Child Protection and Safeguarding Policy

This Child Protection and Safeguarding Policy has been approved and adopted by the Xavier Catholic Education Trust in Sep 2026 and will be reviewed in July 2027.

Committee Responsible: Audit and Risk Committee

Schools Child Protection and Safeguarding Policy

September 2026

The policy should be read in conjunction with the "Safeguarding Definitions, Vulnerabilities and Procedures" document which can be accessed using the link here.

This document is based on guidance from KCSIE 2026 and Working Together to Safeguard Children 2026. KCSIE highlights the importance of frontline staff in developing the school's policy. As part of the review process, we recommend that those who are working with your children have a say in the development of your policy and that this can be evidenced.

KCSIE highlights the importance of developing a safeguarding policy with all staff working with children within an education setting.

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Safeguarding Statement 2026

"Safeguarding is Everyone's Business"

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

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

Children are at the centre of everything we do. We are committed to providing our children with a sense of belonging and an environment that is welcoming, safe, valuable and respectful. Adults in our school know that keeping children safe is everybody's responsibility and that all children, regardless of age, gender, culture, language, race, ability, sexual identity, religion or lack of religion have equal rights to protection and opportunities.

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

Key Personnel

Designated Safeguarding Lead (DSL) , Looked After Teacher and HT is:
Alison Walsh Contact details:
head@staugustine.surrey.sch.uk

Deputy DSL(s) is/are: Mary Hamilton-Eadie, Nelli Engelbrecht and Fiona Reeve
Contact details: Mary.Hamilton-Eadie@staugustine.surrey.sch.uk, nelli.engelbrecht@staugustine.surrey.sch.uk, sendco@staugustine.surrey.sch.uk

The nominated safeguarding governor is: Felicity Edwards
Contact details:FEdwards@staugustine.surrey.sch.uk

The Chair of Governors is:
Rebecca Clark Contact details:
rebcla@staugustine.surrey.sch
.uk

The online safety co-ordinator is: Rory Wise
Contact details:
rwise@staugustine.surrey.sch.
uk

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

The CEO Xavier Catholic Education Trust is: James Kibble
Contact details: j.kibble@xaviercet.org.uk

Terminology

Safeguarding and promoting the welfare of children is defined as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and
- taking action to enable all children to have the best outcomes.

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

Early Help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse.

The local safeguarding partnership has three partners:

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

Child(ren) includes everyone under the age of 18.

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. This includes, but is not limited to, employed staff, contractors, volunteers, governors/trustees, supply staff and self-employed staff.

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

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

MAP refers to the Surrey Multi-Agency Partnership.

C-SPA refers to the Children's Single Point of Access.

DSL refers to Designated Safeguarding Lead (DSL).

DDSL refers to Deputy Designated Safeguarding Lead (DDSL).

Xavier Catholic Education Trust Mission Statement

Our mission is to inspire, nurture and fulfil the calling of every person we encounter and the potential of every school we serve, growing together in faith, hope and love.

Everything we do in Catholic education is to ensure that every child we teach and every person we work with has the opportunity to realise their own calling and become the best version of themselves.

Our aim is to enable potential with the highest-quality provisions, to go out into the world and make our unique contribution for the greater good of all God's people here on Earth.
This is particularly important for the children, who are at the start of their journey to fulfil their calling and only get one chance at experiencing high-quality provision in school.

Introduction

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002 (as amended), the Education (Independent School Standards) Regulations 2014, the Non-Maintained Special Schools (England) Regulations 2015 and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended).

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

Statutory, national, and local guidance – this includes:

- Working together to safeguard children 2026 which sets out the multi-agency working arrangements to safeguard and promote the welfare of children and young people and protect them from harm; in addition, it sets out the statutory roles and responsibilities of settings.

- 'What to do if you are Worried a Child is Being Abused' 2015 - Advice for Practitioners

- Keeping Children Safe in Education 2026 is statutory guidance issued by the Department for Education (DfE) which all schools and colleges must have regard to when carrying out their duties to safeguard and promote the welfare of children.

- Early years foundation stage (EYFS) statutory framework is statutory guidance which sets standards that school and childcare providers must meet for the learning, development, and care of children from birth to 5 years in Ofsted registered settings. (Should be read alongside KCSIE 2026 where children aged 0 to 5 attend school-based nurseries or reception classes).

- Local Guidance from the Local Safeguarding Partnership: Surrey Safeguarding Children Partnership (SSCP) including SSCP Procedures..

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

- Relationships and sex education (RSE) and health education - GOV.UK This is statutory guidance from the Department for Education issued under Section 80A of the Education Act 2002 and section 403 of the Education Act 1996

Guidance and documents referred to in this policy

- Surrey Safeguarding Children Partnership protocols, guidance and procedures
- Working together to safeguard children 2026
- Keeping Children Safe in Education 2026
- Disqualification under the Childcare Act 2006 (updated 2018)
- FGM Act 2003 Mandatory Reporting Guidance 2015 (updated January 2020)
- 'What to do if you are worried a child is being abused' 2015
- Teachers' standards
- Information sharing: advice for practitioners providing safeguarding services
- The Equality Act 2010
- Early years foundation stage (EYFS) statutory framework
- UKCIS guidance: Sharing nudes and semi-nudes: advice for education settings
- Surrey County Council Safeguarding Children Missing Education (CME) Policy
- Surrey County Council Educated Other Than at School (EOTaS)
- Surrey County Council Touch and The Use of Physical Intervention When Working With Children And Young People [awaiting reviewed version]
- Working together to improve school attendance
- Relationships and sex education (RSE) and health education

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

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

Equalities Statement

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

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

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

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

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

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

Policy Aims

- To provide staff with the framework to promote and safeguard the wellbeing of children and in doing so ensure they meet their statutory responsibilities.
- To ensure consistent good practice across the setting and ensure that safeguarding follows a whole setting approach.
- To ensure the school has a clear process in place that is shared with and followed by all staff.
- Clarifying safeguarding expectations for members of the school's community, staff, Governing body, children, and their families.
- All practitioners should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child.
- Contributing to the establishment of a safe, resilient, and robust safeguarding culture in the setting built on shared values; that children are treated with respect and dignity, taught to treat each other and staff with respect, feel safe, have a voice and are listened to.
- Supporting contextual safeguarding practice recognising that the setting's site can be a location where harm can occur.
- Setting expectations for developing knowledge and skills within the setting's community (staff, children, parents/carers) to the signs and indicators of safeguarding issues and how to respond to them.
- Early identification of need for vulnerable learners and provision of proportionate interventions to promote their welfare and safety.
- Working in partnership with children, parents/carers, and other agencies in the Surrey Safeguarding Children's Partnership.

Policy Principles & Values

- The welfare of the child is paramount.
- All staff maintain an attitude of "It does happen here".
- Maintain a "zero-tolerance" approach to sexual violence and sexual harassment.
- Children have a right to feel safe and secure, they cannot learn effectively unless they do so.
- All children have a right to be protected from harm and abuse.
- We will maintain appropriate records and oversight of pupils identified as being at risk, or potentially at risk, of harm.
- All staff have a role in the prevention of harm and abuse and an equal responsibility to act immediately on any suspicion or disclosure that may indicate a child is at risk of harm, either in the school or in the community, taking into account contextual safeguarding, in accordance with statutory guidance.

- We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working to protect and safeguard children. This includes sharing information quickly and appropriately with external agencies, such as the police and children's services, to get children the support and help they need in good time.
- Whilst the school will work openly with parents as far as possible, it reserves the right to contact social care or the police, without notifying parents if this is believed to be in the child's best interests.
- We will always act in the best interests of the child and ensure that our decisions around safeguarding take a child-centred and coordinated approach.

Supporting Children

We will support all children by:

Providing a safe place and stability in the lives of children who have been abused or who are at risk of harm. We recognise that a child who is abused or witnesses abuse and/or violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth. Research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

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

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

Ensuring children are taught to understand and manage risk through Personal, Social, Health and Economic (PSHE) education and Relationship and Sex Education (RSE) and Health Education through all aspects of setting life, including staying safe online.
Responding sympathetically to any requests for time out to deal with distress and/or anxiety.

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

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

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

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

The designated safeguarding lead considering if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

Prevention / Protection

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

The school will:

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

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

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

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

Include safeguarding across the curriculum, including PSHE opportunities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help. It is also recognised that effective education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities.

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

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

Children's Services

Children's Single Point of Access (C-SPA)

Anyone can contact the C-SPA about a child, young person or parent/carer who needs support in Surrey. This could be a concern about how the child is developing, issues that the parent or carer is experiencing, or you suspect a child is being neglected or subjected to physical, sexual, or emotional abuse.

Surrey's Child Protection Consultation Line for advice and support (0300 470 9100 option 3).

If a child is in **immediate danger**, the police should be contacted on 999.

If it is not an emergency, but there is a concern that a child is at risk, C-SPA should be contacted by phone on 0300 470 9100.

Requests for support should be sent securely by email to cspa@surreycc.gov.uk using the Request for Support Form.

Emergency Duty Team (EDT)

Emergency Duty Team (EDT) provides an emergency social care service for urgent situations which are out of normal office hours. If your call is not answered, please leave a message and your contact details for someone to get back to you.
EDT is available **5pm-9am, Monday – Friday, Weekends 24 hours a day.**
Phone: 01483 517898
Email: edt.ssd@surreycc.gov.uk

Local authority designated officer (LADO)

Every local authority has a legal responsibility to appoint a LADO who is responsible for organising the response to concerns/allegations that an adult who works with children may have caused them or could cause them harm. They will be informed within one working day of any allegations that come to our attention. The LADO will give advice and guidance to employers, such as the headteacher and the chair of governors/chair of trustees, to make sure that any allegation is dealt with fairly and quickly, ensuring that the child is protected effectively.

The LADO can be contacted by:

Email: LADO@surreycc.gov.uk

Telephone: 0300123 1650 option 3

Online: LADO Referral Form

The Law (legislation and statutory guidance)

In addition to Surrey Safeguarding Children Partnership's (SSCP) arrangements, St. Augustine's Catholic Primary School also follows the laws and statutory guidance below:

- Working Together to Safeguard Children which sets out the multi-agency working arrangements to safeguard and promote the welfare of children and young people and protect them from harm; in addition, it sets out the statutory roles and responsibilities of schools.

- 'What to do if you are Worried a Child is Being Abused' 2015 - Advice for Practitioners

- Keeping Children Safe in Education (KCSIE, 2026) is statutory guidance issued by the Department for Education (DfE) which all schools and colleges must have regard to when carrying out their duties to safeguard and promote the welfare of children.

- Early years foundation stage (EYFS) statutory framework is statutory guidance which sets standards that school and childcare providers must meet for the learning, development, and care of children from birth to 5 years in Ofsted registered settings. (Should be read alongside KCSIE where children aged 0 to 5 attend school-based nurseries or reception classes).

- Relationships and sex education (RSE) and health education - GOV.UK This is statutory guidance from the Department for Education issued under Section 80A of the Education Act 2002 and section 403 of the Education Act 1996

- Education Act 2002, section 175/The Education (Independent School Standards) Regulations 2014/Part 1 of the schedule to the Non-Maintained Special Schools (England) Regulations 2015 places a duty on maintained/independent schools (including academies)/non-maintained special schools and local authorities to keep children safe and promote their welfare.

- The Children Act 1989 is the main source of child safety law for England and Wales. The Act gives the basis for most of children's services' duties and responsibilities towards children and their families. It also provides the legal framework for the child protection system. The 2004 amendment is used alongside the Act.

- The Children Act 1989 Care Planning, Placement and Case Review sets out what responsibilities' education settings have for children looked after by the local authority.

  The Human Rights Act 1998 sets out the core rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (the Convention) that apply in the UK. Experiencing harassment, violence, and/or abuse, including that of a sexual nature, may breach any or all of these rights.

- The Equality Act 2010 states that schools and colleges must not unlawfully discriminate against children because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (called protected characteristics). Therefore, we can take positive action to deal with disadvantages affecting our children with protected characteristics to make sure their needs are met. The Equality Act 2010: advice for schools advises us further.

- **Sport -** As children get older, some sports are typically taught and played in single-sex groups. The Equality Act 2010 contains an exception in relation to single-sex sport whereby we can separate children according to their biological sex without discriminating lawfully against them where physical strength, stamina or physique of the average girl would put her at a disadvantage in competition with the average boy (or vice versa) or to ensure safety. Where there are no safety concerns and a child makes a request relating to how they participate, we will consider the request in light of the advice on "considering requests for support with social transition" (see KCSIE page 65).

- The Public Sector Equality Duty (PSED) states that we have to be mindful of the need to eliminate unlawful discrimination, harassment and victimisation. Some children may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic or transphobic bullying, or racial discrimination. It is important to make sure we foster good relations between those who share a protected characteristic and those who do not, and work to make sure children have equal opportunities. We give specific attention to this duty when we write our policies or make any decisions about how our school is run.

- Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 and the Childcare Act 2006 set out who is disqualified from working with children.

Regulations and safeguarding requirements relating to school premises

Toilets

We do not allow children into toilets designated for the opposite biological sex. Separate toilets are provided for boys and girls aged 8 and over. Should a child not want to use the toilet designated for their biological sex, we will consider whether we can provide an alternative toilet facility which will not compromise the safety, comfort, privacy or dignity of the child or of other children. All such requests will be recorded, communicated and reviewed regularly.

Changing Rooms and Showers

We will not allow children aged 11 years or older at the start of the school year to undress in front of a child of the opposite biological sex. When responding to a request to support any degree of social transition we will not allow access to changing rooms designated for the opposite sex.

We provide suitable changing accommodation and showers for pupils aged 11 years or over at the start of the school year having regard for their age, numbers and sex and any special requirements they may have. Should a child not want to use the changing rooms designated for their sex, we will consider whether we can provide an alternative changing or washing facility without compromising the provision of single-sex facilities. All such requests will be recorded, communicated and reviewed regularly.

Professional Expectations, Roles and Responsibilities

Role of the Setting

We will ensure that:

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

The school operates safer recruitment procedures in line with KCSIE 2026 and that includes statutory checks on staff suitability to work with children.

All staff receive information about the school's safeguarding arrangements, the school's safeguarding statement, Xavier Code of Conduct, Child Protection and Safeguarding Policy, the role and names of the Designated Safeguarding Lead and their deputy(ies), and Keeping Children Safe in Education 2026 . This applies to the Governing body and Trustees in relation to part 2 of the same guidance.

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

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

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

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

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

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

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

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

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

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

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

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

There are cover arrangements in place when the DSL is unavailable due to illness, leave, or other circumstances. This will include any Deputy DSLs accessing a shared mailbox] to ensure that safeguarding concerns are received, monitored and acted upon without delay.

All School Staff will:

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

Understand that safeguarding is "everyone's responsibility".

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

Sign to say they have read and understood Part 1 of statutory guidance KCSIE (2026). Those working directly with children will also read Annex B.

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

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

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

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

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

- Where a crime may have been committed

Provide a safe environment in which children can learn.

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

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

Create a culture where children who identify as lesbian, gay, bisexual, or are questioning their gender feel safe, can speak out and share concerns.

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

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

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

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

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

Attend training in order to be aware of and alert to the signs of abuse.

Know how to respond to a pupil who discloses harm or abuse following training on 'Working together to Safeguard Children' (2026), and 'What to do if you are worried a child is being Abused' (2015).

Will follow the school's safeguarding and child protection processes and procedures, sharing information quickly when they have a concern about a child's safety and wellbeing, even when they are unsure. Record their concerns if they are worried that a child is being abused and report these to the DSL immediately that day. If the DSL is not contactable immediately a Deputy DSL should be informed.

Be prepared to refer directly to the Children's Single Point of Access (C-SPA), and the Police if appropriate, if there is a risk of significant harm and the DSL or their deputy is not available.

Understand their role in multi- agency safeguarding arrangements and ensure the school contributes to multi-agency working in line with statutory guidance, 'Working Together to Safeguard Children' (2026).

Follow the allegations procedures, as set out in this policy and KCSIE 2026, if the disclosure is an allegation against a member of staff, supply staff, volunteer or contactor.

Report low-level concerns (as defined in KCSIE 2026) about any member of staff/supply staff, volunteer or contractor to the Headteacher. Low-level concerns about the Headteacher should be shared with the Xavier Safeguarding Compliance Director or Chief Executive Officer.

A 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the allegation/harm threshold. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- Is inconsistent with the Xavier code of conduct, including inappropriate conduct outside of work, and
- Does not meet the allegation/harm threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

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

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

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

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

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

Understand early help and be prepared to identify and support children who may benefit from early help. Liaise with other agencies that support children and provide early help.

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

relationships with children and young people which facilitate communication.

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

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

Will follow the school's procedures for identifying and reporting any concerns and issues about the school's online filtering and monitoring systems.

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

The Headteacher

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

The school fully contributes to inter-agency working in line with 'Working Together to Safeguard Children' (2026) guidance.

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

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

Staff receive safeguarding training that is updated regularly.

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

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

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

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

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

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

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

Child-centred systems and processes are in place for children to express their views and give feedback, which are used to inform the whole school approach to safeguarding.

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

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

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

Statutory requirements are met to make a referral to the Disclosure and Barring Service and additionally in the case of teaching staff the Teacher Regulation Agency where they think an individual has engaged in conduct that harmed (or is likely to harm) a child; or if the person otherwise poses a risk of harm to a child.

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

They become the 'case manager' when an allegation is raised about a member of staff and make the final decision regarding all low-level concerns.

Visitors are appropriately supervised or escorted, where necessary. There are enough staff per child where relevant and appropriate.

The Designated Safeguarding Lead:

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

As a member of the Senior Leadership Team, hold the lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems in place) in the school, this responsibility is not able to be delegated.

Liaise with the Surrey Country Council and work in partnership with other agencies in line with Working Together to Safeguard Children (2026).

Where necessary contact Surrey's Child Protection Consultation Line for advice and support (0300 470 9100 option 3).

Manage and submit a Request for Support Form for a child if there are concerns about suspected harm or abuse, to the Children's Single Point of Access (C-SPA), and act as a point of contact and support for school staff. Requests for support should be made securely by email to cspa@surreycc.gov.uk using the Request for Support Form. Urgent referrals should be made by telephone 0300 470 9100 or 03311 435554.

Report concerns that a pupil may be at risk of radicalisation or involvement in terrorism, use the Prevent referral form to refer cases by e-mail to preventreferrals@surrey.pnn.police.uk . If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101 or 07795043842 or 01865555618 and ask to speak to the Prevent Supervisor for Surrey. The Department of Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).

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

Liaise with the "case manager" and Local Authority Designated Officer (LADO) for child protection concerns in cases which concern a member of staff, supply staff, contractor or a volunteer.

Follow KCSIE 2026 guidance on 'Child on Child Abuse' when a concern is raised that there is an allegation of a child abusing another child within the school.

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

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

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

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

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

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

Ensure that the names of the Designated Safeguarding Lead and Deputy Designated Safeguarding

Lead/s are clearly advertised, with a statement explaining the school's role in referring and monitoring cases of suspected abuse.

Encourage and promote a culture of listening to children and taking account of their wishes and feelings when any plans are put in place to support them.

Access training and support to ensure they have the knowledge and skills required to carry out the role.

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

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

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

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

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

Have lead responsibility for online safety, including oversight and checking the effectiveness of the school's filtering and monitoring systems and their reports

Know and understand the requirement for children to have an Appropriate Adult, as described in PACE Code C 2019.

Liaise with school staff (especially pastoral support, behaviour leads, school health colleagues and the SENDCO) on matters of safety and safeguarding and consult Surrey's Continuum of Need Matrix to inform decision making and liaison with relevant agencies.

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

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

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

Work with the Headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that

children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at the setting.

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

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

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

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

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

Where appropriate, the DSL will share information in advance of the child transferring particularly where the information would support an assessment of risk to others in the school as well as the individual child.

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

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

Report to the Headteacher any safeguarding issues for example, use of Surrey's FaST Resolution Process enquiries under section 47 of the Children Act 1989 and Police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.

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

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

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

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

Ensure that the Child Protection and Safeguarding Policy is available publicly and that parents/carers are aware that referrals about suspected harm and abuse will be made and the role of the school in this.

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

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

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

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

(Duties are further outlined in KCSIE (2026, Annex C)

The Deputy Designated Safeguarding Lead(s):

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

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

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

In the absence of the DSL, carries out the activities necessary to ensure the ongoing safety and protection of children. If the designated safeguarding lead is long-term absent, a deputy will temporarily take over as the designated safeguarding lead.

All members of The Governing Body/Trustees understand and fulfil their responsibilities to ensure that:

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

process and policy development.

A governor/trustee takes leadership responsibility for the school's/Trust's safeguarding arrangements.

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

Governors/Trustees sign to say they have read and understood KCSIE and this policy.

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

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

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

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

The school adds to multi-agency working and shares information appropriately and in a timely manner.

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

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

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

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

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

Staff have been trained appropriately and this is updated in line with guidance and all staff have read Keeping Children Safe in Education (2026) part 1 and that mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance.

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

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

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

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

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

Policies and processes are in place to deal with concerns (including allegations) which do not meet the harm threshold, 'low-level concerns' as defined in KCSIE 2026.

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

There is an appointed designated teacher for looked after children who is appropriately trained.

The appointed designated safeguarding lead (DSL) is given the additional time, funding, training, resources and support needed to carry out the role effectively.

On appointment, the DSL and deputy(ies) undertake DSL 'New to Role' with 'Refresher' training every two years as well as attending DSL network events, to refresh knowledge and skills.

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

The governing body does all that they reasonably can to limit children's exposure to online risks from the school's online IT systems and assign a member of the senior leadership team and a governor/trustee to ensure standards are met.

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

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

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

Ensure that safeguarding and child protection files are maintained as set out in KCSIE 2026 Annex C.

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

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

Ensure section 128 checks are undertaken as defined in KCSIE 2026.

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

The school's leadership team are held to account for the school's safeguarding arrangements.

Any weaknesses in Safeguarding are remedied immediately.

The Safeguarding Link Governor/Trustee will ensure:

They meet with the DSL and visit the school termly asking questions that allow them to monitor how the school's safeguarding policies and procedures are being put into practice.

They are part of the biennial safeguarding audit, led by the DSL and headteacher, and make sure it is submitted via Phew.

They are the governing board's/board of trustee's safeguarding specialist, feeding back their findings following school visits and meetings with the DSL.

They attend appropriate training that guides them in how to monitor and progress any areas of weakness in the school's safeguarding arrangements.

They keep up to date with the SSCP's safeguarding arrangements and guidance.

Confidentiality, Sharing and Withholding Information

The school takes our responsibility to protect and look after the data (information) we hold about children and our families seriously. The Data Protection Act (DPA) 2018, the General Data Protection Regulation (GDPR) and the Data (Use and Access) Act 2025 guide us in how to do so. Under the DPA 2018, we will share information without consent if 'the safeguarding of children and individuals at risk' is our reason for doing so, and

- it is not possible to gain consent
- it cannot be reasonably expected that a practitioner (for example, teacher) gains consent, or
- to gain consent would place a child at risk

The government's information sharing advice for safeguarding practitioners supports staff who have to make decisions about sharing information. Staff are aware they can look at the data protection in school's toolkit or speak to a member of the safeguarding team if they are unsure about sharing information. Government guidance emphasises that: "The Data Protection Act 2018, GDPR and Data (Use and Access) Act 2025 do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children."

To keep children safe, we will share information in a timely manner including sharing information with agencies and professionals in line with the Working Together to Safeguard Children 2023 guidance. We respect that safeguarding matters are personal to families, so the DSL, deputy and headteacher will only share information about a child to members of staff and professionals on a need-to-know basis.

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

Notifying parents or carers

Working alongside and supporting families is a key priority. This involves being open and transparent with parents and carers when we have concerns about their child's welfare, and/or we need to request support from other services to make sure the child's situation improves. If we believe notifying parents or carers could increase the risk to the child or cause further harm, we will seek advice from children's services about how and when parents or carers should be updated. It is legitimate to share concerns without a parent's or carer's consent when there is good reason to do so and that sharing the information would improve the safeguarding of the child in a timely manner.

Reporting and Responding to Safeguarding Concerns

The following procedures apply to all staff working in the school and will be covered by training to

enable staff to understand their role and responsibility.

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

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

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

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

1. Make an initial record of the information related to the concern.
2. Report it to the DSL immediately.
3. The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available.
4. Make an accurate record (which may be used in any subsequent court proceedings) as soon as possible and within 24 hours of the occurrence, of all that has happened, including details of:

    - Date, time, place and who was present
    - A clear and comprehensive summary of the concern
    - Any injuries
    - Explanations given by the child / adult
    - Rationale for decision making and action taken
    - Any actual words or phrases used by the child

5. The records must be signed and dated by the author or / equivalent on electronic based records
6. Call the police on 999 if a child is in immediate danger. Anyone can make a referral to children's services if a child is suffering or likely to suffer significant harm. Usually, the DSL/DDSL will make the referral. If you make a direct referral, you must update the DSL or a deputy as soon as is practically possible.

Following a report of concerns the DSL must:

1. Use the Continuum of Support for Children and Families in Surrey and Continuum of Support

Indicators to decide whether or not there are sufficient grounds for suspecting significant harm, in which case a request for support must be made to the C-SPA and the Police if it is appropriate.

2. Where a child ordinarily resides within Surrey, referrals should be made to Surrey Children's Single Point of Access (CSPA) in accordance with Surrey safeguarding procedures. Where a child resides in another local authority area, referrals should be made to the relevant Children's Services department for that local authority, using the referral pathways and procedures applicable in that area. Staff should seek advice from the Designated Safeguarding Lead (DSL) if they are unsure of the appropriate referral route.

3. The school should try to discuss any concerns about a child's welfare with the family and where possible to seek their agreement before making a referral to the C-SPA. However, this should only be done when:
    - it will not place the child at increased risk
    - or sexual/organised abuse is suspected
    - or the fabrication of an illness is suspected
    - or where the discussion could impede a Police investigation or social work enquiry

4. Where there are doubts or reservations about involving the child's family, the DSL should clarify with the C-SPA or the Police whether the parents should be told about the referral and, if so, when and by whom. This is important in cases where the police may need to conduct a criminal investigation.

5. If it is suspected a child is suffering, or is likely to suffer, harm or abuse the DSL must contact the C-SPA by sending a Request for Support Form by secure email to: cspa@surreycc.gov.uk. If the DSL feels unsure about whether a referral is necessary, they can phone the C- SPA to discuss concern.

6. When a pupil is in need of urgent medical attention and there is suspicion of abuse the DSL or their Deputy should take the child to the accident and emergency unit at the nearest hospital, having first notified the C-SPA. The DSL should seek advice about what action the C-SPA will take and about informing the parents/carers, remembering that parents/carers should normally be informed that a child requires urgent hospital attention.

7. If there is not a risk of significant harm, the DSL will either actively monitor the situation or consider offering early help.

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

    - informed by a girl under 18 that an act of FGM has been carried out on her; or
    - they observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for the purposes connected with labour or birth.

The DSL should also be made aware.

If no feedback is received from children's services within 72 hours of making a referral, this must be followed up. If after a referral, the referrer is dissatisfied with the response from children's services and/or the child's situation does not appear to be improving, the DSL (or whoever made the referral) should press for re-consideration to ensure their concerns have been addressed and, most importantly, the child's situation improves. The local escalation policy (Finding a Solution Together (FaST) resolving professional differences procedure will be used, where necessary.

Responding to a Disclosure

We recognise that it takes courage for a child to disclose abuse, neglect, exploitation or another safeguarding concern. Children may not feel ready to tell someone, may not recognise what is happening to them as harmful, or may be worried about the consequences of speaking out. All disclosures will be taken seriously.

When a child makes a disclosure, staff will:

- Listen carefully and give the child their full attention.
- Remain calm, patient and non-judgemental.
- Reassure the child that they have done the right thing by speaking to someone.
- Take what the child says seriously and avoid expressing shock, disbelief or anger.
- Allow the child to speak in their own words and at their own pace.
- Only ask open questions where necessary to establish whether there is a safeguarding concern, for example: *"Tell me about that" or "Can you explain what happened?"*
- Avoid leading questions, interrupting, investigating or attempting to prove what has happened.
- Make it clear that they cannot promise to keep secrets and that information may need to be shared with people who can help keep the child safe.
- Explain, in an age-appropriate way, what will happen next.
- Consider the child's wishes and feelings while ensuring that appropriate safeguarding action is taken.

Staff will not:

- Promise confidentiality.
- Investigate the concern themselves.
- Ask the child to repeat their account unnecessarily.
- Make assumptions or offer alternative explanations.
- Examine injuries, take photographs, or ask the child to provide a written statement.
- Share the information with anyone other than those who need to know in order to safeguard the child.

Following a disclosure, staff will make an accurate written record as soon as possible and report the concern immediately to the Designated Safeguarding Lead (DSL) or a Deputy DSL in accordance with this policy.

Supporting Staff

We recognise that receiving a disclosure or being involved in safeguarding incidents can have a significant emotional impact on staff. Appropriate support, supervision and guidance will be made

available through the safeguarding team and senior leaders where required.

How Children Can Report Concerns

At our school, we want all children to know that their worries will be listened to and taken seriously. We aim to create an environment where children feel safe, valued and confident to seek help. Children can share concerns by speaking to any trusted adult in school and through other reporting systems available within the school, such as worry boxes, online reporting forms and the zones of regulation.

Children are regularly reminded about how to seek help through assemblies, safeguarding displays, classroom teaching, PSHE, RSE and wider curriculum opportunities.

We recognise that children communicate their experiences in different ways. Changes in behaviour, presentation, attendance, emotional wellbeing or engagement may indicate that a child needs support. Staff take a safeguarding-first approach when considering such changes and will remain professionally curious about the child's lived experience.

For children who are pre-verbal or non-verbal, observing behaviour and presentation is even more important for understanding the child's lived experience and ensuring their voice is heard.

Early help

Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. We are keen to provide support to families as soon as a problem becomes visible. If an early help assessment is appropriate, the DSL or a deputy will lead on working together with other agencies and set up an inter-agency assessment, as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

Our DSL and/or deputy use the Helping families early - Surrey County Council information to explore emerging needs and – with consent from the child or family, complete an Early Help Assessment to ensure all identified needs are supported by the appropriate agencies. The partnership's Early-Help-Strategy-2024-2027 sets out their aims for how professionals work effectively together to provide early help.

If early help support is appropriate, it will be kept under constant review. A referral to children's services may be required if the child's situation doesn't appear to be improving. The DSL is aware of the local escalation policy and procedures.

We are aware any child may benefit from support before statutory intervention, including from universal services and community-based Early Help, or the targeted early help level of Family Help. Staff who work directly with children will be particularly alert to the potential need for early help for children listed under paragraph 17 of KCSIE.

Safeguarding Concerns and Allegations against Adults who work with Children – referral to the Local Authority Designated Officer (LADO)

Surrey's LADO procedures will be followed where it is alleged that anyone working in the school that provides education for children under 18 years of age, including supply staff, volunteers and contractors, or another adult who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child or
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children
- behaved or been involved in an incident outside of a setting which did not involve children but could impact on their suitability to work with children.

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

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

In dealing with allegations or concerns against an adult, staff must without delay:

- Report any concerns about the conduct of any member of staff, supply staff or volunteer to the Headteacher immediately who will consider whether a referral to the LADO is required.
- If an allegation is made against the Headteacher, the concerns need to be raised with the Xavier Safeguarding Compliance Director or CEO Xavier Catholic Education Trust without delay.
- There may be situations when the Headteacher or CEO Xavier Catholic Education Trust will want to involve the police immediately if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.
- Once an allegation has been received by the Headteacher, Xavier Safeguarding Compliance Director or CEO Xavier Catholic Education Trust they will contact the LADO (as part of their mandatory duty) on 0300123 1650 option 3 LADO or Email: LADO@surreycc.gov.uk immediately and before taking any action or investigation.
- Where the allegation is in relation to a member of supply staff or trainee teacher, the school will inform the agency/teacher training provider of the process for managing allegations and ensure they are fully involved in enquiries.
- Following consultation with the LADO inform the parents of the allegation unless there is a good reason not to.

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

If the matter is investigated internally, the LADO will advise the school to seek guidance from local authority colleagues in following procedures set out in part 4 of 'Keeping Children Safe in Education' (2026) and the SSCP procedures.

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

Low-Level Concerns

The term low-level concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the setting may have acted in a way that:

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

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

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

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

Sexual Violence and Sexual Harassment between Children in Schools

Child on Child Abuse (including harassment and violence) – Policy

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

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

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

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

All members of staff at the school recognise that children are capable of abusing other children and this will be dealt with under our Child Protection and Safeguarding Policy and in line with KCSIE 2026.

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

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

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

- bullying, including cyberbullying, prejudice-based and discriminatory bullying
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- physical assault and harm, or the threat of harm with a weapon
- sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual making or sharing of nudes and semi-nudes including those generated by AI.
- 'upskirting' which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating person into a group and may also include an online element).

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

Older children may use any type of child-on-child abuse to 'recruit' younger children into gangs, especially in areas where gangs are prevalent. Young people experiencing child sexual exploitation first hand may be forced to 'recruit' other young people using types of child-on-child abuse. We are aware that boys are more likely to carry out child-on-child abuse and girls are more likely to impacted by it, but all child-on-child abuse is unacceptable and will be taken seriously.

Prevention

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

- Take a whole school approach to safeguarding and child protection
- Provide training to staff

- Provide a clear set of values and standards, underpinned by the school's Behaviour Policy and pastoral support; and by a planned programme of evidence-based content delivered through the curriculum
- Engage with specialist support and interventions.

- Making it clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It will never be passed off as "just banter", "just having a laugh", "a part of growing up" or "boys being boys**"** as this can lead to a culture of unacceptable behaviour, misogyny and an unsafe environment for children. We believe that failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.

- Recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported.

- Ensuring all staff are aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator. Child-on-child abuse is preventable, and staff know how to recognise behaviours and indicators of risk early and that timely, evidence-based support can be key to preventing children from going on to commit abuse or violence.

- Ensuring all staff challenge any inappropriate behaviour between children, including the use of derogatory language.

- Challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. As we believe that dismissing or tolerating such behaviours risks normalising them.

Responding Robustly to Reports of Sexual Violence and Sexual Harassment

The school takes a zero-tolerance approach to sexual harassment and sexual violence.

We recognise that a lack of reports does not mean that abuse is not taking place.

We are aware that some children are at increased risk of experiencing sexual harassment and sexual violence, including children with SEND and children who are lesbian, gay, bisexual or questioning their gender.

We recognise that disclosures may not be made all at once and that a report may be the beginning of a wider disclosure that emerges over time.

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

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

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

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

Staff taking a report will never promise confidentiality.

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

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

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

Risk Assessment

Following a report of sexual violence, the designated safeguarding lead (or a deputy) should carry out an immediate risk and needs assessment. For a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment for a report of sexual violence should consider:

• the victim's safety and support needs,
• potential other victims,
• the alleged perpetrator(s),
• the wider school or college community, including staff and students, and any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms, and
• the location and time of the incident, with steps to improve safety in that area.

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

Action:

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

The DSL will consider:

- The wishes of the victim.
- The nature of the incident including whether a crime has been committed and the harm caused.
- Ages of the children involved.
- Developmental stages of the children.
- Any power imbalance between the children.
- Any previous incidents.
- That sexual violence and sexual harassment can take place within intimate personal relationships between.
- Ongoing risks to the victim, other children or school staff.
- Other related issues or wider context.

Confidentiality:

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

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

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

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

Options:

- Manage internally
- Early Help intervention
- Request for support to the C-SPA
- Report to the Police (generally in parallel with a request for support to the C-SPA)

Ongoing Response:

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

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, our DSL and a DDSL will be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately. They will be guided by the CPS: Safeguarding Children as Victims and Witnesses.

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

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

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

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

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

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

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

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

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

Unsubstantiated, unfounded, false or malicious reports

If a report is found to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's services may be appropriate. If a report is shown to be deliberately invented or malicious, we will consider whether any disciplinary action is appropriate according to our behaviour policy.

Physical Abuse

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

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

The principles from the anti-bullying policy will be applied in these cases, with recognition that any Police investigation will need to take priority.

Harmful Sexual Behaviour (HSB)

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. HSB can occur online and/or face-to-face and can also occur simultaneously between the two. HSB will be considered in a child protection context. We will always consider HSB in a child protection context. We recognise that children displaying harmful sexual behaviours have often experienced their own abuse and trauma and they will be offered appropriate support.

When considering HSB, we will take into account the ages and the stages of development of the children. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference in age, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.
Our DSL and DDSL's will:

- have a good understanding of HSB.
- assist in planning the curriculum aimed at preventing HSB.
- ensure staff spot and report inappropriate behaviour to prevent an escalation.
- incorporate our approach to sexual harassment and sexual violence into the whole school approach to safeguarding.

Our curriculum addresses these issues via the following topics according to the age and stage of development of our children:

- healthy and respectful relationships

- what respectful behaviour looks like
- gender roles, stereotyping, equality
- body confidence and self-esteem
- consent

The school's response to HSB:

The management of children with sexually harmful behaviour is complex. We will work with other relevant agencies to maintain the safety of the whole school community. Where appropriate, immediate measures will be put in place to support and protect the person impacted by the behaviours, any witnesses and the alleged instigator of the behaviours. A written record will be made and next steps discussed, taking into account the views of those impacted by the behaviour.

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

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

The Hackett Continuum of Need is a framework used to assess the level of support, intervention, or safeguarding response a child and family may need. It helps professionals identify concerns early, assess risk, and determine whether a child requires universal support, targeted early help, intensive support, or statutory child protection intervention.

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

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

Responding to any incident that comes to your attention:

- Report it to your designated safeguarding lead (DSL) or equivalent immediately, using the school's reporting procedures set out in this policy.
- Never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal.
- If you have already viewed the imagery by accident (e.g. if a young person has shown it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- Do not delete the imagery or ask the young person to delete it.
- Do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL or a deputy.
- Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.

- Do not say or do anything to blame or shame any young people involved.
- Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL or a deputy.

Staff reserve the right to confiscate a device in the possession of a child if they have concerns about sharing nudes or semi-nudes in relation to the device. This is consistent with the Searching, screening and confiscation: advice for schools guidance.

The DSL will follow the government's Sharing nudes and semi-nudes: advice for education settings working with children and young people guidance. Once they are aware of an incident, the DSL will hold an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.

The initial review meeting will consider the initial evidence and aim to establish:

- Whether there is an immediate risk to any child or young person.
- If a referral should be made to the police and/or children's social care.
- If it is necessary to view the image(s) in order to safeguard the child or young person – in most cases, images or videos should not be viewed.
- What further information is required to decide on the best response.
- Whether the image(s) has been shared widely and via what services and/or platforms. This may be unknown.
- Whether immediate action should be taken to delete or remove images or videos from devices or online services.
- Any relevant facts about the children or young people involved that would influence risk assessment.
- If there is a need to contact another education school or individual.
- Whether to contact parents or carers of the children or young people involved – in most cases they should be involved.

The DSL will make an immediate referral to the police and/or children's services if:

- The incident involves an adult.
- There is reason to believe that a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs).
- What they know about the images or videos suggests the content depicts sexual acts that are unusual for the young person's developmental stage or are violent.
- The images involve sexual acts and any child in the images or videos is under 13.
- They have reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example if they are presenting as suicidal or self-harming.
- They become aware of the making or sharing of nudes or semi-nudes.

If none of the above applies, we can decide to respond to the incident without involving the police or children's services. We may escalate the incident at any time if further information/concerns are disclosed at a later date. First, the DSL will be confident that they have

enough information to assess the risks to any child involved and the risks can be managed within our school's pastoral support, behaviour procedures and, if appropriate, the local network of support.

The DSL or a deputy will contact children's services if any child or young person involved is already known to them. If, because of the investigation, the DSL (or equivalent) believes there are wider issues that meet the threshold for children's services' involvement, they will make a referral in line with this policy and local safeguarding procedures.

Viewing the imagery

The decision to view any imagery will be based on the professional judgement of the DSL or a deputy and will comply with this policy. Imagery will never be viewed if the act of viewing will cause significant distress or harm to a child. If a decision is made to view imagery, the DSL will be satisfied that viewing:

- Is the only way to make a decision about whether to involve other agencies because it is not possible to establish the facts from any child or young person involved.
- Is necessary to report it to a website, app or suitable reporting agency (such as the IWF) to have it taken down or support the child or parent/carer in making a report.
- Is unavoidable because a child or young person has presented it directly to a staff member or nudes or semi-nudes have been found on a school device or network.

Deletion of images

If the school has decided that other agencies do not need to be involved, then consideration will be given to deleting imagery from devices and online to limit any further sharing. This decision will be based on the DSL's or a deputy's judgement in line with the guidance. There is further information in the Sharing nudes and semi-nudes section of this policy.

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

Children Absent from Education

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

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

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

Pupils Missing Out on Education

Most children engage positively with school and attend regularly. However, to flourish, some children require an alternative education provision or may require a modified timetable to support a return to full-time education provision. It is recognised that children accessing alternative provision or a reduced or modified timetable may have additional vulnerabilities. Ofsted refer to these as Pupils Missing Out On Education (PMOOE), because they are not accessing their education in school in the 'usual way'.

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

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

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

The school will monitor and track children attending alternative provision to ensure that the provision meets the needs of the child. The school continues to be responsible for the safeguarding of that pupil. The school will obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at/for the alternative provision. The school will also obtain written confirmation that the alternative provider will inform the school of any arrangements that may put the child at risk (i.e. staff changes), so the school can ensure itself that appropriate safeguarding checks have been carried out on new staff.

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

The school leadership will report to governors' information regarding the use and effectiveness of alternative provision and modified timetables. The school will also report to governors any formal direction of a pupil to alternative provision to improve behaviour.

Attendance and Behaviour

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

The school recognises that absence from school, particularly repeatedly and/or for prolonged periods and exclusion from school may be indicators of abuse and neglect, including the exploitation of children. The DSL will regularly liaise with members of school staff with

responsibility for behaviour and attendance to ensure risk is identified and appropriate intervention is in place to protect children from harm.

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

Restrictive Physical Intervention (including reasonable force and seclusion)

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

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

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

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

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

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

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

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

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

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

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

A child suspected of an offence must be cautioned[1] before being questioned about that offence[2] or being further questioned if the answers provided give grounds for suspicion, or if there is a failure or refusal to answer or answer satisfactorily, and the answers or silence are to be given in evidence to a court in a prosecution.

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

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

1. The parent, guardian or, if the child is in the care of a local authority or voluntary organisation, a person representing that authority or organisation.

2. A social worker of a local authority

3. Failing these, some other responsible adult aged 18 or over who is not:

a. a police officer
b. employed by the police
c. under the direction or control of the chief officer of a police force or
d. a person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions,

Further information can be found in the statutory guidance – PACE Code C 2019.

Contextual safeguarding

Contextual safeguarding, also known as 'risk outside the home', is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

We will maintain records of concerns about contextual safeguarding in accordance with our safeguarding procedures. We know the importance of information sharing, therefore if we identify contextual safeguarding concerns about the local area we will share this information with relevant partners. If there is a specific concern about a child, we will consult with children's services.

Whistleblowing

We recognise that children cannot be expected to raise concerns in an environment where staff

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

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

fail to do so.

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

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

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

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

Additional Resources/Useful Links

Surrey Safeguarding Children Partnership webpages
Continuum of Support for children and families living in Surrey
Surrey Education Services (surreycc.gov.uk)
Graded Care Profile 2
NSPCC | The UK children's charity | NSPCC
CEOP Education
Anti Bullying Alliance webpages
Childnet International
Safer Internet Centre webpages
Contextual Safeguarding Network webpages
Lucy Faithfull Foundation webpages
Childline webpages
Check a teacher's record
Individuals prohibited from managing or governing schools
Education provision for SEND - Surrey County Council
Alternative Provision: Alternative Curriculum Pathways and Reintegration Support - Surrey County Council
Youth and school engagement | Surrey Police
Safer Communities Programme | Healthy Surrey
Surrey Healthy Schools | Healthy Surrey
Partner services | Surrey Police
Surrey Children's Services Procedure Manual Supporting the Education and Promoting the Achievement of Children with a Social Worker, Looked After and Previously Looked After Children
Promoting the education of children with a social worker and children in kinship care arrangements: virtual school head role extension
Plan technology for your school guidance

Information Sharing
Mindworks Surrey
Surrey Young Suicide Prevention Toolkit
The Surrey Self-Harm Protocol
Install - Ripple Suicide Prevention
Mandatory reporting of female genital mutilation: procedural information
Helping families early - Surrey County Council
Continuum of Need Indicators
Teaching about relationships, sex and health - GOV.UK
For organisations | ICO (Information Commissioner's Office)
Generative artificial intelligence (AI) in education - GOV.UK
Using AI in education settings: support materials - GOV.UK
Supporting pupils with medical conditions at school - GOV.UK
Allergy safety in schools - GOV.UK
Home Office – Serious Violence Strategy, April 2018
Responding to children who display sexualised behaviour
Sexual development and behaviour in children | NSPCC Learning