



# Oakhyrst Grange School

## **OAKHYRST GRANGE SCHOOL CHILD PROTECTION AND SAFEGUARDING CHILDREN POLICY**

Oakhyrst Grange School is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. At this school we respect and value all children and are committed to providing a caring, friendly and safe environment for our pupils so that they can learn in a relaxed and secure atmosphere. We believe that every pupil should be able to participate in all school activities in an enjoyable and safe environment and be protected from harm. This is the responsibility of every adult employed by, or invited to deliver services at Oakhyrst Grange School. We recognise our responsibility to safeguard all who access our school and to promote the welfare of all of our pupils by protecting them from physical, sexual and emotional abuse, neglect and bullying.

Reviewed and updated AG/AA 08.09.22 (KCSIE 22)

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Next Review September 2024

The telephone numbers are correct at the date of printing

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**Oakhurst Grange School**  
**Child Protection and Safeguarding Children Policy**

Lead DSL – Mr Alex Gear, Head Teacher and SLT:

[head@oakhurstgrangeschool.co.uk](mailto:head@oakhurstgrangeschool.co.uk)

Deputy DSL –: Miss Faye Dance, Deputy Head, SLT and Year 5 Teacher: (currently on maternity leave – returning January 2024)

[faye.dance@oakhurstgrangeschool.co.uk](mailto:faye.dance@oakhurstgrangeschool.co.uk)

DSL Officer – Mr Keith Burke, Year 3 Teacher and SLT:

[keith.burke@oakhurstgrangeschool.co.uk](mailto:keith.burke@oakhurstgrangeschool.co.uk)

DSL Officer – Mrs Roxann Dowling, Head of Early Years, Lower Kindergarten Teacher and SLT:

[roxann.dowling@oakhurstgrangeschool.co.uk](mailto:roxann.dowling@oakhurstgrangeschool.co.uk)

Chairman of Governors/Child Protection Governor – Mrs Pauline Clark:

[pauline.clark@oakhurstgrangeschool.co.uk](mailto:pauline.clark@oakhurstgrangeschool.co.uk)

Online Safety Officer – Mrs Margarita Gorman, IT Technical Coordinator

[itsupport@oakhurstgrangeschool.co.uk](mailto:itsupport@oakhurstgrangeschool.co.uk)

All of the above can be contacted via the School Office on 01883 343344

Surrey Community Police - 101

**Further advice on child protection is available from:**

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

Childline: <http://www.childline.org.uk/>

CEOPSThinkuknow: <https://www.thinkuknow.co.uk/>

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

Surrey Safeguarding Children Board (SSCB): Support Team: 01372 833330

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

Local Authority Designated Officer (LADO): 0300 123 1650 Option 3

Email: [LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk)

Children's Central Single Point of Access (C-SPA) 0300 470 9100 or 01483 517898

Email: [csmash@surreycc.gcsx.gov.uk](mailto:csmash@surreycc.gcsx.gov.uk)

Early Help Co-ordination Hub (South East Hub): 01483 517008

Education Safeguarding Advisor for Surrey

Email: [education.safeguarding@surreycc.gov.uk](mailto:education.safeguarding@surreycc.gov.uk)

Team Manager Clare Stewart

**Emily Colmen, Education Safeguarding Advisor**

Elisabeth Clark, Education Safeguarding Advisor

Narinder Ghosal, Education Safeguarding Advisor

## **Resources**

- Keeping Children Safe in Education September 2023 (KCSIE)  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1101454/Keeping\\_children\\_safe\\_in\\_education\\_2022.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1101454/Keeping_children_safe_in_education_2022.pdf)
- Working Together to Safeguard Children July 2018  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/729914/Working\\_Together\\_to\\_Safeguard\\_Children-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729914/Working_Together_to_Safeguard_Children-2018.pdf)
- What to do if you are worried a child is being abused March 2015  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/419604/What\\_to\\_do\\_if\\_you\\_re\\_worried\\_a\\_child\\_is\\_being\\_abused.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf)
- Information Sharing – Advice for Practitioners July 2018  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/721581/Information\\_sharing\\_advice\\_practitioners\\_safeguarding\\_services.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf)
- The Prevent Duty September 2023  
[Prevent duty guidance: for England and Wales \(accessible\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/1101454/Prevent_duty_guidance_for_England_and_Wales_accessible.pdf)
- GDPR Act 2018  
[2018-05-23 Factsheet 1 - Act overview.pdf \(publishing.service.gov.uk\)](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/2018-05-23_Factsheet_1_-_Act_overview.pdf)

**The School recognises that Safeguarding covers much more than Child Protection and so this policy will be reviewed annually and should be read in conjunction with the Safeguarding, Staff Code of Conduct, Recruitment, Selection and Disclosure, Whistleblowing and IT Acceptable User's Agreements and other related policies and procedures which are available on request from the school office. This policy applies to all settings within the school context at Oakhyrst Grange School including the EYFS.**

## Terminology

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

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

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

**Early Help** means that providing support as soon as additional needs are met. This may include working together with universal and targeted services. Such support may be required at any point in a child's life.

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

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

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

**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.

## 1.0 Introduction

- 1.1 This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2006; the Education Act 2002, and in line with government publications and the ISI regulatory requirements dated September 2018.  
The guidance reflects, 'Keeping Children Safe in Education' September 2023 'Working Together to Safeguard Children' July 2018, 'The Prevent Duty: Departmental Advice for Schools and Childcare Providers' June 2015, Surrey Safeguarding Children Board Procedures<sup>1</sup> (SSCB) and 'What to do if you are worried a child is being abused' March 2015.
- 1.2 The Governing body takes seriously its responsibility under section 175 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within our school are available to identify, assess, and support those children who are suffering harm.
- 1.3 We recognise that **all** adults, including temporary staff, volunteers and governors, have a full and active part to play in protecting our pupils from harm, and that the child's welfare is our paramount concern. Safeguarding and promoting the welfare of children is **everyone's responsibility**.
- 1.4 All staff believe that our school should provide a caring, positive safe and stimulating environment that promotes the social, physical and moral development of the individual child. Our Anti-Bullying policy should be considered alongside the DfE Preventing and Tackling Bullying documents of July 2017.
- 1.5 The aims of this policy are:
  - 1.5.1 To support the child's development in ways that will foster security, confidence and independence.
  - 1.5.2 To provide an environment in which children and young people feel safe, secure, valued and respected, and feel confident, and know how to approach adults if they are in difficulties, believing they will be effectively listened to.
  - 1.5.3 To raise the awareness of all teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse (Reference Appendices 1 and 2)
  - 1.5.4 To provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we, the school, contribute to assessments of need and support packages for those children.
  - 1.5.5 To emphasise the need for good levels of communication between all members of staff, Governors and outside agencies.
  - 1.5.6 To develop a structured procedure within the school, which will be followed by all members of the school community in cases of suspected abuse.
  - 1.5.7 To develop and promote effective working relationships with other agencies, especially the Police and Social Care.
  - 1.5.8 To ensure that all staff including peripatetic staff, volunteers and contractors working within our school who have substantial access to children have been checked as to their suitability, including verification

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<sup>1</sup> The Surrey Safeguarding Children Board Procedures are only available online at [www.surreycc.gov.uk](http://www.surreycc.gov.uk)

of their identity, qualifications, staff suitability form, prohibition checks and a satisfactory DBS check (according to guidance)<sup>2</sup>, and a central record is kept for audit. As a matter of good practice and with a clear desire for transparency candidates will be informed that online checks about them will be made.

## **2.0 Safe School, Safe Staff**

### **2.1 We will ensure that:**

- 2.1.1 All members of the governing body understand and fulfil their responsibilities, namely to ensure that: All Trustees and members of the Board receive appropriate safeguarding and child protection (including online training) at induction and ongoing. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place at Oakhyrst Grange School are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.
- there is a Child Protection and Safeguarding Children policy together with a Staff Code of Conduct policy
  - the school operates safer recruitment procedures by ensuring that there is at least one person on every recruitment panel that has completed Safer Recruitment training
  - the school has procedures for dealing with allegations of abuse against staff and volunteers and to make a referral to the Teaching Regulation Agency (TRA) if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have had they not resigned. No person shall be allowed to work in the school in any capacity who is in contravention of a prohibition order, an interim prohibition order or any direction made under Section 128 or the 2008 Act or Section 142 of the 2002 Act or any disqualification, prohibition or restriction which takes effect as if contained in either such direction
  - in the event of unacceptable professional conduct or conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence the member of staff and volunteers would be dismissed and a referral made to the TRA
  - a senior leader has Designated Safeguarding Lead (DSL) responsibility
  - On appointment, the DSLs undertake interagency training (LSCB Modules 1&2) and also undertake DSL 'New to Role' and the 'Update' Course every 2 years. All DSLs have full training in line with LSCB every 2 years
  - all other staff have Safeguarding training updated annually
  - any weaknesses in Child Protection are remedied immediately
  - the Chairman of the Governing Body, Mrs Pauline Clark, is nominated to liaise with the Local Authority on Child Protection issues and in the event of an allegation of abuse made against the Head Teacher
  - the Child Protection and Safeguarding Children policy is reviewed annually (at a minimum) and that the Child Protection and

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<sup>2</sup> Guidance regarding DBS checks recently updated by the Protection of Freedoms Act 2012

Safeguarding Children policy is available on the school website or by other means

- The Governing Body considers how children may be taught about safeguarding. This may be part of a broad and balanced curriculum covering relevant issues through personal social health and economic education (PSHE) including online safety
- Enhanced DBS checks are in place for the Chair of Governors of our school, as is the case for all Board members and Trustees. These will be renewed every 3 years by way of good practice.

- 2.1.2 The Lead DSL is Mr Alex Gear, Head Teacher. The Deputy DSLs are Miss Faye Dance, Deputy Head and Year 5 Teacher (currently on maternity leave until January 2024) and Mr Keith Burke, SLT and Year 3 Teacher, and Mrs Roxann Dowling EYFS Lead and SLT team member. These Officers have undertaken the compulsory training delivered through the SSCB (2 days), or by an approved external training provider, and, upon appointment will undertake 'DSL New to Role' training followed by biannual updates. They can be contacted via the School Office on 01883 343344 or by email on [secretary@oakhurstgrangeschool.co.uk](mailto:secretary@oakhurstgrangeschool.co.uk).
- 2.1.3 The DSLs who are involved in recruitment and at least one member of the governing body will also complete Safer Recruitment Training (currently on-line on the Educare Training website) to be renewed every 3 years.
- 2.1.4 All members of staff and volunteers are provided with child protection awareness information at induction, so that they know who to discuss a concern with. New staff are expected to receive a Safeguarding talk from the Lead or Deputy DSL and this will include making clear reference to the School Child Protection and Safeguarding Children Policy, reading 'Keeping Children Safe in Education' (KCSIE September 2023) Parts 1, 5 and Annex D, 'What to do if you are Worried a Child is being Abused March 2015 and the Staff Code of Conduct including Whistleblowing. The names and contact details of the DSLs will be made clear and are at the start of this policy. New members of staff will sign the induction check list that is held on their file to confirm that this process has been completed.
- 2.1.5 All members of staff are trained in and receive regular updates in online safety and reporting concerns (Ref Appendix 3).
- 2.1.6 All members of staff, volunteers and governors should be aware of children who are potentially at risk of radicalisation, and such cases should be reported to the DSL. (Ref Appendix 4).
- 2.1.7 All members of staff should understand that mental health issues can, in some cases be an indicator of abuse, harm, neglect or wider safeguarding concerns. Staff should also be aware that children with a social worker may need additional pastoral / academic support. All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.
- 2.1.8 All other staff and governors, have child protection awareness training, updated by the Lead DSL as appropriate, to maintain their



understanding of the signs and indicators of abuse. Indicators of abuse of neglect where harm is a consideration can include ill treatment that is not physical as well as the impact of ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely by others.

- 2.1.9 All members of staff, volunteers and governors know how to respond to a pupil who discloses abuse through delivery of the Awareness Raising pack.
- 2.1.10 All parents/carers are made aware of the responsibilities of staff members with regard to child protection procedures through publication of the school's Child Protection and Safeguarding Children Policy, and reference to it on the school's website.
- 2.1.11 Our lettings policy will seek to ensure the suitability of adults working with children on school sites at any time.
- 2.1.12 Community users organising activities for children are aware of the school's child protection guidelines and procedures.
- 2.1.13 Child protection type concerns or allegations against adults working in the school are referred to the LADO<sup>3</sup> for advice, and that any member of staff found not suitable to work with children will be notified to the TRA and Disclosure and Barring Service (DBS)<sup>4</sup> for consideration for barring, following resignation, dismissal, or when we cease to use their service as a result of a substantiated allegation, in the case of a volunteer.
- 2.1.14 All members of staff, volunteers and governors will be aware of the need to report any discovered crime to the Police within 24 hours and of the need to make a clear statement outlining the details of said crime.
- 2.1.15 Safeguarding and promoting the welfare of children is everyone's responsibility and we all maintain an attitude of "it could happen here" where safeguarding is concerned.
- 2.1.16 All members of staff, volunteers and governors approach to Safeguarding is always child centred making sure that they always consider what is in the best interest of the child.
- 2.1.17 All members of staff, volunteers and governors understand the importance to provide a safe environment for the children to learn in where they feel secure and are encouraged to talk and are listened to.
- 2.1.18 All members of staff, volunteers and governors understand that they have a responsibility to identify concerns, share information and take prompt action by speaking to the Lead DSL or any DDSL's with regard to safeguarding children at Oakhyrst Grange School.
- 2.1.19 All members of staff, volunteers and governors are prepared to refer directly to the C-SPA and the Police if appropriate if there is a risk of significant harm and the DSL or their Deputies are not available
- 2.1.20 All members of staff, volunteers and governors shall read and ensure they have an understanding of 'KCSIE Parts 1, 5 and Annex D' September 2023 and 'What to do if you are worried a child is being abused' March 2015.
- 2.1.21 All members of staff, volunteers and governors should ensure they are aware and understand where they can find further information regarding safeguarding concerns within school and online.

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<sup>3</sup> LADO Local Authority Designated Officer for allegations against staff. AEO Area Education Officer or Duty LADO via 0300 123 1650 Option 3.

<sup>4</sup> Contact the LADO for guidance in any case

- 2.1.22 All members of staff and volunteers should ensure that they have updated Safeguarding training every year.
  - 2.1.23 All teachers to plan opportunities within the curriculum for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe.
  - 2.1.24 All members of staff, volunteers and governors should understand the importance of treating information with confidentiality but never promise to “keep a secret”.
  - 2.1.25 All members of staff, volunteers and governors know who the DSL and Deputy DSLs are and how to contact them.
  - 2.1.26 All members of staff, volunteers and governors will assist the Governing body and Head Teacher in fulfilling their Safeguarding responsibilities set out in legislation and statutory guidance.
  - 2.1.27 All staff foster a sense of belonging and community for the children as we are the Oakhyrst Grange School family.
  - 2.1.28 All staff have an understanding that pupils with SEND are more at risk from suffering abuse and potential child on child abuse. They can face additional safeguarding challenges.
  - 2.1.29 Oakhyrst Grange School contributes to inter-agency working in line with the ‘Working Together to Safeguard Children 2018’ **July 2018** (awaiting update from consultation 2023) guidance.
  - 2.1.30 All staff must be aware that they must not use their personal mobile phones and cameras at any time in the EYFS setting. This is relevant to all situations involving all of the settings within the school. At no time should personal mobiles, school cameras or iPads be taken into the changing areas or toilets.
- 2.2 Our procedures will be annually (at a minimum) reviewed and up-dated.
  - 2.3 The name and photograph of the designated members of staff for Child Protection and Safeguarding, the Designated Safeguarding Leaders, will be clearly advertised in the school, with a statement explaining the school’s role in referring and monitoring cases of suspected harm and abuse.
  - 2.4 All new members of staff will be emailed a copy of our Child Protection and Safeguarding Children policy and have access to the Raising Awareness Pack, with the DSLs’ names clearly displayed, and advised of where the hard copies are located, as part of their induction into the school.
  - 2.5 The policy is available publicly. Parents/carers are made aware of this policy and their entitlement to have a copy of it via the EYFS & Parent handbook or the website.

### **3.0 Responsibilities**

3.1 The Designated Safeguarding Lead’s roles and responsibilities include:

- 3.1.1 To take the lead responsibility for Safeguarding and Child Protection in the School.
- 3.1.2 Referring a child if there are concerns about possible abuse to the C-SPA<sup>5</sup>, and acting as a focal point for staff to discuss concerns. Referrals should be made to the Surrey Multi-Agency Safeguarding Hub using the Multi-Agency Referral Form (MARF).

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<sup>5</sup> All new referrals go to C-SPA 0300 470 9100 operating Monday to Friday 9.00am to 5.00pm. In an emergency out of hours, referrals can be made to the Emergency Duty Team on 01483 517898.

- 3.1.3 To refer cases to the Channel Programme where there is a radicalisation concern via the C-SPA and will act as a point of contact for all staff to discuss their concerns.
- 3.1.4 Keeping detailed and accurate written records of concerns about a child even if there is no need to make an immediate referral.
- 3.1.5 Ensuring that all such records are kept confidentially and are securely stored and are separate from pupil records, until the child's 25<sup>th</sup> birthday, and are copied on to the child's next school or college.
- 3.1.6 Ensuring that an indication of the existence of the additional file in 3.1.5 above is marked on the pupil records.
- 3.1.7 Will ensure that when a pupil transfers school their child protection file is passed to the new school as soon as possible and within statutory timescales and that confirmation of receipt is received.
- 3.1.8 Liaising with other agencies and professionals in line with 'Working Together to Safeguard Children' **July 2018** (awaiting update from consultation 2023)
- 3.1.9 Will liaise with the Case Manager and LADO for Child Protection concerns in cases which concern a member of staff or volunteer and refer cases where a person is dismissed due to the risk or harm to a child to the DBS and TRA as required.
- 3.1.10 Ensuring that either they or the staff member attend case conferences, core groups, or other multi-agency planning meetings, contribute to assessments, and provide a report which has been shared with the parents.
- 3.1.11 Ensuring that any pupil currently with a child protection plan who is absent in the educational setting without explanation for two days is referred to their key worker's Social Care Team.
- 3.1.12 Organising child protection induction, and update training every 3 years, for all school staff.
- 3.1.13 Ensure that all staff read and sign to confirm that they have read 'KCSIE September 2023 Parts 1, 5 and Annex D' and 'What to do if a child is being abused' March 2015'.
- 3.1.14 Will contribute to and provide with the Head Teacher and Chair of Governors the "Audit of Statutory Duties and Associated Responsibilities" to be submitted annually to the Surrey County Council Education Safeguarding team.
- 3.1.15 Will follow the Department of Education and KCSIE September 2023 guidance on "Child on child Abuse" when a concern is raised.
- 3.1.16 Be available during term time for all members of staff, volunteers and governors to discuss any concerns whilst acting as a source of support and expertise in carrying out safeguarding duties.
- 3.1.17 Will have a secure knowledge of SCCB procedures and understands the importance of any update training required to carry out the role. The DSL update training will be renewed every 2 years.
- 3.1.18 Will have a clear understanding of access and referral to the Local Early Help Procedure (appendix 4) and will support and advise members of staff where appropriate.
- 3.1.19 Understands the importance to support the school in their delivery with regards to the requirements of the Prevent Duty.
- 3.1.20 Maintain an overview and responsibility for all aspects of Online Safety. This includes working closely with the Online Safety Officer designated by the school.
- 3.1.21 Updates from Surrey LA are shared with the DSL through *Operation Encompass*. These and other updates are shared with the DSL team. The DSL is responsible for updating the staff and Governors of any changes in safeguarding and online safety procedure and practice. This is done through formal staff meetings, inset training sessions and

reports to Governors. In addition, the DSL provides advice, support and information on an on-going and informal basis. As a matter of good practice staff are regularly informed and reminded about safeguarding policy and procedures in staff meetings through a series of *hot topic* information sessions.

- 3.1.22 When a child/children leave Oakhyrst Grange School, the DSL should ensure that their Child Protection file is transferred to the new school or college as soon as possible, and within 5 days for in-year transfer or within 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives.

3.2 The Deputy Designated Safeguard Lead roles and responsibilities are:

- 3.2.1 Be trained to the same standard as the DSL.
- 3.2.2 Provide support to the DSL in carrying out delegated activities, however the lead responsibility of the DSL cannot be delegated.
- 3.2.3 In the absence of the DSL carry out any activities necessary to ensure the ongoing safety and protection of children within the school.

## 4.0 Supporting Children

- 4.1 Preventative education is most effective in the context of a whole school or college approach that prepares pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. These will be underpinned by the Oakhyrst Grange's behaviour policy and pastoral support system as well as by a planned programme of evidence-based PSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum.

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

Safeguarding' is broader than 'child protection'. As well as protecting children from harm, 'safeguarding' widens the responsibility to preventing harm and promoting the welfare of children. It is recognised that safeguarding and promoting the welfare of children includes:

- Protecting children from maltreatment
- Preventing the impairment of children's mental wellbeing or physical health or development
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes.

Where a child is suffering significant harm, or is likely to do so, action will be taken to protect that child. Action will also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or at immediate risk. The school recognises the importance of children receiving the right help at the right time to address risks and prevent issues escalating, the importance of acting on and referring the early signs of abuse and neglect, keeping clear records, listening to the views of the child, reassessing concerns when situations do not improve, sharing information quickly and challenging inaction. Providing support as soon as possible is more effective in promoting the welfare of children.

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

4.1.1 Children in need under section 17 of the Children Act 1989 are those whose vulnerability is such that they are unlikely to reach or maintain a satisfactory level of health or development, or this will be significantly impaired without the provision of services, plus those who are disabled. The key factors in determining whether a child is in need are: what will happen to the child's health or development without services being provided; and the likely effect the services will have on the child's standard of health and development.

4.1.2 A child shall be taken to be in need if:

- (a) he/she is unlikely to achieve or maintain, or to have the opportunity of achieving or maintaining a reasonable standard of health or development without the provision for him/her of services by a local authority under this Part of the Act;
- (b) his/her mental wellbeing and physical health or development is likely to be significantly impaired, or further impaired, without the provision for him/her of such services; or
- (c) he/she is disabled,  
And "family", in relation to such a child, includes any person who has parental responsibility for the child and any other person with whom he has been living.

4.1.3 A child is disabled if he/she is blind, deaf or dumb or suffers from mental disorder of any kind or is substantially and permanently handicapped by illness, injury or congenital deformity or such other disability as may be prescribed; and in this Part of the Act – "development" means physical, intellectual, emotional, social or behavioural development; and "health" means physical or mental health.

4.1.4 For clarity, a child will be seen at **Risk** if he/she is subject of an emergency protection order or is in Police Protection. A child will be seen to be at **Risk** if there is reasonable cause to suspect that a child who lives, or is found in an authority's area is suffering, or is likely to suffer, significant harm.

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

4.3 Our school will support all children by:

- 4.3.1 Encouraging self-esteem and self-assertiveness, through the curriculum specifically the PSHE curriculum including online safety, as well as our relationships, whilst not condoning aggression or bullying.
- 4.3.2 Ensuring that the online teaching provision is well supported by strong filtering and monitoring processes that are an integral part of the school's teaching and learning.
- 4.3.3 Ensuring that the necessary cyber security standards are met.
- 4.3.4 Promoting a caring, safe and positive environment within the school.
- 4.3.5 Liaising and working together with all other support services and those agencies involved in the safeguarding of children.
- 4.3.6 Notifying Social Care as soon as there is a significant concern.

- 4.3.7 Providing continuing support to a child about whom there have been concerns who leaves the school by ensuring that information is shared under confidential cover to the child's new setting and ensuring the school medical records are forwarded as a matter of priority.
- 4.3.8 Promoting the understanding of the school's duty of care toward keeping children safe in and out of school settings.

## 5 Prevention

- 5.1 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. Teachers adopt various communication processes to allow children to share their worries or concerns.
- 5.2 The school community will therefore:
  - 5.2.1 Work to establish and maintain an ethos where children feel safe and secure and are encouraged to talk and are always listened to.
  - 5.2.2 Include regular consultation with children e.g. through questionnaires, participation in anti-bullying week, asking children to report whether they have had happy/sad lunchtimes/playtimes.
  - 5.2.3 Ensure that all children know there is an adult in the school whom they can approach if they are worried or in difficulty.
  - 5.2.4 Include safeguarding across the curriculum, including PSHE, opportunities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help. In particular this will include anti-bullying work, online safety and road safety. Also focussed work in Year 6 to prepare for transition to Secondary school and more personal safety/independent travel.
  - 5.2.5 Ensure all staff are aware of school guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks. Mobile phones should not be used for the taking of any moving or still images. The camera facility on mobile phones or other platforms should not be used. No mobile devices with a camera facility to be taken into any children's changing areas. (Appendix 10)

## 6 Confidentiality

- 6.1 We recognise that all matters relating to child protection are confidential.
- 6.2 We understand the professional responsibility of information sharing to identify and tackle all forms of abuse to protect and safeguard children. The Data Protection Act May 2018 is not a barrier to sharing information if failure to do so would put a child at risk.
- 6.3 The Head Teacher or DSLs will disclose any information about a child to other members of staff on a need to know basis only.<sup>6</sup>
- 6.4 All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children in line with the 'Working Together to Safeguard Children' July 2018 July 2018 (awaiting

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<sup>6</sup> Guidance about sharing information, can be found in the DfE booklet 'Advice for practitioners providing safeguarding services to children, young people, parents and carers'. DFE-00128-2018

update from consultation 2023) and 'Information Sharing document of Advice for Practitioners' (DfE 2018).

- 6.5 All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing.
- 6.6 We will always undertake to share our intention to refer a child to Social Care with their parents /carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation. If in doubt, we will consult with C-SPA.

## **7.0 Child Protection Procedures**

- 7.1 The following procedures apply to all staff and volunteers at Oakhyrst Grange School.
- 7.2 The framework provides all members of staff and volunteers with guidance enabling them to take appropriate action when they are concerned that a child is being harmed or abused or is at risk of being harmed or abused.
- 7.3 All staff, volunteers and governors at Oakhyrst Grange School understand the importance of a 'child-centred' approach to safeguarding.
- 7.4 If a member of staff, volunteer or governor suspects abuse, spots signs or indicators of abuse, or they have a disclosure of abuse made to them they must:
  - 7.4.1 Make an initial record of the information. This to include specific dates and times.
  - 7.4.2 Report it immediately to the DSL. If the DSL is unavailable, the Deputy should be contacted.
  - 7.4.3 The DSL will consider if there is a requirement for immediate medical intervention and or if a referral to C-SPA is required.
  - 7.4.4 The staff member must make a detailed and accurate record as soon as possible and within 24 hours. Details should include: dates and times of their observations, dates and times of any discussions in which they were involved within, any injuries noted on a Body Map, explanations provided by the adult/child, rationale for their decision making and action taken and any actual words or phrases used by the child.
  - 7.4.5 The records must be signed and dated by the staff member (author) and given to the DSL.
  - 7.4.6 In the absence of the DSL or Deputy Safeguarding Lead or Officer, staff must be prepared to contact C-SPA directly if there is potential for immediate harm or risk.
- 7.5 Following a report of concerns made to the DSL, the DSL will:
  - 7.5.1 Decide whether there are sufficient grounds for suspecting significant harm using the SSCB Levels of Need Document. If this is the case, a referral will be made to the C-SPA using a Multi-Agency Referral Form (MARF).
  - 7.5.2 The school will normally seek to discuss concerns with the child's

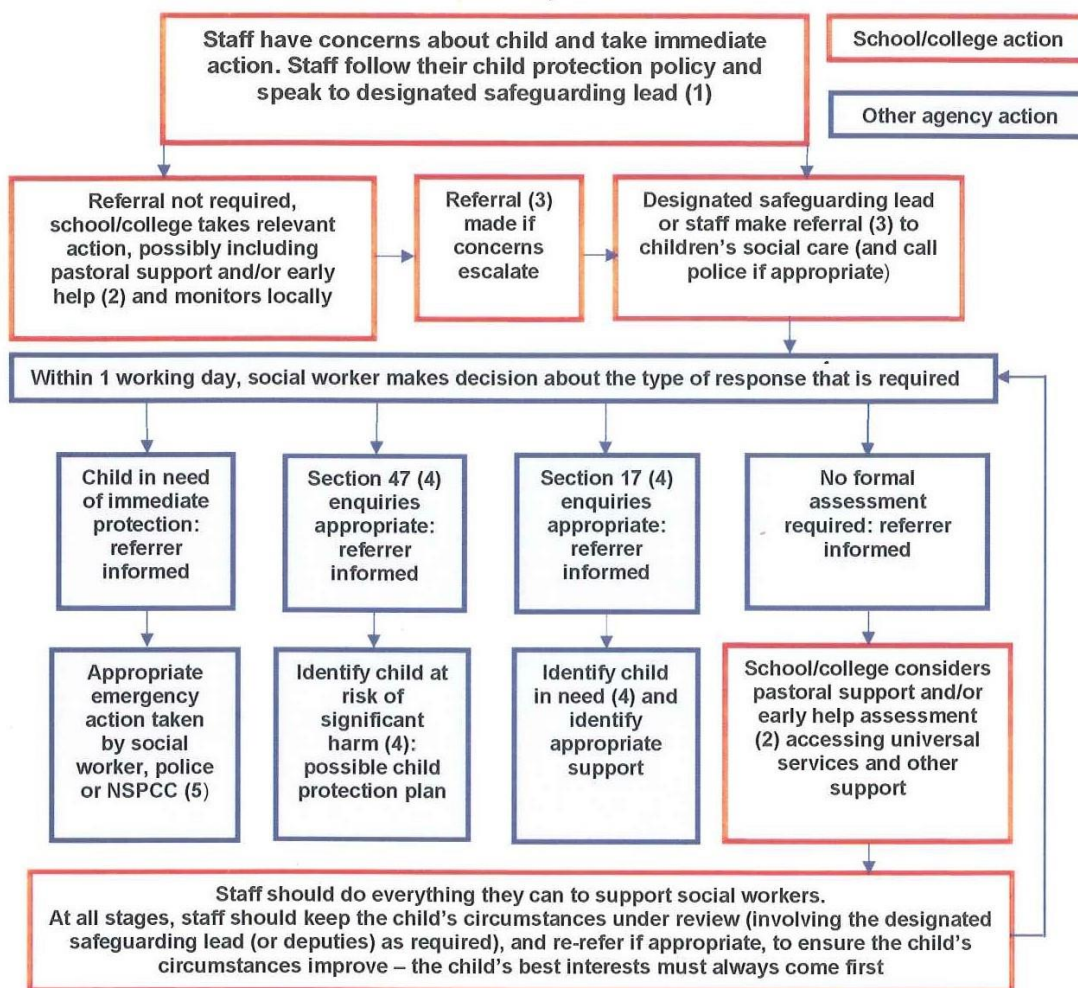
family, although this will not be done if it is thought to put the child in increased risk. Advice will always be taken from the C-SPA or the police.

7.5.3 The child's views should always be taken into account.

7.5.4 If there is not a risk of significant harm, the DSL will either consider Early Help or actively monitor the situation with support from the Safeguarding Team.



### Actions where there are concerns about a child



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

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

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

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

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

## 8.0 Dealing with Disclosures

- 8.1 The staff at Oakhyrst Grange School understand the importance of providing opportunities for our pupils to be listened to.
- 8.2 Staff understand that promises cannot be made but will listen positively and try to reassure the child.
- 8.3 Staff understand that it is important to communicate with a child appropriately, taking into consideration learning difficulties, communication difficulties and those whose preferred language is not English.
- 8.4 All staff are aware that concerns should be raised with the DSL but staff have the right to contact the C-SPA or police directly should they need to.
- 8.5 At Oakhyrst Grange School we follow the guidance principles of the seven R's: **Receive, Reassure, Respond, Report, Record, Remember and Review.**
  - 8.5.1 **Receive** – Listen to what is being said and make a note of what has been said as soon as practicable.
  - 8.5.2 **Reassure** - Reassure the pupil that you are taking what is being said seriously. Do not make promises.
  - 8.5.3 **Respond** – Do not ask leading questions or ask the child why something has happened. Explain to the pupil what you have to do next and whom you have to talk to.
  - 8.5.4 **Report** – Share your concerns immediately with the DSL or deputy DSL or Officers. If you are unable to contact these members of staff and the child is at risk of immediate harm, contact the C-SPA or police. If you are dissatisfied with the level of response, you should press for reconsideration.
  - 8.5.5 **Record** – Record all information received as accurately as possible. Include dates, times and full names. Record conversations using the words provided by the child. Keep all original written disclosures or drawings and give them to the DSL. Ensure all notes are signed, dated and timed.
  - 8.5.6 **Remember** – Make sure your approach is child centred. Listen, reassure and be available for the child. Share your knowledge only with the appropriate professional colleagues. Get support for yourself if you require it.
  - 8.5.7 **Review** – The review is led by the DSL who will check that the action taken provided good outcomes for the child, that any weaknesses within the procedure have been remedied and will research if further training is required for staff members.
  - 8.5.8 Information of the Child Protection Procedures and Disclosing Information can be found in our Raising Awareness Pack.

## **9 Supporting Staff**

- 9.1 We recognise that staff working in the school who have become involved with a child who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting.
- 9.2 We will support such staff by providing an opportunity to talk through their anxieties with the DSLs and to seek further support as appropriate.

## **10 Allegations against staff and volunteers**

- 10.1 All school staff should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.
- 10.2 All staff should be aware of the school's own Staff Code of Conduct (Behaviour) policy. (Appendix 10)
- 10.3 Guidance about conduct and safe practice, including safe use of mobile phones by staff and volunteers will be given at induction<sup>7</sup>
- 10.4 We understand that a pupil may make an allegation against a member of staff.
- 10.5 If such an allegation is made, or information is received which suggests that a person may be unsuitable to work with children, the member of staff receiving the allegation or aware of the information, will immediately inform the DSL<sup>8</sup>.
- 10.6 The DSL on all such occasions will discuss the content of the allegation with the Local Authority Designated Officer (LADO)<sup>9</sup>
- 10.7 If the allegation made to a member of staff concerns the Head Teacher, the person receiving the allegation will immediately inform the Chair of Governors who will consult as in 10.6 above, without notifying the Head Teacher first. If the allegation is made against either the Deputy DSL or other DSL the person receiving the allegation will immediately inform the Lead DSL or the Chair of Governors who will consult as in 10.6 above.
- 10.8 The school will follow the Surrey procedures for managing allegations against staff. Under no circumstances will we send a child home, pending such an investigation, unless this advice is given exceptionally, as a result of a consultation with the LADO.
- 10.9 Suspension of the member of staff, excluding the Head Teacher, against whom an allegation has been made, needs careful consideration, and the Head Teacher will seek the advice of the LADO in making this decision.
- 10.10 In the event of an allegation against the Head Teacher, the decision to suspend will be made by the Chair of Governors with advice as in 10.9 above.

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<sup>7</sup> Refer to "Guidance for Safe Working Practice for the Protection of Children and Staff in Education Settings" available on the DfE website, also the SCC e-safety toolkit <https://www.surreycc.gov.uk/schools-and-learning/teachers-and-education-staff/educational-advice-and-support/education-safeguarding-in-surrey-schools-and-learning/e-safety-in-education>

<sup>8</sup> or Chair of Governors in the event of an allegation against the Head Teacher

<sup>9</sup> Duty LADO 0300 123 1650

- 10.11 We have a procedure for managing the suspension of a contract for a community user in the event of an allegation arising in that context.
- 10.12 Allegations against staff and volunteers of Oakhyrst Grange School should be made to the Head Teacher, Mr Alex Gear who will contact the Local Authority Designated Officer (LADO) immediately and before taking any action or investigation.
- 10.13 If an allegation is made against the Head Teacher, the concerns need to be raised with Mrs Pauline Clark, the Chairman of Governors.

## **11 Allegations: Child on child Abuse**

- 11.1 Child on child abuse can take the following forms: bullying (including cyber bullying), physical abuse, sexual violence, sexual harassment, upskirting, sexting, initiation/hazing type violence and rituals.  
It is important to realise that child-on-child abuse is harmful and that it can never be passed off as banter, just having a laugh, or part of growing up. Victims should be supported swiftly and effectively through our pastoral care systems.
- 11.2 Allegations should be brought to the DSL. The DSL will discuss the content of the allegation with the Local Authority Designated Officer (LADO) after an initial investigation has been undertaken in line with the school's Anti-Bullying Policy. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and all staff should be aware of it and of our policy and procedures for dealing with it.
- 11.3 Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.
- 11.4 We understand that sexual harassment and sexual violence can occur both online and offline and be both physical and verbal.
- 11.5 Within the PSHE curriculum at Oakhyrst Grange School we cover a range of topics including healthy and respectful relationships and what respectful behaviour looks like.
- 11.6 Staff making a report of sexual violence or sexual harassment will follow the guidance in the Child Protection Procedures section of this policy.
- 11.7 The Brook Traffic Light Tool (Appendix 12) is a system used to categorise the sexual behaviours of young people and is designed to help professionals make decisions about safeguarding children.
- 11.8 The tool must be used within the context of the guidance provided at <https://www.brook.org.uk/our-work/using-the-sexual-behaviours-traffic-light-tool>

## **11.8 Anti-Bullying and Anti-Cyber Bullying**

- 11.8.1 Our school policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. This includes all forms e.g. cyber, racist, homophobic and gender related bullying. We keep a record of known bullying incidents. All staff are aware that children with SEND and / or differences/perceived differences are more susceptible to being bullied / victims of child abuse.
- 11.8.2 We are aware that safeguarding issues can develop through child on child abuse. It can occur in many forms including but not limited to bullying, cyber-bullying, sexual violence and sexual harassment, youth produced sexual imagery and initiation/hazing type violence and rituals. Children can adopt language that may be seen as banter or of a jocular nature that is in fact threatening and bullying. This is not an acceptable form of communication. Tutorial periods, school assemblies and PSHE/cross-curricular work should be used as opportunities to demonstrate appropriate language and communications that stress the need for positive support between peers. Every opportunity should be taken to pick up on examples of inappropriate banter/language highlighting that there is no place for such language or behaviour at any time. Negative gender related banter or language is not acceptable. Where children feel threatened they should be supported by members of staff. It is essential that children should be enabled to express their fears and concerns promptly and openly by any member of staff. This and all safeguarding matters will be taken seriously. Examples of positive behaviour should be given to both victim and perpetrator by way of support and by way of modelling good examples of appropriate language. Ours is a kind and caring community and we should always choose our words carefully.
- 11.8.3 We understand that technology has become a significant aspect of many safeguarding issues. We address this in our broad curriculum. It is important for the school to have strong filtering and monitoring controls of all online and IT provision. These filtering and monitoring controls need to be tested at least half-termly.

## **12.0 Radicalisation and Extremism**

- 12.1 Prevent is a part of our school Safeguarding framework; a local approach to ensuring the safety and well-being of all of our children and young people from birth to age 19.
- 12.2 The Prevent Duty states all schools and colleges are subject to a duty under section 26 of the Counter Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism.
- 12.3 Extremism is defined as the “vocal or active opposition to fundamental British Values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs”.
- 12.4 Radicalisation (as defined in the revised Prevent Duty Guidance for England and Wales) refers to the process by which a person comes to support terrorism and extremist ideologists with terrorist groups.

- 12.5 The Prevent Strategy aims to stop people becoming drawn into terrorism. While it remains rare for children and young people to become involved in terrorist activity, young people from an early age can be exposed to terrorist and extremist influences or prejudiced views. This can occur both offline and online. As with other forms of Safeguarding strategies, early intervention is always preferable. Schools, working with other local partners, families and communities, play a key role in ensuring young people and their communities are safe from the threat of terrorism.
- 12.6 We understand that schools are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. We have clear procedures in place for protecting children at risk of radicalisation and use the Channel process to support individuals identified as vulnerable to being drawn into terrorism. (ref Appendix 5).
- 12.7 Through our PSHEE and other curriculum areas we teach and adopt Fundamental British Values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of different faiths and beliefs
- 12.8 We understand the importance to be aware of changes in children's behaviour which may indicate they are in need of further support.
- 12.9 Staff with concerns should contact the DSL who can use the Channel Process to make a referral. In case of an emergency call 999.
- 12.10 The school is clear that exploitation of vulnerable children and radicalisation should be viewed as a safeguarding concern and follows the Department of Education guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism.

### **13 Domestic Abuse**

- 13.1 Domestic abuse is not limited to the actual or threatened physical, emotional, psychological, financial or sexual abuse. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, mental or physical ability. It involves the use of power or control by one person over another.
- 13.2 Living in a home where domestic abuse takes place is harmful to children and can have a serious impact on their behaviour, wellbeing and understanding of healthy positive relationships. Children may be victims of domestic abuse. They may see hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long term impact on their health, wellbeing, development, and ability to learn.
- 13.2 Oakhyrst Grange School is enrolled onto the Operation Encompass Scheme, a joint project between Surrey Police, Surrey County Council, Surrey Domestic Abuse Service and Surrey Schools. Every school day morning, the DSL is notified of all domestic abuse incidents that have occurred and been reported to the police in the previous 24 hours to enable an opportunity for the

school to provide the right support at the right time for children who are experiencing domestic abuse within their household.

#### **14 Private Fostering Arrangements**

- 14.1 Private fostering arrangement occurs when someone other than a parent or close relative cares for a child over a period of 28 days or more.
- 14.2 Oakhyrst Grange School follows guidance set out in the KCSIE September 2023 document with regards to Private Fostering Arrangements.

#### **15 Children Looked After**

- 15.1 The most common reason for a child to become looked after is as a result of abuse and neglect.
- 15.2 Oakhyrst Grange School follows guidance set out in the KCSIE September 2023 document with regards to Private Fostering Arrangements.

#### **16 Children Missing in Education**

- 16.1 Oakhyrst Grange School staff recognise that children missing education are at a significant risk of underachieving, being victims of abuse and harm or exploitation or radicalisation.  
It is important that all members of staff fully understand the difference between Children Missing in Education and Children Absent from Education.
- 16.2 Where possible the school holds more than one emergency contact number for each pupil.
- 16.3 The school ensures that there is a record of joiners and leavers.
- 16.4 Oakhyrst Grange School has an attendance and behaviour policy.
- 16.5 Oakhyrst Grange School recognise that absence from school and exclusion may be indicators of abuse and neglect, including the exploitation of children. The DSL will regularly liaise with the members of staff for attendance to ensure risk is identified and appropriate intervention is in place to protect children from harm.
- 16.6 Oakhyrst Grange School follows guidance set out in the KCSIE September 2023 document with regards to Children Missing in Education and Attendance and Behaviour. Staff should be aware of the difference between children Missing Education and children Absent from Education. See paragraph 175 KCSIE September 2023.

#### **17 Physical Intervention**

- 17.1 We acknowledge that staff must only ever use physical intervention as a last

resort, when a child is endangering him/herself or others, and that at all times it must be the minimal force necessary to prevent injury to another person.

- 17.2 Such events should be recorded and signed by a witness.
- 17.3 Staff who are likely to need to use physical intervention will be appropriately trained.
- 17.4 We understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection or disciplinary procedures.
- 17.5 We recognise that 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 boundary.<sup>10</sup>

## **18 Whistle-blowing**

- 18.1 We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.
- 18.2 All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues. If it becomes necessary to consult outside the school, they should speak in the first instance, to the LADO following the Whistleblowing Policy.
- 18.3 Whistleblowing re the Head Teacher should be made to the Chair of the Governors, Mrs Clark whose contact details are readily available to staff at the start of this policy.

## **19 Health & Safety**

- 19.1 Our Health & Safety Policy, set out in a separate document, reflects the consideration we give to the protection of our children both physically within the school environment, and for example in relation to internet use, and when away from the school and when undertaking school trips and visits.

## **20 Monitoring and Evaluation**

- 20.1 Our Child Protection and Safeguarding Children Policy will be monitored and evaluated by:
  - 20.1.1 Keeping accurate records of all reported incidents and outcomes
  - 20.1.2 Regular reports to the Board of Management
  - 20.1.3 SLT and whole staff consultation

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<sup>10</sup> 'Guidance on Safer Working Practices is available from <https://www.safeguardingschools.co.uk/wp-content/uploads/2015/10/Guidance-for-Safer-Working-Practices-2015-final1.pdf>



***This policy also links to our policies on:***

*Behaviour*

*Missing Child*

*Safer Recruitment, Selection and Disclosure*

*Staff Code of Conduct*

*Whistleblowing*

*Anti-bullying*

*Health & Safety*

*Complaints*

*Attendance*

*Curriculum*

*PSHE/Health Education*

*Administration of medicines*

*First Aid*

*Drug Education*

*Sex and Relationships Education*

*Intimate Care*

*Online Safety*

*Risk Assessment*

*Grievance Procedure*

*Infection Control Sheet*

*\**

## Appendix 1

### **Recognising Signs of Abuse, Child Sexual Exploitation (CSE) and Child Criminal Exploitation (county lines)**

#### **Categories of Abuse:**

- Physical Abuse
- Emotional Abuse (including Domestic Abuse)
- Sexual Abuse
- Neglect
- Contextual Safeguarding or Extra-familial harm to include online safety, sexual exploitation, criminal exploitation, radicalisation and trafficking. Referred to in 'Working Together to Safeguard Children 2018' as a new concept of Contextual Safeguarding to describe the risk that children and young people face from their peers or in the wider community. KCSIE September 2023 refers to this as Familial Harm.

#### **Signs of Abuse in Children:**

The following non-specific signs may indicate something is wrong:

- Significant change in behaviour
- Extreme anger or sadness
- Aggressive and attention-seeking behaviour
- Suspicious bruises with unsatisfactory explanations
- Lack of self-esteem
- Self-injury
- Depression
- Age inappropriate sexual behaviour
- Child Sexual Exploitation.

#### **Risk Indicators**

The factors described in this section are frequently found in cases of child abuse. Their presence is not proof that abuse has occurred, but:

- Must be regarded as indicators of the possibility of significant harm
- Justifies the need for careful assessment and discussion with designated / named / lead person, manager, (or in the absence of all those individuals, an experienced colleague)
- May require consultation with and / or referral to Children's Services

The absence of such indicators does not mean that abuse or neglect has not occurred.

In an abusive relationship the child may:

- Appear frightened of the parent/s

- Act in a way that is inappropriate to her/his age and development (though full account needs to be taken of different patterns of development and different ethnic groups)

The parent or carer may:

- Persistently avoid child health promotion services and treatment of the child's episodic illnesses
- Have unrealistic expectations of the child
- Frequently complain about/to the child and may fail to provide attention or praise (high criticism/low warmth environment)
- Be absent or misusing substances
- Persistently refuse to allow access on home visits
- Be involved in domestic abuse

Staff should be aware of the potential risk to children when individuals, previously known or suspected to have abused children, move into the household.

## **Recognising Physical Abuse**

Physical Abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child (KCSIE September 2018) (KSCSIE September 2023 now operational).

The following are often regarded as indicators of concern:

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

## **Bruising**

Children can have accidental bruising, but the following must be considered as non-accidental unless there is evidence or an adequate explanation provided:

- Any bruising to a pre-crawling or pre-walking baby
- Bruising in or around the mouth, particularly in small babies which may indicate force feeding
- Two simultaneous bruised eyes, without bruising to the forehead, (rarely accidental, though a single bruised eye can be accidental or abusive)
- Repeated or multiple bruising on the head or on sites unlikely to be injured accidentally
- Variation in colour possibly indicating injuries caused at different times
- The outline of an object used e.g. belt marks, hand prints or a hair brush
- Bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- Bruising around the face
- Grasp marks on small children

- Bruising on the arms, buttocks and thighs may be an indicator of sexual abuse

### **Bite Marks**

Bite marks can leave clear impressions of the teeth. Human bite marks are oval or crescent shaped. Those over 3 cm in diameter are more likely to have been caused by an adult or older child.

A medical opinion should be sought where there is any doubt over the origin of the bite.

### **Burns and Scalds**

It can be difficult to distinguish between accidental and non-accidental burns and scalds, and will always require experienced medical opinion. Any burn with a clear outline may be suspicious eg:

- Circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- Linear burns from hot metal rods or electrical fire elements
- Burns of uniform depth over a large area
- Scalds that have a line indicating immersion or poured liquid (a child getting into hot water is his/her own accord will struggle to get out and cause splash marks)
- Old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation

Scalds to the buttocks of a small child, particularly in the absence of burns to the feet, are indicative of dipping into a hot liquid or bath.

### **Fractures**

Fractures may cause pain, swelling and discolouration over a bone or joint.

Non-mobile children rarely sustain fractures.

There are grounds for concern if:

- The history provided is vague, non-existent or inconsistent with the fracture type
- There are associated old fractures
- Medical attention is sought after a period of delay when the fracture has caused symptoms such as swelling, pain or loss of movement
- There is an unexplained fracture in the first year of life

### **Scars**

A large number of scars or scars of different sizes or ages, or on different parts of the body, may suggest abuse.

## **Recognising Emotional Abuse**

Emotional Abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. (KCSIE September 2018) (KSCSIE September 2023 now operational).

Emotional abuse may be difficult to recognise, as the signs are usually behavioural rather than physical. The manifestations of emotional abuse might also indicate the presence of other kinds of abuse.

The indicators of emotional abuse are often also associated with other forms of abuse.

The following may be indicators of emotional abuse:

- Developmental delay
- Abnormal attachment between a child and parent/carer e.g. anxious, indiscriminate or not attachment
- Indiscriminate attachment or failure to attach
- Aggressive behaviour towards others
- Scape-goated within the family
- Frozen watchfulness, particularly in pre-school children
- Low self esteem and lack of confidence
- Withdrawn or seen as a "loner" – difficulty relating to others

## **Recognising Signs of Sexual Abuse**

Sexual Abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening (KCSIE September 2018. (KSCSIE September 2023 now operational).

Boys and girls of all ages may be sexually abused and are frequently scared to say anything due to guilt and/or fear. This is particularly difficult for a child to talk about and full account should be taken of the cultural sensitivities of any individual child/family.

Recognition can be difficult, unless the child discloses and is believed. There may be no physical signs and indications are likely to be emotional/behavioural.

Some behavioural indicators associated with this form of abuse are:

- Inappropriate sexualised conduct
- Sexually explicit behaviour, play or conversation, inappropriate to the child's age
- Continual and inappropriate or excessive masturbation
- Self-harm (including eating disorder), self-mutilation and suicide attempts
- Involvement in prostitution or indiscriminate choice of sexual partners
- An anxious unwillingness to remove clothes e.g. for sports events (but this may be related to cultural norms or physical difficulties)

Some physical indicators associated with this form of abuse are:

- Pain or itching of genital area
- Blood on underclothes
- Pregnancy in a younger girl where the identity of the father is not disclosed
- Physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing

### **Sexual Abuse by Young People**

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or children.

**Developmental Sexual Activity** encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

**Inappropriate Sexual Behaviour** can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is “acting out” which may derive from other sexual situations to which the child or young person has been exposed.

If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

Abusive sexual activity included any behaviour involving coercion, threats, aggression together with secrecy, or where one participant relies on an unequal power base.

### **Assessment**

In order to more fully determine the nature of the incident the following factors should be given consideration. The presence of exploitation in terms of:

- **Equality** – consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies
- **Consent** – agreement including all the following:
  - Understanding that is proposed based on age, maturity, development level, functioning and experience

- Knowledge of society's standards for what is being proposed
  - Awareness of potential consequences and alternatives
  - Assumption that agreements or disagreements will be respected equally
  - Voluntary decision
  - Mental competence
- **Coercion** – the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance.

In evaluating sexual behaviour of children and young people, the above information should be used only as a guide. Further information and advice is available in the Surrey multi-agency protocol "Working with Sexually Active Young People" available at [www.surreycc.gov.uk/safeguarding](http://www.surreycc.gov.uk/safeguarding), by choosing Safeguarding Children – Protocols and Guidance for Professionals. Assessment, Consultation and Therapy (ACT) 01306 745310 can also assist professionals in identifying sexual behaviour of concern in children and adolescents.

## **Recognising Neglect**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. (KCSIE 2018) (KSCSIE September 2023 now operational).

## **Child Sexual Exploitation (CSE)**

CSE is a form of child sexual abuse. It does not always involve physical contact. The use of technology may be apparent.

The following list of indicators is not exhaustive or definitive but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation.

Signs include:

- underage sexual activity
- inappropriate sexual or sexualised behaviour
- sexually risky behaviour, 'swapping' sex
- repeat sexually transmitted infections
- in girls, repeat pregnancy, abortions, miscarriage
- receiving unexplained gifts or gifts from unknown sources
- having multiple mobile phones and worrying about losing contact via mobile

- having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- changes in the way they dress
- going to hotels or other unusual locations to meet friends
- seen at known places of concern
- moving around the country, appearing in new towns or cities, not knowing where they are
- getting in/out of different cars driven by unknown adults
- having older boyfriends or girlfriends
- contact with known perpetrators
- involved in abusive relationships, intimidated and fearful of certain people or situations
- hanging out with groups of older people, or anti-social groups, or with other vulnerable peers
- associating with other young people involved in sexual exploitation
- recruiting other young people to exploitative situations
- truancy, exclusion, disengagement with school, opting out of education altogether
- unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- mood swings, volatile behaviour, emotional distress
- self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
- drug or alcohol misuse
- getting involved in crime
- police involvement, police records
- involved in gangs, gang fights, gang membership
- injuries from physical assault, physical restraint, sexual assault.

### **Child Criminal Exploitation (county lines)**

- Child criminal exploitation is the geographically widespread exploitation of children to commit crimes.
- Criminal exploitation of children is a typical feature of county lines criminal activity.
- We understand that a child who is affected by gang activity, criminal exploitation or serious youth violence can be at risk of significant harm through physical, sexual and/or emotional abuse.
- Concerns of Child Criminal Exploitation should be made immediately to the DSL who can make a referral to the C-SPA.



## **Appendix 2**

### **Forced Marriage, Female Genital Mutilation and Honour Based Violence**

#### **Forced Marriage (FM)**

This is an entirely separate issue from arranged marriage. It is a human rights abuse and falls within the Crown Prosecution Service definition of domestic violence. Young men and women can be at risk in affected ethnic groups. Whistle-blowing may come from younger siblings. Other indicators may be detected by changes in adolescent behaviours. Never attempt to intervene directly as a school or through a third party. Always call either the Contact Centre or the Forced Marriage Unit 020 7008 0151. Email [fmu@fco.gov.uk](mailto:fmu@fco.gov.uk).

#### **Female Genital Mutilation (FGM)**

It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM.

All staff must report cases where they discover that FGM appears to have been carried out on a girl under the age of 18 to the Police under Section 5B of the Female Genital Mutilation Act 2003. Those failing to report such cases will face disciplinary actions (KCSIE September 2018) (KSCSIE September 2023 now operational).

#### **What is FGM?**

It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

#### **4 types of procedure:**

Type 1 Clitoridectomy – partial/total removal of clitoris

Type 2 Excision – partial/total removal of clitoris and labia minora

Type 3 Infibulation entrance to vagina is narrowed by repositioning the inner/outer labia

Type 4 all other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

Why is it carried out?

Belief that:

- FGM brings status/respect to the girl – social acceptance for marriage
- Preserves a girl's virginity
- Part of being a woman / rite of passage
- Upholds family honour
- Cleanses and purifies the girl
- Gives a sense of belonging to the community
- Fulfils a religious requirement
- Perpetuates a custom/tradition
- Helps girls be clean / hygienic

- Is cosmetically desirable
- Mistakenly believed to make childbirth easier

### **Is FGM legal?**

FGM is internationally recognised as a violation of human rights of girls and women. It is **illegal** in most countries including the UK.

### **Circumstances and occurrences that may point to FGM happening are:**

- Child talking about getting ready for a special ceremony
- Family taking a long trip abroad
- Child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leone, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan)
- Knowledge that the child's sibling has undergone FGM
- Child talks about going abroad to be 'cut' or to prepare for marriage

Signs that may indicate a child has undergone FGM:

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

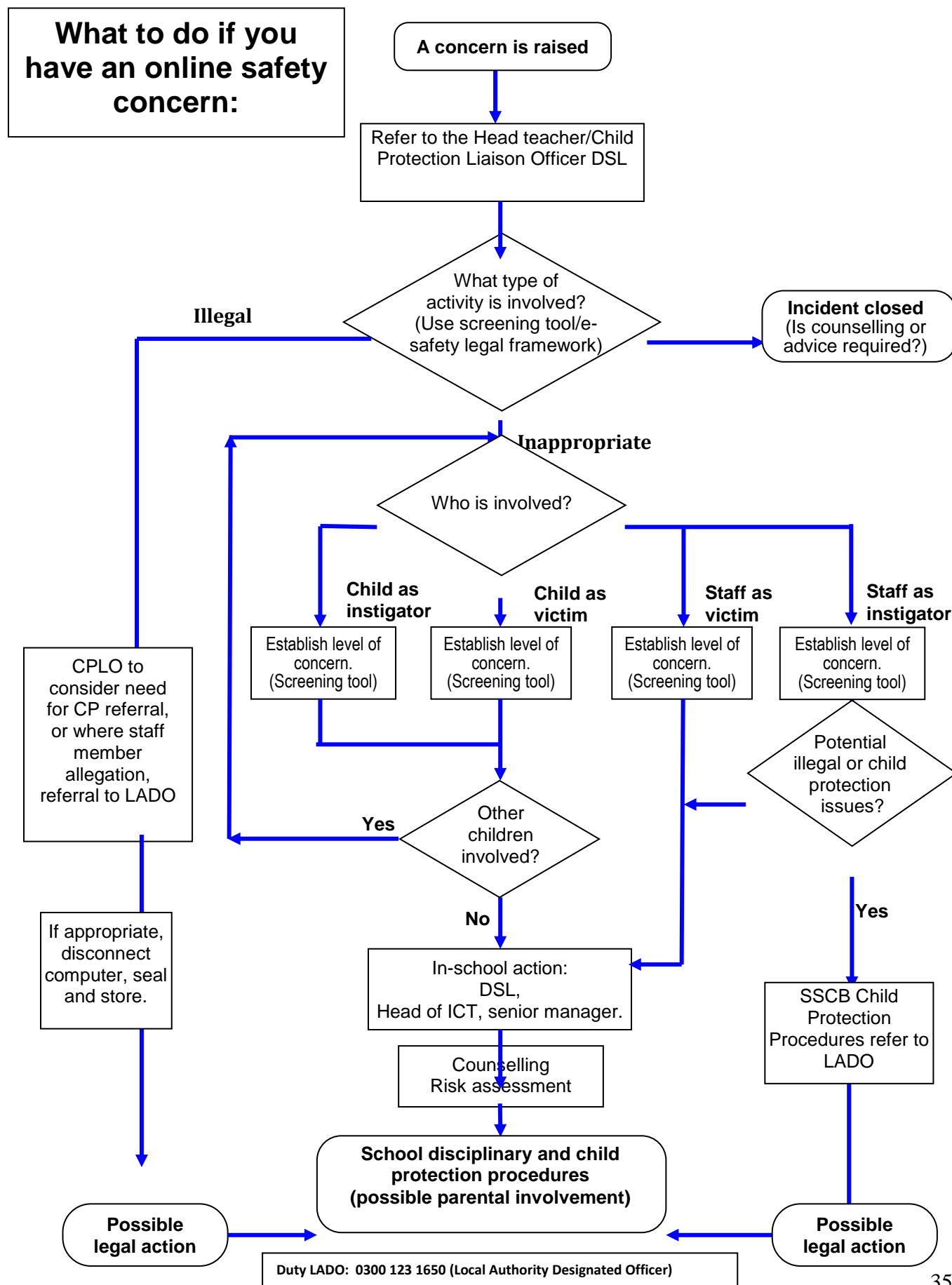
### **The 'One Chance' rule**

As with Forced Marriage there is the 'One Chance' rule. It is essential that settings /schools/colleges take action **without delay** and call the Contact centre.

### **Honour Based Violence**

- Honour based violence can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and or honour.
- It is considered a violation of human rights and may be a form of domestic and or sexual abuse.

## Appendix 3



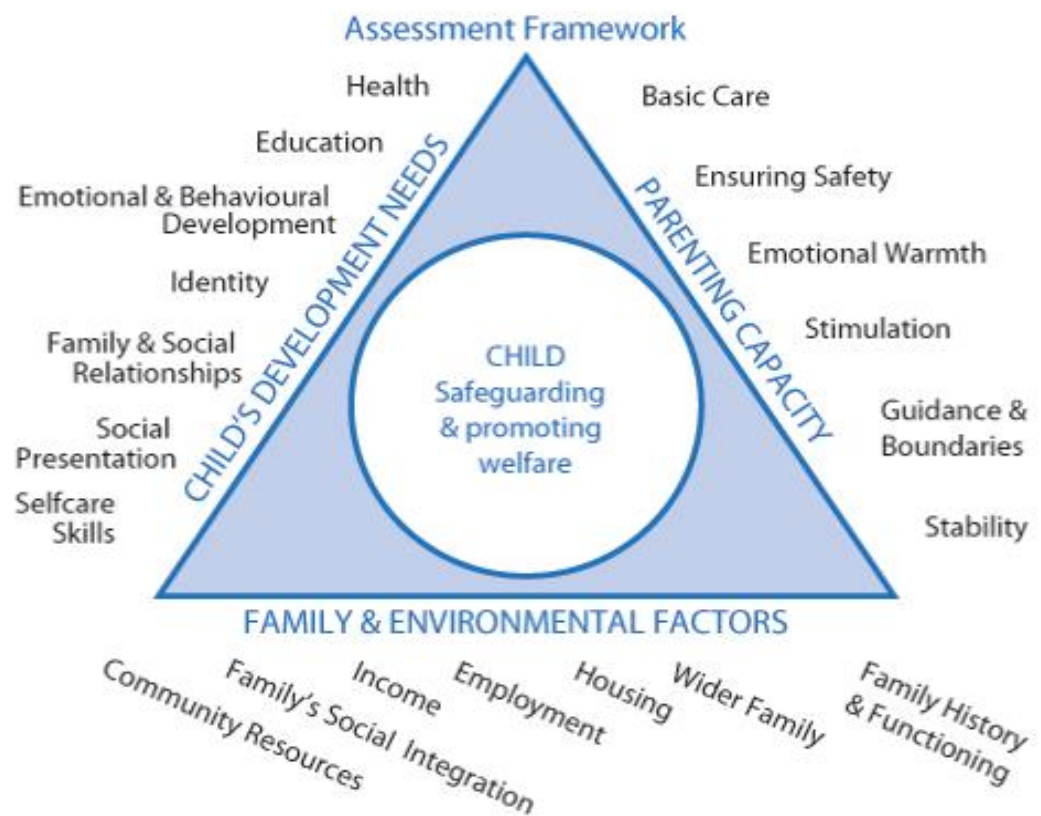
## Appendix 4

### Early Help Procedure Diagram



## Appendix 5

### Assessment Framework Tool



## Appendix 6

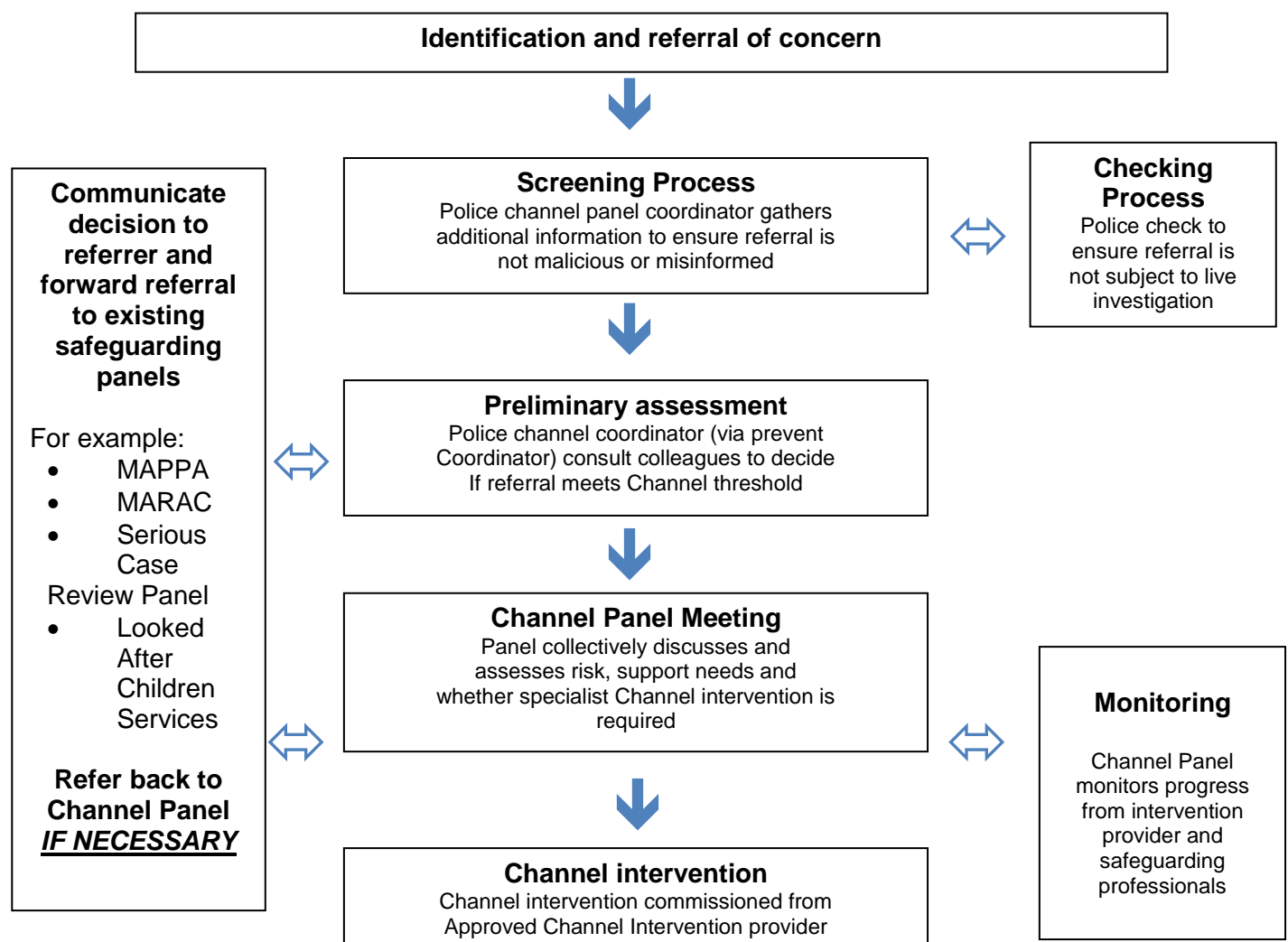
### Channel Panel

The Channel process is essentially a safeguarding programme aimed at supporting individuals identified as vulnerable to being drawn into violent extremism or terrorist related activity. As with other safeguarding practices Channel is reliant on a multi-agency response and multi-disciplinary work to minimise and manage the risk to an individual. Channel is voluntary and so the individual must provide consent. It draws on existing collaboration between local authorities, the police, statutory partners and the local community and has three objectives:

- Identify individuals at risk of being drawn into radical extremism
- Assess the nature and extent of the risk
- Develop the most appropriate support for the individuals concerned.

The Counter Terrorism and Security Act (2015) provides a statutory framework for a joint local authority/ police panel to assess the extent to which identified individuals are vulnerable to being drawn into terrorism and to put in place a support plan. This effectively places Channel on a statutory footing. The Act sets out that these panels are to be chaired by the responsible local authority, which across Surrey is the Community Safety Unit.

The diagram below illustrates the Channel Panel process:





# Oakhurst Grange School

## Appendix 13

### Brook Sexual Behaviours Light Tool



## SEXUAL BEHAVIOURS

● ● ● TRAFFIC LIGHT TOOL

### Behaviours: age 0 to 5 years

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

#### ● Green behaviours

- holding or playing with own genitals
- attempting to touch or curiosity about other children's genitals
- attempting to touch or curiosity about breasts, bottoms or genitals of adults
- games e.g. mummies and daddies, doctors and nurses
- enjoying nakedness
- interest in body parts and what they do
- curiosity about the differences between boys and girls

#### ● Amber behaviours

- preoccupation with adult sexual behaviour
- pulling other children's pants down/skirts up/trousers down against their will
- talking about sex using adult slang
- preoccupation with touching the genitals of other people
- following others into toilets or changing rooms to look at them or touch them
- talking about sexual activities seen on TV/online

#### ● Red behaviours

- persistently touching the genitals of other children
- persistent attempts to touch the genitals of adults
- simulation of sexual activity in play
- sexual behaviour between young children involving penetration with objects
- forcing other children to engage in sexual play

#### What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- 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.

#### What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of 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.

#### What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of 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.

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Brook Sexual Behaviours Traffic Light Tool adapted with permission from True Relationships & Reproductive Health, (2012). Traffic Lights guide to sexual behaviours in children and young people: identify, understand and respond. Brisbane: True Relationships & Reproductive Health, Australia.

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## Behaviours: age 5 to 9 years

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

### ● Green behaviours

- feeling and touching own genitals
- curiosity about other children's genitals
- curiosity about sex and relationships, e.g. differences between boys and girls, how sex happens, where babies come from, same-sex relationships
- sense of privacy about bodies
- telling stories or asking questions using swear and slang words for parts of the body

#### What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- 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.

### ● Amber behaviours

- questions about sexual activity which persist or are repeated frequently, despite an answer having been given
- sexual bullying face to face or through texts or online messaging
- engaging in mutual masturbation
- persistent sexual images and ideas in talk, play and art
- use of adult slang language to discuss sex

#### What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of 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.

### ● Red behaviours

- frequent masturbation in front of others
- sexual behaviour engaging significantly younger or less able children
- forcing other children to take part in sexual activities
- simulation of oral or penetrative sex
- sourcing pornographic material online

#### What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of 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.

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## Behaviours: age 9 to 13 years

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

### Green behaviours

- 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 peer

### Amber behaviours

- 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

### Red behaviours

- 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

#### What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

#### What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

#### What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

#### What can you do?

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

#### What can you do?

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

#### What can you do?

Red behaviours indicate a need for immediate intervention and action.

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## Appendix 8: Low-level Concern

### 1 Introduction

The purpose of this policy is to create and embed a culture of openness, trust and transparency in which the clear values and expectations in the School's code of conduct are constantly lived, monitored and reinforced by all staff. The School understands that spotting the early signs of harmful behaviour towards children can be difficult, and that many will be hesitant to report concerns they have about their colleagues' behaviour, particularly the behaviour of their superiors. Staff are encouraged to maintain an attitude that recognises that abuse can happen anywhere, in any setting, and that anyone can be a perpetrator.

Used well, these procedures will facilitate the early identification of problematic or inappropriate behaviour and minimise the risk of students being abused. They also reduce the likelihood of misunderstanding and the possibility of a staff member being subject to an unfounded allegation.

Staff should be interpreted widely to mean anyone associated with the organisation, ie whether working in or on behalf of Oakhyrst Grange, engaged as a paid employee (including supply staff), worker or contractor, volunteers or members of the Board.

### 2 Definitions

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 has acted in a way that:

- Is inconsistent with the School's Code of Conduct, including inappropriate conduct outside of work; and
- Does not meet the allegation threshold or is otherwise not serious enough to consider a referral to the LADO. The allegation threshold refers to the following circumstances where an adult 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;
  - behaved towards a child in a way that indicates they may pose a risk of harm to children; or
  - behaved in a way that indicates they may not be suitable to work with children, including behaviour that has happened outside of School.

*NB: The term 'low-level' does not mean that the concern is insignificant; it simply means the behaviour does not meet the allegation threshold as defined in KCSIE.*

Inappropriate behaviour can exist on a wide spectrum, from that which is inadvertent or thoughtless through to that which is ultimately intended to enable abuse. Examples of such behaviour could include, but are not limited to: being overly friendly with students; showing favouritism; taking photographs of students on a personal device; or humiliating students.

### 3 Reporting concerns

Low-level concerns may come to light in a variety of ways and from a number of sources. For example: suspicion; complaint; or a disclosure made by a student, parent or other adult within or outside of the School; or as a result of vetting checks undertaken.

Staff are required to report any concerns about any adult (including a person employed by a supply agency or a contractor) to the Head Teacher. If the Head Teacher is unavailable,

the concern should be raised with the DSL so that the matter can be dealt in a timely manner but the Head Teacher should be informed as soon as possible. In the case of supply staff, and contractors their employers will be notified so that any patterns of inappropriate behaviour can be identified. Where the concern relates to the Head Teacher, it should be reported to the Chair of Governors, Pauline Clark. Such reports should be made without undue delay. Staff do not need to be able to determine whether their concern is a low-level concern or whether it meets the threshold of an allegation. This determination will be made by the Head Teacher/Chair of Governors when the matter has been investigated.

A member of staff may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, a member of staff, for whatever reason, may have behaved in a manner which, on reflection, falls short of the standards set out in the Staff Code of Conduct. Under such circumstances, the member of staff should make a self-referral to the Head Teacher as soon as possible. Doing so demonstrates transparency, facilitates effective management of the issue and can reduce the risks of misunderstandings and false allegations.

Staff can report low-level staff concerns to the Head Teacher verbally or by completing the attached pro forma (Appendix 1). To determine the most appropriate response to a low-level concern, the Head Teacher, usually in consultation with the DSL, will:

- speak to the person raising the concern to ascertain the facts and any pertinent additional information;
- review the information to establish whether the member of staff that is the subject of the concern has behaved in a way that is consistent with the Staff Code of Conduct and the law;
- determine whether the concern should be reconsidered as an allegation where there are other low-level concerns extant about the same member of staff;
- communicate with the LADO where there is uncertainty about whether the allegations threshold has been met or what the next steps should be;
- speak to the member of staff in question to inform them that a concern has been raised and to give them the chance to respond to it; and
- ensure that accurate and detailed written records are kept of all conversations (internal and external) to do with the concern and any actions or decisions subsequently taken.

#### **4 Acting on concerns**

If it is determined that the low-level concern refers to behaviour that did not violate the Staff Code of Conduct and the law, the Head Teacher or DSL will speak to the member of staff about whom the concern was made to discuss their behaviour, why their behaviour may have been misinterpreted, and how in future they should act so that a similar situation does not recur. The Head Teacher will also speak to the person who raised the concern to explain why the behaviour reported is consistent with teaching standards and the law.

If the Head Teacher judges that the concern is low-level, they will react in a sensitive and proportionate manner. The Head Teacher or DSL will hold a meeting with the member of staff who is the subject of the concern during which they will:

- explain how their behaviour was perceived by the individual reporting the concern (without naming them, where possible) and how their behaviour was inappropriate and problematic.
- discuss what caused the individual to behave as they did.

- explain clearly how their behaviour must change and explore what support would help achieve it.
- let the member of staff explain their view of the concern.
- ask the member of staff to re-read the Staff Code of Conduct and other relevant policies.

The DSL and the Head Teacher will then consider whether the member of staff should receive further support. If so, the DSL will develop a plan, with the involvement of the member of staff, that specifies how the support will be delivered and how their behaviour will be monitored until such time as it has improved. Should an investigation into the behaviour be needed, it will be undertaken in a professional and discreet manner with information disclosed to appropriate members of staff on a need-to-know basis. If others have been made to feel uncomfortable by the behaviour, they will be offered pastoral support, where appropriate. If it is unclear whether the threshold has been met, the LADO will be consulted on a no-names basis.

All low-level concerns, including those determined to be unfounded, will be recorded in writing by the Head Teacher. The record will include details of the concern, the context in which the concern arose, any actions taken, any decisions reached (along with the rationale for them) and the eventual outcome. The name of the individual sharing their concerns will be noted. If the individual wishes to remain anonymous, then this will be respected as far as reasonably possible. Records of low-level concerns are confidential and securely stored by the DSL, in accordance with the Data Protection Act 2018 and the UK General Data Protection regulation, until six years after the individual ceases to be employed by the School.

Low-level concerns which relate exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in employment references provided by the School. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it will be referred to in the reference.

## **5 Monitoring and review**

Records of low-level concerns will be reviewed at least termly by the DSL, Head Teacher and Chair of Governors to ensure that all such concerns are being dealt with promptly and appropriately, and that any potential patterns of concerning, problematic or inappropriate behaviour are identified. Where a pattern of such behaviour is identified consideration will be given to whether the matter warrants internal disciplinary action, if it should be escalated to the LADO and, more broadly, whether existing policies need to be revised and/or additional training is required to minimise the risk of recurrence. All cases, regardless of whether they are substantiated or not, will be considered as part of the termly review to determine whether any lessons can be learned and further improvements to policies and procedures can be made.

This policy will be reviewed annually by the Head Teacher and DSL, and in response to any new safeguarding requirements or concerns surrounding the wider cultural issues in the school.

## Appendix 1: Low-level Concern Reporting Form

*NB: This is for reporting concerns about staff and not for reporting concerns about students.*

Thank you for reporting your concerns. We are grateful to you for taking the safety and welfare of our students seriously. Please fill in the below form, including as much detail as you can, and return it directly to the Head Teacher or Chair of Governors. Please refrain from discussing this concern with anyone other than the Head Teacher or the DSL until the matter has been dealt with. We ask that you keep all details, including the name of the staff member to whom the concern pertains, confidential.

Your details	
Name (optional)	
Role	
Date and time of completing this form	
Details of individual whom the concern is about	
Name	
Role	
Relationship to the individual who is reporting the concern, eg manager, colleague	
Details of concern	
<p><b>Please include as much detail as possible. Think about the following:</b> What behaviour and/or incident are you reporting? What exactly happened? Why does the behaviour and/or incident worry you? Why do you believe the behaviour and/or incident is not consistent with our Staff Code of Conduct?</p>	
Details of any students involved	

<b>Name(s)</b>	
<b>Do you believe there is a risk of harm to students, either now or in the future, as a result of the individual's behaviour? Explain your answer.</b>	
<b>Next steps</b>	
<b>What would you like to see happen in response to your concern?</b>	
<b>Signature</b>	
<b>For use by safeguarding team upon receipt of concern</b>	
<b>Date and time concern received</b>	
<b>Signature of Head Teacher or Chair of Governors</b>	
<b>Actions to be taken, eg no action, investigation, reclassification as allegation meeting the harms threshold.</b>	