



Cleves School  
Learning Together

# Child Protection and Safeguarding Policy 2025/6

Reviewed	September 2025
Reviewed by	The Children's Achievement and Well Being Committee on behalf of Cleves School Board of Trustees
Approved by	Board of Trustees
Created by	Hugh Thomas
Revised by	Hugh Thomas
Guidance referenced	Surrey County Council Schools Child Protection and Safeguarding Policy Template - September 2025 DfE guidance: <a href="#">Keeping children safe in education</a> NGA guidance: <a href="#">safeguarding for governing boards</a>
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## 1. Safeguarding Statement 2025

'Safeguarding is Everyone's Business' we recognise our moral and statutory responsibility to safeguard and promote the welfare of all children.

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

The purpose of this policy is to provide staff, volunteers and Cleves School Academy Trust trustees with the framework they need in order to keep children safe and secure in our school. [This includes how we protect children from experiencing harm and how we should respond when we suspect or confirm that a child is being harmed.](#) The policy also informs parents and carers how we will safeguard their children whilst they are in our care.

<b>Key Personnel</b>
<b>The Designated Safeguarding Lead (DSL) is:</b> Natasha Green Contact details: email: <a href="mailto:ngreen@cleves.co.uk">ngreen@cleves.co.uk</a> Telephone: 01932224300
<b>The deputy DSL(s) are:</b> Hugh Thomas, Rebecca Cannell Rebecca Flaherty and Michele Taylor Contact details: email: <a href="mailto:ngreen@cleves.co.uk">ngreen@cleves.co.uk</a> ; <a href="mailto:hthomas@cleves.co.uk">hthomas@cleves.co.uk</a> ; <a href="mailto:rcannell@cleves.co.uk">rcannell@cleves.co.uk</a> ; <a href="mailto:rflaherty@cleves.co.uk">rflaherty@cleves.co.uk</a> ; <a href="mailto:mtaylor@cleves.co.uk">mtaylor@cleves.co.uk</a> Telephone: 01932 224300
<b>The nominated child protection trustee is:</b> Adam Abbott-Watkins Contact details: email: <a href="mailto:awatkins@cleves.co.uk">awatkins@cleves.co.uk</a>
<b>The Acting Headteacher is:</b> Natasha Green Contact details: email: <a href="mailto:ngreen@cleves.co.uk">ngreen@cleves.co.uk</a> Telephone: 01932224300
<b>The Chair of Trustees is:</b> Susan Foster Contact details: email: <a href="mailto:chair@cleves.co.uk">chair@cleves.co.uk</a>
<b>The person to liaise with the Local Authority Designated Officer (LADO) re: any allegations about the Headteacher is:</b> Doris Neville-Davies Contact details: email: <a href="mailto:dneville-davies@cleves.co.uk">dneville-davies@cleves.co.uk</a>

## 2. Terminology

**Keeping Children Safe in Education (KCSIE)** defines **Safeguarding** as the process for protecting children from harm and abuse, whether that is within or outside the home, as well as online. This includes:

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

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

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

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

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

**Social Care** refers to Children's Services in the area in which the child is resident, unless a child is a Looked After Child then this will be the Children's Services in their home authority. (Child looked after (CLA) used internally in Surrey County Council rather than looked after child)

**MAP** refers to the Surrey Multi-Agency Partnership.

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

**DSL** where appropriate also refers to Deputy Designated Safeguarding Lead (DDSL)

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

**The Surrey Safeguarding Partnership** has three partners:

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

### Children's Services

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

Anyone can contact the C-SPA about a child, young person or parent/carer who needs support in Surrey. This could be a concern about how the child is developing, issues that the parent or carer is

experiencing, or you suspect a child is being neglected or subjected to physical, sexual, or emotional abuse.

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

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

If it is not an emergency, but there is a concern that a child is at risk, C-SPA should be contacted by phone on 0300 470 9100 or 03311 435554.

Requests for support should be sent securely by email to [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk) using the [Request for Support Form](#).

If you have children attending your school from other local authorities, you may wish to also include their contact details here - this government website will help identify which local council to report child abuse to and their contact details: [Report child abuse to a local council - GOV.UK](#).

### **Emergency Duty Team (EDT)**

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

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

Phone: 01483 517898

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

### **Local Authority Designated Officer (LADO)**

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

The LADO can be contacted by:

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

Telephone: 0300123 1650 option 3

Online: [LADO Referral Form](#)

## **3. Introduction**

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

All action taken by Cleves School Academy Trust will be in accordance with statutory, national, and local guidance – this includes:

- [Working Together to Safeguard Children 2023](#) which sets out the multi-agency working arrangements to safeguard and promote the welfare of children and young people and protect them from harm; in addition, it sets out the statutory roles and responsibilities of settings.
- [‘What to do if you are Worried a Child is Being Abused’ 2015 - Advice for Practitioners.](#)
- [Keeping Children Safe in Education \(KCSIE, 2025\)](#) is statutory guidance issued by the Department for Education (DfE) which all schools and colleges must have regard to when carrying out their duties to safeguard and promote the welfare of children.
- [Relationships and sex education \(RSE\) and health education - GOV.UK](#) which is statutory guidance from the Department for Education issued under Section 80A of the Education Act 2002 and section 403 of the Education Act 1996.
- [Local Guidance from the Local Safeguarding Partnership: Surrey Safeguarding Children Partnership \(SSCP\) including SSCP Procedures.](#)

This policy applies to all members of staff and Cleves School Academy Trust Academy trustees.

Guidance and documents referred to in this policy:

- [Surrey Safeguarding Children Partnership protocols, guidance and procedures](#)
- [Working Together to Safeguard Children 2023](#)
- [Keeping Children Safe in Education 2025](#)
- [Disqualification under the Childcare Act 2006 \(updated 2019\)](#)
- [FGM Act 2003 Mandatory Reporting Guidance 2015 \(updated January 2020\)](#)
- [‘What to do if you are worried a child is being abused’ 2015](#)
- [Teachers' standards](#)
- [Information sharing: advice for practitioners providing safeguarding services](#)
- [The Equality Act 2010](#)
- [Early years foundation stage \(EYFS\) statutory framework](#)
- Surrey County Council Safeguarding Children Missing Education (CME) and Educated Other Than at School (EOTaS)
- Surrey County Council Touch and The Use Of Physical Intervention When Working With Children And Young People

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

- Recruitment and Selection
- Whistleblowing
- Code of Conduct
- Behaviour
- E-Safety/Online Safety
- Attendance
- Health & Safety.

#### **4. Equalities Statement**

We will consider our duties under the [Equality Act 2010](#) and our general and specific duties under the [Public Sector Equality Duty](#). General duties include to:

- Eliminate discrimination, harassment, victimisation, and other conduct that is prohibited by the Equality Act 2010.
- Advance equality of opportunity between people who share a protected characteristic and people who do not share it.
- Foster good relations across all protected characteristics between people who share a protected characteristic and people who do not share it.

Details of our specific duties are published under Cleves School Academy Trust equality statement and measurable objectives ( [Cleves School Academy Trust website - Policies](#)).

Staff are aware of the additional barriers to recognising abuse and neglect in children with Special Educational Needs and Disabilities (SEND). This is reflected in our [Special Educational Needs and Disability Policy](#).

Cleves School Academy Trust also adheres to the principles of, and promotes anti-oppressive practice in line with, the [United Nations Convention of the Rights of the Child](#) and the [Human Rights Act 1998](#).

## **5. Policy Aims**

The aims of the procedures described in the policy are:

- To provide staff with the framework to promote and safeguard the wellbeing of children and in doing so ensure they meet their statutory responsibilities.
- To ensure consistent good practice across Cleves School Academy Trust and ensure that safeguarding follows a whole setting approach.
- Clarifying safeguarding expectations for members of the Cleves' community, staff, Governing Board, children and their families.
- Contributing to the establishment of a safe, resilient, and robust safeguarding culture in Cleves School Academy Trust built on shared values; that children are treated with respect and dignity, taught to treat each other and staff with respect, feel safe, have a voice and are listened to.
- Supporting contextual safeguarding practice recognising that Cleves can be a location where harm can occur.
- Setting expectations for developing knowledge and skills within Cleves' community (staff, children, parents/carers) to the signs and indicators of safeguarding issues and how to respond to them.
- Early identification of need for vulnerable learners and provision of proportionate interventions to promote their welfare and safety.
- Working in partnership with children, parents/carers, and other agencies in the Surrey Safeguarding Children's Partnership.

## **6. Policy Principles and Values**

- The welfare of the child is paramount.
- Maintain an attitude of "It could happen here".
- Maintain a "zero-tolerance" approach to sexual violence and sexual harassment.
- Children have a right to feel safe and secure, they cannot learn effectively unless they do so.
- All children have a right to be protected from harm and abuse.

- All staff have a role in the prevention of harm and abuse and an equal responsibility to act immediately on any suspicion or disclosure that may indicate a child is at risk of harm, either in Cleves School Academy Trust or in the community, taking into account contextual safeguarding, in accordance with statutory guidance.
- We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working to protect and safeguard children.
- Whilst Cleves School Academy Trust will work openly with parents/carers as far as possible, it reserves the right to contact social care or the police, without notifying parents/carers if this is believed to be in the child's best interests.
- We will always act in the best interests of the child and ensure that our decisions around safeguarding take a child-centred and coordinated approach.

## **7. Supporting Children**

### **Cleves School Academy Trust will support all children**

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

### **Cleves School Academy Trust will:**

- Promote a caring, safe and positive environment within the school.
- Encourage self-esteem and self-assertiveness, through the curriculum and through positive relationships within the Cleves community.
- Ensure children are taught to understand and manage risk through Personal, Social, Health and Economic (PSHE) education and Relationship and Sex Education (RSE) and Health Education through all aspects of school life, including staying safe online.
- Respond sympathetically to any requests for time out to deal with distress and/or anxiety.
- Ensure children are made aware of and have access to details of helplines, counselling, or other avenues of external support.
- Liaise and work in partnership with other support services and agencies involved in early help and the safeguarding of children.
- Establish and maintain an ethos where children feel safe and secure, are encouraged to talk and are always listened to.
- Include regular consultations with children e.g. through questionnaires, participation in anti-bullying activity, asking children to report whether they feel safe in the setting.
- Ensure that all children know they can access a trained adult in Cleves School Academy Trust whom they can approach if they are worried or in difficulty.
- Include safeguarding across the curriculum, including PSHE opportunities which equip children with the skills they need to keep themselves and others safe, including online and to know to whom they should turn to for help. It is also recognised that effective education will be tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special education needs or disabilities.
- Provide preventative education by creating a culture of zero tolerance for sexism, misogyny/ Misandry, homophobia, biphobia and sexual violence and sexual harassment. Please refer to the Cleves [school values](#) and the [behaviour policy](#).
- Ensure all staff are aware of Cleves' guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.

- Notify social care without delay if there is an immediate risk of significant harm.
- Provide continuing support to children about whom there have been concerns and who leave Cleves School Academy Trust by ensuring that information is shared confidentially with the child's new setting.
  - Cleves School Academy Trust will ensure records are forwarded as a matter of priority and within statutory timescale.
  - The designated safeguarding lead will consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

Cleves School Academy Trust recognises it plays a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection.

## **8. Professional expectations, roles, and responsibilities**

### **Cleves' role**

Cleves School Academy Trust will ensure that:

- Details of the DSL and DDSL are available on the Cleves School Academy Trust website, in the newsletter, on the notice board in reception and around the school.
- It operates safer recruitment procedures in line with KCSIE 2025 which includes statutory checks on the suitability of staff to work with children.
- All staff receive information about Cleves School Academy Trust's safeguarding arrangements, its safeguarding statement, staff behaviour policy code of conduct), Safeguarding and Child Protection policy, the role and names of the Designated Safeguarding Lead (DSL) and their Deputy Designated.
- Safeguarding Lead (DDSL), and [Keeping Children Safe in Education 2025](#) part 1 or the condensed version of it in annex A (dependent on their role). All staff will sign to say they have read and understood it. This applies to the Governing Board in relation to part 2 of the same guidance.
- All staff receive safeguarding and child protection training (including online safety) at induction in line with advice from [SSCP](#). Training is regularly updated as required, and at least annually to continue to provide them with relevant skills and knowledge to safeguard children effectively.

All members of staff are trained in and receive regular updates in online safety and reporting concerns. All teachers should be fully aware of how these systems work, and Cleves will make sure that this is part of the start-of-year safeguarding training in September.

- Staff should ensure that they are periodically reiterating to the students the importance of bearing in mind the school's systems.
- All members of staff maintain a zero-tolerance approach to sexual violence and sexual harassment. All staff and Trustees have regular safeguarding and child protection awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse.
- The Safeguarding and Child Protection Policy is made available via Cleves School Academy Trust website and a paper copy is available upon request for parents/carers.
- All parents/carers are made aware of the responsibilities of staff members with regard to safeguarding and child protection procedures.
- Provide a coordinated offer of early help when additional needs of children are identified and contribute to early help arrangements and inter-agency working and plans.
- Cleves School Academy Trust's lettings policy seeks to ensure the suitability of adults working with children on Cleves' site at any time and ensure that any groups who use Cleves' premises have Safeguarding and Child Protection policies and procedures in place.
- Community users organising activities for children are aware of Cleves' Safeguarding and Child Protection Policy, guidelines and procedures.
- The names of the designated members of staff for safeguarding and child protection, the DSL and DDSL(s), are clearly advertised in the school.

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

- Maintain an attitude of "It could happen here" with regards to safeguarding.
- Understand that safeguarding is everyone's responsibility.
- Maintain a "zero-tolerance" approach to sexual violence and sexual harassment.
- All staff will sign, read and understand Part 1 of statutory guidance KCSIE (2025). Those working directly with children will also read Annex B
- In addition to this all staff will be aware of the systems in place which support safeguarding including reading this Safeguarding and Child Protection Policy; the Behaviour Policy; the Staff Code of Conduct; safeguarding response to children who go missing from education; and the role of the DSL.
- Know who and how to contact the DSL and DDSL, the Chair of Trustees and the Trustee responsible for safeguarding.
- Be aware of indicators of abuse and neglect understanding that children can be at risk of harm inside and outside of Cleves, inside and outside of home and online. Exercising professional curiosity and knowing what to look for

is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

- Be able to identify vulnerable learners and take action to keep them safe. Information or concerns about learners will be shared with the DSL where it includes those:
  - who may need a social worker and may be experiencing abuse or neglect
  - requiring mental health support
  - may benefit from early help
  - where there is a radicalisation concern
  - where a crime may have been committed.
- Provide a safe environment in which children can learn.
- Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to.
- Ensure children know that there are adults in Cleves School Academy Trust who they can approach if they are worried or have concerns.
- All staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Ensure only appropriately trained professionals attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- Take immediate action if they have a mental health concern about a child that is also a safeguarding concern, following our Safeguarding and Child Protection Policy and procedures.
- Plan opportunities within the curriculum for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe.
- Attend training in order to be aware of and alert to the signs of abuse and neglect.
- Know how to respond to a child who discloses harm or abuse following training of 'Working Together to Safeguard Children' (2023), and 'What to do if you are worried a child is being abused' (2015).
- Record their concerns if they are worried that a child is being abused and report these to the DSL immediately that day. If the DSL is not contactable immediately a DDSL should be informed.
- Be prepared to refer directly to the Children's Single Point of Access (C-SPA), and the Police if appropriate, if there is a risk of significant harm and the DSL or their DDSL is not available.
- Follow the allegations procedures, as set out in this policy and KCSIE 2025, if the disclosure is an allegation against a member of staff, supply staff, volunteer or contractor.

- Report low-level concerns (as defined in KCSIE 2025) about any member of staff/supply staff/volunteer or contractor to the Headteacher who will follow all guidance [Surrey LADO guidance](#) in response.
- Provide support for children subject to early help, child in need or child protection and be involved, where appropriate, in the implementation of individual plans to further safeguard vulnerable learners and understand their academic progress and attainment and maintain a culture of high aspirations for this cohort.
- A member of staff who is approached by a child should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they need to pass information to other professionals to help keep the child and/or other children safe. The degree of confidentiality should always be governed by the need to protect the child.
- Notify the DSL or their DDSL of any child on a child protection plan or child in need plan who has unexplained absence.
- Understand early help and be prepared to identify and support children who may benefit from early help. Liaise with other agencies that support children and provide early help.
- Be aware that children may not feel ready or know how to someone they are being abused, exploited, or neglected, and/or they may not recognise these experiences as harmful. This could be due to their vulnerability, disability and/or sexual orientation or language barriers.
- Be mindful that the Teacher Standards states that teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

### **The Headteacher**

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

- Cleves School Academy Trust fully contributes to inter-agency working in line with Working Together to Safeguard Children (2023) guidance.
- The Safeguarding and Child Protection Policy and procedures are implemented and followed by all staff.
- That Cleves School Academy Trust has appropriate policies in place that make it clear that sexual harassment, online sexual abuse and sexual violence (including sexualised language) is unacceptable, with appropriate sanctions and support in place.
- That Cleves' staff have appropriate knowledge of KCSIE (2025) part 5.
- That all children are supported to report concerns about harmful sexual behaviour freely. That concerns are taken seriously and dealt with swiftly and appropriately, and children are confident that this is the case. Comprehensive records of all allegations are kept.
- All staff are aware of the role of the DSL, including the identity of the DSL and any DDSLs.

- Sufficient time, training, support, funding, resources, including cover arrangements where necessary, is allocated to the DSL to carry out their role effectively, including the provision of advice and support to Cleves' staff on safeguarding and child protection matters, to take part in strategy discussions/meetings and other inter-agency meetings and/or support other staff to do so; and to contribute to the assessment of children.
- Opportunities are provided for a co-ordinated offer of early help when additional needs of children are identified.
- That DDSLs are trained to the same standard as the DSL and the role is explicit in their job description.
- Adequate and appropriate DSL cover arrangements are in place for any out of hours/out of term activities.
- Where there is a safeguarding concern that the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Child-centred systems and processes are in place for children to express their views and give feedback.
- All staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle-blowing procedures.
- Children are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online
- That allegations or concerns against staff and other adults are dealt with in accordance with guidance from the DfE, SSCP and Surrey County Council (SCC).
- That statutory requirements are met to make a referral to the Disclosure and Barring Service and additionally in the case of teaching staff the Teacher Regulation Agency where they think an individual has engaged in conduct that harmed (or is likely to harm) a child; or if the person otherwise poses a risk of harm to a child.
- Record low-level concerns in cases which concern a member of staff/supply staff/contractor or a volunteer. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that will be respected as far as reasonably possible.

### **The Designated Safeguarding Lead**

(Duties are further outlined in KCSIE [\(2025, Annex C\)](#))

Details of the DSL and DDSL are available in the Cleves School Academy Trust website, our newsletter, notice board in reception.

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

- Hold the lead responsibility for safeguarding and child protection - including online safety and understanding the filtering and monitoring systems in place – in the school, this responsibility is not able to be delegated. This should be explicitly included in their job description.
- Liaise with the Surrey County Council in partnership with other agencies in line with Working Together to Safeguard Children (2023).
- Where necessary contact Surrey's Child Protection Consultation Line for advice and support (0300 470 9100 option 3).
- Manage and submit a Request for Support Form for a child if there are concerns about suspected harm or abuse, to the C-SPA, and act as a point of contact and support for Cleves' staff. Requests for support should be sent securely by email to [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk) using the [Request for Support Form](#) urgent referrals should be made by telephone 0300 470 9100 or 03311 435554.
- Report concerns that a child may be at risk of radicalisation or involvement in terrorism, use the [Prevent referral form](#) to refer cases by e-mail to [preventreferrals@surrey.pnn.police.uk](mailto:preventreferrals@surrey.pnn.police.uk) . If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101 or 07795 043842 or 01865 555618 and ask to speak to the Prevent Supervisor for Surrey. The DfE has also set up a dedicated telephone helpline for staff and Governors/Proprietors/management committees to raise concerns around Prevent (020 7340 7264).
- Refer cases where a crime may have been committed to the Police as required. NB: NPCC-[When to call the police](#) should help DSLs understand when they should consider calling the Police and what to expect when they do.
- Liaise with the "case manager" and Local Authority Designated Officer (LADO) for child protection concerns in cases which concern a member of staff/supply staff/contractor or a volunteer.
- Follow relevant DfE guidance and KCSIE 2025 on 'Child on Child abuse' when a concern is raised that there is an allegation of a child abusing another child within the school.
- When there has been a report of sexual violence, make an immediate risk and needs assessment. Additionally, where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis and will be put in place as required.
- Be available during term time (during school hours) for staff in Cleves to discuss any safeguarding concerns. Appropriate and adequate cover arrangements will be arranged by the DSL and Cleves School Academy Trust leadership for any out of hours/term activities.
- Act as a source of support and expertise in carrying out safeguarding duties for the whole school community.
- Ensure that the names of the DSL and DDSL, are clearly advertised, with a statement explaining the school's role in referring and monitoring cases of suspected abuse.

- Encourage and promote a culture of listening to children and taking account of their wishes and feelings, amongst all staff.
- Access training and support to ensure they have the knowledge and skills required to carry out the role.
- Have a secure working knowledge of SSCP procedures and understand the assessment process for providing early help and statutory intervention, in line with [Surrey's Effective Family Resilience levels of need document](#).
- Have a clear understanding of access and referral to the local early help offer and will support and advise members of staff where early help intervention is appropriate.
- Have a working knowledge of how Surrey County Council conduct an initial child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Understand the lasting impact that adversity and trauma can have, including on the children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes.
- Understand and support the school's delivery with regards to the requirements of the Prevent duty and provide advice and guidance to staff on protecting children from radicalisation.
- Liaise with school staff (especially pastoral support, behaviour leads, Cleves' health colleagues and the SENDCO) on matters of safety and safeguarding and consult Surrey's Effective Family Resilience document to inform decision making and liaison with relevant agencies.
- Be alert to the specific needs of children in need, those with Special Educational Needs and Disability (SEND) and young carers.
- Understand the risks associated with online activity and be confident that they have the up-to-date knowledge and capability to keep children safe whilst they are online at the school; in particular understand the additional risks that children with SEND face online and the associated and appropriate support they require.
- The DSLs should understand the level of filtering and monitoring that happens in Cleves and should "block harmful and inappropriate content without unreasonably impacting teaching and learning".
- DSL training should be updated at least every two years and their knowledge and skills refreshed at regular intervals but at least annually.
- Work with the Headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at the school.
- Keep up to date, detailed, accurate records on CPOMS that include all concerns about a child even if there is no need to make an immediate referral and record the rationale for decisions made and action taken.

- Ensure that an indication of the existence of the additional safeguarding/child protection file is marked on the child's main file record.
- Ensure that when a child transfers (including in-year), their safeguarding/child protection file is passed to the new setting as soon as possible, and within five days for an in-year transfer or within the first five days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.
- If the transit method requires that a copy of the safeguarding/child protection file is retained until such a time that the new school acknowledges receipt of the original file, the copy should be securely destroyed on confirmation of receipt.
- Ensure that where a child transfers and is on a child protection plan, child in need plan or is a looked after child, their information is passed to the new setting immediately and that the child's social worker is informed. In addition, consideration should be given to a multi-agency settings transition meeting if the case is complex or on-going.
- Ensure that all appropriate staff members have a working knowledge and understanding of their role in case conferences, core groups and other multi-agency planning meetings, to ensure that they attend and are able to effectively contribute when required to do so; where a report is required, this should be shared with the parents prior to the meeting.
- Report to the Headteacher/Principal any significant issues for example, use of [Surrey's FaST Resolution Process](#) enquiries under section 47 of the Children Act 1989 and Police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the [Statutory guidance - PACE Code C 2019](#).
- Ensure that the case holding social worker is informed of any child currently with a child protection plan who is absent without explanation.
- Organise safeguarding and child protection induction, regularly updated training and a minimum of annual updates (including online safety) for all school staff, keep a record of attendance and address any absences.
- Ensure each member of staff has access to, and understands, the school's Safeguarding and Child Protection policy procedures, especially new and part-time staff.
- Ensure that in collaboration with Cleves School Academy Trust's leadership team and Cleves Board of Trustees, the Safeguarding and Child Protection Policy is reviewed annually, and the procedures and implementation are updated and reviewed regularly.
- Ensure that the Safeguarding and Child Protection Policy is available publicly and that parents/carers know that referrals about suspected abuse or neglect may be made and the role of Cleves School Academy Trust in this.
- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.

- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and leadership staff.
- Establish and maintain links with the SSCP to make sure staff are aware of training opportunities and the latest policies on local safeguarding arrangements.
- Contribute to and provide, with the Headteacher and Chair of Governors, the biennial (s157 s175) Statutory Audit for Safeguarding Arrangements and Termly Safeguarding Data Collections via PHEW to Surrey County Council.

### **The Deputy Designated Safeguarding Lead(s)**

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

- Be trained to the same standard as the DSL and the role is explicit in their job description.
- Provide support and capacity to the DSL in carrying out delegated activities of the DSL; however, the lead responsibility of the DSL cannot be delegated.
- In the absence of the DSL, carry out the activities necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the DSL the DDSL will assume all of the functions of the DSL.

### **The Board of Trustees**

All members of the Board of Trustees understand and fulfil their responsibilities to ensure that:

- There is a whole school approach to safeguarding, involving everyone in Cleves School Academy Trust and ensuring that safeguarding, and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- A nominated governor for safeguarding is identified.
- The Board of Trustees should ensure that all members receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in Cleves School Academy Trust are effective and support the delivery of a robust whole school approach to safeguarding. Training should be regularly updated.
- The child's wishes and feelings are considered when determining what action to take and what services to provide.
- Cleves School Academy Trust has effective safeguarding policies and procedures including a Safeguarding and Child Protection Policy, a Staff Behaviour Policy or Code of Conduct, a Behaviour Policy and a response to children who go missing from education.
- Policies are consistent with SSCP and statutory requirements, are reviewed annually (as a minimum) and updated if needed, so that it is kept up to date with safeguarding issues as they

emerge and evolve, including lessons learnt and that the Safeguarding and Child Protection Policy is available on Cleves School Academy Trust website.

- The SSCP is informed in line with local requirements about the discharge of duties via the Biennial (s 157 s 175) Statutory Audit for Safeguarding Arrangements and Termly Safeguarding Data Collections via [PHEW](#) to Surrey County Council.
- Ensure recruitment, selection and induction follow safer recruitment practice including all appropriate checks. Inform shortlisted candidates that you might conduct an online search as part of due diligence checks in the recruitment process (KCSIE 24 para 221).
- Staff have been trained appropriately and this is updated in line with guidance and all staff have read KCSIE (2025) part 1 and Annex B. Additionally, there are mechanisms in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance.
- Ensure that, as part of the requirement for staff to undergo regular updated safeguarding training, including online safety and the requirement to ensure children are taught about safeguarding, is integrated, aligned, and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning.
- Consider the above training requirements, Trustees should have regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all children.
- All staff including temporary staff/supply staff, volunteers and contractors are provided with the school's Safeguarding and Child Protection policy and if applicable the staff behaviour policy.
- Take a proportionate risk-based approach to the level of information that is provided to temporary staff, volunteers and contractors.
- Cleves School Academy Trust has procedures for dealing with allegations of abuse against staff (including the Headteacher), volunteers and against other children and that a referral is made to the DBS and/or the Teaching Regulation Agency (as applicable) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have, had they not resigned.
- Policies and processes are in place to deal with concerns (including allegations) which do not meet the harm threshold or low-level concerns as defined in KCSIE 2025.
- A member of the senior leadership team has been appointed by the Board of Trustees as the DSL who will take lead responsibility for safeguarding and child protection and that the role is explicit in the role holder's job description.
- That on appointment, the DSL and DDSL initially undertake DSL 'New to Role' with 'Refresher' training at least every two years as well as attending DSL network events, to refresh knowledge and skills.
- Children are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through PSHE and RSE.

- Ensure that Cleves School Academy Trust will regularly review the effectiveness of filtering and monitoring systems in place to safeguard children online. Trustees should review the standards (below) and discuss with IT staff and service providers what more needs to be done to support schools and colleges in meeting this standard. To support schools and colleges to meet this duty, the Department for Education has published [filtering and monitoring standards](#) which set out that schools and colleges should:
  - identify and assign roles and responsibilities to manage filtering and monitoring systems.
  - review filtering and monitoring provision at least annually.
  - block harmful and inappropriate content without unreasonably impacting teaching and learning.
  - have effective monitoring strategies in place that meet their safeguarding needs.
- Ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.
- Cleves School Academy Trust will comply with DfE and the Surrey County Council Policy Guidance for Safeguarding Children Missing Education and Education Other Than At School.
- Clear systems and processes are in place for identifying possible mental health concerns, including routes to escalate and clear referral and accountability systems.
- Ensure that safeguarding and child protection files are maintained as set out in KCSIE 2025 Annex C.
- Enhanced DBS checks (without barred list checks unless the governor is also a volunteer at the school) are in place for all Cleves School Academy Trust trustees.
- Ensure section 128 checks are undertaken as defined in KCSIE 2025.
- Ensure where the Board of Trustees hire or rent out school facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) appropriate arrangements are in place to keep children safe.

## 9. Confidentiality, Sharing and Withholding Information

All matters relating to safeguarding and child protection will be treated as confidential and only shared as per the [‘Information sharing: advice for practitioners providing safeguarding services’ guidance](#). The setting will refer to the guidance in the [Data protection: toolkit for schools](#) to support the setting with data protection activity, including compliance with General Data Protection Regulation (GDPR). to support the setting with data protection activity, including compliance with General Data Protection Regulation (GDPR).

Information will be shared with staff within Cleves School Academy Trust who ‘need to know’.

Relevant staff have due regard to GDPR principles which allow them to share (and withhold) information.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the [Data Protection Act 1998](#) and GDPR are not a barrier to sharing information where a failure to do so would place a child at risk of harm. There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.

All staff will always endeavour to gain parent/carers consent to refer a child to social care unless to do so could put the child at greater risk of harm or impede a criminal investigation.

## **10. Reporting and responding to safeguarding concerns**

The following procedures apply to all staff working in Cleves School Academy Trust and will be covered in training to enable staff to understand their role and responsibility.

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

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

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

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

Immediately speak to DSL or DDSL then make an initial record of the information related to the concern as soon as possible on CPOMS including details of:

- Date
- Time
- Place
- Who was present
- Context
- Details of disclosure/concern (using the child's words)
- Demeanour/non-verbal behaviours of the child
- Child's voice
- Any injuries
- Rationale for decision making
- Actions taken

### **Report it to the DSL immediately.**

The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available.

The records must be signed and dated by the author or / equivalent on electronic based records

In the absence of the DSL or DDSL and where it is not possible to make contact with any of them, staff must be prepared to refer directly to C-SPA (and the Police if appropriate) if there is the potential for immediate significant harm or contact the consultation line at the C-SPA for support and advice.

Following a report of concerns the DSL must take the following steps.

Using the [Continuum of Support for Children and Families in Surrey](#) and [Continuum of Support Indicators](#), decide whether or not there are sufficient grounds for suspecting harm, in which case a request for support must be made to the C-SPA and the Police if it is appropriate.

Cleves School Academy Trust should try to discuss any concerns about a child's welfare with the parent/carer and where possible obtain their agreement before making a referral to the C-SPA. However, this should only be done when:

- it will not place the child at increased risk
- or sexual/organised abuse is suspected
- or the fabrication of an illness is suspected
- or where the discussion could impede a Police investigation or Social Work enquiry.

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

If it is suspected that a child is suffering, or is likely to suffer, harm or abuse the DSL must contact the C-SPA. If the DSL feels unsure about whether a referral is necessary, they can phone the CSPA consultation line to discuss concerns.

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

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

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

Teachers who come to know, in the course of their work, that FGM has been carried out on a child **must directly** report this to the police. Failure to do so will result in disciplinary sanctions. The teacher should tell the DSL or a deputy who will support them in making a direct report to the police. The teacher may need to support a referral to children's services. Staff will never examine children. The DSL should also be made aware.

## **11. Dealing with safeguarding concerns**

### **All staff**

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

Additional consideration needs to be given to children with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.

All staff should know who the DSL is and who to approach if the DSL is unavailable. All staff have the right to make a referral to the C-SPA or Police directly and should do this if, for whatever reason, there are difficulties following the agreed protocol, for example, they are the only adult on Cleves School Academy Trust premises at the time and have concerns about sending a child home.

Guiding principles (Refer to Appendix 1):

- Receive
- Reassure
- Respond
- Report
- Record
- Remember
- Review (by the DSL)

### **What happens next?**

It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. The member of staff should be informed by the DSL what has happened following a report being made. If they do not receive this information, they should seek it out.

If they believe that the concern has not been acted upon appropriately, they should inform the Headteacher or Safeguarding Governor or contact the C-SPA for advice.

## **12. Safeguarding concerns and allegations made about staff, including supply teachers, volunteer and contractors**

[Surrey's LADO procedure](#) will be followed where it is alleged that anyone working in Cleves School Academy Trust that provides education for children under 18 years of age, including supply staff, volunteers and contractors or another adult who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child and/or
- possibly committed a criminal offence against or related to a child and/or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

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

The setting may also receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities). In this instance, you should follow your safeguarding policies and procedures and inform the local authority designated officer (LADO), as you would with any safeguarding allegation (KCSIE 24 para 377)

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

- Report any concerns to the Headteacher immediately.
- If an allegation is made against the Headteacher the concerns need to be raised with the Chair of Trustees as soon as possible. If the Chair of Trustees is not available, then the LADO should be contacted directly.
- There may be situations when the Headteacher, Chair of Trustees will want to involve the Police immediately if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.
- Once an allegation has been received by the Headteacher or Chair/Vice Chair of Trustees they will contact the LADO (as part of their mandatory duty) on 0300123 1650 option 3 LADO or Email: [LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk) immediately and before taking any action or investigation.
- Following consultation with the LADO inform the parents/carers of the allegation unless there is a good reason not to.
- In liaison with the LADO, Cleves School Academy Trust will determine how to proceed and if necessary, the LADO will refer the matter to Social Care and/or the Police.
- If the matter is investigated internally, the LADO will advise Cleves School Academy Trust to seek guidance in following procedures set out in part 4 of KCSIE (2025) and the SSCP procedures.

### **Low-level concerns**

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

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

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

Cleves School Academy Trust creates an environment where staff are encouraged and feel confident to self-refer where they have found themselves in a situation.

Reports should be made to the Headteacher, or Deputy in the Head's absence, in a timely manner. If the Headteacher has any doubt as to whether the information which has been shared about the individual as a low-level concern in fact meets the harm threshold, they will consult with the LADO.

### 13. What is child abuse?

The following definitions are taken from Working Together to Safeguard Children (2023). In addition to these definitions, it should be understood that children can also be abused by being sexually exploited, honour-based violence, forced marriage or female genital mutilation. To support the local context, all staff have access to Surrey's [Continuum of Need Matrix](#).

#### Forms of abuse and neglect

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

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

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

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

Cleves School Academy Trust use the [Graded Care Profile 2](#) tool to support better identification and intervention in cases of neglect Surrey [Surrey Neglect Screening Tool](#) is used to support with the initial identification of neglect.

Further information on indicators of abuse can be accessed via

- [Abuse & Neglect - Surrey Safeguarding Children Partnership](#)
- [Surrey Safeguarding Children Partnership Procedures Manual Recognising Abuse and Neglect](#)
- [Handling Cases of Affluent Neglect in Schools](#)
- [NSPCC](#).

## **14. Sexual violence and sexual harassment between children in the setting**

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

Our school is aware of Ofsted's [Review of sexual abuse in schools and colleges](#). The review was carried out as a result of the large amount of testimonies shared on the [Everyone's Invited](#) website, which highlighted the prevalence of sexual harassment and sexual violence.

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

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

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

Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying) abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')

- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery) [UKCIS guidance: Sharing nudes and semi-nudes advice for education settings working with children and young people](#)
- 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).

**See Appendix One for detailed definitions.**

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

We recognise that children are capable of abusing other children and their peers and this will be dealt with under our child protection policy and in line with KCSiE (2025).

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

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

- Making clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It will never be passed off as “banter”, “just having a laugh”, “a part of growing up” or “boys being boys”. We believe that failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.
- Recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported.
- Challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. As we believe that dismissing or tolerating such behaviours risks normalising them.

## Prevention

- Taking a whole school approach to safeguarding and child protection
- Providing training to staff
- Providing a clear set of values and standards, underpinned by the school's behaviour policy and pastoral support; and by a planned programme of evidence-based content delivered through the curriculum.
- Engaging with specialist support and interventions.

Responding robustly to reports of sexual violence and sexual harassment. The following processes ([Following Hackett's Sexualised behaviour Continuum](#)) may be required depending on the nature of the offence:

1. **Hackett Inappropriate:** Manage internally using the behaviour policy and pastoral support.
2. **Hackett Problematic:** Early help response used for non-violent harmful sexual behaviour to prevent escalation.
3. **Hackett Abusive:** Refer to children's services when a child has been harmed, is at risk of harm or in immediate danger.
4. **Hackett Violent:** Report to the police if a crime has been committed, such as rape, assault by penetration or sexual assault, following the [When to call the police](#) guidance.

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

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

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

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

## Risk Assessment

Following a report, the DSL will make an immediate risk and needs assessment on a case-by-case basis.

The risk assessment will consider:

- The victim, especially their protection and support.
- The alleged perpetrator, their support needs and any discipline action.
- All other children at the school.
- The victim and the alleged perpetrator sharing classes and space at school.
- The risk assessment will be recorded and kept under review.

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

Support regarding risk assessments can be accessed from the [Surrey Education Services](#) Education Safeguarding Team Resources Hub.

### **Action**

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

The DSL will consider:

- The wishes of the victim.
- The nature of the incident including whether a crime has been committed and the harm caused.
- Ages of the children involved.
- Developmental stages of the children.
- Any power imbalance between the children.
- Any previous incidents.
- That sexual violence and sexual harassment can take place within intimate personal relationships between children.
- Importance of understanding intra familiar harms and any necessary support for siblings following incidents
- Ongoing risks to victim, other children, adult students, or staff.
- Other related issues or wider context.

### **Confidentiality**

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

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

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

### **Options**

- Manage internally
- Early help intervention

- Request for support to the C-SPA
- Report to the Police (generally in parallel with a request for support to the C-SPA).

All concerns, discussions, decisions and reasons for decision will be recorded on the CPOMS system

### **Ongoing Response**

- The DSL will manage each case individually and will ensure the risk assessment is reviewed regularly with relevant partner agencies, for example the Police and social care.
- Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, the school should be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately.
- Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim.
- The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart on Cleves School Academy Trust premises and on transport where appropriate.
- Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, Cleves School Academy Trust will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and may lead to the view that allowing the perpetrator to remain in the same setting would seriously harm the education or welfare of the victim (and potentially themselves and other children).
- Where a criminal investigation into sexual assault leads to a conviction or caution, Cleves School Academy Trust will, if it has not already, consider any suitable sanctions in light of their behaviour policy, which may include consideration of permanent exclusion. Where the perpetrator is going to remain at the setting, the Headteacher should continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on school premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.
- The victim, alleged perpetrator and any other children and adults affected will receive appropriate support and safeguards on a case-by-case basis.
- Cleves School Academy Trust will take any disciplinary action against the alleged perpetrator in accordance with Cleves School Academy Trust behaviour policy.
- Cleves School Academy Trust recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.
- Cleves School Academy Trust will consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.
- Cleves School Academy Trust recognises that children who have experienced sexual violence display a wide range of responses to their experiences including clear signs of trauma, physical and emotional responses, or no overt signs at all.

### **Physical Abuse**

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

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

The principles from the [Cleves School Academy Trust Behaviour Policy](#) will be applied in these cases, with recognition that any Police investigation will need to take priority.

## 15. Harmful Sexual Behaviour (HSB)

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

Cleves' response to HSB: [Brook Traffic Light Tool for Sexual Behaviour](#) uses a traffic light system to categorise the sexual behaviours of children it can be used to help professionals:

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

By categorising sexual behaviours, Cleves School Academy Trust can work with other agencies to the same standardised criteria when making decisions and can protect children with a multi-agency approach.

Cleves School Academy Trust recognises that it is vital that professionals agree on how behaviours should be categorised regardless of culture, faith, beliefs, and their own experiences or values.

### Upskirting

**Cleves Academy Trust** will ensure that all staff and children are aware that 'upskirting' is a criminal offence and will not be tolerated. The Criminal Prosecution Service (CPS) defines 'upskirting' as: "a colloquial term referring to the action of placing equipment such as a camera or mobile phone beneath a person's clothing to take a voyeuristic photograph without their permission".

**Cleves Academy Trust** will decide each incident on a case-by-case basis, with the DSL or a deputy taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police, as required.

### Sharing nudes and semi-nudes

This is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18 ([UKCIS, 2024](#)). It is a form of child sexual abuse. All incidents will be dealt with as safeguarding concerns. The primary concern at all times will be the welfare and protection of the children involved. While sharing nudes and semi-nudes of themselves or their peers breaks the law, we know it is important to avoid criminalising young people unnecessarily.

Children might share nudes because of threats and/or pressures from relationships. They might also want to send nudes, but this is usually because they believe they will get something in return. Sextortion is when someone threatens to share or distribute nude or semi-nude images of another person if they don't do what is asked. It can happen to anybody, but a large amount of cases involve teenage boys. The explicit imagery may be used to blackmail the young person into sending more

images, money, or in some cases, into recruiting more victims. Images can be both real or generated by artificial intelligence.

We are aware of the [alert guidance](#) and support provided by the National Crime Agency and CEOP, and will use it to respond to incidents.

## **16. Anti-Bullying/Cyberbullying**

Cleves' policy on anti-bullying is set out in [Cleves Antibullying Policy](#) which includes measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying). The subject of bullying is addressed at regular intervals in PHSE education. In addition, cyberbullying is part of the content of Digital safety units within the computing curriculum.

We keep a record of known bullying incidents which is shared with and analysed by the Governing body. All staff are aware that children with SEND and/or children who identify as Lesbian, Gay, Bisexual, Transgender, Queer or Questioning (LGBTQ+) are more susceptible to being bullied/victims of child abuse.

The fact that a child or a young person may be LGBTQ+ is not in itself an inherent risk factor for harm. However, children who are LGBTQ+ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+.

Risks can be compounded where children who are LGBTQ+ lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.

Useful links:

- [Surrey Safeguarding Children Partnership Procedures Manual Bullying](#)
- [Behaviour in schools](#) (advice for schools, including advice for appropriate behaviour between pupils)
- [Relationships Education, Relationships and Sex Education and Health Education guidance](#)
- [Preventing bullying - GOV.UK](#)
- [Guidance for schools on colleges on gender questioning children](#) (currently in draft, to be finalised)

## **Physical Intervention**

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

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

## **17. Safety/Cybercrime**

Cleves School Academy Trust has an [e-safety policy](#) which empowers us to protect and educate pupils, and staff in their use of technology and establishes mechanisms to identify, intervene in, and

escalate any concerns where appropriate. Cleves School Academy Trust also has a clear policy on the use of mobile and smart technology – [AUP Policy](#).

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk, content, contact, conduct and commerce.

Children are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated. Day-to-day management of this online system falls to the ICT team (Mrs Thompson, Mr Thomas and the IT support company) and pastoral leaders, who will receive any concerns raised by the filtering and monitoring system.

Cleves School Academy Trust will follow the guidance around [harmful online challenges and online hoaxes](#) when supporting children and sharing information with parents/carers.

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 DSL will consider a referral into the [Cyber Choices](#) programme.

This programme 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.

## **18. Racist Incidents**

Our policy on racist incidents is set out separately and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of racist incidents.

## **19. Radicalisation, Extremism and Terrorism**

[The Prevent Duty for England and Wales \(2023\)](#) under section 26 of the Counter Terrorism and Security Act 2015 places a duty on education and other children's services to have due regard to the need to prevent people from being drawn into terrorism.

Extremism is defined as 'the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces'.

Radicalisation refers to 'the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups'.

Terrorism is 'an action that endangers or causes serious violence to a person/people; causes serious violence to a person/people; causes serious damage to property; or seriously interferes with 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.'

Some children are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal or dangerous. This can happen both online and offline.

Cleves School Academy Trust is clear that exploitation of vulnerable children and radicalisation should be viewed as a safeguarding concern and follows the DfE guidance for settings and childcare providers on preventing children and young people from being drawn into terrorism.

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.

To prevent children from being radicalised into terrorism, we make sure:

- Our filtering and monitoring systems will prevent and protect children from accessing extremist material.
- Children are taught about British Values and staying safe online via the curriculum.
- Children are provided with a safe space to discuss controversial issues and the skills they need to challenge extremist views.
- Staff are trained to spot the indicators of radicalisation and extremism and how to report concerns as soon as possible.
- The DSL attends Prevent awareness training and is aware of the latest guidance.
- We perform a risk assessment assessing how our learners or staff may be at risk of being radicalised into terrorism (including online) using the counter terrorism local profile and updates from the local partnership.

Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL making a [Prevent Referral](#).

The DSL should report concerns that a child may be at risk of radicalisation or involvement in terrorism, use the [Prevent referral form](#) to refer cases by e-mail to: [preventreferrals@surrey.pnn.police.uk](mailto:preventreferrals@surrey.pnn.police.uk).

If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101.

To speak to the Prevent Supervisor for Surrey call 07795043842

There is a dedicated telephone helpline 0800 0113764 for staff and Trustees to raise concerns around Prevent .

Setting staff receive training to help identify early signs of radicalisation and extremism.

Opportunities are provided in the curriculum to enable children to discuss issues of religion, ethnicity and culture and Cleves School Academy Trust follows the [Promoting fundamental British values through SMSC](#).

Cleves' trustees, the Headteacher and the DSL will assess the level of risk within Cleves School Academy Trust and put actions in place to reduce that risk. Risk assessment may include, due diligence checks for external speakers and private hire of facilities, anti-bullying policy and other issues specific to the setting's profile, community and philosophy.

Although not a cause for concern on their own, possible indicators when taken into consideration alongside other factors or context may be a sign of being radicalised.

Further information and a list of such indicators can be found at [Radicalisation and Extremism - Examples and Behavioural Traits \(educateagainsthate.com\)](https://educateagainsthate.com)

## 20. Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, mental or physical ability. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

[Domestic Abuse Act](#) 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).

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 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.

Cleves School Academy Trust is enrolled onto the Operation Encompass scheme, a joint project between Surrey Police, Surrey Domestic Abuse Service and Surrey settings. The system ensures that when the 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 DSL in Cleves School Academy Trust before the child or children arrive at Cleves School Academy Trust the following day. This ensures that Cleves School Academy Trust 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.

Useful links:

- [Surrey Safeguarding Children Partnership Procedures Manual - Domestic Abuse](#)
- [Homepage - Surrey Safeguarding Children Partnership](#)
- [Surrey Against Domestic Abuse Strategy 2024-2029 | Healthy Surrey](#)
- [Multi agency risk assessment conferences | Healthy Surrey](#)
- [Request information under Clare's Law: Make a Domestic Violence Disclosure Scheme \(DVDS\) application | Metropolitan Police](#)
- [NSPCC-UK domestic abuse Signs Symptoms Effects](#)
- [Refuge what is domestic abuse/effects of domestic abuse on children](#)
- [Safe Young Lives | Young people & domestic abuse - SafeLives](#)
- [Domestic abuse: specialist sources of support - GOV.UK](#) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)

## **21. Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL is aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

Useful links:

- [Homelessness Reduction Act Factsheets - GOV.UK](#)

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

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

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

CSE is a form of child sexual abuse. CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited, for example believing they are in a genuine romantic relationship.

CSE 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
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development
- become pregnant

Any concerns that a child is being or is at risk of being sexually exploited should be passed immediately to the DSL.

Cleves School Academy Trust is aware there is a clear link between regular non-attendance and CSE. Staff will consider a child to be at potential CSE risk in the case of regular non-attendance at and make reasonable enquiries with the child and parents/carers to assess this risk.

All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside Cleves School Academy Trust and/or can occur between children outside of these environments. All staff, but especially the DSL will consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

In all cases if the DSL identifies any level of concern the DSL should contact the C-SPA and if a child is in immediate danger the Police should be called on 999.

Cleves School Academy Trust is aware that often a child is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. As a consequence, the child may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse. Children also rarely self-report CSE so staff must be particularly vigilant to potential indicators of risk.

Cleves School Academy Trust includes the risks of sexual exploitation in the PSHE and RSE curriculum.

### **Child Criminal Exploitation (CCE)**

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

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”. Children 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 become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others.

CCE can include children being forced and/or manipulated:

- to work in cannabis factories.
- into moving drugs or money across the country (county lines).
- to shoplift or pickpocket.
- to threaten serious violence to others.
- into committing vehicle crime.

Any concerns that a child is being or is at risk of being criminally exploited will be passed without delay to the DSL. The DSL will then contact the C-SPA and if there is concern about a child’s immediate safety, the Police will be contacted on 999.

Cleves School Academy Trust Academy Trust is aware there is a clear link between regular non-attendance at setting and exploitation. Staff will consider a child to be at potential risk in the case of regular non-attendance at setting and make reasonable enquiries with the child and parents/carers to assess this risk.

## **23. Serious Violence**

There are a number of indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include:

- increased absence from school
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries

- Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Staff are aware that violence can often peak in the house just before and after the children attend Cleves, which includes travelling to and from school.

## **24. Modern Slavery**

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.

The DSL will seek advice and support from children's services who may in turn make a referral to the National Crime Agency via the National Referral Mechanism (NRM). Further advice can be provided directly by the modern slavery helpline on 0800 012 1700.

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

FGM is illegal in England and Wales under the FGM Act (2003). It is a form of child abuse and violence against women. [A mandatory reporting duty](#), requires teachers to report directly and immediately to the Police 101 where they either:

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

The duty applies to all persons who are employed or engaged to carry out 'teaching work' whether or not they have qualified teacher status.

The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the DSL; however, the DSL should be informed.

Setting staff are trained to be aware of risk indicators of FGM.

Concerns about FGM outside of the mandatory reporting duty should be reported using the setting's Safeguarding and Child protection procedures. Staff should be particularly alert to suspicions or concerns expressed by female children about going on a long holiday during the summer holiday.

There should also be consideration of potential risk to other girls in the family and the wider community. Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the Police by calling 999.

There are no circumstances in which a member of staff should examine a girl.

[Refer to appendix 3.](#)

## **26. Forced Marriage**

A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include

physical, psychological, financial, sexual, and emotional pressure. It may also involve physical or sexual violence and abuse.

Forced marriage is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014. In addition, since February 2023, it is also a crime to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. This applies to non-binding, unofficial 'marriages' as well as legal marriages.

A forced marriage is not the same as an arranged marriage which is common in many cultures. The families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

Cleves' staff should never attempt to intervene directly as a setting or through a third party. We are aware that the legal age for marriage in the UK has risen to 18, regardless of parental consent. The DSL will follow the local safeguarding procedure and contact should be made with the C-SPA and/or the Forced Marriage Unit 200 7008 0151 if a concern comes to their attention.

## **27. So-called 'Honour'-based abuse (HBA)**

HBA can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such abuse can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

HBA might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion.
- want to get out of an arranged marriage; become involved with a boyfriend or girlfriend from a different culture or religion.
- want to get out of an arranged marriage.
- want to get out of a forced marriage
- wear clothes or take part in activities that might not be considered traditional within a particular culture

It is considered a violation of human rights and may be a form of domestic and/or sexual abuse.

## **One Chance Rule**

All staff are aware of the 'One Chance' Rule' in relation to forced marriage, FGM and HBA. Staff recognise they may only have one chance' to speak to a child who is a potential victim and have just one chance to save a life.

Cleves School Academy Trust Academy Trust is aware that if the victim is not offered support following disclosure that the 'One Chance' opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBA cases.

## **28. Private Fostering Arrangements**

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 years old or 18 years old if the child is disabled.

A child who is looked after or placed in any residential home, hospital or school (where they are receiving full-time education) is excluded from the definition. In a private fostering arrangement, the parent retains parental responsibility.

However, Children under 16 who spend more than 2 weeks in residence during holiday time in a school, become privately fostered children for the purposes of the legislation during that holiday period. See also Schedule 8 (para 9) Children Act 1989.

Private fostering occurs in all cultures and children may be privately fostered at any age.

Cleves School Academy Trust Academy Trust recognises that most privately fostered children remain safe and well but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the child has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Social Care immediately. However, where a member of staff becomes aware that a child may be in a private fostering arrangement, they will raise this with the DSL and the DSL will notify the C-SPA immediately.

Useful links:

- [Surrey Children's Services Procedure Manual Private Fostering](#)
- [A5-Private-Fostering-leaflet.pdf](#)

## **29. Looked After Children and Previously Looked After Children**

The most common reason for children becoming looked after is because of abuse and/or neglect.

Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child and contact arrangements with birth parents or those with parental responsibility.

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

The designated teacher and governor for looked after children will have the appropriate level of training to equip them with the knowledge and skills to undertake their role.

The designated teacher will work with Surrey's Head of virtual School for both looked after children and previously looked after children.

### **30. Children with special educational needs and disabilities or health issues**

Our Special Educational Needs Co-ordinator (SENDCo) and DSL work closely together to safeguard and support children who have special educational needs and disabilities (SEND), in particular when there are any reports of abuse. Children with SEND or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. These can include:

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

Any reports of abuse will require close liaison with the DSL and the SENDCO. Cleves School Academy Trust Academy Trust will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

Surrey offers additional pastoral support for children with SEND.

Useful links:

- [Surrey Safeguarding Children Partnership Procedures Manual Children with Disabilities/Complex Needs.](#)

### **31. Children Absent from Education**

All children are entitled to an efficient, full-time education which is suitable to their age, ability, aptitude, and any SEND they may have.

Cleves School Academy Trust recognises that children missing education, can be a vital warning sign of a range of safeguarding possibilities. They are also at significant risk of underachieving, being victims of abuse and harm, exploitation, radicalisation, and not being in education, employment or training (NEET) later in life.

Where possible Cleves School Academy Trust Academy Trust will hold more than one emergency contact number for each child.

Cleves School Academy Trust Academy Trust will ensure that there is a record of joiners and leavers as defined in [The Education \(Pupil Registration\) \(England\) 2006 \(amended 2016\).](#)

When removing a child's name, Cleves School Academy Trust Academy Trust will notify the Surrey County Council of:

- (a) the full name of the child,
- (b) the full name and address of any parent with whom the child normally resides,
- (c) at least one telephone number of the parent, (d) the child's future address and destination setting, if applicable, and the ground in regulation 8 under which the child's name is to be removed from Cleves School Academy Trust register.

Cleves School Academy Trust will make reasonable enquiries to establish the whereabouts of a child jointly with the Local Authority, before deleting the child's name from Cleves School Academy Trust register if the deletion is under regulation 8(1), sub-paragraphs (f) (iii) and (h) (iii) of [The Education \(Pupil Registration\) \(England\) 2006 \(amended 2016\)](#).

**Cleves School Academy Trust will:**

- Enter children on the admissions register on the first day on which Cleves School Academy Trust has agreed, or has been notified, that the child will attend the setting.
- Notify Surrey County Council within five days of adding a child's name to the admission register. The notification must include all the details contained in the admission register for the new child.
- Monitor each child's attendance through their daily register and follow Surrey County Council procedure in cases of unauthorised absence.
- Remove a child's name from the admissions register on the date that the child leaves the setting.
- Cleves School Academy Trust will notify Surrey County Council when they are about to remove a child's name from Cleves's register under any of the fifteen grounds listed in the regulations, no later than the date that the child's name is due to be removed.

Where parents/carers notify Cleves, in writing, of their intention to Electively Home Educate (EHE) Cleves School Academy Trust will forward a copy of the letter to the Surrey County Council Inclusion Team.

Where parents/carers orally indicate that they intend to withdraw their child to EHE and no letter has been received, Cleves School Academy Trust will not remove the child from roll and will notify the Inclusion Team at the earliest opportunity.

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

### **32. Pupils Missing Out on Education (PMOOE)**

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

Cleves School Academy Trust will gain consent (if required in statute) from parents/carers to put in place alternative provision and/or a reduced or modified timetable

Cleves School Academy Trust will ensure that parents/carers (and the Local Authority where the child has an Education Health Care Plan (EHCP)) are given clear information about alternative provision placements and reduced/modified timetables: why, when, where, and how they will be reviewed.

Cleves School Academy Trust will keep the placement and timetable under review and involve parents/carers in the review. Reviews will be frequent enough to provide assurance that the off-site education and/or modified timetable is achieving its objectives and that the child is benefiting from it.

Cleves School Academy Trust will monitor and track children attending alternative provision to ensure that the provision meets the needs of the child. Cleves School Academy Trust continues to be responsible for the safeguarding of that pupil. Cleves School Academy Trust will obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment,

Cleves School Academy Trust will comply with regular data returns requested by the Surrey County Council, regarding all children of statutory setting age, attending alternative provision, and/or on a reduced/modified timetable.

Cleves School Academy Trust leadership will report to Cleves School Academy Trust information regarding the use and effectiveness of alternative provision and modified/reduced timetables. Cleves School Academy Trust will also report to Cleves School Academy Trust any formal direction of a child to alternative provision to improve behaviour.

### **33. Attendance and Behaviour**

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

Cleves School Academy Trust recognises that absence from and exclusion from may be indicators of abuse and neglect, including the exploitation of children. The DSL will regularly liaise with members of staff with responsibility for behaviour and attendance to ensure risk is identified and appropriate intervention is in place to protect children from harm.

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

### **34. Restrictive Physical Intervention**

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

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

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

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

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

### **35. Whistleblowing**

We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.

All staff, including temporary staff/supply staff and volunteers, should be aware of their duty to raise concerns, where they exist, about the management of safeguarding and child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the setting's safeguarding arrangements.

If it becomes necessary to consult outside the setting, they should speak in the first instance, to the Area Schools Officer or LADO in accordance with the Whistleblowing Policy.

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

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

Whistleblowing regarding the Headteacher or other matters should be made to the Chair of Trustees whose contact details are: [Cleveswhistleblowing@outlook.com](mailto:Cleveswhistleblowing@outlook.com)

### **Links with other policies**

- Administration of medicines
- Allegations against staff
- Anti-bullying
- Behaviour Policy
- Child Exploitation
- Curriculum Policy
- Drug Education
- Equality Policy
- E-Safety, including staff use of mobile phones
- Health & Safety
- Intimate Care
- Parental Concerns/Complaints.
- Physical Intervention
- PSHE
- Prevent - Radicalisation and Extremism
- Recruitment and Selection
- Risk Assessment
- School Attendance
- Relationships and Sex Education
- Staff Behaviour Policy / Code of Conduct

- Substance Misuse Policy
- Teaching and Learning
- Whistleblowing
- Sexual Violence and Sexual Harassment

### **36. Additional Resources**

- [Surrey Safeguarding Children Partnership webpages](#)
- [Continuum of Support for children and families living in Surrey](#)
- [Surrey Education Services \(surreycc.gov.uk\)](https://www.surreycc.gov.uk) – Education Safeguarding Resources Hub
- [Graded Care Profile 2](#)
- [NSPCC | The UK children's charity | NSPCC](#)
- [CEOP Education](#)
- [Anti Bullying Alliance webpages](#)
- [Childnet International](#)
- [Safer Internet Centre webpages](#)
- [Contextual Safeguarding Network webpages](#)
- [Lucy Faithfull Foundation webpages](#)

## **37. Appendix 1: Sexual violence**

It is important that settings are aware of sexual violence and the fact children can, and sometimes do, abuse other children in this way and that it can happen both inside and outside of setting. When referring to sexual violence in this advice, we do so in the context of child-on-child sexual violence.

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 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. (NOTE- Settings 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. (NOTE – this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

### **What is consent?**

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.

- a child under the age of 13 can never consent to any sexual activity
- the age of consent is 16
- sexual intercourse without consent is rape.

Further information about consent can be found here: [Rape Crisis England & Wales - Sexual consent.](#)

### **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 the setting. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is 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. Settings 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.
- displaying pictures, photos or drawings of a sexual nature
- upskirting (this is a criminal offence), and
- online sexual harassment.

This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

- consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of U18s is a criminal offence. [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people)
- sharing of unwanted explicit content
- sexualised online bullying
- unwanted sexual comments and messages, including, on social media
- sexual exploitation; coercion and threats, and
- coercing others into sharing images of themselves or performing acts they’re not comfortable with online.

It is important that settings consider sexual harassment in broad terms. Sexual harassment (as set out above) creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence.

## **38. Appendix 2: Guiding principles, the seven R's**

### **Receive**

- Listen to what is being said, without displaying shock or disbelief
- Accept what is said and take it seriously
- Make a note of what has been said as soon as practicable

### **Reassure**

- Reassure the pupil, but only so far as is honest and reliable
- Don't make promises you may not be able to keep e.g. 'I'll stay with you' or 'everything will be alright now' or 'I'll keep this confidential'
- Do reassure, for example, you could say: 'I believe you', 'I am glad you came to me', 'I am sorry this has happened', 'We are going to do something together to get help'

### **Respond**

- Respond to the pupil only as far as is necessary for you to establish whether or not you need to refer this matter, but do not interrogate for full details
- Do not ask 'leading' questions i.e. 'did he touch your private parts?' or 'did she hurt you?'
- Such questions may invalidate your evidence (and the child's) in any later prosecution in court
- Do not ask the child why something has happened.
- Do not criticise the alleged perpetrator; the pupil may care about him/her, and reconciliation may be possible at 21
- Do not ask the pupil to repeat it all for another member of staff. Explain what you have to do next and whom you have to talk to. Reassure the pupil that it will be a senior member of staff

### **Report**

- Share concerns with the DSL immediately.
- If you are not able to contact your DSL or the Deputy DSL, and the child is at risk of immediate harm, contact the C-SPA or Police, as appropriate directly
- If you are dissatisfied with the level of response you receive following your concerns, you should press for reconsideration

### **Record**

- If possible, make some very brief notes at the time, and write them up as soon as possible
- Keep your original notes on file
- Record the date, time, place, person/s present and noticeable nonverbal behaviour, and the words used by the child. If the child uses sexual 'pet' words, record the actual words used, rather than translating them into 'proper' words
- If appropriate, complete a body map to indicate the position of any noticeable bruising
- Record facts and observable things, rather than your 'interpretations' or 'assumptions'

### **Remember**

- Support the child: listen, reassure, and be available
- Complete confidentiality is essential. Share your knowledge only with appropriate professional colleagues
- Get some support for yourself if you need it.
- Review (led by DSL)

- Has the action taken provided good outcomes for the child?
- Did the procedure work?
- Were any deficiencies or weaknesses identified in the procedure? Have these been remedied?
- Is further training required?

### **What happens next?**

It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. The member of staff should be informed by the DSL what has happened following a report being made. If they do not receive this information they should seek it out.

If they have concerns that the disclosure has not been acted upon appropriately they might inform the Headteacher or Safeguarding Governor of the school and/or may contact the CSPA.

Receiving a disclosure can be upsetting for the member of staff and schools should have a procedure for supporting them after the disclosure. This might include reassurance that they have followed procedure correctly and that their swift actions will enable the allegations to be handled appropriately.

In some cases additional counselling might be needed and staff should be encouraged to recognise that disclosures can have an impact on their own emotions.

**39. Appendix 3: Circumstances and occurrences that may point to FGM happening are:**

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

**Signs that may indicate a child has undergone FGM:**

- prolonged absence from school and other activities
- behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued
- bladder or menstrual problems
- finding it difficult to sit still and looking uncomfortable
- complaining about pain between the legs
- mentioning something somebody did to them that they are not allowed to talk about
- secretive behaviour, including isolating themselves from the group
- reluctance to take part in physical activity
- repeated urinal tract infection
- disclosure

**The 'One Chance' rule**

As with Forced Marriage there is the 'One Chance' rule. It is essential that settings /schools/colleges take action **without delay** and make a referral to children's services or to police if the circumstances come under the mandatory reporting duty for those employed or engaged to carry out 'teaching work' in the school.

## **40. Appendix 4: Recognising signs of child abuse**

### **Categories of Abuse:**

- Physical Abuse
- Emotional Abuse (including Domestic Abuse)
- Sexual Abuse (including child sexual exploitation)
- Neglect

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

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

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

### **Risk Indicators**

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

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

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

In an abusive relationship the child may:

- appear frightened of the parent/s
- act in a way that is inappropriate to her/his age and development (though full account needs to be taken of different patterns of development and different ethnic groups)

The parent or carer may:

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

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

## **Recognising Physical Abuse**

The following are often regarded as indicators of concern:

- an explanation which is inconsistent with an injury
- several different explanations provided for an injury
- unexplained delay in seeking treatment
- the parents/carers are uninterested or undisturbed by an accident or injury
- parents are absent without good reason when their child is presented for treatment
- repeated presentation of minor injuries (which may represent a “cry for help” and if ignored could lead to a more serious injury)
- family use of different doctors and A&E departments
- reluctance to give information or mention previous injuries

## **Bruising**

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

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

## **Bite Marks**

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

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

## **Burns and Scalds**

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

- circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)
- linear burns from hot metal rods or electrical fire elements
- burns of uniform depth over a large area

- scalds that have a line indicating immersion or poured liquid (a child getting into hot water is his/her own accord will struggle to get out and cause splash marks)
- old scars indicating previous burns/scalds which did not have appropriate treatment or adequate explanation

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

## **Fractures**

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

Non-mobile children rarely sustain fractures.

There are grounds for concern if:

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

## **Scars**

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

## **Recognising Emotional Abuse**

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

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

The following may be indicators of emotional abuse:

- developmental delay
- abnormal attachment between a child and parent/carer e.g. anxious, indiscriminate or not attachment
- indiscriminate attachment or failure to attach
- aggressive behaviour towards others
- scape-goated within the family
- frozen watchfulness, particularly in pre-school children
- low self-esteem and lack of confidence
- withdrawn or seen as a “loner” – difficulty relating to others

## 41 Appendix 5 - Online safety and the use of smart devices

Our detailed approach is covered in our [ICT and Acceptable Use Policy](#) and where they can be found. Cleves School Academy Trust understands the significant and essential role that we have in making sure children are protected from potentially harmful and inappropriate online material. We consider online safety in every aspect of school life.

We:

- Have in place online safety processes that protect our children and staff including how we identify, intervene in and escalate online concerns, where appropriate.
- Make sure technology is used responsibly and safely through education.
- Set clear expectations for the use of mobile phones and smart technology.

We fulfil our aims by:

- Ensuring appropriate filtering and monitoring systems are in place on the school's network and devices.
- Educating children to learn how to keep themselves safe when online (using the government's [Teaching online safety in schools](#) guidance), what to do if they are harmed or spot a risk and what the consequences are if they break the school rules about online safety.
- Engaging with parents and carers about what online safety looks like.
- Making sure our whole school approach is reflected in all relevant policies.
- Regularly training staff on online safeguarding risks and how to be online safely.
- Making sure children, staff, parents/carers, governors/trustees and volunteers sign an understandable acceptable use agreement that covers how they should use the school's IT systems and their mobile and smart technology.
- Making parents, carers, children and staff aware that staff can search an electronic device they have confiscated. See [Searching, Screening and Confiscation](#).

Due to the constant changes to online technology and the related harms, we will carry out an annual review and risk assessment of our online safety policies, procedures and systems.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk, content, contact, conduct and commerce.

### The 4Cs

Being online can be a great source of fun, entertainment, communication and education. Some people's online behaviour places others at risk. The number of issues covered under online safety is large and constantly growing. They are categorised into these four areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism misinformation, disinformation (including fake news) and conspiracy theories.
- **Contact:** being subjected to harmful online interaction with other users, for example peer to peer pressure, commercial advertising, and adults posing as children or young adults with the intention to groom or exploit children for sexual, criminal, financial or other purposes.
- **Conduct:** online behaviour that increases the likelihood of, or causes, harm, for example making, sending and receiving explicit images (e.g. consensual and non consensual sharing

of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying).

- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If children or members of staff report any issues, we will report it to the Anti-Phishing Working Group (<https://apwg.org/>).

### **Mobile phones and smart technology (including smart watches)**

Many children have unlimited and unrestricted access to the internet via mobile phone networks; therefore children could be harmed or harm others online when at school. This may include sexually harassing, bullying and sharing indecent images (often via large chat groups). To protect children from these risks while they are at our school we have a clear policy that mobile phones (while allowed on site) must be turned off at the gate and placed inside school bags for the duration of the school day.

### **Media recordings, audio, image and video (including digital files)**

When we make media recordings of children, such as taking videos or photos, we will get the child's and their parents'/carers' consent, make sure the child is appropriately dressed and encourage the child to tell us if they are worried about any media that has been taken of them. See our staff code of conduct and online safety policy, which cover our school's expectations for staff making media recordings.

### **Filtering and monitoring**

To limit children's exposure to online risks from Cleves School Academy Trust IT systems, we have strong and effective filtering and monitoring systems, following the government's [Meeting digital and technology standards in schools and colleges](#) guidance. We will also follow the government's [Plan technology for your school](#) guidance to self-assess against the filtering and monitoring standards and receive personalised recommendations on how to meet them. We will make sure that:

- Specific staff have assigned roles and responsibilities to manage systems.
- Staff know about the systems in place and how to escalate concerns.
- There are annual reviews of the systems, or more frequently if there is a significant change or issue.
- Our governing body/board of trustees reviews the systems with the DSL, IT staff and service providers, to find out what more can be done to keep children safe.
- The systems are effective for the age range of children and consider children potentially at greater risk of harm.
- When we block online content, it does not impact teaching and learning.
- Filtering works across all devices including mobile devices and smart technology

### **Remote education**

If our children are being taught remotely e.g. at home, we will be in regular contact with parents and carers. We will make sure parents and carers are aware of:

- What their child/ren are being asked to do online, including the sites they will be accessing and who from the school will interact with their child/ren.
- The importance of children being safe online and offering advice on how to do so.

- What systems our school uses to filter and monitor online use.

### **Information security and access systems**

We have procedures in place to protect our IT systems and staff and learners from cybercrime, i.e. when criminals seek to exploit human or security vulnerabilities online to steal passwords, data or money directly. We will follow the government's [Cyber security standards for schools and colleges guidance](#) which were developed to help us improve our resilience against cyber-attacks. Our procedures and systems are reviewed regularly to keep up with the constant changes to cyber-crime technologies.

Children are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated. The school's online safety co-ordinator is Hugh Thomas

The school will follow the guidance around [harmful online challenges and online hoaxes](#) when supporting children and sharing information with parents/carers.

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 DSL will consider a referral into the [Cyber Choices](#) programme.

This programme 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.

Useful links:

- [Childnet International](#)
- [Safer Internet Centre webpages](#)
- [Generative AI: product safety expectations](#)

## 42 Appendix 6 - Looked After Children

Nationally, Looked After Children significantly underachieve and are at greater risk of exclusion compared with their peers. We believe that Cleves School Academy Trust has a major part to play in ensuring that Looked After Children are exceptionally well prepared for the next steps in their lives. We aim to provide them with the knowledge and skills they need to be successful, enthusiastic learners and responsible individuals by providing a positive, safe and stimulating environment where all are included and achievements are celebrated.

Cleves School Academy Trust believes that in partnership with Surrey County Council as Corporate Parents we have a special duty to safeguard and promote the education of Looked After Children.

### **Definitions - Looked After Children (LAC) are defined as:**

- Children or young people who are the subject of a Care Order or Interim Care Order under the Children Act 1989.
- Children who are placed in foster care, children's residential homes, with relatives or friends, in semi-independent or supported independent accommodation.
- Children subject to a Care or Interim Care Order whilst placed with a parent, where the LA has parental responsibility.
- Children who are not subject to an order, but are accommodated by the LA under an agreement with their parents or respite care.

### **Previously - Looked After Children (PLAC) are defined as:**

- Children who are no longer looked after by an LA in England and Wales because they have either been adopted or are the subject of an adoption, special guardianship or child arrangements order.
- Children who were adopted outside England and Wales from 'state care' (care that is provided by a public authority, religious organisation, or other organisation whose main purpose is to benefit society).

LAC reviews, involving the school, will take place up until an adoption order has been granted. However, Pupil Premium Plus funding will continue for LAC until they are 16 years old.

- o To provide a safe and secure environment, where education is valued and there is a belief in the abilities and potential of all children.
- o To support our looked after children and give them access to every opportunity to achieve to their potential, enjoy learning and take as full a part as possible in all school activities.
- o To ensure that school policies and procedures are followed for LAC as for all children.
- o To work with the Virtual School and ensure that carers and social workers of LAC pupils are kept fully informed of their child's progress and attainment.
- o To fulfil our schools' role as corporate parents to promote and support the education of our Looked After Children, by asking the question, **'Would this be good enough for my child?'**

Our school's approach to supporting the educational achievement of Looked After Children is based on the following principles:

- Prioritising education
- Promoting attendance
- Targeting support
- Having high expectations
- Promoting inclusion
- Raising aspiration

- Achieving stability and continuity
- Early intervention and priority action
- Listening to children
- Promoting health and well-being
- Reducing exclusions and promoting stability
- Working in partnership with carers, social workers and other professionals

### **In pursuit of this policy we will:**

- Nominate a Designated Teacher for Looked After Children who will act as their advocate and coordinate support for them.
- Nominate a school governor to ensure that the needs of Looked After Children in the school are taken into account at a school management level and to support the Designated Teacher.
- Support the Designated Teacher in carrying out their role by making time available and ensuring that they attend training on Looked After Children.
- Work closely with the Virtual School and Social Care in the best interests of LAC and in completion of the Personal Education Plan (PEP).

### **The role and responsibilities of the designated teacher for looked after children**

#### **Designated Teacher (DT)**

The role became statutory in September 2009 under the Children and Young Persons' Act 2008 (the 2008 Act). The Designated Teacher must be a qualified teacher or a member of staff. Ideally, s/he should be a senior member of staff who has enough status and experience to advise and provide training to school staff on issues relating to LAC. They need to be able to influence decisions about the teaching and learning of these children.

#### **DT Responsibilities:**

Knowing who all the LAC are in school and ensuring that availability of all relevant details from school record-keeping systems as required.

Attending relevant training about LAC and acting as the key liaison professional for other agencies and carers in relation to LAC.

- Promoting a culture of high expectations and aspirations for how LAC should learn.
- Helping school staff understand the issues that affect the learning of LAC such as differentiated teaching strategies appropriate for individual children and in making full use of AfL.
- Making sure that LAC are prioritised in one-to-one tuition arrangements and that carers understand the importance of supporting learning at home.
- Removing the barriers to learning for LAC.
- Ensuring any LAC new to the school are welcomed positively and assessed when they start at the school to identify strengths and weaknesses in their learning. This will be used to inform planning and teaching.
- Developing personalised learning packages for LAC in conjunction with the relevant teaching staff.
- Ensuring that the LAC in their school have a voice in setting learning targets for themselves.
- Championing for LAC.
- Leading on developing and implementing the PEP within the school. The social worker is responsible for initiating the PEP process and completing the relevant pages of the ePEP form.
- Monitoring the child's progress against the targets on the PEP and extending these targets if they have been achieved.

- Ensuring the child makes a smooth transition to the new school and that the child's records are transferred without delay.
- Liaising with the Virtual School in all aspects of the LAC progress and support.
- Communicate with the Virtual School to manage allocation of PP+ for the benefit of LAC.
- Manage PP+ for Previously Looked After Children to support educational attainment and personal development.
- Convening urgent multi-agency meetings if a LAC is experiencing difficulties or is at risk of exclusion.
- Arranging for a mentor or key worker to whom the young person can talk to. Arranging for the LAC to be supported by their peers.
- Producing at least one annual report to the governing body which should include: current progress, attendance and exclusions (if any), any concerns regarding behaviour, how the PEP has been implemented and whether the actions put in place are effective in addressing the learning needs of LAC, how the DT works in partnership with the LA, training undertaken for carrying out the role effectively. The report must not mention the children's names for confidentiality reasons.
- Promoting good home-school links and the importance of education as a way of improving life chances for LAC.
- Ensuring that, where the school has concerns about a child's behaviour, the Virtual School is informed at the earliest opportunity and additional support is provided to prevent exclusion, which would only be used as absolute last resort.
- Considering the needs of LAC and PLAC when designing and implementing the school's Behaviour Policy.

#### **The role and responsibility of the governing body:**

- Support the local authority in its statutory duty to promote the educational achievement of looked after children.
- Ensure that the DT is given the appropriate level of support in order to fulfil their role.
- In partnership with the headteacher, ensure that, through their training and development, the DT has the opportunity to acquire and keep up-to-date the necessary skills, knowledge and training to understand the respond to the specific teaching and learning needs of LAC.
- Governing bodies and the SLT should make sure that the DT role contributes to the deeper understanding of everyone in the school who is likely to be involved in supporting LAC to achieve.
- The governing body, in partnership with the head teacher, is responsible for monitoring how well the role is working. As part of this monitoring an annual report will be received from the DT.

#### **All staff will have:**

- o Have high expectations in regard to the achievement of LAC & PLAC.
- o Ensure that the individual needs of LAC & PLAC are met through quality first teaching.
- o Are aware of the specific needs of LAC & PLAC in relation to Attachment and Trauma and make appropriate adjustments to teaching and classroom management to meet these needs.
- o Work proactively with the DT to ensure that LAC & PLAC meet their targets and achieve. Ensuring that any barriers to learning, and inclusion are highlighted at the earliest opportunity.
- o Work to ensure the Inclusion of LAC & PLAC within the School community, maintaining their confidentiality while also providing support with raising their self-esteem, and supporting their relationships with peers in line with the Anti Bullying policy.

This policy links with a number of other school policies/procedures and it is important that Governors have regard to the needs of Looked After Children when reviewing them:

- Admissions Policy
- Behaviour Policy
- Anti-bullying and Anti-Hate Policy
- Home-school agreement
- Equality Policy
- Child Protection Policy and Safeguarding Policy
- Special Educational Needs and Disability Policy

The school will champion the needs of Looked After Children, raise awareness and challenge negative stereotypes about them, in order to ensure that they achieve to the highest level possible.

Useful Links:

- [www.gov.uk/government/publications/promoting-the-education-of-looked-after-children](http://www.gov.uk/government/publications/promoting-the-education-of-looked-after-children)
- <https://learning.nspcc.org.uk/children-and-families-at-risk/looked-after-children>