

# Safeguarding and Child Protection Policy



SUTTON VALENCE SCHOOL

**Key Staff** (all contact details available in Annex F)

- Designated Safeguarding Lead (DSL): Ms Lauren Austen (Assistant Head – Safeguarding)
- Deputy Designated Safeguarding Lead (DDSL): Mrs Maja Trachonitis (Assistant Head – Wellbeing)
- Deputy Designated Safeguarding Lead (DDSL): Mr Steven Head (Head of Boarding Compliance)
- Safeguarding Governors: Dr Michael Heber  
Mr Roy Blackwell

In addition to these, the Senior Deputy Headmaster, Mr Jeremy Farrell, has overall responsibility for the day-to-day oversight of pastoral care and safeguarding and child protection systems in School

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This policy addresses the Independent School Standards Regulations (ISSRs 2015 draft 2018) and the consequent ISI Regulatory Requirements and commentary (last updated in February 2020) Part 3 - Welfare, health and safety of pupils, Paras 7(a) and (b), 8(a) and (b) and 9.

This policy has been developed in accordance with the principles established by The Children's Acts (1989 and 2004), The Education Acts (2002), The Equality Act (2010) and the Protection of Freedoms Act (2012)

This policy will have regard to the Government (DfE) guidance in the following documents:

- *Keeping Children Safe in Education* (KCSIE) September 2023, which incorporates the additional statutory guidance, *Disqualification under the Childcare Act 2006 June 2015*. Issued under Section 175 of the Education Act 2002 and the Education (Independent School Standards) Regulation 2017;
- Reference to the non-statutory advice: *What to do if you are worried a child is being abused: Advice for practitioner's* March 2015;
- *Working together to Safeguard Children 2018* (A guide to inter-agency working to safeguard and promote the welfare of children). This document refers to the non-statutory advice: *Information Sharing 2018*;
- *The Prevent Duty: Departmental advice for schools and childcare providers* June 2015;
- *Revised Prevent Duty Guidance: for England and Wales* (Guidance for specified authorities in England and Wales) July 2015 (Pages 10-12);
- *Sexual Violence and Sexual Harassment between Children in Schools and Colleges* September 2021.
- *The Prevent Duty: safeguarding learners vulnerable to radicalization*: (Support for those working in education settings with safeguarding responsibilities) October 2022.

And the;

- Kent Safeguarding Children Multi-Agency Partnership (KSCMP)

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

- Anti-Bullying Policy;
- Child Protection Advice Document;
- Drugs Policy;
- Guidelines for Life at Sutton Valence School;
- Health and Safety Policy;
- Missing Pupil Policy;
- Online Safety Policy;
- Outside Speakers Protocol and Policy;
- Positive Behaviour Policy;
- Positive Handling Policy;
- Recruitment Policy;
- Relationships and Sex Education (RSE) Policy;
- School Supervision Policy;
- Visits and Off-Site Activities Policy.

This policy applies to **all staff** employed by Sutton Valence School, including temporary, supply staff and volunteers.

**The School aims to safeguard and promote the welfare of all its students and operates with the best interests of the students at heart. In addition, some students will require specific child protection and welfare support to enable them to thrive.**

The School understands the role it plays in the wider safeguarding system for children and is aware that abuse can happen in any place and at any time.

We are aware of the specific needs of our SEND students and those new to the School at any point in the academic year. We pay particular attention to the needs of such pupils by following the Induction Programme contained in Annex I.

The School plays a significant role in promoting good physical and mental health for all children in our care.

The aim of the following procedures is to ensure that the safeguarding, protection, physical and mental health, and general welfare of all our pupils remains of paramount importance.

### **Education, Training and Prevention of Harm**

Sutton Valence School believes that the safeguarding and promoting of welfare is the responsibility of all members of the community. Everyone who comes into contact with children and their families has a role to play in identifying concerns, sharing information and taking prompt action. The School promotes an open culture in which concerns or questions about safeguarding can be raised at any time, and in any context.

The School understands the importance of acting on and referring the early signs of abuse and neglect, keeping clear records, listening to views of the child, reassessing concerns when situations do not improve, sharing information quickly and challenging inaction. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of the children. If staff have any concerns regarding a child's wellbeing, they have a professional and personal duty to contact the Designated Safeguarding Lead (DSL) or, if unavailable, the Deputy Designated Safeguarding Lead/s (DDSLs) or the Senior Deputy Headmaster (SDH) at the earliest opportunity.

All new members of staff are trained in Safeguarding and Child Protection as part of their induction into the school. During this training, it is made clear that anyone can make a referral to the KSCMP (Further details in Annex F). They can access this via the School Internet or request a copy of:

- The current Safeguarding and Child Protection Policy;
- The latest version of *Keeping Children Safe in Education* including parts 1,4, 5 and Annex B and D;
- Local Area Safeguarding Team Contacts;
- Details of how to contact the DSL, DDSLs and SDH.

They must return a signed and dated form confirming that they have read and understood these documents. Whenever KCSIE is updated, or other relevant legislative changes are made, existing staff are brought up to date with the newer versions.

Annual training is provided at the start of the academic year for all employees. Throughout the year any new employees receive training. Additionally, at the weekly staff briefings, current issues are highlighted, and staff receive updates at INSET and twilight staff meetings. Staff briefings and department meetings, enable staff to discuss issues that particular children are having and for the DSL to readily identify and initiate an Early Help Assessment if required. These issues could be related to behaviour, relationships or mental health concerns. Online, in-house guidance is provided, and hard copies are available for those departments without access to the School intranet. The monthly safeguarding bulletin is also circulated and on display. Staff and volunteers should have a clear understanding of the potential signs of abuse. Staff should also be able to identify children at risk and know it is their personal and professional duty to report any welfare or safeguarding concerns to the DSL/DDSL/SDH They may challenge the handling of individual cases and ask for appropriate confirmation that their concerns have been taken seriously. In the absence of action, they should report to KSCMP.

Staff have an awareness of safeguarding issues that can put students at risk of harm. Behaviours linked to issues such as drugtaking or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk.

Staff understand their role in providing appropriate support and reporting to the DSL/DDSL/SDH as soon as a potential safeguarding or child protection issue emerges. All concerns reported by staff and students are taken seriously and discussed with the appropriate colleagues. Decisions relating the level of support and intervention, including Early Help Assessment, as well as parental involvement, are made jointly and can be in consultation with the KSCMP. The effectiveness of interventions and outcomes are monitored and assessed.

Staff understand that students should be taken seriously, kept safe and never be made to feel ashamed or that they are creating a problem for reporting any concern.

When a referral to Social Services is made, a Team Around the Child (TAC) will be established where appropriate and a Lead Professional identified. If Early Help is in place, additional referrals, e.g. to CAMHS, may be made by those health professionals. Likewise, in the event the child's situation is not improving, they are likely to follow the *Signs of Safety and Wellbeing* model.

The School's DSL/DDSL/SDH receive annually updated training in Safeguarding and Child Protection and Inter-Agency working.

All staff working directly with children participate in regular reviews of their own practice, providing opportunities to discuss any concerns they may have about welfare and safeguarding matters.

To share best practice and review procedures, pastoral staff will discuss, where appropriate, safeguarding-related cases at Housemasters and Boarding meetings.

Safeguarding and welfare concerns are standard items on all appropriate agendas.

### **Early Help Assessment**

Early Help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to teenage years.

The School recognises that providing early help can be more effective in safeguarding and promoting the welfare of children, than in reacting later once a crisis point has been reached. Early Help can provide support for children experiencing problems, so the risks are minimized, harm is avoided and the need for intervention from statutory and specialist agencies is reduced.

The School will follow the guidance provided by the KSCMP in identifying, assessing and acting to support children who may benefit from early help:

Effective Early Help relies upon local agencies working together to:

- Identify children and families who would benefit from Early Help Assessment;
- Undertake an assessment of the need for Early Help Assessment;
- Provide targeted Early Help Assessment services to address the assessed needs of a child and their family, which focuses on activity to significantly improve the outcomes for the child.

The House and tutorial system enables staff to readily identify and initiate Early Help for our students. Knowledge and awareness of contextual safeguarding supports decisions and provides valuable insight and information.

For both the Boarding and Day communities, there are many additional sources of support on campus. These include Learning Support, Counselling, Medical Team, Senior Deputy Head, Assistant Head (Wellbeing), DSL, DDSLs, School Chaplain, Day and Boarding Matrons, Housemasters/ Housemistresses (HSMs), Behavioral Specialists and Tutors. External sources of support include; educational psychologists, counsellors, GP or onward referrals to CAMHS. The DSL and the DDSLs promote communications with external agencies. Where appropriate, parents are involved from the outset.

Although decisions to seek support for a child in need would normally be taken in consultation with parents and pupils, their consent is not required for a referral where there are reasonable grounds to believe that a child is at risk of significant harm.

In cases where a pupil has been identified as being at risk of radicalisation, we will consider the level of risk to identify the most appropriate referral, which could include Channel or Children's Social Care.

We recognise that it is mandatory for schools to report to the police cases where it is believed that an act of Female Genital Mutilation (FGM) appears to have been carried out.

It is important to differentiate the needs of a child in need of additional support (child at risk), whose needs should lead to inter-agency assessment, using the Local Safeguarding Children Board's criteria documents 'Early Help Processes' (August 2015) and 'Thresholds for Intervention' (May 2015) and the needs of a child who has suffered or is likely to suffer significant harm, who should be reported to the Mid-Kent Multi-Agency Safeguarding Hub team as a matter of urgency.

### **How are we likely to find out that a child is being abused?**

Child abuse can encompass, but is not restricted to, physical abuse, emotional abuse, sexual abuse, financial abuse and neglect, of anyone under the age of 18 by someone who is either an adult or an adolescent. It can also include Modern Slavery, psychological abuse, domestic abuse, discriminatory abuse, organisational abuse and self-neglect. (*Annex E*).

There are three main ways in which we are likely to be alerted to the possible abuse of children in our care.

1. By our own observations of the signs or symptoms of abuse (*Annex E*);
2. By allegations or reports made by a parent, student or member of staff;
3. By a disclosure from the child that abuse has taken place.

### **Child-on-child Abuse**

Children can abuse other children (often referred to as child-on-child abuse) and it can take many forms. It **can** happen both inside and outside of school and online. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports. This **can** include (but is not limited to): bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; consensual and non-consensual sharing of nudes and semi-nudes images and/or videos; 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; upskirting and initiation/hazing type violence and rituals. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) **can** be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

It is recognised that girls are more likely to be victims and boys perpetrators but any child-on-child abuse is unacceptable and will be taken seriously. Additionally, children with SEND

profiles are potentially more vulnerable to abuse. We recognise that even if there are no reported cases of child-on-child abuse, it may still be taking place but simply not being reported.

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face and are never acceptable.

The relevant extracts from the Guidelines for Life at Sutton Valence School, which can be found in the School's Anti-Bullying Policy, sets out the following familiar key phrases for pupils to use if they feel they are being harassed by another person:

'I've had enough. I want you to stop doing that' or  
'I've had enough. I want you to stop saying that'.

The policy states that these phrases are not intended to make the other person stop the harassment immediately; they make it easier for the School to manage the harassment. Any student repeating such phrases lets the person know that they regard the situation as one of harassment and that the incident will be reported.

Other ways in which the School sets out to minimise these risks include:

- Online safety advice;
- Pathways Programme;
- Tutor time discussions;
- School assemblies;
- Chapel services;
- Publicity signposting support, both external agencies and staff within school;
- School Council;
- School Nurses;
- Talks from outside speakers;
- 'Help Yourself' booklets in the Library;
- Break out assemblies.

Any allegations of child-on-child abuse will be recorded and investigated. Both the victim and the alleged perpetrator(s) will be supported through the investigation and beyond. Where appropriate, details will be shared with the wider staff so that ongoing pupil interactions can be monitored.

The School will respond to cases of sharing of nude and semi-nude images in line with the UKCCIS guidance, *Sharing nudes and semi-nudes: advice for education settings working with children and young people* and KSCMP guidance.

Children can report abuse to any adult in the School community and can be confident that their concerns will be taken seriously. Information about who children can speak to is displayed prominently throughout the School as well as being regularly referred to in assemblies, tutor time and through the Pathways Programme. The School operates an open-door policy and reports made by parents will likewise be investigated thoroughly. Abuse that occurs online, or outside of the School, will not be downplayed and will be treated equally seriously. Children can use the 'Have you got ten minutes?' prompt if they wish to speak to any member of staff as well as

emailing or using the Teams communication.

Staff must know that some children may not feel confident to tell staff about their abuse, but be aware that some children may act in a way that they hope adults will notice. It may be that conversations are overheard or a friend may make a report instead of the child in question. Children can also use the anonymous 'concerns' button. Staff must also understand that there may be communication barriers for children with a SEND profile.

Staff will remain vigilant for children who appear to have low self-esteem and other mental health concerns. Concerns will be shared with the DSL. It might be relevant to work in conjunction with the Assistant Head (Wellbeing), Head of Learning Support, the Nursing team or the School counsellor.

A log of child-on-child abuse incidents will be kept by the DSL.

### **What should I do about it?**

To respond appropriately to the matters relating to suspected, alleged or actual child abuse, each member of staff at Sutton Valence School should follow these guidelines:

- If you have concerns, contact the DSL/DDSL/SDH as soon as possible;
- If you are told by a child (a disclosure), or another child, about abuse, it is essential to refer the matter to the DSL or, in her absence, DDSLs / SDH as soon as possible. Reassure the child that you will support them but explain that you must refer this information upwards. Make it clear to the child that confidentiality cannot be preserved; however, they can be reassured that the information will only be shared with key people. Avoid asking leading questions and be as objective and calm as possible. Using the School's Safeguarding and Child Protection Reporting Protocol, make a formal written record of the exchange immediately afterwards, adding your signature and the date. This should then be handed to the DSL or in her absence to the DDSLs / SDH, directly;
- All members of staff should be aware that if, at any point, there is immediate danger or risk of serious harm to a child, a referral should be made to Children's Social Care and/or the Police directly and without delay, and that anyone can make a referral. The DSL should be informed as soon as possible that a referral has been made. The School will raise the concerns with parents/guardians at the earliest appropriate opportunity, following a discussion that this is in the best interest of the child, and potentially work in partnership with them and other agencies to improve outcomes;
- In the first instance, regardless of the home address of the pupil, contact will be made with the West Kent Education Safeguarding Team. Contact details, including the Central Duty Team out of hours number can be found on staffroom notice boards, in new starter information packs and in this Policy (*Annex F*);
- On-site School CCTV footage will be looked at, if appropriate, in the case of safeguarding allegations.

Any deficiencies and weaknesses in the School's Safeguarding and Child Protection arrangements, which the School may become aware of by any means, will be remedied without delay.



## Allegations against teachers, staff, including supply staff, or volunteers

All staff and volunteers can be at risk of allegations by students and it is wise to take precautions when dealing with them on a day to day basis. Common sense prevails, but note the following 'Best Practice' advice on pages 12 to 14 of this Policy;

- As is outlined in recent guidance, any touching of a student should be avoided. See the Positive Handling Policy for direction;
- Jokes and innuendos can be misunderstood, as can nick names. Be careful what is said;
- Solo journeys, either in school transportation, or in individual vehicles should be avoided. If such an incident occurs, full details must be logged with the DSL;
- When meeting a student on a 1:1 basis, a room with a windowed door should be used where possible and the DSL must be informed by email;
- If a student arrives early for morning registration and there are no other adults in the building, it is sensible to ask them to wait outside the room, or send them to a more central location, such as a day room;
- When interviewing students about disciplinary matters, it is often appropriate to have another member of staff present;
- Staff should make sure that their social media profiles are 'private'. There must not be any communication through social networking sites between staff and existing pupils. (See *Annex G* for clarity on communication with Old Suttonians). Staff must not give out personal email addresses or personal mobile numbers to pupils;
- If work email addresses are given out, this must be for the purposes of communicating about school activities only.

Procedures in the case of an allegation against a member of staff or a volunteer:

- The procedures followed by Sutton Valence School in respect of allegations of abuse made against teachers and other staff shall, in all regards, follow the guidance set out in Part 4 Sections One and Two of *Keeping Children Safe in Education KCSIE 2023*;
- All allegations should be reported at once and directly to the Headmaster, without informing the person against whom the allegation has been made;
- In the Headmaster's absence or should the incident involve the Headmaster himself, or be a conflict of interest, report the matter directly to the Chair of Governors, ([COG@svs.org.uk](mailto:COG@svs.org.uk)). Staff should feel confident to report matters to the LADO directly. Instances of professional misconduct will be reported to the Teaching Regulation Agency (TRA);
- In the event of serious injury requiring immediate treatment, the member of staff must contact the Medical Centre;
- If the allegations may meet the harms threshold, the DSL will liaise with the Headmaster and inform the Local Authority Designated Officer (LADO) within one working day. It will be clear that the referral is being made under the School's Safeguarding and Child Protection Procedure and the report will be confirmed in writing within 24 hours;
- In some cases, when deciding whether to make a referral, following an allegation or suspicion of abuse, it may be appropriate to seek the advice of the KSCMP Designated Officer for Allegations. This may be done informally and without giving names in the first instance;
- In the event of a criminal act being alleged, the Police will be contacted for their advice;
- In either case, Sutton Valence School will do nothing which may jeopardise a police investigation, such as asking a child leading questions or attempting to investigate the allegation of abuse;

- No investigations will be conducted prior to the DSL/DDSLs/SDH speaking to the LADO and together they will consider its nature, content and context and agree a course of action including any involvement of Social Care services and/or the Police. Discussions will be recorded in writing;
- If the complaint is considered sufficiently serious and following discussion with the KSCMP Designated Officer for Allegations, and involves a member of staff, that member of staff will be told that serious allegations of misconduct have been made and that they will be suspended from duty immediately pending a full investigation. The member of staff will have the opportunity to answer the allegations and their contractual rights will remain in force. The member of staff concerned will continue to have access to the Deputy Head and the Assistant Bursar HR, who will keep the member of staff informed of developments;
- In the case of suspension from duty pending full investigation, it may be appropriate for the School to provide alternative accommodation for members of staff, outside of the boarding environment;
- In the event that no further action is to be taken in regard to the individual facing the allegation, the decision and justification for it should be recorded by the DSL and the KSCMP Designated Officer for Allegations. Agreement will be reached on what information should be put in writing to the individual concerned and by whom. They will also consider what action should follow in respect of the individual and those who made the initial allegation;
- In all cases of complaint, decisions will be taken to ensure that the complaint is fully investigated quickly, and in a fair and consistent way, and resolved in such a way that it is in the child's best interests, whilst supporting the person who is the subject of the allegation;
- All serious complaints will be reported to the Chairman of the Governors at once and subsequently to all Governors;
- If you are told of possible abuse by an adult, refer this as soon as possible to the DSL or, in her absence the DDSLs or SDH. In cases where there is reasonable cause to suspect that a child is suffering, or likely to suffer significant harm as the result of an action by another child or children, then the School will have a duty to refer the situation to the local safeguarding agencies.

## **Low-Level Concerns and Best Practice for Staff**

### **Underpinning Principles**

- The welfare of the child is paramount;
- Staff are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions;
- Staff should work, and be seen to work, in an open and transparent way;
- Staff should apply the same professional standards regardless of culture, disability, gender, language, racial origin, religious belief and sexual orientation.

### **What is a Low-Level concern?**

A low-level concern is defined in KCSIE 2023 as:

*“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 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.”*

KCSIE 2023 provides examples of the type of behaviour that could be a low-level concern:

- Being over friendly with children;
- Having favourites;
- Taking photographs of children on a mobile phone, against school policy;
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door;
- Humiliating pupils.

All low-level concerns about a person’s own or another member of staff’s behaviour, must be reported to the Headmaster.

Anyone reporting concerns under this policy does not need to determine whether the ‘harm’ threshold is met; the Headmaster is responsible for evaluating all notifications and determining when they should be referred.

Everyone working or volunteering at Sutton Valence School should understand that the School has a reporting culture and that anything that makes you stop and think should be reported, on the basis that a small observation by one person helps to build a more detailed picture of any situation.

### **Staff Reporting Low-Level Concerns**

Staff can report either in person or by completing the form (found in Annexe G) and sending to the Headmaster. Although not encouraged, staff can submit a report to the Headmaster anonymously.

Reports should be made as soon as reasonably possible. It is, however, understood that the awareness of the need to report is sometimes the result of a period of reflection and there should never be a worry that it is ‘too late’ to report a low-level concern.

In most circumstances, it will be important to record who has made the report and for this to be shared, where appropriate, with the person about whom the report has been made. Where an individual has a particular reason to wish for their name not to be passed to the individual/s, this will be respected as far as possible, recognising that there will always be circumstances where this cannot be guaranteed.

### **Self-Reporting**

Occasionally a member of staff may find themselves in a situation which could be misinterpreted, or which might appear compromising to others. In many situations this relates to managing interactions with the school friends of a staff member’s own children.

A member of staff may also, for whatever reason, recognise on reflection that they have behaved in a manner that they consider falls below the standards set out above. Self-reporting in these circumstances can be positive for a number of reasons:

- It is self-protective in that it enables a potentially difficult issue to be addressed at the earliest possible opportunity;
- It demonstrates awareness of the expected behavioural standards and self-awareness as to the individual’s own actions or how they could be perceived; and

It is an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

## **Outcomes**

The Headmaster will review all matters raised and agree the necessary steps to be taken which may involve either him or another senior member of staff doing the following:

- Speaking to the person who raised the concern for further clarification;
- Speaking to any potential witnesses;
- Speaking to the individual about whom the low-level concern has been raised;
- Reviewing the information and determining whether the behaviour is consistent with the School's expectation and the law, whether it constitutes a low-level concern and whether it is serious enough to consider a referral to the LADO;
- Seeking advice from the LADO where appropriate; and
- Keeping appropriate records of conversations, outcomes and the reason for decisions.

Where it is determined that the behaviour constitutes a low-level concern, the Headmaster will respond in a sensitive and proportionate way.

Appropriate actions may include management guidance or training, a focused conversation about what occurred and why, and the setting of clear standards for the future.

Where a low-level concern also raises issues of misconduct or poor performance, it may be appropriate to action the disciplinary or capability procedures.

Where a low-level concern relates to a member of contracted staff, the School will also refer the matter to the employer, so that they can identify any potential patterns of inappropriate behaviour.

References provided on behalf of School employees will only reference substantiated safeguarding concerns that meet the harm threshold. Therefore, low-level concerns will not be included, unless they relate to issues that would normally be referred to in references such as misconduct or poor performance.

## **Recording**

A simple, central record will be kept of all notified reports, identifying who raised the concern, who it was regarding, the details of the concern, whether it is a one-off or ongoing notification, and a summary of actions taken.

More detailed notes will also be kept of meetings and conversations related to the matter, to the extent appropriate to the issue raised.

The central record is kept under review by the Headmaster, Senior Deputy Headmaster, the DSL and Assistant Bursar.

Where it was determined that a concern warranted referral to the LADO or led to a disciplinary or capability process, records will also be kept about those processes on the individual's HR file, in the usual way.

The Headmaster, Senior Deputy Headmaster, DSL and Assistant Bursar will meet on a termly basis to review the low-level concerns record, looking for trends and organisational issues.

As part of the annual review of safeguarding, the Safeguarding Governor and the Headmaster will review the record. The report to the full Governing Body meeting will include an anonymised sample of low-level concerns received.

### **Best Practice for Staff**

Further information on Best Practice for staff can be found in the 'how to Guides' on the School Intranet system, in the Safeguarding Booklet given to all staff, the Staff Handbook and Teaching Standards.

### **Setting an Example**

All staff who work in schools set examples of behaviour and conduct which can be copied by students.

Staff must therefore set an example to students. They will:

- avoid using inappropriate or offensive language at all times;
- demonstrate the highest standards of conduct in order to encourage our students to do the same;
- show tolerance and respect for the rights of others;
- not undermine fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs;
- express personal beliefs in a way that will not overly influence students and will not exploit students' vulnerability or might lead them to break the law;
- avoid putting themselves at risk of allegations of abusive or unprofessional conduct.

### **Staff/Pupil Relationships**

Staff will observe proper boundaries with students that are appropriate to their professional position.

Staff should avoid contact with students outside of School hours if possible.

Personal contact details should not be exchanged between staff and students. This includes social media profiles.

If a staff member is concerned at any point that an interaction between themselves and a student may be misinterpreted, this should be reported to the Headmaster as a low-level concern.

### **Communication with Students**

The following information is designed to protect you and is best practice.

- Do not exchange telephone numbers with students;
- Do not contact them using a mobile device;
- Do not engage in electronic communication with them on your personal device;
- Communication should be through the School email system only and must hold up to scrutiny;
- Maintain a formal voice and tone;
- Do not become 'friends' on Facebook.

## **Facebook**

It is best practice to note the following advice:

- Check that your settings are private. Be aware that Facebook can change their privacy settings frequently. You will need to check, regularly;
- Do not use your professional teaching name;
- Do not accept existing pupils to be 'friends' (The exception is for members of staff who have children who are pupils at School);
- Be considerate to colleagues when posting photographs. Ask permission if necessary;
- Do not be detrimental to staff colleagues or Sutton Valence School online;
- Remember that Facebook 'own' your photographs.

When students have left Sutton Valence, they may wish to contact you on Facebook. This advice is assuming that students have left after the Upper Sixth Form has been completed:

- Students should have left for a period of over 18 months;
- The request to become friends should come from students, not staff.

## **Solo Journeys**

All solo journeys must be logged, via email, with the DSL. It may be possible to send the email prior to the trip, or it may have to wait until afterwards in the case of an emergency.

The email must contain the following information:

- Student's name;
- Date and time of journey;
- Reason for journey;
- Vehicle used;
- If the journey is arranged for a future date, an accompanying email from the parent where confirmation that they are completely happy with, and understand the details of, the forthcoming journey is requested.

## **Solo Teaching**

There are occasions when individual lessons/tutorials/clinics are given by staff. In order to protect ourselves it is essential to remember our guidelines for situations such as this:

- Always choose a room with a window;
- If at all possible, remain on the opposite side of the desk;
- Do not use rooms that are squirreled away;
- Your HOD should be aware of regular meetings/timetables additions/revision and catch-up sessions.

All solo teaching must be logged via email with the DSL. It may be possible to send the email prior to the lesson, or it may have to wait until afterwards if a child drops in to see you unannounced. An email to cover the term is absolutely fine for regular tutorials.

The email must contain the following information:

- Student's name;

- Date and time;
- Reason for lesson.

In situations such as Music lessons where doors are closed and nearly all lessons are 1:1, staff should follow the specific guidance of the Director of Music.

The Learning Support Department, The Examinations Officer, the School Counsellor and the Assistant Head (Wellbeing) will also have specific guidelines due to the nature of their contact with children.

You may feel it necessary to note if a child regularly arrives to a lesson early.

**Specific systems are in place to underline our safeguarding brief (beyond the daily interaction, contact and support) which includes our procedures for dealing with child-on-child abuse.**

Sutton Valence School pays particular attention to its practices, in particular through the Pathways Programme, to help children adjust their behaviours in order to reduce risks. There are sessions on sex and relationships which include, amongst other things, sending nudes, pornography, child sexual exploitation and sexual bullying, as well as curriculum sessions on the safe use of electronic equipment and access to the internet. Additionally, Tutors work alongside their charges to support and discuss some of the daily challenges presented by the digital age. As we state in our Anti-Bullying Policy:

Consequently, bullying, harassment, victimisation and discrimination will not be tolerated. Any kind of bullying is unacceptable and we accept that it can cause significant damage to a victim's ability to thrive physically, emotionally, psychologically and socially.

Bullying is behaviour by an individual or a group that intentionally hurts another individual either physically or emotionally and may cause psychological damage. It is usually unprovoked, uses malicious actions or words and is delivered directly or via other media. It is often repeated over a period of time, so that it not only causes distress at the time, but the threat of future attacks also causes anxiety and fear. Its aim is to cause unhappiness, making others feel insecure, isolated and unwanted.

This policy accepts that bullying can take many forms and use different means. In identifying its occurrence, the School has for a long time firmly rejected the idea that deliberate unpleasantness can be excused by describing such behavior as banter.

- Different forms of bullying include racial, religious, cultural, sexual/sexist, homophobic or gender orientation or identity, special educational needs and disability, because a child is adopted or a carer, or bullying based on physical difference;
- Different means of bullying include physical (including sexual); verbal (spoken and written, via any means); emotional bullying (including exclusion, use of silence, forming of cliques, spreading of rumours); extortion bullying (demanding money or possessions from another or taking or damaging belongings); cyber-bullying (including via texting, social networking sites, mobile phone, digital media, email, camera enabled devices, image sharing sites);
- It can involve manipulating a third party to torment or tease someone. It can involve complicity that falls short of direct participation;
- Bullying can happen anywhere and at any time and can involve everyone - students in our school, other young people from outside our community, staff and parents. Bullying is often hidden and subtle. It can also be overt and intimidating;
- Bullying can also take place outside school, using mobile, internet and wireless technologies.

A bullying incident will be treated as a Safeguarding or Child Protection concern when there is reasonable cause to believe that a pupil is suffering or is likely to suffer significant harm.

### **Safer Recruitment Procedures**

- The School is committed to Safer Recruitment Procedures to ensure that all those working in the school, on either a paid or voluntary basis, are suitable to do so as far as can be reasonably ascertained;
- At least one member of any interview process for employment to the School will have undertaken Safer Recruitment training;
- Sutton Valence School also has arrangements in place for the welfare of pupils, in respect of any person living in School boarding accommodation who is not employed by the School, such as the partners and children over the age of 16 (who are not themselves students at the School) of those with residential responsibilities. The DSL meets and gives training to these individuals;
- Appropriate checks include the provision for Enhanced Disclosure and Barring Service and banned list checks for all persons employed by the School in regulated activities, as well as the maintenance of the Single Central Register. Pre-employment checks are carried out to ensure that anyone employed in teaching is not subject to a prohibition order issued by the Secretary of State;
- As part of the shortlisting process, the School carries out an online search to help identify any incidents or issues that have happened and are publicly available online and which the School may want to explore with the applicant at interview;
- References are verified and at interview, candidates are asked to account for any gaps in their employment history;
- The School ensures it is following the most recent guidance in respect of these issues;
- The School is required by law to promptly report to the Disclosure and Barring Service (DBS) any person (whether employed, contracted, a volunteer or student) whose services are no longer used for regulated activity and the DBS referral criteria are met, that is, they have caused harm or posed a risk of harm to a child;
- The School is aware that it has a legal duty to respond to requests from the DBS for information it holds already;
- The School understands that it is also under duty to consider making a referral to the Teaching Regulation Authority where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate;
- In the case of our students working with adults who are not employed by the School, e.g. undertaking specialist outdoor training off- site, measures are in place to ensure that appropriate Child Protection checks and procedures are in place;
- All visitors to the School site are subject to our security procedures, which include a signing in process, the identification of them as visitors while on site and being detailed to a specific member of staff. They are also given a visitor's leaflet in regard to safeguarding and child protection on the School site.

### **Reviewing the Child Protection Policy**

The Governors of Sutton Valence School will undertake an annual review of the School's Child Protection Policy, including an update and review of procedures and their implementation. The Governors will ensure the School contributes to inter- agency working in line with *Working Together to Safeguard Children 2018* by good cooperation with local agencies and effective



implementation of Safeguarding and Child Protection policies and procedures. These aspects will be recorded at the Governor's meeting in the Summer Term following full discussions with the Designated Safeguarding Lead and detailed minutes. The Governors with special responsibility for Child Protection within the School are Roy Blackwell and Michael Heber who meet at least once a term with the DSL and the Senior Deputy Head . Termly reports are provided for the full Governors' meeting and, if necessary, interim updates will be signed off at these meetings.

Governors receive training in Safeguarding and Child Protection issues.

List of Annex:

- Annex A – Safeguarding Information for School and College Staff from KCSIE 2023
- Annex B – Further Safeguarding Information from KCSIE 2023
- Annex C – The Role of the Designated Safeguarding Lead
- Annex D – Online Safety Information
- Annex E – Definition of Child Abuse and Potential Signs
- Annex F – Key Contact Details
- Annex G – Low Level Concern Form
- Annex H – The Green Form
- Annex I – Induction Programme for New Pupils

## **Annex A**

### **Safeguarding information for school and college staff taken from KCSIE 2023**

The following is a condensed version of Part one of Keeping children safe in education. It can be provided (instead of Part one) to those staff who do not directly work with children, if the governing body or proprietor think it will provide a better basis for those staff to promote the welfare and safeguard children.

#### **The role of school and college staff**

1. Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children has an important role to play.
2. School and college staff are particularly important as they are in a position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating. It is important all staff (including those who do not work directly with children) recognise the important role they play in protecting children. What school and college staff need to know.
3. For the purposes of safeguarding, a child is anyone under the age of 18. Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:
  - protecting children from maltreatment;
  - preventing impairment of children's mental and physical health or development;
  - ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
  - taking action to enable all children to have the best outcomes.

All staff should:

- be aware of the systems in their school or college which support safeguarding, and these should be explained to them as part of staff induction. As a minimum this Annex and the child protection policy should be shared with staff at induction;
- receive appropriate safeguarding and child protection training (including online safety) which is regularly updated. In addition, all staff should receive safeguarding and child protection updates (including online safety) (for example, via emails, ebulletins and staff meetings), as required, and at least annually, to provide them with the skills and knowledge to safeguard children effectively;
- know the identity of the designated safeguarding lead (and any deputies) and how to contact them;
- know what to do if a child tells them they are being abused or neglected. This includes understanding they should never promise a child that they will not tell anyone else about a report of abuse, as this is unlikely to be in the best interests of the child;
- Should be able to reassure all victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

## What school and college staff should look out for

### Abuse and neglect

4. Knowing what to look for is vital to the early identification of abuse and neglect. All staff should be aware of indicators of abuse and neglect, including exploitation, so that they are able to identify cases of children who may be in need of help or protection.
5. If staff are unsure, they should always speak to the designated safeguarding lead (or deputy).

### Forms of abuse and neglect

6. **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused by other children or adults, in a family or in an institutional or community setting by those known to them or, more rarely, by others.
7. **Physical abuse:** a form of abuse that may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.
8. **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
9. **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Females can also be abusers as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and all staff should be aware of it and their school or colleges policy and procedures for dealing with it.
10. **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may involve a parent or carer failing to provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
11. All staff should be aware that child sexual and child criminal exploitation are forms of child abuse. Safeguarding issues

12. All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol misuse, deliberately missing education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nudes and semi-nudes (also known as youth produced sexual imagery) put children in danger.

### **Child-on-child abuse**

13. All staff should be aware that children can abuse other children (often referred to as child-on-child abuse). It can happen both inside and outside of school/college and online. It is important that all staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to reports.
14. The School adopts a zero-tolerance approach to peer-on-peer abuse. The School strives to ensure that no victim is ever made to feel ashamed.
15. All staff should be clear as to the school or college's policy and procedures with regards to child-on-child abuse. Child-on-child abuse is most likely to include, but may not be limited to:
- bullying (including cyberbullying, prejudice-based and discriminatory bullying); Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive. UKCIS provides detailed advice about sharing of nudes and semi-nude images and videos;
  - abuse in intimate personal relationships between peers;
  - physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
  - sexual violence, such as rape, assault by penetration and sexual assault;
  - sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment;
  - non-consensual sharing of nudes and semi nudes images and/or videos;
  - 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;
  - upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm; and
  - initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element.

### **What school and college staff should do if they have concerns about a child**

16. Staff working with children should maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child.
17. Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe.

18. If staff have any concerns about a child's welfare, they should act on them immediately. They should follow their school or college's child protection policy and speak to the designated safeguarding lead (or deputy). In the absence of the designated safeguarding lead staff should speak to the DDSLs or SDH.
19. The designated safeguarding lead (or deputies) will generally lead on next steps, including who else, if anyone, in the school or college should be informed and whether to pass a concern to children's social care and/or the police. In some instances, staff may be expected to support the children social care assessment process. If this is the case, the designated safeguarding lead (deputies or SDH) will support them.

### **Why is all of this important?**

20. It is important for children to receive the right help at the right time to address risks and prevent issues escalating. Research and serious case reviews have repeatedly shown the dangers of failing to take effective and immediate action. Examples of poor practice includes failing to act on and refer the early signs of abuse and neglect. What school and college staff should do if they have safeguarding concerns about another staff member who may pose a risk of harm to children.
21. If staff have safeguarding concerns about another member of staff (including volunteers, supply staff, tradespersons and visitors) they should speak to the headteacher or to another member of the school's or college's senior leadership team. What school or college staff should do if they have concerns about safeguarding practices within the school or college
22. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's or college's safeguarding regime, and know that such concerns will be taken seriously by the senior leadership team.
23. Appropriate whistleblowing procedures should be in place for concerns to be raised with the school or college's senior leadership team. Where staff feel unable to raise an issue with their employer or feel that their genuine safeguarding concerns are not being addressed NSPCC whistleblowing advice line is available.

Staff can call 0800028 0285 – 8:00 AM to 8:00 PM, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk). Alternatively, staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC), Weston House, 42 Curtain Road, London EC2A 3NH

### **Opportunities to teach safeguarding**

The Department has produced a one-stop page for teachers on GOV.UK, 'Teaching about relationships sex and health'. This includes teacher training modules on the RSHE topics and non-statutory implementation guidance.

The following resources may also help schools and colleges understand and teach about safeguarding:

- DfE advice for schools: teaching online safety in schools;
- UK Council for Internet Safety (UKCIS)32 guidance: Education for a connected world;

- UKCIS guidance: Sharing nudes and semi-nudes: advice for education settings working with children and young people;
- The UKCIS external visitors guidance will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors;
- National Crime Agency's CEOP education programme: Thinkuknow;
- Public Health England: Rise Above

## **Annex B – Further Safeguarding Information taken from KCSIE 2023**

Annex B contains important additional information about specific forms of abuse and safeguarding issues. School and college leaders and those staff who work directly with children should read this annex.

As per Part One of this guidance, if staff have any concerns about a child’s welfare, they should act on them immediately. They should follow their own organisation’s child protection policy and speak to the Designated Safeguarding Lead (or Deputy).

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children’s social care (and if appropriate the police) is made immediately.

### **Table of Contents**

- Child abduction and community safety incidents
- Children and the court system
- Children missing from education
- Children with family members in prison
- Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)
- County Lines
- Modern Slavery and the National Referral Mechanism
- Cybercrime
- Domestic Abuse
- Homelessness
- So-called ‘honour-based’ abuse (including Female Genital Mutilation and Forced Marriage)
- FGM
- Forced marriage
- Preventing radicalisation
- The Prevent duty
- Channel
- Additional Support
- Child-on-child abuse
- Sexual violence and sexual harassment between children in schools and colleges
- Upskirting
- The response to a report of sexual violence or sexual harassment
- Additional advice and support

### **Child abduction and community safety incidents**

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org).

### **Children and the court system**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children [5-11-year olds](#) and [12-17 year olds](#).

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online [child arrangements information tool](#) with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

### **Children who are absent from education**

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, 'honour'-based abuse or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their school's or college's unauthorised absence and children who are absent from education procedures.

### **Children with family members in prison**

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, [NICCO](#) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

### **Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)**

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.



Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions;
- associate with other children involved in exploitation;
- suffer from changes in emotional well-being;
- misuse drugs and alcohol;
- go missing for periods of time or regularly come home late; and
- regularly miss school or education or do not take part in education.

Children who have been exploited will need additional support to help maintain them in education.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: [Child sexual exploitation: guide for practitioners](#)

## **County lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home;
- have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’ or hotel room where there is drug activity;
- owe a ‘debt bond’ to their exploiters;
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child’s involvement in county lines is available in guidance published by the [Home Office](#).

### **Modern Slavery and the National Referral Mechanism**

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK ([www.gov.uk](http://www.gov.uk))

### **Cybercrime**

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either ‘cyber-enabled’ (crimes that can happen off-line but are enabled at scale and at speed on-line) or ‘cyber dependent’ (crimes that can be committed only by using a computer). Cyber-dependent crimes include;

- unauthorised access to computers (illegal ‘hacking’), for example accessing a school’s computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or ‘booting’. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the **Cyber Choices** programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with

regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that **Cyber Choices** does not currently cover ‘cyber-enabled’ crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: [Cyber Choices](#), [‘NPCC- When to call the Police’](#) and [National Cyber Security Centre - NCSC.GOV.UK](#)

## **Domestic abuse**

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of peer-on-peer abuse is sometimes referred to as ‘teenage relationship abuse’. Depending on the age of the young people, this may not be recognised in law under the statutory definition of ‘domestic abuse’ (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The Act’s provisions, including the new definition, will be commenced over the coming months.

## **Operation Encompass**

[Operation Encompass](#) operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school

the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website.

### **National Domestic Abuse Helpline**

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- [Refuge what is domestic violence/effects of domestic violence on children](#)
- [Safelives: young people and domestic abuse.](#)
- [Domestic abuse: specialist sources of support - GOV.UK \(www.gov.uk\)](#) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)
- [Home : Operation Encompass](#) (includes information for schools on the impact of domestic abuse on children).

### **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: [Homeless Reduction Act Factsheets](#). The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's social care will be the lead

agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The Department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation: click [here](#).

### **So-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage)**

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

#### **Actions**

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, the designated safeguarding lead (or deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on **teachers**<sup>1</sup> that requires a different approach (see following section).

#### **FGM**

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

#### **FGM mandatory reporting duty for teachers**

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers**, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should **not** be examining pupils or students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#).

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<sup>1</sup> Under Section 5B(11)(a) of the Female Genital Mutilation Act 2003, "teacher" means, in relation to England, a person within section 141A(1) of the Education Act 2002 (persons employed or engaged to carry out teaching work at schools and other institutions in England).

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out.<sup>129</sup> Unless the teacher has good reason not to, they should still consider and discuss any such case with the school's or college's designated safeguarding lead (or deputy) and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#).

Further information can be found in the [Multi-agency statutory guidance on female genital mutilation](#) and the [FGM resource pack](#) particularly section 13.

### **Forced marriage**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example.) Forced Marriage is also defined as anything done to make someone marry before they turn 18, even if there is no pressure or abuse. Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit has published [statutory guidance](#) and [Multi-agency guidelines](#), pages 32-36 of which focus on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fmf@fcdo.gov.uk](mailto:fmf@fcdo.gov.uk).

### **Preventing radicalisation**

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach. The School recognises its role in ensuring that the RSE curriculum can help children prepare for life in modern Britain. In doing this we will make use of the latest guidance that can be found at [Educate Against Hate - Prevent Radicalisation & Extremism](#)

- **Extremism**<sup>2</sup> is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces. **Radicalisation**<sup>3</sup> refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

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<sup>2</sup> As defined in the Government's Counter Extremism Strategy

<https://www.gov.uk/government/publications/counter-extremism-strategy>.

<sup>3</sup> As defined in the Revised Prevent Duty Guidance for England and Wales.

<https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales>

<sup>129</sup> Section 5B(6) of the Female Genital Mutilation Act 2003 states teachers need not report a case to the police if they have reason to believe that another teacher has already reported the case.

- **Terrorism**<sup>4</sup> is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat **must** be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

The school's or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

## **The Prevent duty**

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard<sup>5</sup> to the need to prevent people from being drawn into terrorism".<sup>6</sup> This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads and other senior leaders in schools should familiarise themselves with the revised [Prevent duty guidance: for England and Wales](#), especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). Designated safeguarding leads and other senior leaders in colleges should familiarise themselves with the [Prevent duty guidance: for further education institutions in England and Wales](#). The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

Furthermore, the Designated Safeguarding Leads should be familiar with the [Department for Education guidance and support documents](#) (October 2022) to help them understand, manage and identify radicalisation risks in their setting.

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<sup>4</sup> As defined in the Terrorism Act 2000 (TACT 2000) <http://www.legislation.gov.uk/ukpga/2000/11/contents>

<sup>5</sup> According to the Prevent duty guidance 'having due regard' means that the authorities should place an appropriate amount of weight on the need to prevent people being drawn into terrorism when they consider all the other factors relevant to how they carry out their usual functions.

<sup>6</sup> "Terrorism" for these purposes has the same meaning as for the Terrorism Act 2000 (section 1(1) to (4) of that Act).

## Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are susceptible to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

The designated safeguarding lead should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme, and have that support in place for when the child arrives.

Statutory guidance on Channel is available at: [Channel guidance](#).

## Additional support

The Department has published further advice for schools on the [Prevent duty](#). The advice is intended to complement the Prevent guidance and signposts to other sources of advice and support.

The Home Office has developed three e-learning modules:

- [1 - Awareness Course](#): an introduction to the Prevent duty; the forms of extremism and terrorism threatening the UK and development of knowledge around the risks of radicalisation and an individual's role;
- [2 - Referrals Course](#): for anyone who may need to make a Prevent referral and those who might spot a concern and share it with their DSL or an equivalent so that they can make a referral to the police;
- [3 - Channel or Prevent Multi-Agency Course](#): for Local authority Channel panel or PMAP chairs, Channel or PMAP members and anyone who may be asked to contribute to, or sit on, a Channel panel or PMAP.

[Educate Against Hate](#), is a government website designed to support school teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help school staff identify and address the risks, as well as build resilience to radicalisation.

For advice specific to further education, the Education and Training Foundation (ETF) hosts the [Prevent for FE and Training](#). This hosts a range of free, sector specific resources to support further education settings comply with the Prevent duty. This includes the Prevent Awareness e-learning, which offers an introduction to the duty, and the Prevent Referral e-learning, which is designed to support staff to make robust, informed and proportionate referrals.

The ETF Online Learning environment provides online training modules for practitioners, leaders and managers, support staff and governors/Board members outlining their roles and responsibilities under the duty.



## Peer-on-peer/ child-on-child abuse

Children can abuse other children (often referred to as peer-on-peer abuse) and it can take many forms. It **can** happen both inside and outside of school/college and online. It is important that all staff recognise the indicators and signs of peer-on-peer abuse and know how to identify it and respond to reports. This **can** include (but is not limited to): bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; consensual and non-consensual sharing of nudes and semi-nudes images and/or videos; 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; upskirting and initiation/hazing type violence and rituals. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) **can** be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

## Sexual violence and sexual harassment between children in schools and colleges

### Context

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through 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 likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

It is essential that **all** victims are reassured that they are being taken seriously and that they will be supported and kept safe. 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.

Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk.

Staff should be aware of the importance of:

- challenging inappropriate behaviours;
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and,
- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

## What is sexual violence and sexual harassment?

### Sexual violence

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way and that it can happen both inside and outside of school/college. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003<sup>7</sup> as described below:

**Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

**Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

**Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

**What is consent?**<sup>136</sup> Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

<sup>108</sup> Further information about consent can be found here: [Rape Crisis England & Wales - Sexual consent](#)

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;<sup>109</sup>
- sexual intercourse without consent is rape.

### Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is

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<sup>7</sup> [Legislation.gov.uk](http://legislation.gov.uk).

likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.<sup>139</sup> It may include:
- consensual and non-consensual sharing of nudes and semi-nudes images and/or videos.<sup>140</sup> As set out in [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) (which provides detailed advice for schools and colleges) taking and sharing nude photographs of U18s is a criminal offence;
  - sharing of unwanted explicit content, upskirting (is a criminal offence<sup>141</sup>)
  - sexualised online bullying
  - unwanted sexual comments and messages, including on social media
  - sexual exploitation; coercion and threats

### **Upskirting<sup>141</sup>**

The Voyeurism (Offences) Act 2019, which is commonly known as the Upskirting Act, came into force on 12 April 2019. ‘Upskirting’ is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any sex, can be a victim. Further information about this issue can be found at [Upskirting: know your rights - GOV.UK \(www.gov.uk\)](#)

### **The response to a report of sexual violence or sexual harassment**

The initial response to a report from a child is incredibly important. How the school or college responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. Schools and colleges not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying of some behaviours can actually lead to a culture of unacceptable behaviour. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. 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.

If staff have a concern about a child or a child makes a report to them, they should follow the referral process as set out from paragraph 55 in Part one of this guidance. As is always the case, if staff are in any doubt as to what to do they should speak to the designated safeguarding lead (or a deputy).

<sup>108</sup>[PSHE Teaching about consent](#) from the PSHE association provides advice and lesson plans to teach consent at Key stage 3 and 4.

<sup>109</sup> It is important to differentiate between consensual sexual activity between children of a similar age and that which involves any power imbalance, coercion or exploitation. Due to their additional training, the designated safeguarding lead (or deputy) should be involved and generally speaking leading the school or college response. If in any doubt, they should seek expert advice.

<sup>136</sup> It is important school and college staff (and especially designated safeguarding leads and their deputies) understand consent. This will be especially important if a child is reporting they have been raped or sexually assaulted in any way. More information: [here](#).

<sup>139</sup>[Project deSHAME](#) from Childnet provides useful research, advice and resources regarding online sexual harassment.

<sup>140</sup> Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive.

<sup>141</sup> [The Voyeurism \(Offences\) Act 2019](#) which amends the Sexual Offences Act 2003 to make upskirting a specific offence of voyeurism. The Act came into force on 12 April 2019.

## Toolkits

- [Childnet - STAR SEND Toolkit equips, enables and empowers educators with the knowledge they need to support young people with special educational needs and disabilities.](#)
- [Childnet - Just a joke? provides lesson plans, activities, a quiz and teaching guide designed to explore problematic online sexual behaviour with 9-12 year olds.](#)
- [Childnet - Step Up, Speak Up a practical campaign toolkit that addresses the issue of online sexual harassment amongst young people aged 13-17 years old.](#)
- [Preventing Harmful Sexual Behaviour toolkit by the Lucy Faithfull Foundation, the toolkit contains links to useful information, resources and support, including practical tips to prevent HSB.](#)
- [NSPCC - Harmful sexual behaviour framework](#) An evidence-informed framework for children and young people displaying HSB.
- [Contextual Safeguarding Network – Beyond Referrals - Schools](#) levers for addressing HSB in schools.

## Additional advice and support

### Abuse

- [What to do if you're worried a child is being abused – DfE advice](#)
- [Domestic abuse: Various Information/Guidance - Home Office \(HO\)](#)
- [Faith based abuse: National Action Plan - DfE advice](#)
- [Relationship abuse: disrespect nobody - Home Office website](#)
- [Tackling Child Sexual Abuse Strategy – Home Office policy paper](#)
- [Together we can stop child sexual abuse – HM Government campaign](#)

## **Bullying**

- [Preventing bullying including cyberbullying](#) - DfE advice

## **Children missing from education, home or care**

- [Children missing education](#) - DfE statutory guidance
- [Child missing from home or care](#) - DfE statutory guidance
- [Children and adults missing strategy](#) - Home Office strategy

## **Children with family members in prison**

- [National Information Centre on Children of Offenders](#) - Barnardo's in partnership with HM Prison and Probation Service

## **Child Exploitation**

- [Trafficking: safeguarding children](#) - DfE and HO guidance
- [Care of unaccompanied and trafficked children](#) – DfE statutory guidance
- [Modern slavery: how to identify and support victims](#) – HO statutory guidance

## **Drugs**

- [Drug strategy 2017](#) - Home Office strategy
- [Information and advice on drugs](#) - Talk to Frank website
- [Drug and Alcohol education — teacher guidance & evidence review](#) – PSHE Association website

## **(so called) “Honour Based Abuse” including FGM and forced marriage**

- [Female genital mutilation: information and resources](#)- Home Office guidance
- [Female genital mutilation: multi agency statutory guidance](#) - DfE, DH, and HO statutory guidance
- [Forced marriage](#) - Forced Marriage Unit (FMU) statutory guidance
- [FGM resource pack](#) – HM Government guidance

## **Health and Well-being**

- [Fabricated or induced illness: safeguarding children](#) - DfE, DH, HO
- [Rise Above: Free PSHE resources on health, wellbeing and resilience](#) - Public Health England
- [Medical-conditions: supporting pupils at school](#) - DfE statutory guidance
- [Mental health and behaviour](#) - DfE advice

## **Homelessness**

- [Homelessness: How local authorities should exercise their functions](#) - Ministry of

Housing, Communities & Local Government guidance

### **Private fostering**

- [Private fostering: local authorities](#) - DfE statutory guidance

### **Radicalisation**

- [Prevent duty guidance](#)- Home Office guidance
- [Prevent duty: additional advice for schools and childcare providers](#) - DfE advice
- [Educate Against Hate website](#) - DfE and Home Office advice
- [Prevent for FE and Training](#) - Education and Training Foundation (ETF)
- [The Prevent duty: safeguarding learners vulnerable to radicalisation](#) - GOV.UK ([www.gov.uk](http://www.gov.uk))

### **Violence**

- [Serious violence strategy](#) - Home Office Strategy
- [Factors linked to serious violence and how these factors can be used to identify individuals for intervention](#) – Home Office
- [Youth Endowment Fund](#) – Home Office
- [Gangs and youth violence: for schools and colleges](#) - Home Office advice
- [Ending violence against women and girls 2016-2020 strategy](#) - Home Office strategy
- [Violence against women and girls: national statement of expectations for victims](#) - Home Office guidance
- [Sexual violence and sexual harassment between children in schools and colleges](#) - DfE advice

## **Annex C**

### **Role of the Designated Safeguarding Lead**

#### **Purpose**

The Designated Safeguarding Lead (DSL) is a member of the Senior Management Team, who is accountable to the Headmaster and has the status and authority to carry out the duties of the post, including committing resources to safeguarding and child protection matters, and, where appropriate, directing other staff.

The DSL takes lead responsibility for safeguarding and child protection issues (including online safety and understanding the filtering and monitoring systems and processes in place), and coordinates and communicates child protection procedures as agreed by the Kent Safeguarding Children Multi-Agency Partnership (KSCMP).

The DDSLs and SDH provide cover for every aspect of this role. The DSL meets at least weekly with the DDSLs.

#### **Key Responsibilities**

To liaise with the local authority and work with other agencies in line with KSCMP, *Working Together to Safeguard Children 2018*, *Keeping Children Safe In Education 2023* and *Prevent Duty Guidance for England and Wales* (July 2015).

Has the appropriate authority to:

- raise awareness and provide advice and support to other staff and volunteers on child welfare and child protection matters;
- take part in strategy discussions and inter-agency meetings and/or support other staff to do so;
- contribute to the assessment of children.

#### **Managing referrals**

- Refer all cases of suspected abuse to the local Multi-Agency Safeguarding Hub team;
- Refer all known safeguarding allegations against a member of staff or volunteer to the area LADO;
- Support staff who make referrals to Local Authority Children's Social Care;
- Refer cases to the Channel programme where there is a radicalisation concern as required;
- Support staff who make referrals to the Channel programme;
- Refer cases to the DBS (cases where a person is dismissed or has left due to risk/harm to a child);
- Refer cases to the Police (cases where a crime may have been committed);
- Ensure that all necessary contacts and/or referrals are made promptly;
- Liaise with the Headmaster to inform him of issues, especially ongoing enquiries, under Section 47 of the Children Act 1989 and police investigations;
- Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

#### **Training**

In addition to basic child protection training, the DSL should undergo updated child protection training yearly, in order to:

- Understand the assessment process for providing early help and intervention;
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference;
- Be able to attend and contribute to case conferences and review conferences, and to contribute effectively when required to do so;
- Ensure each member of staff or volunteer can access and understands the school's Safeguarding and Child Protection policy and procedures;
- Carry out the Safeguarding and Child Protection training of new staff as part of the induction programme;
- Ensure that at least one member of any recruitment panel has had training in Safer Recruitment;
- Be alert to the specific needs of children in need, those with SEND and young carers;
- Be able to keep detailed, accurate, secure written records of concerns and referrals.

### **Raising awareness**

- Ensure the School's Policies are known and used appropriately;
- Ensure the Safeguarding and Child Protection Policy is reviewed annually and that the procedures and implementation are updated and reviewed regularly, and work with the governing body on this;
- Ensure the Safeguarding and Child Protection Policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the School in this;
- Liaise with Kent County Council Children's Services Department to make sure staff and volunteers are aware of training opportunities and the latest local policies on safeguarding;
- Where children leave the School, ensure their Child Protection file is reviewed and passed on to any new school or college as soon as possible, but transferred separately from the main student file;
- Understand and support the School with regards to the requirements of the Prevent duty and be able to provide advice and support to staff on protecting children from the risk of radicalisation;
- Obtain access to resources and attend any relevant or refresher training courses;
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

### **Understanding the views of Children**

It is important that children feel heard and understood. Therefore, designated safeguarding leads should be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them; and
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.



## Annex D

### Online Safety Information and support

There is a wealth of information available to support schools, colleges and parents/carers to keep children safe online. The following list is not exhaustive but should provide a useful starting point:

#### Advice for governing bodies/proprietors and senior leaders

- [Childnet](#) provide guidance for schools on cyberbullying;
- [Educateagainsthate](#) provides practical advice and support on protecting children from extremism and radicalisation;
- [London Grid for Learning](#) provides advice on all aspects of a school or college's online safety arrangements;
- [NSPCC](#) provides advice on all aspects of a school or college's online safety arrangements;
- [Safer recruitment consortium](#) "guidance for safe working practice", which may help ensure staff behaviour policies are robust and effective;
- [Searching screening and confiscation](#) is departmental advice for schools on searching children and confiscating items such as mobile phones;
- [South West Grid for Learning](#) provides advice on all aspects of a school or college's online safety arrangements;
- [Use of social media for online radicalisation](#) - A briefing note for schools on how social media is used to encourage travel to Syria and Iraq;
- UK Council for Internet Safety have provided advice on, and an [Online Safety Audit Tool](#) to help mentors of trainee teachers and newly qualified teachers induct mentees and provide ongoing support, development and monitoring;
- Department for Digital, Culture, Media & Sport (DCMS) [Online safety guidance if you own or manage an online platform](#) provides practical steps on how companies can embed safety into the design of their online platforms. It offers information on common platform features and functions (such as private messaging) and their risks, as well as steps that can be taken to manage that risk;
- Department for Digital, Culture, Media & Sport (DCMS) [A business guide for protecting children on your online platform](#) provides guidance to businesses on how to protect children on their online platform. It outlines existing regulatory requirements and provides best practice advice on how to protect children's personal data, ensure content is appropriate for the age of users, ensure positive user-to-user interactions and address child sexual exploitation and abuse.

## Remote education, virtual lessons and live streaming

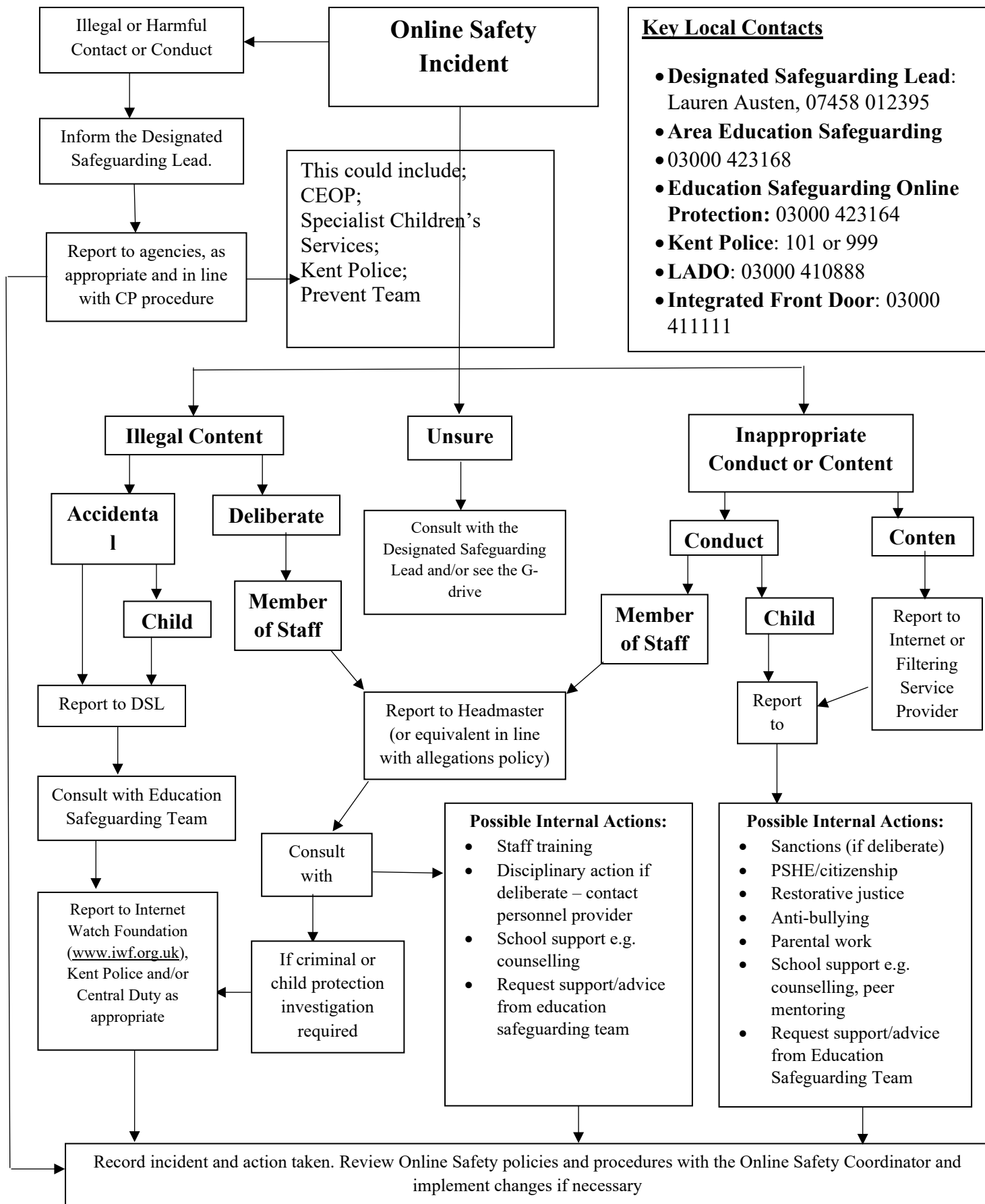
- [Case studies](#) on remote education practice are available for schools to learn from each other;
- [Departmental guidance on safeguarding and remote education](#) including planning remote education strategies and teaching remotely;
- [London Grid for Learning](#) guidance, including platform specific advice;
- [National cyber security centre](#) guidance on choosing, configuring and deploying video conferencing;
- [National cyber security centre](#) guidance on how to set up and use video Conferencing;
- [UK Safer Internet Centre](#) guidance on safe remote learning.
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## Support for children

- [Childline](#) for free and confidential advice
- [UK Safer Internet Centre](#) to report and remove harmful online content
- [CEOP](#) for advice on making a report about online abuse

## Parental support

- [Childnet](#) offers a toolkit to support parents and carers of children of any age to start discussions about their online life, to set boundaries around online behaviour and technology use, and to find out where to get more help and support;
- [Commonsensemedia](#) provide independent reviews, age ratings, and other information about all types of media for children and their parents;
- [Government advice](#) about protecting children from specific online harms such as child sexual abuse, sending nudes, and cyberbullying;
- [Government advice](#) about security and privacy settings, blocking unsuitable content, and parental controls;
- [Internet Matters](#) provide age-specific online safety checklists, guides on how to set parental controls on a range of devices, and a host of practical tips to help children get the most out of their digital world;
- [Let's Talk About It](#) provides advice for parents and carers to keep children safe from online radicalisation;
- [London Grid for Learning](#) provides support for parents and carers to keep their children safe online, including tips to keep primary aged children safe online;
- [Stopitnow](#) resource from [The Lucy Faithfull Foundation](#) can be used by parents and carers who are concerned about someone's behaviour, including children who may be displaying concerning sexual behaviour (not just about online);
- [National Crime Agency/CEOP Thinkuknow](#) provides support for parents and carers to keep their children safe online;
- [Net-aware](#) provides support for parents and carers from the NSPCC and O2, including a guide to social networks, apps and games;
- [Parentzone](#) provides help for parents and carers on how to keep their children safe Online;
- [Parent info](#) from Parentzone and the National Crime Agency provides support and guidance for parents from leading experts and organisations;
- [UK Safer Internet Centre](#) provide tips, advice, guides and other resources to help keep children safe online.



## Annex E

### Child abuse definition and possible signs

Child abuse is maltreatment of a child. Someone, an adult or a child, may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm.

Children may be abused within an extended family or in an institutional or community setting by those known to them, or by others, such as via the internet.

Child abuse can encompass but is not restricted to:

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

**Emotional abuse** - the persistent emotional maltreatment of a child, such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless and unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may involve interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Sexual abuse** - involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact or non-contact activities including grooming a child in preparation for abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual exploitation involves varying degrees of coercion, intimidation or enticement. It includes unwanted pressure from peers to have sex, involving children in the looking at or production of, sexual images, sexual bullying including cyberbullying and grooming (including via the internet). However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

**Neglect** - the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may involve a parent or carer failing to protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care and treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Financial Abuse

Modern Slavery

Domestic Abuse

Bullying and Cyberbullying

Psychological Abuse

Organisational Abuse

Self neglect

Discriminatory Abuse

### **Possible signs of abuse:**

- Absconding or running away;
- Delay in seeking medical attention;
- No explanation or inadequate explanation of injuries;
- Changing explanation of injuries;
- Recurrent injuries - particularly if forming a pattern (e.g. always on a particular day or in the care of the same person);
- Inadequate parental concern;
- Multiple injuries that occurred at different dates;
- Bruises;
- Burns and scalds;
- Bites and large and deep scratches;
- Incisions from sharp objects;
- Finger marks or grasp marks (from slapping or coercion);
- Lesions and cuts;
- Unexplained soreness, bleeding or injury to the genital or anal area;
- Sexually explicit play and behaviour;
- Mimicking learnt (sexual) behaviour;
- Aggressive behaviour (to self and others);
- Sexually precocious behaviour and prostitution;
- Solvent or alcohol or drug abuse;
- Anorexia and bulimia;
- Self-harming and suicide attempts;
- Sexual abuse of other children;
- Sexually transmitted diseases;
- Compulsive masturbation;
- Changes in school performance;
- Isolation from peers;
- Eating and sleeping problems;
- Withdrawn or over-active states.

All members of staff at Sutton Valence School should be aware of the signs and symptoms of abuse.

For further information, refer to <https://www.nspcc.org.uk/>

## Annex F

### Key contact details:

<b>Safeguarding Role</b>	<b>Name</b>	<b>Position at the School</b>	<b>Contact Details</b>
Designated Safeguarding Lead (DSL)	Ms Lauren Austen	Assistant Head - Safeguarding	07458012395 01622 845247 <a href="mailto:austenl@svs.org.uk">austenl@svs.org.uk</a>
Deputy Designated Safeguarding Lead (DDSL)	Mrs Maja Trachonitis	Assistant Head – Wellbeing	07458 046296 01622 845223 <a href="mailto:trachonitism@svs.org.uk">trachonitism@svs.org.uk</a>
Deputy Designated Safeguarding Lead (DDSL)	Mr Steven Head	Head of Boarding Compliance	07703 567134 <a href="mailto:heads@svs.org.uk">heads@svs.org.uk</a>
Senior Deputy Headmaster	Mr Jeremy Farrell	Senior Deputy Headmaster	077200 38252 <a href="mailto:farrellj@svs.org.uk">farrellj@svs.org.uk</a>
Safeguarding Governor	Mr Roy Blackwell	School Governor	<a href="mailto:blackwellr@svs.org.uk">blackwellr@svs.org.uk</a>
Safeguarding Governor	Dr Michael Heber	School Governor	<a href="mailto:heberm@svs.org.uk">heberm@svs.org.uk</a>
Independent Listener	Mrs Mary Hall	Volunteer	<a href="mailto:halltheresemary@gmail.com">halltheresemary@gmail.com</a>
Chair of Governors	Mrs Gillian Swaine	Chair of Governors	<a href="mailto:COG@svs.org.uk">COG@svs.org.uk</a>

Key External Agencies, Services and Professionals' Contact details



## Education Safeguarding Service Contacts

Head Office: Sessions House, County Hall, Maidstone, Kent ME14 1XQ	
Claire Ray Head of Service	03000 423169
Rebecca Avery Training & Development Manager	03000 423168
Robin Brivio Senior Safeguarding Advisor	03000 423169
Online Safety	03000 423164
<p>For advice on safeguarding issues please call your area office on the numbers listed below.</p> <p>If a child may be at risk of <b>imminent harm</b>, you should call the <b>Integrated Front Door on 03000 411111</b> or the <b>Police on 999</b></p>	
Maidstone	03000 423158

### Other Key Kent Contacts

Integrated Front Door: 03000 411111 (outside office hours 03000 419191)  
 Early Help Contacts (district teams) can be found on [www.kelsi.org.uk](http://www.kelsi.org.uk)

LADO Team contact number: 03000 [410888](tel:03000410888)  
 If your call is urgent i.e. a child is in **immediate danger** and you cannot be connected to the team you should call the Integrated Front Door on  
 03000 41 11 11  
 Email: [kentchildrenslado@kent.gov.uk](mailto:kentchildrenslado@kent.gov.uk)

Kroner House, Eurogate Business Park, Ashford, Kent, TN24 8XU

Area Education Officers

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South Kent – David Adams 03000 410199

East Kent – Marisa White 03000 418794
West Kent – Nick Abrahams 03000 410058
North Kent – Ian Watts 03000 414302
<b>Prevent Education Officers</b>
North/West/ Medway - Sally Green <a href="mailto:sally.green2@kent.gov.uk">sally.green2@kent.gov.uk</a> 03000 413439
South/East - Jill Allen <a href="mailto:jill.allen@kent.gov.uk">jill.allen@kent.gov.uk</a> 03000 413585

Childline	0800 1111
Child Sexual Exploitation	<a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a> 0808 800 5000
Crimestoppers	0800 555111
Emergency services	999
FGM	0800 028 3550
Forced Marriage Unit	020 7008 0151 <a href="mailto:fm@fco.gov.uk">fm@fco.gov.uk</a>
For Non-emergency advice: contact the DfE dedicated helpline	020 7340 7264 or mailbox on: <a href="mailto:counter-extremism@education.gsi.gov.uk">counter-extremism@education.gsi.gov.uk</a>
NSPCC FGM free phone helpline	0800 028 3550
Police non-emergency	101
Report online terrorist activity	<a href="https://www.gov.uk/report-terrorism">https://www.gov.uk/report-terrorism</a>



Report suspected extremism online	<a href="https://www.gov.uk/report-suspicious-activity-to-mi5">https://www.gov.uk/report-suspicious-activity-to-mi5</a>
The NSPCC Whistleblowing Advice Line	0800 028 0285

## Annex G

### Low Level Concern

Please use this form to share any concern no matter how small and even if no more than causing a sense of unease or ‘nagging doubt’ that an adult’ at Sutton Valence School has acted in a way that is:

- is inconsistent with the School’s expectations on staff’s conduct, including inappropriate conduct outside of work; and
- does not meet the allegation threshold or is otherwise not serious enough to consider a referral to the LADO.

You should provide a concise and factual record including brief context in which the low-level concern arose, and details which are chronological, precise and as accurate as possible of any such concern and relevant incident(s). Please use a separate sheet if necessary.

Unless there is a good reason for anonymity, please provide your details at the bottom of the form, and sign/date it. Please return completed forms to the Headmaster.

Name(s) of  
relevant staff  
member(s):

Department and  
role of relevant  
staff member(s):

Detail of concern:

[please attach  
additional sheets  
as needed]

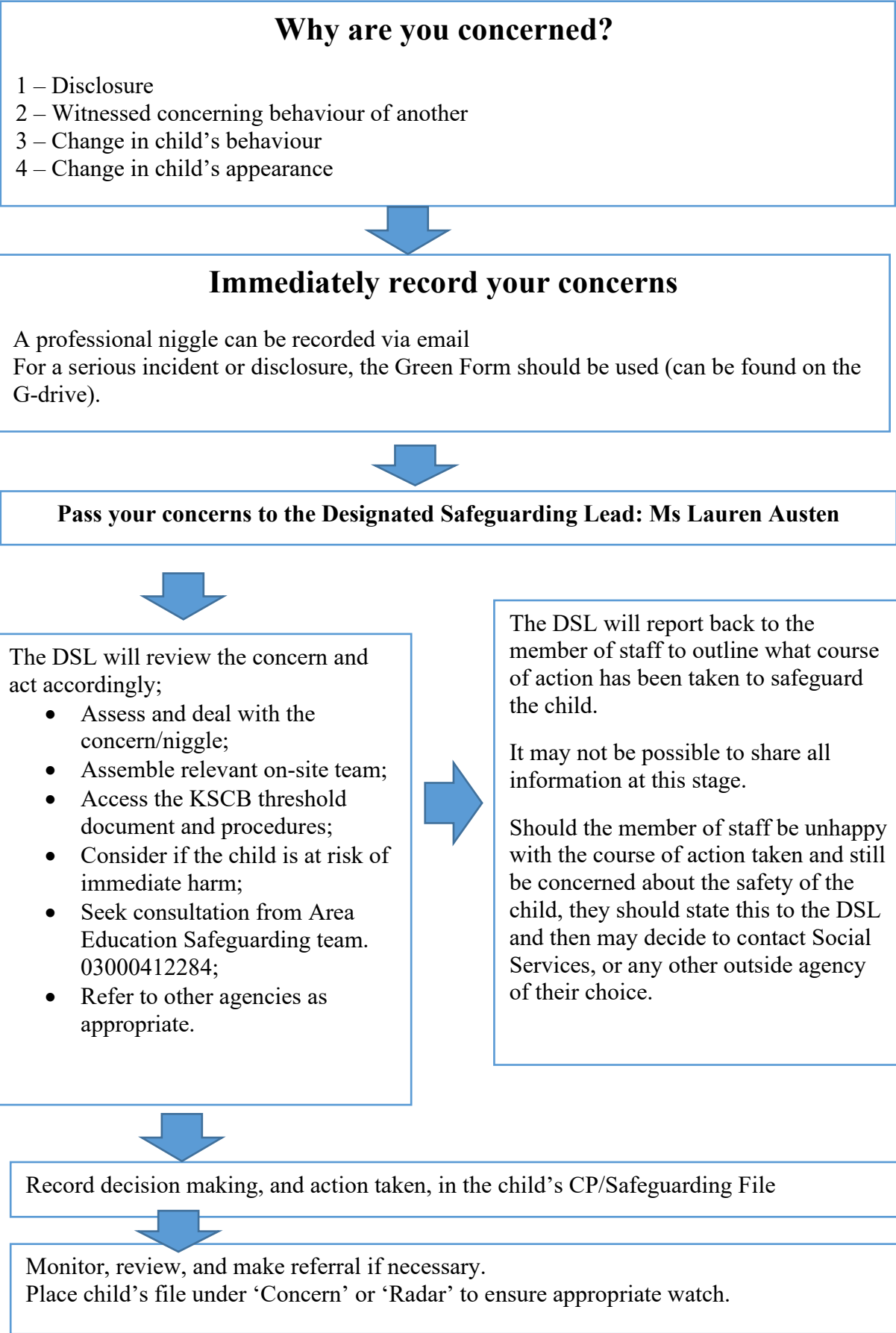
Name(s) of any  
children  
concerned:

*Unless you have a good reason to remain anonymous, please supply  
your details below:*

Name of  
reporting staff  
member:

Date:

Signature:



**Annex H**



**The Green Form**

**Safeguarding Incident/Concern Form**

<b>Pupil Name</b>	<b>Date of Birth and Year Group</b>
<b>Name and position of person completing form (please print)</b>	
<b>Date of Incident/Concern (dd mm yy)</b>	
<b>Incident/Concern (who, what, where, when)</b>	
<b>Any other relevant information (witnesses, immediate action taken)*</b>	
<b>Action taken*</b>	
<b>Signature</b>	<b>Date form completed (dd mm yy)</b>
.....	
<small>*Continue on a separate sheet if necessary</small>	

## ANNEX I

### New Pupil protocol (when joining mid-term)

New pupils arriving mid-term should only be allowed to arrive in School on Mondays with boarders arriving on Sunday nights.

Ser	Action	Responsible	Remarks	Completed (date & initials)
<b>Prior to arrival</b>				
1	Option choices confirmed and parents advised by letter to download required apps and software prior to arrival as advised by GJM.	Admissions to liaise with Academic Deputy Head and GJM		
2	All pupil information forms, full contact details and medical forms are completed and submitted to School.	Admissions to liaise with Mel Horley and School Nurses. Nurses to liaise with pastoral teams as necessary. When pupil is on ISAMs, CJK to complete timetable liaising with HODs Maths and English as necessary.		
3	Contact with previous school should be made prior to joining with regard to any safeguarding concerns	DSL with Mrs Edwards		
4	Tutor and House to be allocated.  Welcome letter sent by HSMs	Deputy Headmaster  HSMS	Letter introducing themselves and providing contact details and pen portrait of tutor	
5	Pupil is allocated to relevant MS Teams and One Note Notebooks prior to arrival	RKB to liaise with ICT Support.		
<b>Arrival date confirmed</b>				
6	Admissions to circulate new pupil details including arrival date to all SMT.	Admissions	Arrival day to be Mondays or Sunday evening for boarders	

7	Pupil and parents to arrive at 8.25 am and report to Reception. HSM and buddy greet.	Admissions to liaise with Tutor and HSM	First day should always be a Monday. Admissions to make it clear that the pupils must bring their laptop/device on day one.	
8	HSM and Tutor meet pupil and parents during tutor time and Chapel	Tutor (HSM)		
9	Tutor to tour new pupil and take to ICT Bunker during chapel, Photo taken for iSAMS. At the same time HSM meets with parents to discuss success criteria / relevant background	Bunker /ICT/Admissions		
10	Tutor to take new pupil to P2	Tutor		
11	Buddy to take pupil to next lessons and collect at break	Tutor		
12	Tutor to contact home at the end of first week to check progress	Tutor		

Author: Ms Lauren Austen

Policy Date: September 2023

Approval Date by Governors:

Review Date: September 2024 or earlier if further updates required