people should report this to their Line Manager, DSL, CEO or trustee board member as appropriate. They will be fully supported throughout the process.

All staff must be aware that they have a professional responsibility to share information with other agencies to safeguard children and young people in accordance with the Information Sharing Policy published by HM Government, adopted by the Children's Trust and endorsed by SSCP. 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. Staff should not share sensitive information with colleagues in an unprofessional manner.

All staff must be aware that they cannot promise a child that they will keep secrets/not disclose potentially harmful information.

## 7.    Safer Recruitment Policy Statement

The Trust will ensure that all recruitment practices comply with Part Three of Keeping Children Safe in Education 2025. This includes verifying a candidate's identity, obtaining an enhanced DBS check with children's barred list information where appropriate, verifying mental and physical fitness, right to work in the UK, and professional qualifications. References must be obtained prior to interview where possible and should be scrutinised for any concerns. All offers of employment are conditional upon satisfactory completion of pre-employment checks. The single central record must be maintained and include all required information for staff, volunteers, supply staff and members of the proprietor body.
The purpose of safer recruitment is to ensure:

- Applicants who may wish to harm, children or young people are deterred from applying for jobs or volunteering opportunities.

- Any unsuitable applicants are rejected by scrutinising applications and exploring potential areas for concern at interview.
- Unsuitable appointments are not made by having at least one member of the interview panel trained in safer recruitment; carrying out all relevant pre-employment checks* and ensuring all new staff and volunteers are given an appropriate induction.
- We identify and manage any identified risks.
- We maintain a safe and vigilant culture.

*Disclosure and Barring Service (DBS) Checks

All new staff and volunteers are to have a DBS check before commencing employment. Any failure to disclose convictions may result in disciplinary action or dismissal. Any positive disclosures will be discussed with the Head Teacher, DSL, CEO and/or trustees. All this information will be kept on the personnel file. The DBS number and date of processing will be held on a secure database.
A risk assessment will be completed if there is a positive DBS check sent back.

## 8.      Additional Relevant Policies/ Procedures

This safeguarding policy should be read alongside our organisational policies (generally available on The Trust website and individual school websites), procedures, guidance and other related documents as well as  Keeping Children Safe in Education.

## 8.1      References

- Surrey Safeguarding Children Partnership protocols, guidance and procedures
- Working Together to Safeguard Children 2023
- Information Sharing Advice for Practitioners' guidance
- Keeping children safe in education 2025
- Keeping Children Safe during community activities, after school clubs and tuition

If schools believe there to be Private Fostering Arrangements in place they should consult this document:
- 6091-DfES-ChildrensActFostering

If schools believe a child might be an unaccompanied asylum seeker they should reference the government guidance here:
- Processing children's asylum claims (accessible) - GOV.UK

**Appendix 1**

# SAFEGUARDING CHILDREN

Our schools are committed to safeguarding and
promoting the welfare of children and expect all staff and volunteers to share this commitment.

**If you have any concerns regarding the safeguarding of a child at St Andrew's Primary School please email**
dsl@standrews-primary.surrey.sch.uk

**Designated Safeguarding Lead (DSL):**



**Stina Witkowski**
**Head Teacher**

**Deputy Designated Safeguarding Leads (DDSL):**



**Abbie Evans**          **James Hunter**          **Jane Reed**

**All DSLs are fully committed to their roles. To find out more about what we do and your responsibilities please refer to our Safeguarding Policy which can be found on our website.**

The nominated safeguarding governor is: **Mike Branscombe**
Contact details:  mbranscombe@enlightenlt.education

In the case of safeguarding allegations against the Head Teacher the CEO, Mike Boddington, should be contacted using the email ceo@enlightenlt.education
In the case of safeguarding allegations against the CEO the chair of trustees should be contacted using the email: hcoulson@enlightenlt.education

**Appendix 2 –Visiting Speaker Protocol**

**1. Purpose**
To ensure that all visiting speakers to the school provide educational value, uphold the school's ethos, and comply with safeguarding and health & safety regulations.

**2. Planning and Approval**
- **Staff Responsibility**: The staff member inviting the speaker must complete a **Speaker Request Form** at least **2 weeks in advance**.
- **Approval**: The form must be reviewed and approved by the **Designated Safeguarding Lead (DSL)** and a member of the **Senior Leadership Team (SLT)**.
- **Content Review**: A brief outline of the speaker's content must be submitted for review to ensure it is age-appropriate and aligns with school values.

**3. Safeguarding and Conduct**
- **ID Verification**: All speakers must present valid photo ID upon arrival.
- **Supervision**: A member of staff must be present throughout the visit.
- **Safeguarding Briefing**: Speakers will be given a short safeguarding briefing upon arrival, including how to report concerns.
- **Code of Conduct**: Speakers must agree to the school's code of conduct and safeguarding policies.

**4. Logistics and Safety**
- **Arrival and Departure**: Speakers must sign in and out at reception.
- **Emergency Procedures**: Speakers will be informed of fire exits and emergency protocols.
- **Accessibility**: Ensure any special requirements (e.g. AV equipment, accessibility needs) are arranged in advance.

**5. Evaluation and Feedback**
- **Staff Feedback**: If requested the supervising staff member will complete a short evaluation form after the session.
- **Student Feedback**: Optional student feedback may be collected to assess engagement and impact.
- **Record Keeping**: All documentation will be stored securely for future reference.

**6. Prohibited Content**
Speakers must not:
- Promote political, religious, or ideological agendas.
- Use discriminatory, offensive, or inappropriate language.
- Share personal contact details with students.

**7. Breach of Protocol**
Any breach of this protocol may result in the speaker being asked to leave and may affect future invitations.

**Appendix 3 – Risk Assessment: Pupils Being Drawn into Terrorism or Supporting Extremist Ideas**

**1. Context and Background**

Schools have a statutory duty under the Counter-Terrorism and Security Act 2015 to prevent pupils from being drawn into terrorism. This includes safeguarding against radicalisation and supporting pupils who may be vulnerable to extremist ideologies.

**2. Risk Identification**

| Risk Area | Description |
|---|---|
| **Online Radicalisation** | Pupils may access extremist content via social media, forums, or encrypted messaging apps. |
| **Peer Influence** | Pupils may be influenced by peers who express extremist views or share radical content. |
| **Community Tensions** | Local or global events may heighten tensions and increase susceptibility to extremist narratives. |
| **Identity and belonging** | Pupils struggling with identity, discrimination, or isolation may be more vulnerable to radicalisation. |
| **Unsupervised Spaces** | Areas with limited adult supervision (e.g., online platforms, after-school clubs) may pose risks. |

**3. Risk Assessment**

| Risk | Likelihood | Impact | Overall Risk Level |
|---|---|---|---|
| Online exposure to extremist content | Medium | High | High |
| Peer-led radicalisation | Low | Medium | Medium |
| Influence from family/community | Medium | Medium | Medium |
| Lack of staff awareness/training | Medium | High | High |
| Pupils feeling isolated or marginalised | Medium | High | High |

**4. Mitigation Measures**

- **Staff Training**: Regular training on Prevent Duty, safeguarding, and recognising signs of radicalisation.
- **Curriculum Integration**: Promote British values, critical thinking, and digital literacy through PSHE and other subjects.
- **Online Safety**: Implement robust filtering and monitoring systems; educate pupils on safe internet use.
- **Safeguarding Procedures**: Clear referral pathways for concerns; designated safeguarding leads trained in Prevent.
- **Engagement with Families**: Build trust and communication with parents/carers to support early intervention.
- **Safe Spaces for Dialogue**: Encourage open discussions about identity, beliefs, and current events in a respectful environment.

**5. Monitoring and Review**

- **Regular Audits**: Review policies and procedures annually or after significant incidents.
- **Incident Reporting**: Maintain logs of concerns and actions taken.
- **Pupil Voice**: Use surveys and forums to understand pupil perspectives and concerns.
- **External Partnerships**: Collaborate with local authorities, police, and community organisations.

**6. Conclusion**

This risk assessment is designed to support schools in creating a safe, inclusive environment where pupils are protected from radicalisation and extremist influences. It should be reviewed regularly and adapted to reflect changes in the school community or wider societal context.