



# **Safeguarding Policy**

## **September 2024**

Safeguarding Statement 2024-2025 .....	4
Key Personnel .....	4
Terminology .....	5
Safeguarding and promoting the welfare of children is defined as:.....	5
Introduction .....	5
Policy Aims .....	7
Supporting Children .....	7
Prevention / Protection.....	8
Safe School, Safe Staff.....	9
Roles and Responsibilities - All School Staff .....	10
Roles and Responsibilities - The Headmaster/Head .....	12
Roles and Responsibilities - The Designated Safeguarding Lead .....	13
Roles and Responsibilities - The Deputy Designated Safeguarding Lead(s).....	16
Roles and Responsibilities - All members of The Governing Body .....	16
Confidentiality and Sharing Information .....	18
Child Protection Procedures .....	18
Child Protection Procedures Flowchart.....	21
Dealing with disclosures .....	22
Allegations against adults who work with children .....	23
What is child abuse?.....	24
Neglect.....	26
Emotional abuse .....	27
Physical abuse.....	28
Sexual abuse .....	29
Abuse involving Children with SEN needs.....	30
Children who are lesbian, gay, bisexual, or gender questioning.....	31
Children and the Court System .....	31
Children with Family members in prison .....	32
Homelessness .....	32
Cyber Crime.....	32
Child Abduction and Community Safety Incidents .....	32
Sexual violence and sexual harassment between children in school.....	33
Child on Child Abuse Policy .....	33
Harmful Sexual Behaviour .....	36
Anti-Bullying and Cyberbullying .....	40
Online Safety .....	40
Racist Incidents .....	41

Radicalisation and Extremism.....	41
Domestic Abuse.....	43
Mental Health.....	44
Child Exploitation (CSE) .....	44
Consensual and Non-Consensual Sharing of Nudes and Semi-nudes (Youth produced sexual imagery or sexting) .....	45
Female Genital Mutilation (FGM) .....	47
Forced Marriage .....	48
Honour-based Abuse .....	48
One Chance Rule .....	48
Private Fostering Arrangements .....	48
Children Looked After .....	51
Children Missing Education .....	51
Pupils Missing Out of Education .....	52
School Attendance and Behaviour.....	53
Restrictive Physical Intervention .....	53
Lower Level Concerns (Low Level Concerns) .....	53
Whistle-blowing.....	54
Links with other school policies.....	54
Additional Resources .....	55
Appendix A – Low level concern form.....	56

## Safeguarding Statement 2023/2024

“It could happen here”

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children.

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

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

### Key Personnel

#### **RGS Guildford**

The Designated Safeguarding Lead (DSL) at RGS Guildford is: Mr Nick Gough  
Contact details: email: [nwg@rgsg.co.uk](mailto:nwg@rgsg.co.uk) or [dsl@rgsg.co.uk](mailto:dsl@rgsg.co.uk) Telephone: 01483 880600

The Deputy DSL(s) at RGS Guildford are: Mr Adrian Woodman [auw@rgsg.co.uk](mailto:auw@rgsg.co.uk) Mrs Jill Thorpe [jsrt@rgsg.co.uk](mailto:jsrt@rgsg.co.uk) Mrs Shelley Kidgell [ski@rgsg.co.uk](mailto:ski@rgsg.co.uk), Mr Michael Royds [mrfr@rgsg.co.uk](mailto:mrfr@rgsg.co.uk) Mr James Witts [jcw@rgsg.co.uk](mailto:jcw@rgsg.co.uk), Mr Matthew Baggs [mfb@rgsg.co.uk](mailto:mfb@rgsg.co.uk) Mr Jamie Lythgoe [jdnl@rgsg.co.uk](mailto:jdnl@rgsg.co.uk), Mr Alan Dodd [acd@rgsg.co.uk](mailto:acd@rgsg.co.uk); Mr Matthew Bailey [mba@rgsg.co.uk](mailto:mba@rgsg.co.uk), Miss Gemma Spencer [ges@rgsg.co.uk](mailto:ges@rgsg.co.uk) Mr Ian Wilkes [iw@rgsg.co.uk](mailto:iw@rgsg.co.uk) Miss Jennifer McAllister [ilm@rgsg.co.uk](mailto:ilm@rgsg.co.uk) Mr Jimmy Pressley [jwp@rgsg.co.uk](mailto:jwp@rgsg.co.uk) Telephone: 01483 880600

The Liaison Governor for Safeguarding at RGS Guildford is: Mr Simon Gimson  
Contact details via Mrs K Edwards, Secretary to the Governors - telephone: 01483 887126 or the School Office 01483 880600.

The Headmaster at RGS Guildford is: Dr Jon Cox  
Contact details: email: [Headmaster@rgsg.co.uk](mailto:Headmaster@rgsg.co.uk) - telephone: 01483 880600.

The Chair of Governors is: Mrs Sarah Creedy  
Contact details via Mrs K Edwards, Secretary to the Governors - telephone: 01483 887126 or via the School Office 01483 880 600.

#### **RGS Prep**

The Designated Safeguarding Lead (DSL) at RGS Prep is: Mr Toby Freeman-Day  
Contact details: email: [cge@rgsg.co.uk](mailto:cge@rgsg.co.uk) Telephone: [01483 880652](tel:01483880652)

The deputy DSL(s) are: Mr Adam Moore, Mrs Nicola Mendoza, Mrs Jo Petersen, Mrs Rebecca Self  
Contact details: email: [prepDSL@rgsg.co.uk](mailto:prepDSL@rgsg.co.uk) Telephone: [01483 880650](tel:01483880650)

The Liaison Governor for Safeguarding is: Mun-Ling Logue  
Contact details via Mrs K Edwards, Secretary to the Governors - telephone: 01483 887126

The Head is: Mr Toby Freeman-Day

Contact details: email: [cge@rgsg.co.uk](mailto:cge@rgsg.co.uk) -telephone: 01483 880652

The Chair of Governors is: Mrs Sarah Creedy  
Contact details via Mrs K Edwards, Secretary to the Governors - telephone: 01483  
887126

The DSL at the Cathedral is: Matt O'Grady  
Contact details: [email:dops@guildford-cathedral.org](mailto:dops@guildford-cathedral.org) - telephone: 07757850952

## Terminology

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

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

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

**Early Help** means providing support as soon as additional needs and support emerge at any point in a child's life.

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

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

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

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

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

**C-SPA** refers to the Children's Single Point of Access and the Child Protection Consultation Line. Tel. 0300 470 9100, out of hours 01483 517 898.

## Introduction

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002, and in line with statutory guidance: 'Working Together to Safeguard Children' 2023, Revised Safeguarding Statutory Guidance 'Framework for the Assessment of Children in Need and their Families' 2000, 'What to do if You are Worried a Child is Being Abused' 2015.

The policy also reflects, both statutory guidance 'Keeping Children Safe in Education' 2024 (KCSIE), and Surrey Safeguarding Children Partnership (SSCP) Procedures.

The Governing body takes seriously its responsibility under section 175 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure there are robust arrangements within our school to identify, assess, and support those children who are suffering harm or at risk of suffering harm.

This policy applies to all members of staff and governors in RGS Guildford and RGS Prep.

## **Guidance and documents referred to in this policy**

- [Surrey Safeguarding Children Partnership protocols, guidance and procedures](#)
- [Working together to safeguard children 2023: statutory guidance](#)
- [Keeping children safe in education 2024 \(publishing.service.gov.uk\)](#)
- [Disqualification under the Childcare Act 2006 \(updated 2019\)](#)
- [FGM Act 2003 Mandatory Reporting Guidance 2016](#)
- ['What to do if you are worried a child is being abused' 2015](#)
- [Teacher Standards 2011](#)
- [Information Sharing Advice for Practitioners' guidance 2018](#)
- [SCC Children Missing Education](#)
- [SCC Touch and the use of physical intervention when working with children and young people](#)
- [The Equality Act 2010](#)

## **Policy Principles & Values**

The welfare of the child is paramount.

Maintain an attitude of "It could happen here."

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 RGS Guildford, RGS Prep 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 RGS Guildford and RGS Prep will work openly with parents as far as possible, it reserves the right to contact Social Care or the police, without notifying parents if this is believed to be in the child's best interests.

## **Policy Aims**

To demonstrate RGS Guildford and RGS Prep's commitment with regard to safeguarding and child protection to pupils, parents and other partners.

To raise the awareness of all teaching and non-teaching staff of their responsibilities to safeguard children through identifying and reporting possible cases of abuse.

To enable RGS Guildford and RGS Prep to effectively contribute to Early Help, assessments of need and support for those children.

To provide robust school systems and procedures that is followed by all members of the RGS Guildford community in cases of suspected abuse.

To develop and promote effective working relationships with other agencies, in particular Early Help providers, the Police, Health and Social Care.

To ensure that all staff working within our school who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory DBS check (according to KCSIE guidance), and a single central record is kept for audit.

We comply with the Disqualification under the Childcare Act 2006 guidance issued in August 2018.

## **Supporting Children**

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

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

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

Our school will support all children on site.

We will promote a caring, safe and positive environment within RGS Guildford and RGS Prep.

We will encourage self-esteem and self-assertiveness, through the curriculum and through positive relationships within the RGS Guildford community.

We will ensure children are taught to understand and manage risk through Personal, Social, Health and Moral Education (PSHME), PSHCE at RGS Prep and Relationships and Sex Education (RSE) and through all aspects of school life. This includes online safety.

We will respond sympathetically to any requests for time out to deal with distress and anxiety.

We will offer details of helplines, counselling, or other avenues of external support.

We will liaise and work in partnership with other support services and agencies involved in Early Help and the safeguarding of children.

We will notify Social Care immediately if there is a significant concern.

We will provide continuing support to a child about whom there have been concerns who leaves RGS Guildford or RGS Prep by ensuring that information which may include paper files and relevant electronic documentation is shared under confidential cover to the child's new setting and ensure RGS Guildford or RGS Prep medical records are forwarded as a matter of priority and within statutory timescales.

## **Prevention / Protection**

We recognise that RGS Guildford and RGS Prep 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.

RGS Guildford and RGS Prep will:

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

Include regular consultation with children e.g., through questionnaires, participation in anti-bullying activity, asking children to report whether they have had issues at break and lunchtimes.

Ensure that all children know there is and can access an adult within RGS Guildford and RGS Prep whom they can approach if they are worried or in difficulty. The name of the designated members of staff for child protection, the Designated Safeguarding Lead and Deputies, are clearly advertised in multiple locations in the school.

Include safeguarding across the curriculum, including PSHME at RGS Guildford, the PSHCE programme at RGS Prep and RSE and provide opportunities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help.

In particular at RGS Guildford, this will include anti-bullying work, online-safety, accessing emergency services, road and pedestrian safety and personal safety with focussed work in Year 7 PSHME lessons to prepare for pupils for their first year at RGS Guildford.

Also, focussed work in Year 6 at RGS Prep to prepare for transition to Secondary school and more personal safety / independent travel.

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

Staff working in EYFS are aware of the additional restrictions on the use of mobile phones & cameras within their setting. (See Mobile Phone & Camera Policy) Staff working in the RGS Prep Nursery or Shell Classrooms must keep their mobile phones in the Staffroom. They may only use their phones in the staffroom or an outside area out of the sight of pupils and away from RGS Prep. There are display notices prohibiting the use of mobile phones/ cameras by parents or carers in the Nursery and Shell classrooms. In all classrooms of RGS Prep, use of mobile phones is restricted to those whose roles require (such as Estates or DSLs) or those who have otherwise asked permission in advance.



RGS Prep is committed to supporting and meeting the needs of all pupils. If a pupil has particular needs which require intimate care or the administration of medication, a support plan will be drawn up to meet those needs appropriately. Wherever possible, the pupil's wishes and feelings will be taken into account and respected throughout this process. (See the RGS Prep Intimate Care Policy).

## **Safe School, Safe Staff**

We will ensure that:

RGS Guildford and RGS Prep operates a safer recruitment procedure that includes statutory checks on staff suitability to work with children.

In addition, as part of the shortlisting process the RGS carries out an online search as part of their due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the school might want to explore with the applicant at interview. The RGS informs shortlisted candidates that online searches may be done as part of due diligence checks.

All staff receive information about RGS Guildford and RGS Prep's safeguarding arrangements, safeguarding statements, staff behaviour policy (code of conduct), Safeguarding Policy, the role and names of the Designated Safeguarding Lead and their deputies and Keeping Children Safe in Education Part 1, Annex A and Annex B. See link below:

[Keeping children safe in education 2024 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

All staff receive safeguarding and child protection training at induction in line with advice from Surrey Safeguarding Children's Partnership which is regularly updated and receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually via EDUCARE, an online provider or regular DSL updates during staff INSET.

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

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

The Safeguarding policy is made available via the RGS Guildford and RGS Prep website and that parents/carers are made aware of this policy.

All parents/carers are made aware of the responsibilities of staff members with regard to child protection procedures through the publication of the Safeguarding Policy and reference to it in RGS Guildford's *'The Guide'* and RGS Prep's *New Pupil Booklet*.

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

Our lettings policy will seek to ensure the suitability of adults working with children on school sites at any time.

Community users organising activities for children are aware of RGS Guildford and RGS Prep's Safeguarding Policy, guidelines and procedures.

The name of the designated members of staff for child protection, the Designated Safeguarding Lead and deputy(s), are clearly advertised in RGS Guildford and RGS Prep with a statement explaining their role in referring and monitoring cases of suspected harm and abuse.

All staff are expected to read Part 1, Annex A and Annex B of Keeping Children Safe in Education 2024 and will sign to say they have read and understood it. This applies to the Governing Body in relation to part 2 of the same guidance.

## **Roles and Responsibilities - All School Staff**

All staff have a key role to play in identifying concerns early and in providing help for children. To achieve this, they will:

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 RGS Guildford and RGS Prep who they can approach if they are worried or have concerns.

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.

Maintain an attitude of “it could happen here” with regards to safeguarding.

Know how to respond to a pupil 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).

All RGS Guildford and RGS Prep staff maintain a zero-tolerance approach to Sexual Violence and Sexual Harassment. Such abuse should never be passed off as ‘just banter’ or ‘just having a laugh’ or ‘part of growing up’ or ‘boys will be boys’ as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

Record their concerns if they are worried that a child is being abused and report these to the DSL immediately that day. If the DSL is not contactable immediately a Deputy DSL should be informed.

Be prepared to refer directly to the Multi Agency Partnership (MAP), and the police if appropriate, if there is a risk of significant harm and the DSL or their Deputies are not available.

Follow the allegations procedures if the disclosure is an allegation against a member of staff.

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

Provide support for children subject to Early Help, Child in Need or Child Protection that is in keeping with their plan.

Treat information with confidentiality but never promising to “keep a secret.”

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

Have an understanding of early help and be prepared to identify and support children who may benefit from early help.

Professionals should be alert to the need for Early Help for a child who:

- is frequently missing/goes missing from education, home or care
- has experienced multiple suspensions
- is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit
- has a parent or carer in custody or is affected by parental offending.

Undergo safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction, in line with any advice from the safeguarding partners.

Will identify children who may benefit from early help, liaising with the DSL in the first instance. (Options may include managing support for the child internally via RGS Guildford and RGS Prep's pastoral support process or an early help assessment). In some circumstances it may be appropriate for a member of school staff to act as the Lead Professional in early help cases.

Liaise with other agencies that support pupils and provide early help.

Know who the DSL and Deputy DSL are and know how to contact them.

Have an awareness of the role of the DSL, RGS Guildford and RGS Prep's Safeguarding Policy, Behaviour Policy and Staff Code of Conduct, and procedures relating to the safeguarding response for children who go missing from education.

Understand that corporal punishment is unlawful in all schools. RGS Guildford and RGS Prep do not condone or carry out any form of corporal punishment.

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.

#### **Use of Mobile Phones and Cameras Mobile Telephones:**

- Staff may only access their mobile phones during working hours, when pupils are not present and staff are not engaged in the process of teaching.
- The Head of RGS and the Head of RGS Prep can give permission for staff to access their mobile phones during teaching time, for example if family emergencies so dictate.
- Staff working within the EYFS must store their mobile phones out of the classroom areas during working hours.

#### **Use of Cameras:**

Photographs taken for the purpose of recording a pupil or group of pupils participating in activities or celebrating their achievements is an effective form of recording their progress. However, it is essential that photographs are taken and stored appropriately in order to safeguard the pupils in our care.

- Cameras on personal mobile phones may not be used at RGS Prep and only designated school cameras may be used to take images of pupils within the School setting or on outings. Sometimes outside providers may be appointed by the School to take photographs of pupils for media purposes, for the website, for marketing or for personal use. All parents must sign consent for this.

- The Head of RGS and the Head of RGS Prep are responsible for checking the list of pupils where consent is withheld. Alongside the marketing team, they need to ensure that images of these pupils do not appear on the School's website or in the media. Images taken on these cameras must be deemed suitable without putting the pupil/pupils in any compromising positions that could cause embarrassment or distress.
- Images taken and stored on the school camera must be downloaded by designated staff as soon as possible.
- At RGS any photographs taken on a mobile phone should be downloaded to the school system and deleted from the phone as soon as possible.
- Photographs may be distributed to other members of the staff in order to update pupil achievements, or for recording purposes.
- At RGS Prep cameras may only be taken into a bathroom if photographic evidence of children washing their hands needs to be recorded, as is sometimes required by EYFS. This activity must be properly supervised by appropriate staff.

## **Photography and images**

The vast majority of people who take or view photographs or videos of children do so for entirely innocent and acceptable reasons. Sadly, some people abuse children through taking or using images, so staff have the following safeguards in place.

To protect pupils, staff will:

- seek their consent for photographs to be taken or published (for example, on our website or in newspapers or publications)
- seek parental consent
- not use pupils full name with an image
- ensure pupils are appropriately dressed
- ensure that personal data is not shared.
- store images appropriately, securely and for no longer than necessary.
- only use school equipment, i.e., not personal devices.
- encourage pupils to tell us if they are worried about any photographs that are taken of them

Parents are asked to refrain from taking photographs at school events.

### **First aid and managing medical conditions.**

Staff will be trained appropriately in first aid and will adhere to the safeguarding implications.

Section 100 of the Children and Families Act 2014 places a duty on schools to make arrangements for supporting pupils at their school with medical conditions. Individual Health care Plans may need to be drawn up and multi-agency communication will be essential. Staff will be appropriately trained and responsibilities will be carried on in accordance with government guidance 'Supporting pupils at school with medical conditions' Dec 2015 [Supporting pupils at school with medical conditions \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

Assist the Governing Body and Headmaster/Head in fulfilling their safeguarding responsibilities set out in legislation and statutory guidance.

## **Roles and Responsibilities - The Headmaster/Head**

In addition to the role and responsibilities of all staff the Headmaster/Head will ensure that:

RGS Guildford and RGS Prep fully contributes to inter-agency working in line with Working Together to Safeguard Children 2023 guidance.

The Child Protection and Safeguarding Policy and procedures are implemented and followed by all staff.

All staff are aware of the role of the Designated Safeguarding Lead (DSL), including the identity of the DSL and any deputies.

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

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

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

The Designated Safeguarding Lead to ensure adequate and appropriate 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.

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

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

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

## **Roles and Responsibilities - The Designated Safeguarding Lead**

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) in RGS Guildford and RGS Prep, this responsibility is not able to be delegated.

Have an "it could happen here" approach to safeguarding.

Liaise with the local authority and work in partnership with other agencies in line with Working Together to Safeguard Children.

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

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

The DSL should make a referral themselves, which may include liaison with the relevant Channel Panel or local police contact.

The DSL should also support staff who make referrals to the Channel programme where there is a radicalisation concern, as required.

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 01483 632982 and ask to speak to the Prevent Supervisor for Surrey.

The Department of Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).

Refer cases where a crime may have been committed to the Police as required.

Liaise with the "case manager" and Local Authority Designated Officer for child protection concerns in cases which concern a member of staff or a volunteer; and refer cases where a person is dismissed or left service due to risk/harm to a child to the Disclosure and Barring Service and Teaching Regulation Agency, as required.

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

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

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

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

The DSL should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place).

Have a secure working knowledge of SSCP procedures and understands the assessment process for providing early help and statutory intervention, including the local authority levels of need criteria and referral arrangements.

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.

Understand and support RGS Guildford and RGS Prep in 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, tutors, school health professionals and the Head of Learning Support) on matters of safety and safeguarding and consult the SSCP Levels of Need document to inform decision making and liaison with relevant agencies. Will be alert to the specific needs of children in need, those with SEND and young carers.

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

Keep detailed, accurate records (either written or using appropriate secure online software), that include all concerns about a child even if there is no need to make an immediate referral and the rationale for decisions made and action taken.

Ensure that an indication of the existence of the additional child protection file is marked on the pupil school file record.

Ensure that when a pupil transfers school, their child protection file is passed to the new school as soon as possible, and within statutory timescales (separately from the main pupil file and ensuring secure transit) and that confirmation of receipt is received.

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

Ensure that a copy of the Child Protection file is retained until such a time that the new school acknowledges receipt of the original file. The copy should then be securely destroyed on confirmation of receipt.

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 Headmaster/Head any significant issues for example, use of the [SSCP multi-agency escalation procedures](#), enquiries under section 47 of the Children Act 1989 and police investigations.

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

Ensure that all staff sign to say they have read, understood and agree to work within RGS Guildford and RGS Prep's Safeguarding Policy, Staff Behaviour Policy (Code of Conduct) and Keeping Children Safe in Education (KCSIE 2024) Part 1, Annex A and Annex B and ensure that the policies are used effectively.

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

Ensure that in collaboration with RGS Guildford and RGS Prep leadership and governors, the Safeguarding Policy is reviewed annually and the procedures and implementation are updated and reviewed regularly.

Ensure that the Safeguarding Policy is available publicly and that parents are aware that referrals about suspected harm and abuse will be made and the role of RGS Guildford and RGS Prep in this.

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

Contribute to and provide, with the Headmaster/Head and Chair of Governors, the "Audit of Statutory Duties and Associated Responsibilities" to be submitted annually to the Surrey County Council, Education Safeguarding Team.

Ensure that the name of the designated members of staff for Child Protection, the Designated Safeguarding Lead and deputies, are clearly advertised in RGS Guildford and RGS Prep, with a statement explaining RGS Guildford and RGS Prep's role in referring and monitoring cases of suspected abuse.

Meet all other responsibilities as set out for DSLs in Keeping Children Safe in Education 2024.

## **Roles and Responsibilities - The Deputy Designated Safeguarding Lead(s)**

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

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

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

In the absence of the DSL, carries out the activities necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the DSL the deputy will assume all of the functions above.

## **Roles and Responsibilities - All members of The Governing Body**

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

RGS Guildford and RGS Prep have effective safeguarding policies and procedures including a Safeguarding Policy, a Staff Behaviour Policy or Code of Conduct, a Behaviour Policy and a response to children who go missing from education. Ensure policies are consistent with Surrey Safeguarding Children's Partnership (SSCP) and statutory requirements, are reviewed annually and that the Safeguarding Policy is available on RGS Guildford and RGS Prep website.

The SSCP is informed in line with local requirements about the discharge of duties via the annual safeguarding audit.

RGS Guildford and RGS Prep operates a safer recruitment procedure that includes statutory checks on staff suitability to work with children and disqualification by association regulations and by ensuring that there is at least one person on every recruitment panel who has completed safer recruitment training, if there is not a panel conducting interviews then the individual will have completed the safer recruitment training.



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

Staff have been trained appropriately and this is updated in line with guidance and all staff have read Keeping Children Safe in Education (2024) part 1, Annex A and Annex B that mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance.

All staff undergo safeguarding and child protection training (including online safety which, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction. The training should be regularly updated and in line with any advice from the safeguarding partners

Ensure online safety is a running and interrelated theme whilst devising and implementing their whole school or college approach to safeguarding and related policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead (and deputies) and any parental engagement.

Review the ICT monitoring standards so that they meet safeguarding needs and discuss with IT staff and service providers what more needs to be done to support schools and colleges in meeting this standard.

All staff including temporary staff and volunteers are provided with RGS Guildford and RGS Prep's Safeguarding Policy and Staff Behaviour Policy.

RGS Guildford and RGS Prep has procedures for dealing with allegations of abuse against staff (including the Headmaster/Head), 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.

A nominated governor for safeguarding is identified.

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

On appointment, the DSL and deputy(s) undertake appropriate interagency training and also undertake DSL 'New to Role' and 'Update' training every two years, as well as attending DSL network events to refresh knowledge and skills.

Children are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through Personal, Social, Health and Moral Education (PSHME) at the RGS, the PSHCE programme at RGS Prep and Relationships and Sex Education (RSE).

RGS Guildford and RGS Prep will comply with DfE and Surrey County Council [Children Missing Education](#) requirements, including the updates brought into effect from August 2024.

RGS Guildford and RGS Prep will comply with regular data returns requested by the Local Authority, regarding all pupils, of statutory school age, attending alternative provision and/or on a reduced or modified timetable.

Appropriate online filtering and monitoring systems are in place.

Enhanced DBS checks (without barred list checks unless the governor is also a volunteer at RGS Guildford and RGS Prep) are in place for all Governors.

Any weaknesses in Safeguarding are remedied immediately.

## Confidentiality and Sharing Information

All matters relating to child protection will be treated as confidential and only shared as per the [‘Information Sharing Advice for Practitioners’ \(DfE 2018\) guidance](#).

Information will be shared with staff within RGS Guildford and RGS Prep who ‘need to know.’

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 General Data Protection Regulations are not a barrier to sharing information where a failure to do so would place a child at risk of harm. There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.

It is recommended that all staff and governors read the DfE Data Protection guidance for schools (DfE, 2024b) [Data protection in schools - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/data-protection-in-schools) that sets out how to: comply with data protection law; develop data policies; understand what staff and pupil data to keep; and prevent personal data breaches

All staff must be aware that they cannot promise a child to keep secrets which might compromise the child’s safety or wellbeing. However, staff are aware that matters relating to child protection and safeguarding are personal to children and families, in this respect they are confidential, and the Headmaster/Head or DSLs will only disclose information about a child to other members of staff on a need-to-know basis.

All staff will always undertake to share our intention to refer a child to Social Care with their parents /carers unless to do so could put the child at greater risk of harm or impede a criminal investigation.

## Child Protection Procedures

The following procedures apply to all staff working in RGS Guildford and RGS Prep and will be covered by training to enable staff to understand their role and responsibility.

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

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

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

As well as keeping records of concerns, discussions and decisions, the DSL should keep record of the rationale for any decisions made.

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

1. Make an initial record of the information related to the concern.
2. Report it to the DSL immediately.

3. The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available.
4. Make an accurate record (which may be used in any subsequent court proceedings) as soon as possible and within 24 hours of the occurrence, of all that has happened, including details of:
  - Dates and times of their observations.
  - Dates and times of any discussions in which they were involved.
  - Any injuries.
  - Explanations given by the child / adult.
  - Rationale for decision making and action taken.
  - Any actual words or phrases used by the child.
5. The records must be signed and dated by the author or / equivalent on electronic based records.
6. In the absence of the DSL or their Deputy, staff must be prepared to refer directly to the C-SPA (and the police if appropriate) if there is the potential for immediate significant harm.

**Following a report of concerns the DSL must:**

1. [Using the SSCP Levels of Need](#), decide whether, or not there are sufficient grounds for suspecting significant harm, in which case a referral must be made to the C-SPA and the police if it is appropriate. [Effective-family-resilience-SSCP-Dec-2020-v7-1.pdf \(surreyscp.org.uk\)](#)
2. Normally RGS Guildford and RGS Prep should try to discuss any concerns about a child's welfare with the family and where possible to seek their agreement before making a referral to the C-SPA. However, this should only be done when it will not place the child at increased risk or could impact a police investigation. The child's views should also be taken into account.

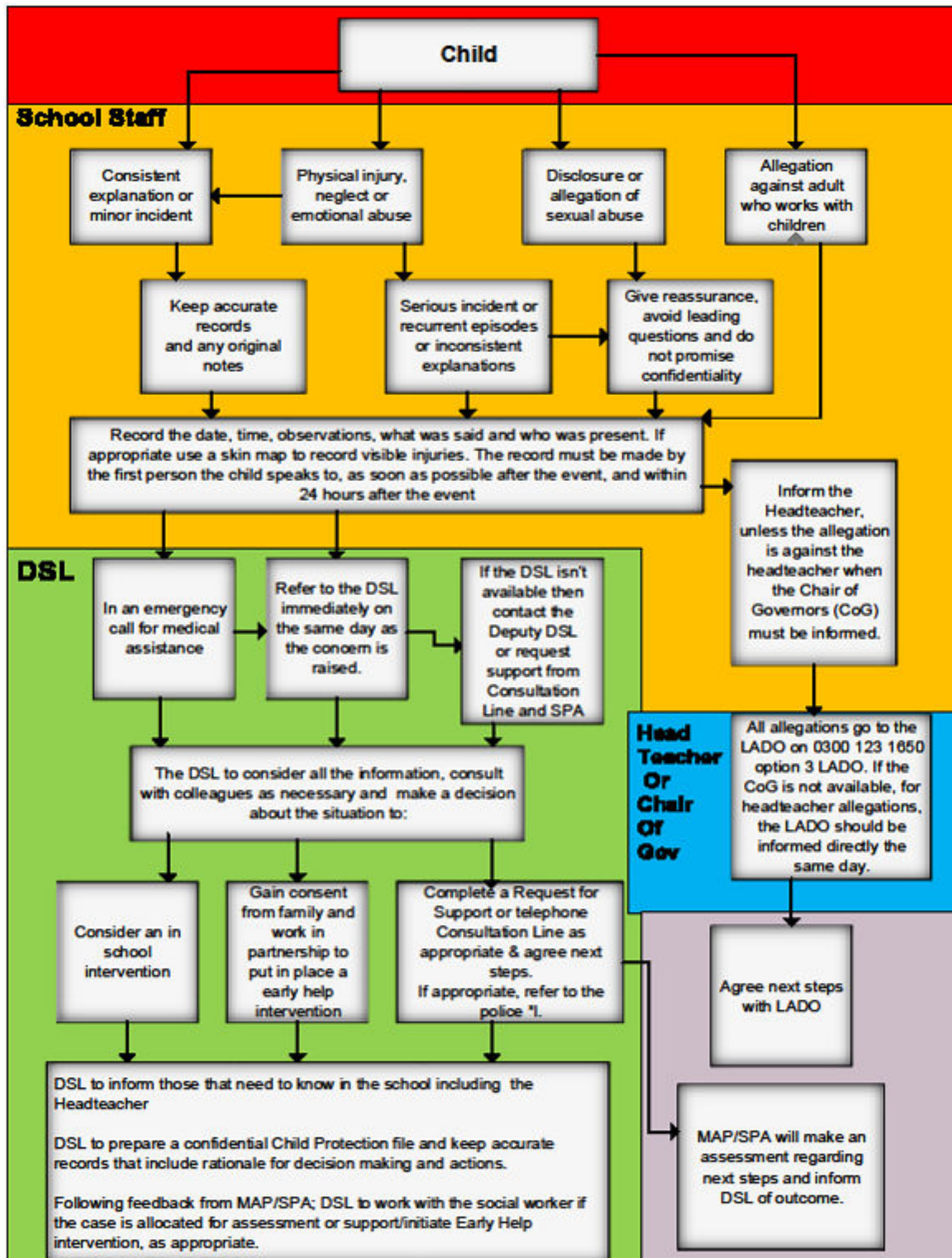
If there are grounds to suspect a child is suffering, or is likely to suffer, significant harm or abuse the DSL must contact the C-SPA (by sending a Request for Support Form) securely by email to: [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk) or contact the C-SPA consultation line on 0300 470 9100 to discuss the concerns. If a child is in immediate danger and urgent protective action is required, the Police (dial 999) must be called. The DSL must also notify the C-SPA of the occurrence and what action has been taken.

3. If the DSL feels unsure about whether a referral is necessary, they can phone the C-SPA to discuss concerns.
4. If there is not a risk of significant harm, the DSL will either actively monitor the situation or consider offering early help.
5. Where there are doubts or reservations about involving the child's family, the DSL should clarify with the C-SPA or the police whether the parents should be told about the referral and, if so, when and by whom. This is important in cases where the police may need to conduct a criminal investigation.
6. When a pupil is in need of urgent medical attention and there is suspicion of abuse the DSL or their Deputy should take the child to the accident and emergency unit at the nearest hospital, having first notified the C-SPA. The DSL should seek advice about what action the

C-SPA will take care about informing the parents, remembering that parents should normally be informed that a child requires urgent hospital attention.

7. The exception to this process will be in those cases of known FGM where there is a mandatory requirement for the teacher to report directly to the police. The DSL should also be made aware.

## Child Protection Procedures Flowchart



*\* In the cases of known FGM, the teacher who was made aware will also make contact with the police*

## Dealing with disclosures

### 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 may need to pass information to other professionals to help keep the child 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 RGS Guildford or RGS Prep premises at the time and have concerns about sending a child home.

### 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 as far as is honest and reliable;
- Do not 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;
- 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 re-consideration.

### **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, persons present and noticeable non-verbal 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 Headmaster/Head or Safeguarding Governor of RGS Guildford and RGS Prep and/or may contact the C-SPA.

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.

## **Allegations against adults who work with children**

### **Procedure**

This procedure should be used in all cases in which it is alleged a member of staff or volunteer in a school, or another adult who works with children has:

- *behaved in a way that has harmed a child, or may have harmed a child;*
- *possibly committed a criminal offence against or related to a child; or*

- *behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children.*

In dealing with allegations or concerns against an adult, staff must:

- Report any concerns about the conduct of any member of staff or volunteer to the Headmaster/Head immediately;
- Where there may be a conflict of interest in reporting the matter to the Headmaster/Head, the matter should be reported to the LADO directly;
- If an allegation is made against the Headmaster/Head, the concerns need to be raised with the Chair of Governors as soon as possible, without informing the Headmaster/Head. If the Chair of Governors is not available, then the LADO should be contacted directly without informing the Head;
- There may be situations when the Headmaster/Head or Chair of Governors 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 Headmaster/Head or Chair of Governors, they will contact the LADO on 0300123 1650 option 3 LADO; 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 of the allegation unless there is a good reason not to.
- Where an allegation relates to a member of supply staff provided by an agency, the agency should be fully involved.

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

If the matter is investigated internally, the LADO will advise RGS Guildford and RGS Prep to seek guidance from local authority colleagues in following procedures set out in part 4 of 'Keeping Children Safe in Education' (2024) and the SSCP procedures.

RGS Guildford and RGS Prep may 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). As with any safeguarding allegation, schools and colleges should follow their safeguarding policies and procedures, including informing the LADO.

## **What is child abuse?**

The following definitions are taken from [Working Together to Safeguard Children HM Government \(2023\)](#). In addition to these definitions, it should be understood that children can also be abused by being sexually exploited, honour-based abuse, forced marriage or female genital mutilation. To support the local context, all staff have access to the Surrey Safeguarding Children Partnership resources [Abuse & Neglect - Surrey Safeguarding Children Partnership \(surreyscp.org.uk\)](#)

## **What is abuse, neglect and exploitation?**

Abuse, neglect and exploitation are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another child or children.



## **Physical abuse**

Physical abuse 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 persistent 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 participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another.

It may involve serious bullying (including cyber bullying), 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 in isolation.

## **Sexual abuse**

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

The activities may involve physical contact, 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 (including online).

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

## **Neglect**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

Neglect may occur during pregnancy 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);
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Members of DSL teams at both the RGS and RGS Prep have received additional training on the [Graded Care Profile: Neglect Assessment Tool](#).

The Surrey Safeguarding Children Partnership has a [Neglect Strategy \(2024-2026\)](#)

## **Neglect**

The nature of neglect.

Neglect is a lack of parental care, but poverty and lack of information or adequate services can be contributory factors.

Far more children are registered to the category of neglect on Child in Need and Child Protection plans than to the other categories. As with abuse, the number of children experiencing neglect is likely to be much higher than the numbers on the plans.

Neglect can include parents or carers failing to:

- provide adequate food, clothing and shelter;
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision or stimulation;
- ensure access to appropriate medical care or treatment.

NSPCC research has highlighted the following examples of the neglect of children under 12 years old:

- frequently going hungry;
- frequently having to go to school in dirty clothes;
- regularly having to look after themselves because of parents being away or having problems such as drug or alcohol misuse;
- being abandoned or deserted;
- living at home in dangerous physical conditions;
- not being taken to the doctor when ill;
- not receiving dental care.

Neglect is a difficult form of abuse to recognise and is often seen as less serious than other categories. It is, however, very damaging: children who are neglected often develop more slowly than others and may find it hard to make friends and fit in with their peer group.

Neglect is often noticed at a stage when it does not pose a risk to the child. The duty to safeguard and promote the welfare of children (What to do if You're Worried a Child is Being Abused DfE 2015) would suggest that an appropriate intervention or conversation at this early stage can address the issue and prevent a child continuing to suffer until it reaches a point when they are at risk of harm or in significant need.

Neglect is often linked to other forms of abuse, so any concerns school staff have should be discussed with the DSL.

## **Indicators of neglect**

The following is a summary of some of the indicators that may suggest a child is being abused or is at risk of harm.

It is important to recognise that indicators alone cannot confirm whether a child is being abused. Each child should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Do not keep it to yourself.

#### Physical indicators of neglect

- Constant hunger and stealing food;
- Poor personal hygiene - unkempt, dirty or smelly;
- Underweight;
- Dress unsuitable for weather;
- Poor state of clothing;
- Illness or injury untreated.

#### Behavioural indicators of neglect

- Constant tiredness;
- Frequent absence from school or lateness;
- Missing medical appointments;
- Isolated among peers;
- Frequently unsupervised;
- Stealing or scavenging, especially food;
- Destructive tendencies.

## **Emotional abuse**

The nature of emotional abuse.

Most harm is produced in low warmth, high criticism homes, not from single incidents.

Emotional abuse is difficult to define, identify/recognise and/or prove.

Emotional abuse is chronic and cumulative and has a long-term impact.

All kinds of abuse, neglect and exploitation have emotional effects although emotional abuse can occur by itself.

Children can be harmed by witnessing someone harming another person – as in domestic abuse.

It is sometimes possible to spot emotionally abusive behaviour from parents and carers to their children, by the way that the adults are speaking to, or behaving towards children. An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later on.

## **Indicators of emotional abuse**

#### Developmental issues

- Delays in physical, mental and emotional development;
- Poor school performance;
- Speech disorders, particularly sudden disorders or changes.

#### Behaviour

- Acceptance of punishment which appears excessive;
- Over-reaction to mistakes;
- Continual self-deprecation (I am stupid, ugly, worthless etc.);
- Neurotic behaviour (such as rocking, hair-twisting, thumb-sucking);
- Self-mutilation;
- Suicide attempts;

- Drug/solvent abuse;
- Running away;
- Compulsive stealing, scavenging;
- Acting out;
- Poor trust in significant adults;
- Regressive behaviour – e.g., wetting;
- Eating disorders;
- Destructive tendencies;
- Neurotic behaviour;
- Arriving early at school, leaving late.

#### Social issues

- Withdrawal from physical contact;
- Withdrawal from social interaction;
- Over-compliant behaviour;
- Insecure, clinging behaviour;
- Poor social relationships.

#### Emotional responses

- Extreme fear of new situations;
- Inappropriate emotional responses to painful situations (“I deserve this”);
- Fear of parents being contacted;
- Self-disgust;
- Low self-esteem;
- Unusually fearful with adults;
- Lack of concentration, restlessness, aimlessness;
- Extremes of passivity or aggression.

## Physical abuse

The nature of physical abuse.

Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly, it is not necessary to be concerned about most of these minor injuries. But accidental injuries normally occur on the bony prominences – e.g. knees, shins.

Injuries on the soft areas of the body are more likely to be inflicted intentionally and should therefore make us more alert to other concerning factors that may be present.

A body map can assist in the clear recording and reporting of physical abuse. The body map should only be used to record observed injuries and no child should be asked to remove clothing by a member of staff of RGS Guildford or RGS Prep.

#### Indicators of physical abuse / factors that should increase concern

- Multiple bruising or bruises and scratches (especially on the head and face);
- Clusters of bruises – e.g., fingertip bruising (caused by being grasped);
- Bruises around the neck and behind the ears – the most common abusive injuries are to the head;
- Bruises on the back, chest, buttocks, or on the inside of the thighs;
- Marks indicating injury by an instrument – e.g., linear bruising (stick), parallel bruising (belt), marks of a buckle;
- Bite marks;

- Deliberate burning may also be indicated by the pattern of an instrument or object – e.g., electric fire, cooker, cigarette;
- Scalds with upward splash marks or tide marks;
- Untreated injuries;
- Recurrent injuries or burns;
- Bald patches.

In the context of RGS Guildford and RGS Prep, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when:

- the explanation given does not match the injury;
- the explanation uses words or phrases that do not match the vocabulary of the child (adult's words);
- no explanation is forthcoming;
- the child (or the parent/carer) is secretive or evasive;
- the injury is accompanied by allegations of abuse or assault.

You should be concerned if a child:

- is reluctant to have parents/carers contacted;
- runs away or shows fear of going home;
- is aggressive towards themselves or others;
- flinches when approached or touched;
- is reluctant to undress to change clothing for sport;
- wears long sleeves during hot weather;
- is unnaturally compliant in the presence of parents/carers;
- has a fear of medical help or attention;
- admits to a punishment that appears excessive.

## Sexual abuse

The nature of sexual abuse.

Sexual abuse is often perpetrated by people who are known and trusted by the child – e.g., relatives, family friends, neighbours, babysitters, and people working with the child in school, faith settings, clubs or activities. Children can also be subject to child sexual exploitation.

Sexual exploitation is seen as a separate category of sexual abuse. The [SSCP professional guidance](#) provides school staff with information regarding indicators of CSE as does the NSPCC [Child Sexual Exploitation & How to Keep Your Child Safe | NSPCC](#)

Characteristics of child sexual abuse:

- it is often planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic;
- grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent (this may occur online);
- grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives.

Most people who sexually abuse children are men, but some women sexually abuse too.

## Indicators of sexual abuse

### Physical observations:

- Damage to genitalia, anus or mouth;
- Sexually transmitted diseases;
- Unexpected pregnancy, especially in very young girls;
- Soreness in genital area, anus or mouth and other medical problems such as chronic itching;
- Unexplained recurrent urinary tract infections and discharges or abdominal pain.

### Behavioural observations:

- Sexual knowledge inappropriate for age;
- Sexualised behaviour or affection inappropriate for age;
- Sexually inappropriate behaviour;
- Hinting at sexual activity;
- Inexplicable decline in education progress;
- Depression or other sudden apparent changes in personality as becoming insecure;
- Lack of concentration, restlessness, aimlessness;
- Socially isolated or withdrawn;
- Overly compliant behaviour;
- Acting out, aggressive behaviour;
- Poor trust or fear concerning significant adults;
- Regressive behaviour;
- Onset of wetting, by day or night; nightmares;
- Arriving early at school, leaving late, running away from home;
- Suicide attempts, self-mutilation;
- Suddenly drawing sexually explicit pictures;
- Eating disorders or sudden loss of appetite or compulsive eating;
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys;
- Become worried about clothing being removed;
- Trying to be 'ultra-good' or perfect; overreacting to criticism.

## Abuse involving Children with SEN needs

Children with special educational needs or certain health conditions can face additional safeguarding challenges both online and offline.

Additional barriers can exist when recognising abuse, neglect and exploitation in this group of children. 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
  - communication barriers and difficulties in managing or reporting these challenges
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

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

The RGS will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place. Guidance on this support can be found from a number of places:

[SEND code of practice: 0-25 years](#)

[Supporting pupils at School with medical conditions](#)

[The Special Educational Needs and Disabilities Information and Support Services \(SENDIASS\).](#)

[Mencap](#)

[Children with special educational needs and disabilities \(SEND\) | NSPCC Learning](#)

[Safeguarding d/Deaf and disabled children and young people | NSPCC Learning](#)

## **Children who are lesbian, gay, bisexual, or gender questioning.**

*\*Please be aware that this section when written is still under review, pending the outcome of the gender questioning children guidance consultation, and final gender questioning guidance documents being published. The link in the paragraph below is for the draft consultation document that at the time of writing has not been finalised.*

A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are. However, the Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder.

It recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience. As such, when supporting a gender questioning child, The Royal Grammar School will take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. The Royal Grammar School and RGS Prep will refer to the [Guidance for Schools and Colleges in relation to Gender Questioning Children](#), when deciding how to proceed. Risks can be compounded where children lack trusted adults with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff

## **Children and the Court System**

Children are sometimes required to give evidence either as witnesses in the criminal courts or as part of family court procedure. This can be stressful and may reflect existing conflict and difficulties in the family. Staff members should be aware that any child who is involved in the court process may be at risk of a particular safeguarding issue. The Ministry of Justice has produced two age-appropriate guides for children who may have to give evidence in the criminal courts.

Guidance for schools can be found:

-for 5 to 11 year olds (HM Courts and Tribunals Service, 2017a) [Young witness booklet for 5 to 11 year olds - GOV.UK \(www.gov.uk\)](#)

-for 12 to 17 year olds (HM Courts and Tribunals Service, 2017b) [Young witness booklet for 12 to 17 year olds - GOV.UK \(www.gov.uk\)](#)

## **Children with Family members in prison**

Children with a parent in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. National Information Centre on Children of Offenders provides information designed to support professionals working with offenders and their children to help mitigate the negative consequences for those children.

## **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL and deputies are aware of contact details and referral routes into the Local housing Authority so that they can raise /progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour as well as the family being asked to leave a property. In most cases school staff will be considering homelessness in the context of children who live with their families and intervention will be on that basis. However, it should be recognised that some 16 and 17 year olds may be living independently for example, having being excluded from the family home and will require a different level of intervention and support. Children's services will be the lead agency for those young people and the DSL or deputy should ensure appropriate referrals are made based on the child's circumstances.

## **Cyber Crime**

Cyber crime is criminal activity committed using computers and/or the internet. It is broadly categorised as cyber enabled (crimes that can happen offline but are enabled at speed online) or cyber dependant (crimes that can only be committed using a computer).

Cyber dependant crimes include:

- Unauthorised access to computers (illegal hacking) for example accessing the school's computer network to access exam papers or to change grades awarded.
- Denial of Service. (DoS DDos attacks or "bootin") these are attempts to make a computer network or website unavailable by overwhelming it with traffic from multiple sources;
- Making, supplying or maintaining malware (malicious software) such as viruses, ransomware, spyware, botnet and remote access trojans, with the intent to commit further offence, including those above.
- Children with particular skill and interest in technology may inadvertently or deliberately stray into cyber-dependant crime. If there are concerns about a child in this area the DSL, should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the home office and led by the NCA working with regional and local police. It aims to intervene where young people are at risk of committing or being drawn into low level cyber dependant offences and divert them to a more positive use of their skills and interest. Note that Cyber Choices does not currently cover cyber enabled crime such as fraud, purchasing of illegal drugs online and child sexual abuse and exploitation nor other areas of concern such as online bullying or general online safety.

## **Child Abduction and Community Safety Incidents**

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



Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence (for example, as they start travelling to school on their own) it is important they are given practical advice about how to keep themselves safe for example in the form of outdoor safety lessons or sessions from the local police force.

## **Sexual violence and sexual harassment between children in school**

### **Child on Child Abuse Policy**

#### **Context**

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

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

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, adult students and school and college staff are supported and protected as appropriate.

#### **Policy**

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

We recognise that children are capable of abusing their peers and this will be dealt with under our Safeguarding Policy and in line with KCSIE (2024).

We are clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.

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

#### **Prevention**

Taking a whole school approach to safeguarding & child protection.

Providing training to staff.

Providing a clear set of values and standards, underpinned by RGS Guildford and RGS Prep'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 to reports of sexual violence and sexual harassment**

Children making a report of sexual violence or sexual harassment including "upskirting" (which is a criminal offence under the Voyeurism Act 2019), typically involves taking a picture under a person's

clothing without him/her knowing, with the intention of viewing their genitals or buttocks for the purpose of sexual gratification or to cause the victim humiliation, distress or alarm.

Any report of “upskirting” will be taken seriously, children will be kept safe and will be well supported. If the report includes an online element staff will be mindful of the [Searching, Screening and Confiscation: advice for schools \(DfE 2022 guidance\)](#).

Staff taking the report will inform the DSL or the Deputy DSL immediately.  
Staff taking a report will never promise confidentiality.  
Parents or carers should usually be informed (unless this would put the child at greater risk).

RGS Guildford and RGS Prep recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported.

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

### **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 RGS Guildford and RGS Prep;
- 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 RGS Guildford and RGS Prep’s approach to supporting and protecting pupils.

Support regarding risk assessments can be accessed from the [Education Safeguarding Team](#) – [education.safeguarding@surreycc.gov.uk](mailto:education.safeguarding@surreycc.gov.uk)

### **Action: 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.

Ongoing risks.

Other related issues or wider context.

**Options:**

Manage internally with the support of Tutors, Heads of Year and Heads of Section.

Early Help intervention.

Request for Support to the C-SPA.

Report to the police (generally in parallel with a referral to the C-SPA).

**Ongoing Response:**

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

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 school premises and on transport where appropriate.

Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, RGS Guildford or RGS Prep 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 school or college would seriously harm the education or welfare of the victim (and potentially themselves and other pupils).

Where a criminal investigation into sexual assault leads to a conviction or caution, RGS Guildford or RGS Prep 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 RGS Guildford or RGS Prep, the Headmaster/Head should continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on school and college premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

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

RGS Guildford or RGS Prep will take any disciplinary action against the alleged perpetrator in accordance with the School's behaviour policy.

RGS Guildford and RGS Prep recognise that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.

**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 pupils to pupils can also be abusive.

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

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

References:

[Keeping children safe in education 2024 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/123456/keeping-children-safe-in-education-2024.pdf)

## **Harmful Sexual Behaviour**

The [Brook Traffic Light Tool](#) uses a traffic light system to categorise the sexual behaviours of young people and is designed to help be a guide for 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, school can work with other agencies to the same standardised criteria when making decisions and can protect children and young people with a multi-agency approach.

The NSPCC have an explanation around the use of Hackett's sexualised behaviour continuum

[Understanding sexualised behaviour in children | NSPCC Learning](#)

RGS Guildford recognise that it is vital that professionals agree on how behaviours should be categorised regardless of culture, faith, beliefs, and their own experiences or values.

## Brook Sexual Behaviours Traffic Light Tool

### Behaviours: age 0 to 5

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

#### What is a green behaviour?

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

#### What can you do?

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

#### Green behaviours

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

#### What is an amber behaviour?

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

#### What can you do?

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

#### Amber behaviours

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

#### What is a red behaviour?

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

#### What can you do?

Red behaviours indicate a need for immediate intervention and action.

#### Red behaviours

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

This is intended to be used as a guide only. Please refer to the guidance tool at <https://www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool> for further information

Print date: 01/10/2015 - Brook has taken every care to ensure that the information contained in this publication is accurate and up-to-date at the time of being published. As information and knowledge is constantly changing, readers are strongly advised to use this information for up to one month from print date. Brook accepts no responsibility for difficulties that may arise as a result of an individual acting on the advice and recommendations it contains.

### Behaviours: age 5 to 9 and 9 to 13

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

<p><b>What is a green behaviour?</b></p> <p>Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability and reflective of natural curiosity, experimentation, consensual activities and positive choices</p> <p><b>What can you do?</b> Green behaviours provide opportunities to give positive feedback and additional information.</p> <p><b>Green behaviours 5-9</b></p> <ul style="list-style-type: none"> <li>• feeling and touching own genitals</li> <li>• curiosity about other children's genitals</li> <li>• curiosity about sex and relationships, e.g. differences between boys and girls, how sex happens, where babies come from, same-sex relationships</li> <li>• sense of privacy about bodies</li> <li>• telling stories or asking questions using swear and slang words for parts of the body</li> </ul> <p><b>Green behaviours 9-13</b></p> <ul style="list-style-type: none"> <li>• solitary masturbation</li> <li>• use of sexual language including swear and slang words</li> <li>• having girl/boyfriends who are of the same, opposite or any gender</li> <li>• interest in popular culture, e.g. fashion, music, media, online games, chatting online</li> <li>• need for privacy</li> <li>• consensual kissing, hugging, holding hands with peers</li> </ul>	<p><b>What is an amber behaviour?</b></p> <p>Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.</p> <p><b>What can you do?</b> Amber behaviours signal the need to take notice and gather information to assess the appropriate action.</p> <p><b>Amber behaviours 5-9</b></p> <ul style="list-style-type: none"> <li>• questions about sexual activity which persist or are repeated frequently, despite an answer having been given</li> <li>• sexual bullying face to face or through texts or online messaging</li> <li>• engaging in mutual masturbation</li> <li>• persistent sexual images and ideas in talk, play and art</li> <li>• use of adult slang language to discuss sex</li> </ul> <p><b>Amber behaviours 9-13</b></p> <ul style="list-style-type: none"> <li>• uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing</li> <li>• verbal, physical or cyber/virtual sexual bullying involving sexual aggression</li> <li>• LGBT (lesbian, gay, bisexual, transgender) targeted bullying</li> <li>• exhibitionism, e.g. flashing or mooning</li> <li>• giving out contact details online</li> <li>• viewing pornographic material</li> <li>• worrying about being pregnant or having STIs</li> </ul>	<p><b>What is a red behaviour?</b></p> <p>Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental, or power differences. They may pose a concern due to the activity type, frequency, duration or the context in which they occur</p> <p><b>What can you do?</b> Red behaviours indicate a need for immediate intervention and action.</p> <p><b>Red behaviours 5-9</b></p> <ul style="list-style-type: none"> <li>• frequent masturbation in front of others</li> <li>• sexual behaviour engaging significantly younger or less able children</li> <li>• forcing other children to take part in sexual activities</li> <li>• simulation of oral or penetrative sex</li> <li>• sourcing pornographic material online</li> </ul> <p><b>Red behaviours 9-13</b></p> <ul style="list-style-type: none"> <li>• exposing genitals or masturbating in public</li> <li>• distributing naked or sexually provocative images of self or others</li> <li>• sexually explicit talk with younger children</li> <li>• sexual harassment</li> <li>• arranging to meet with an online acquaintance in secret</li> <li>• genital injury to self or others</li> <li>• forcing other children of same age, younger or less able to take part in sexual activities</li> <li>• sexual activity e.g. oral sex or intercourse</li> <li>• presence of sexually transmitted infection (STI)</li> <li>• evidence of pregnancy</li> </ul>
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This is intended to be used as a guide only. Please refer to the guidance tool at <https://www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool> for further information

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Brook sexual behaviours traffic light tool adapted from Family Planning Queensland. (2012). Traffic Lights guide to sexual behaviours. Brisbane: Family Planning Queensland, Australia.

## Behaviours: age 13 to 17

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

What is a green behaviour?	What is an amber behaviour?	What is a red behaviour?
<p>Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability and reflective of natural curiosity, experimentation, consensual activities and positive choices.</p> <p><b>What can you do?</b> Green behaviours provide opportunities to give positive feedback and additional information.</p> <p><b>Green behaviours 13-17</b></p> <ul style="list-style-type: none"> <li>• solitary masturbation</li> <li>• sexually explicit conversations with peers</li> <li>• obscenities and jokes within the current cultural norm</li> <li>• interest in erotica/pornography</li> <li>• use of internet/e-media to chat online</li> <li>• having sexual or non-sexual relationships</li> <li>• sexual activity including hugging, kissing, holding hands</li> <li>• consenting oral and/or penetrative sex with others of the same or opposite gender who are of similar age and developmental ability</li> <li>• choosing not to be sexually active</li> </ul>	<p>Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.</p> <p><b>What can you do?</b> Amber behaviours signal the need to take notice and gather information to assess the appropriate action.</p> <p><b>Amber behaviours 13-17</b></p> <ul style="list-style-type: none"> <li>• accessing exploitative or violent pornography</li> <li>• uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress,</li> <li>• withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing</li> <li>• concern about body image</li> <li>• taking and sending naked or sexually provocative images of self or others</li> <li>• single occurrence of peeping, exposing, mooning or obscene gestures</li> <li>• giving out contact details online</li> <li>• joining adult- only social networking sites and giving false personal information</li> <li>• arranging a face to face meeting with an online contact alone</li> </ul>	<p>Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental, or power differences. They may pose a concern due to the activity type, frequency, duration or the context in which they occur</p> <p><b>What can you do?</b> Red behaviours indicate a need for immediate intervention and action.</p> <p><b>Red behaviours 13-17</b></p> <ul style="list-style-type: none"> <li>• exposing genitals or masturbating in public</li> <li>• preoccupation with sex, which interferes with daily function</li> <li>• sexual degradation/humiliation of self or others</li> <li>• attempting/forcing others to expose genitals</li> <li>• sexually aggressive/exploitative behaviour</li> <li>• sexually explicit talk with younger children</li> <li>• sexual harassment</li> <li>• non-consensual sexual activity</li> <li>• use of/acceptance of power and control in sexual relationships</li> <li>• genital injury to self or others</li> <li>• sexual contact with others where there</li> <li>• is a big difference in age or ability</li> </ul>

		<ul style="list-style-type: none"><li>• sexual activity with someone in authority and in a position of trust</li><li>• sexual activity with family members</li><li>• involvement in sexual exploitation and/or trafficking</li><li>• sexual contact with animals</li><li>• receipt of gifts or money in exchange for sex</li></ul>
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## Anti-Bullying and Cyberbullying

Our school policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures.

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 differences / perceived differences are more susceptible to being bullied / victims of child abuse.

When there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm' a bullying incident should be addressed as a child protection concern. If the anti-bullying procedures are seen to be ineffective, the Headmaster/Head and the DSL will also consider child protection procedures.

PSHME education regularly provides opportunities for children to understand bullying is wrong, its impact and how to deal with it.

## Online Safety

RGS Guildford and RGS Prep have an online safety policy which explains how we try to keep pupils safe in school and how we respond to online safety incidents.

Children increasingly use electronic equipment on a daily basis to access the internet, share and view content and images via social media sites such as Facebook, X, TikTok, Instagram, Snapchat and voodoo and for online gaming.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into 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, and extremism.

-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 them 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 you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>)

Some adults and other children use these technologies to harm children. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing children to engage in extremist or sexual behaviour such as webcam photography or face-to-face meetings.

Pupils may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders.

Pupils are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated. RGS Guildford online safety co-ordinator is Mr. Matthew Bailey, (Head of Third Form). The online safety co-ordinator at RGS Prep is Mr Nick Williams. Filtering and monitoring generally is overseen by the DSL.

The School filtering and monitoring system will be reviewed annually. Harmful and inappropriate content will be blocked without unreasonably impacting teaching and learning. The appropriate level of security protection procedures should be in place in order to safeguard the School systems, staff and learners to keep up with evolving cyber-crime technologies.

## **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.

## **Radicalisation and Extremism**

[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 'as 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.' We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

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.

RGS Guildford and RGS Prep are clear that exploitation of susceptible children and radicalisation should be viewed as a safeguarding concern and follows the Department for Education guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism.

RGS Guildford and RGS Prep seek to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

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

Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture; RGS Guildford and RGS Prep follows the [DfE advice Promoting Fundamental British Values as part of SMSC \(spiritual, moral, social and cultural education\) in Schools \(2014\)](#).

RGS Guildford and RGS Prep school governors, the Headmaster/Head and the Designated Safeguarding Leads (DSL) will assess the level of risk within the school 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](https://www.et-foundation.co.uk/professional-development/safeguarding-prevent/legislation-guidance-resources/policy) <https://www.et-foundation.co.uk/professional-development/safeguarding-prevent/legislation-guidance-resources/policy> and other issues specific to the school's profile, community and philosophy.

When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL in the first instance.

They should then follow the safeguarding procedures and refer cases by e-mail to [preventreferrals@surrey.pnn.police.uk](mailto:preventreferrals@surrey.pnn.police.uk) following the [Prevent referral process and use the Prevent referral form](#). 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 01483 632982 and ask to speak to the Prevent Supervisor for Surrey. Refer cases to the Channel programme where there is a radicalisation concern as required.

The Department for Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).

### **Indicators of vulnerability to radicalisation**

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

Extremism is defined by the Government in the Prevent Strategy as:

Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

Extremism is defined by the Crown Prosecution Service as:

- The demonstration of unacceptable behaviour by using any means or medium to express views which;
- Encourage, justify, or glorify terrorist violence in furtherance of particular beliefs;
- Seek to provoke others to terrorist acts;
- Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
- Foster hatred which might lead to inter-community violence in the UK.

There is no such thing as a "typical extremist": those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.

Indicators of vulnerability include:

- Identity Crisis – the student / pupil is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
- Personal Crisis – the student / pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
- Personal Circumstances – migration; local community tensions; and events affecting the student / pupil's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
- Unmet Aspirations – the student / pupil may have perceptions of injustice or a feeling of failure;
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration;
- Special Educational Needs and Disability – students / pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

More critical risk factors could include:

- Being in contact with extremist recruiters;
- Accessing violent extremist websites, especially those with a social networking element;
- Possessing or accessing violent extremist literature;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Justifying the use of violence to solve societal issues;
- Joining or seeking to join extremist organisations; and
- Significant changes to appearance and / or behaviour;
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

The Department of Education guidance [The Prevent Duty](#) can be accessed via this link.

## **Domestic Abuse**

Domestic abuse represents one quarter of all violent crime. It is actual or threatened physical, emotional, psychological or sexual abuse. It involves the use of power and control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, mental or physical ability. Domestic abuse can also involve other types of abuse.

We use the term domestic abuse to reflect that a number of abusive and controlling behaviours are involved beyond violence. Slapping, punching, kicking, bruising, rape, ridicule, constant criticism, threats, manipulation, sleep deprivation, social isolation, and other controlling behaviours all count as abuse.

Living in a home where domestic abuse takes place is harmful to children and can have a serious impact on their behaviour, wellbeing and understanding of healthy, positive relationships. Children who witness domestic abuse are at risk of significant harm and staff are alert to the signs and symptoms of a child suffering or witnessing domestic abuse.

Abuse can include children witnessing the ill-treatment of others and that this is particularly relevant when children see, hear or experience domestic abuse and its effects

RGS Guildford and RGS Prep have been enrolled onto the Operation Encompass scheme, a joint project between Surrey Police, Surrey County Council, Surrey Domestic Abuse Service and Surrey Schools; where every school day morning our DSL is notified of all domestic abuse incidents that have occurred and been reported to Police in the previous 24 hours which involved a child at this school (72 hours on a Monday morning). This provides an opportunity for us to ensure the right support is in place at the right time for children who are experiencing domestic abuse.

## **Mental Health**

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

Only appropriately trained professionals should 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.

Where children have suffered abuse, neglect and exploitation, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken and the DSL (or deputy) informed immediately. The DSL will decide whether or not escalation to external services is necessary, e.g. a referral to CAMHS / [Mindworks](#).

## **Child Exploitation (CSE)**

Child sexual exploitation is a form of child sexual abuse.

It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. All staff are aware of the link between online safety and vulnerability to CSE.

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

RGS Guildford and RGS Prep are aware there is a clear link between regular non-attendance at school and CSE. Staff will consider a child to be at potential CSE risk in the case of regular non-attendance at school and make reasonable enquiries with the child and parents to assess this risk.

The DSL will consider the published Surrey Safeguarding Children Partnership guidance and advice when there is a concern that a child is being or is at risk of being sexually exploited or where indicators have been observed that are consistent with a child who is being or who is at risk of being sexually exploited.

In all cases if the tool identifies any level of concern (green, amber or red) the DSL should contact the C-SPA and email a Request for Support Form. If a child is in immediate danger the police should be called on 999.

RGS Guildford and RGS Prep are aware that a child often 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.

RGS Guildford and RGS Prep include the risks of sexual exploitation in the PSHME and RSE curriculum. Pupils will be informed of the grooming process and how to protect themselves from people who may potentially be intent on causing harm. They will be supported in terms of recognising and assessing risk in relation to CSE, including online, and knowing how and where to get help.

### **Child Criminal Exploitation & Gangs**

There are a number of areas in which young people are put at risk by gang activity, both through participation in, and as victims of, gang violence which can be in relation to their peers or to a gang-involved adult in their household.

A child who is affected by gang activity or serious youth violence may have suffered, or may be likely to suffer, significant harm through physical, sexual and emotional abuse or neglect.

The risk or potential risk of harm to the child may be as a victim, a gang member or both - in relation to their peers or to a gang-involved adult in their household. Teenagers can be particularly susceptible to recruitment into gangs and involvement in gang violence. This vulnerability may be exacerbated by risk factors in an individual's background, including violence in the family, involvement of siblings in gangs, poor educational attainment, or poverty or mental health problems.

Criminal exploitation of children is a typical feature of county lines criminal activity. Key identifying features of involvement in county lines are when children are missing, when the victim may have been trafficked for transporting drugs, a referral to the National Referral Mechanism should be considered with Social Care and Police colleagues.

A child who is affected by gang activity, criminal exploitation or serious youth violence can be at risk of significant harm through physical, sexual and emotional abuse. Girls may be particularly at risk of sexual exploitation.

Any concerns that a child is being or is at risk of being criminally exploited will be passed without delay to the DSL. RGS Guildford and RGS Prep are aware there is a clear link between regular non-attendance at school and exploitation. Staff will consider a child to be at potential risk in the case of regular non-attendance at school and make reasonable enquiries with the child and parents to assess this risk.

A referral to the C-SPA will be made when any concern of harm to a child as a consequence of gang activity including child criminal exploitation becomes known. Any member of staff who has concerns that a child may be at risk of harm should immediately inform the DSL. The DSL will contact the C-SPA. If there is concern about a child's immediate safety, the Police will be contacted on 999.

### **Consensual and Non-Consensual Sharing of Nudes and Semi-nudes (Youth produced sexual imagery or sexting)**

The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is unlawful.

Consensual and non-consensual sharing of nudes and semi-nudes refers to both images and videos (also known as sexting or youth produced sexual imager) where:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18;
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult;
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

All incidents of this nature should be treated as a safeguarding concern and in line with the UKCCIS guidance [‘Sexting in schools and colleges: responding to incidents and safeguarding young people’](#)

Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child is child sexual abuse and should be responded to.

If a member of staff becomes aware of an incident involving consensual and non-consensual sharing of nudes or semi-nudes, they should follow the child protection procedures and refer to the DSL immediately.

The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff must not view, copy or print consensual or non-consensual nudes or semi-nudes (youth produced sexual imagery or sexting).

The DSL should hold an initial review meeting with appropriate school staff and subsequent interviews with the children involved (if appropriate).

Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the child at risk of harm.

At any point in the process if there is concern a young person has been harmed or is at risk of harm a referral should be made to the C-SPA or the Police as appropriate.

Immediate referral at the initial review stage should be made to Children’s Social Care / Police if:

The incident involves an adult.

There is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs).

What you know about the imagery suggests the content depicts sexual acts which are unusual for the child’s development stage or are violent.

The imagery involves sexual acts.

The imagery involves anyone aged 12 or under.

There is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.

If none of the above apply then the DSL will use their professional judgement to assess the risk to pupils involved and may decide, with input from the Senior Deputy/ Head, to respond to the incident without referral to the C-SPA or the Police.

During the decision making the DSL will consider if:

- There is a significant age difference between the sender/receiver;
- There is any coercion or encouragement beyond the sender/receiver;
- The imagery was shared and received with the knowledge of the child in the image;
- The child is vulnerable, for example subject to Child in Need, Child Protection or Early Help plans, Looked After, SEND;
- There is a significant impact on the children involved;
- The image is of a severe or extreme nature;
- The child involved understands consent;
- The situation is isolated or if the image been more widely distributed;
- There other circumstances relating to either the sender or recipient that may add cause for concern;
- The children have been involved in incidents relating to sharing, consensual or non-consensual nudes or semi-nudes before.

If any of these circumstances are present the situation will be referred according to our child protection procedures, including referral to the C-SPA or the Police.

The DSL will record all incidents of a student sharing consensual or non-consensual nudes or semi-nudes, including the actions taken, rationale for actions and the outcome.

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

Female Genital Mutilation (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 'known' cases of FGM in under 18s](#), which are identified in the course of their professional work, to the police.

The duty applies to all persons in school who is employed or engaged to carry out 'teaching work' in RGS Guildford or RGS Prep, 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 Designated Safeguarding Lead; however, the DSL should be informed.

If a teacher is informed by a girl under 18 that an act of FGM has been carried out on her or a teacher observes 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 the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth, the teacher should personally make a report to the police force in which the girl resides by calling 101. The report should be made immediately.

School staff are trained to be aware of risk indicators of FGM. Concerns about FGM outside of the mandatory reporting duty should be reported using RGS Guildford and RGS Prep's child protection procedures. Staff should be particularly alert to suspicions or concerns expressed by female pupils 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 practicing community. Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including dialling 999 if appropriate.

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

## **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.

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.

School staff should never attempt to intervene directly as a school or through a third party. Contact should be made with the C-SPA and / or the Forced Marriage Unit - 0200 7008 0151.

## **Honour-based Abuse**

Honour based abuse (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 violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

Honour based abuse 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.

RGS Guildford and RGS Prep are 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.

## **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.



Children looked after by the local authority or who are placed in residential schools, children's homes or hospitals are not considered to be privately fostered.

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

RGS Guildford and RGS Prep recognise 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 as soon as possible. However, where a member of staff becomes aware that a pupil may be in a private fostering arrangement, they will raise this with the DSL and the DSL will notify the C-SPA.

## **Safeguarding Responsibilities for the Cathedral Choristers**

### **At RGS Prep:**

The Cathedral Choristers are a vital part of RGS Prep Community. When the cathedral staff are responsible for the choristers on School premises, they follow RGS Prep safeguarding procedures. All of the Cathedral Music staff have completed RGS Prep Safeguarding training (or an agreed upon equivalent alternative). When the Choristers leave RGS Prep premises, they transfer to the Cathedral Safeguarding procedures.

Those Choristers who are not pupils at RGS Prep remain the sole responsibility of the Cathedral (safeguarding and practical) at all times.

The DSL from RGS Prep meets annually with the Cathedral's DSL to ensure that safeguarding concerns and arrangements are discussed and that there is no conflict or gap between the two procedures. A fortnightly pastoral meeting takes place between the Music staff at the Cathedral and the Head of RGS Prep to ensure that all arrangements are considered to ensure the safety of the pupils. Outside of RGS Prep term, the Chapter is wholly responsible for the insurance and supervision of the choristers.

During RGS Prep term, the following division of responsibilities applies.

#### **a) Monday, Tuesday, Thursday and Friday**

In the mornings, all the cathedral choristers are delivered to Markham House at RGS Prep by their parents, and they become the responsibility of the Cathedral as soon as they enter the building and have been checked-in by a member of the cathedral music department who will be staffing the front door.

At the end of the morning practice, the RGS Prep choristers are released to go to their classes directly. The Cathedral Music Staff deliver the register that has been taken to the Front Office and RGS Prep registers are amended accordingly. At that moment the insurance and supervision of the RGS Prep choristers passes from the Cathedral to RGS Prep.

The RGS choristers are accompanied by the Cathedral Music Staff to the front door and escorted into the taxi which is organised by the RGS (if this is delayed, RGS Prep Office staff take responsibility). At that moment the insurance and supervision of the RGS choristers passes from the Cathedral to the RGS. One of the Cathedral Music staff phones the Front Office of the RGS when the taxi has left confirming that it is on its way and confirming the

attendance of the choristers. Before leaving RGS Prep, pupils and/or staff will confirm the destination of the taxi. The RGS choristers then confirm their arrival at the Front Office and proceed to class.

In the afternoons, the cathedral choristers remain under RGS Prep's care and supervision until 4.00 pm or the time the RGS Prep choristers embark the bus to the Cathedral (whichever is earlier). At the end of lessons, the RGS Prep Choristers are dismissed and meet at the Sports Hall door. A member of the Cathedral Music Staff arrives with the bus, checks in with RGS Prep Office to see if any pupils have gone home unexpectedly during the day and then escorts the choristers onto the bus. As the choristers leave the school site, responsibility for their insurance and supervision passes from RGS Prep School to the Cathedral for the rest of the day, until the pupils are returned to their parents. The RGS choristers become the responsibility of the Cathedral when they are on the bus.

### **b) Saturday & Sunday**

As RGS Prep is closed over the weekend, the Cathedral is wholly responsible for the insurance and supervision of the cathedral choristers on both Saturdays and Sundays.

### **Off-site activities**

The choristers' annual day-out, concerts, tours and other choir engagements that take the choristers away from the cathedral are insured by (and are the responsibility of) the Cathedral, and they are organised and supervised by the cathedral music department staff in accordance with the Chapter's current safeguarding protocols.

In the light of advice from the Choirs Schools' Association, which recommends that the Cathedral and the Governors should harmonize their safeguarding procedures, members of the cathedral music department complete RGS Prep safeguarding training sessions alongside all Cathedral sessions. The Head of RGS Prep (DSL) meets annually with the Cathedral DSL to discuss Safeguarding issues and review policy and practice.

### **At RGS GUILDFORD:**

Every Monday, Tuesday, Thursday and Friday morning during term time, the Choristers leave the RGS Prep School premises to be transported to RGS Guildford after choir practice.

The RGS choristers are accompanied by the Cathedral Music Staff to the front door of RGS Prep School and are escorted into the taxi which is organised by RGS Prep.

The RGS choristers confirm their arrival at the Front Office and proceed to class.

A termly pastoral meeting or correspondence takes place between the Music staff at the Cathedral and the Head of Lower School (Deputy DSL) to ensure that all arrangements are considered to ensure the safety of the students. Outside of RGS School term, the Cathedral is wholly responsible for the supervision of the cathedral choristers.

Every Tuesday and Thursday afternoon, during term time, the Choristers leave RGS Guildford to attend choir practice at the Cathedral.

The cathedral choristers remain under RGS Guildford's care and supervision until 4.00 pm. The RGS choristers become the responsibility of the Cathedral when they board the bus, until the pupils are returned to their parents.

As RGS Prep School is closed over the weekend, the Chapter is wholly responsible for the supervision of the cathedral choristers on both Saturdays and Sundays.

## Children Looked After

The most common reason for children becoming looked after is as a result of abuse, neglect and exploitation.

RGS Guildford and RGS Prep ensures that staff have the necessary skills and understanding to keep looked after children safe. 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.

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

The designated teacher for children looked after at the RGS is, Mr Nick Gough. The designated teacher for looked after children at RGS Prep is Mrs Rebecca Self. The DSL should have details of the child's social worker and the name and contact details of the Surrey County Council's Head of Virtual School.

The designated teacher for children looked after and children previously looked after will work in partnership with the Virtual School Assistant Head to discuss how Pupil Premium Plus funding can be best used to support the progress of children looked after in RGS Guildford and RGS Prep and meet the needs of the child within their personal education plan.

## Children Missing Education

[CME Policy February 2024 \(surreycc.gov.uk\)](https://www.surreycc.gov.uk)

All children, regardless of their circumstances, are entitled to an efficient, full time education which is suitable to their age, ability, aptitude and any special educational needs they may have.

RGS Guildford and RGS Prep recognise that children missing education are at significant risk of underachieving, being victims of abuse and harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.

Where possible RGS Guildford and RGS Prep will hold more than one emergency contact number for each pupil.

RGS Guildford and RGS Prep will ensure that there is a record of joiners and leavers as defined in [CME Policy February 2024 \(surreycc.gov.uk\)](https://www.surreycc.gov.uk)

When removing a child's name, RGS Guildford and RGS Prep will notify the Local Authority 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 school, if applicable, and (e) the ground in regulation 8 under which the child's name is to be removed from RGS Guildford or RGS Prep register.

RGS Guildford and RGS Prep will make reasonable enquiries to establish the whereabouts of a child jointly with the Local Authority, before deleting the child's name from the RGS Guildford and RGS Prep register if the deletion is under regulation 8(1), sub-paragraphs (f) (iii) and (h) (iii) of The Education (Pupil Registration) (England) 2006.

RGS Guildford and RGS Prep will:

- Enter pupils on the admissions register on the first day on which RGS Guildford or RGS Prep has agreed, or has been notified, that the pupil will attend RGS Guildford or RGS Prep;
- Monitor each child's attendance through their daily register and follow the SCC procedure in cases of unauthorised absence;
- Remove a child's name from the admissions register on the date that the child leaves RGS Guildford or RGS Prep;
- RGS Guildford and RGS Prep will notify the Local Authority when they are about to remove a child's name from the RGS Guildford or RGS Prep 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 notify RGS Guildford or RGS Prep, in writing, of their intention to electively home educate. RGS Guildford or RGS Prep will forward a copy of the letter to the Elective Home Education Team / Education Inclusion Team. Where parents orally indicate that they intend to withdraw their child to be home educated and no letter has been received, RGS Guildford or RGS Prep will not remove the child from roll and will notify Education Inclusion Team at the earliest opportunity.

## **Pupils Missing Out of Education**

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

Children having unexplainable and/or persistent absences from education can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly County Lines.

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

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

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

RGS Guildford and RGS Prep will monitor and track children attending alternative provision to ensure that the provision meets the needs of the child.

RGS Guildford and RGS Prep continue to be responsible for the safeguarding of pupils with an alternative provision provider.

RGS Guildford and RGS Prep will comply with regular data returns requested by the Local Authority, regarding all pupils, of statutory school age, attending alternative provision and/or on a reduced or modified timetable.

RGS Guildford and RGS Prep leadership will report to governors of any formal direction of a pupil to alternative provision to improve behaviour.

RGS Guildford and RGS Prep leadership will report to governor's information regarding the use and effectiveness of the use of alternative provision and modified timetables.

## **School Attendance and Behaviour**

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

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

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

## **Restrictive Physical Intervention**

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

Staff who are likely to need to use physical intervention will be appropriately trained in "Positive Options" / "Positive Touch" 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 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, RGS Guildford and RGS Prep will consider the risks, given the additional vulnerabilities of these children.

The Department for Education has advice for the [Use of Reasonable Force \(2013\)](#).

## **Lower Level Concerns (Low Level Concerns)**

Staff use the Low Level Concern Form (Appendix A) to share any concern – no matter how small, and even if no more than a 'nagging doubt' – that an adult may have acted in a manner which:

- is not consistent with the RGS Guildford or RGS Prep's Staff Code of Conduct, and/or;

- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

Where possible staff should speak with the DSL (or nominated staff member) or Headmaster/Head as soon as possible. Reports about supply staff and contractors should be notified to their employers so any potential patterns of inappropriate behaviour can be identified.

If the concern is about the Headmaster/ Head, staff must pass it onto the Chair of Governors (contact details via Mrs K Edwards, Secretary to the Governors - telephone: 01483 887126).

Records of low-level concerns should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and responded to.

Where a pattern of behaviour is identified, the school should decide on a course of action. This might be internal disciplinary procedures, or referral to the LADO if the harms threshold is met.

The school must consider if any wider cultural issues in school enabled the behaviour to occur and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence.

The rationale for all decisions and actions taken must be recorded.

## **Whistle-blowing**

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

All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in RGS Guildford and RGS Prep or RGS Prep's safeguarding arrangements. If it becomes necessary to consult outside RGS Guildford and RGS Prep, they should speak in the first instance, to the Area Schools Officer or LADO in accordance with the Whistleblowing Policy.

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

Whistle-blowing regarding the Headmaster/Head should be made to the Chair of the Governing Body whose contact details are available to staff.

## **Links with other school policies**

[Admissions](#)

Allegations against staff.

[Anti-bullying.](#)

[Behaviour Policy](#)

[Citizenship policy](#)

[Complaints Policy](#)

[Curriculum Policy](#)

E-Safety, including staff use of mobile phones

[First Aid Policy](#)

[Health & Safety](#)

[Information and records retention policy](#)

Intimate Care Policy

Mobile Phone and Camera Policy  
[Multi cultural/ Anti Racism Policy](#)  
[Physical Intervention](#)  
[PSHME/PSHCE](#)  
Prevent - Radicalisation and Extremism  
[Risk Assessment](#)  
RSE Policy  
[SEND Policy](#)  
School Attendance  
[SMSC policy](#)  
Staff Behaviour Policy / Code of Conduct  
[Student absence policy](#)  
[Substance Misuse Policy](#)  
Teaching and Learning  
[Whistleblowing](#)

## Additional Resources

[Homepage - Surrey Safeguarding Children Partnership \(surreyscp.org.uk\)](http://surreyscp.org.uk)

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

Child Line: <http://www.childline.org.uk/pages/home.aspx>

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

Beat Bullying: <http://www.beatbullying.org/>

Childnet International – making the internet a great and safe place for children. Includes resources for professionals and parents <http://www.childnet.com/>

Thinkuknow (includes resources for professionals and parents) <https://www.thinkuknow.co.uk/>

Safer Internet Centre <http://www.saferinternet.org.uk/>

Contextual Safeguarding Network <https://www.contextualsafeguarding.org.uk/>

[Keeping children safe in education 2024 \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

Date of last review:	<b>2nd September 2024</b>
Reviewed by:	<b>Assistant Head Pastoral (DSL) RGS &amp; Head of RGS Prep (DSL)</b>
Date of next review:	<b>Trinity 2025</b>
Signed off by Chair of Governors:	<b>Mrs Sarah Creedy</b>

## Appendix A – Low level concern form

Please use this form to share any concern – no matter how small, and even if no more than a ‘nagging doubt’ – that an adult may have acted in a manner which:

- is not consistent with RGS Guildford or RGS Prep’s Staff Code of Conduct, and/or;
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult’s suitability to work with children.

Where possible please speak with the Headmaster/ Head as soon as possible. It is also helpful to document your concerns, which can be done using this form and then passed to the Headmaster/ Head.

If the concern is about the Head Teacher, please pass it onto the Chair of Governors (Contact details via Mrs. K Edwards, Secretary to the Governors - telephone: 01483 880665)

### Allegation

Behaviour which indicates that an adult who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

### Low-Level Concern

Any concern – no matter how small, even if no more than a ‘nagging doubt’ – that an adult may have acted in a manner which:

- is not consistent with an organisation’s Code of Conduct, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult’s suitability to work with children.

### Appropriate Conduct

Behaviour which is entirely consistent with the organisation’s Code of Conduct, and the law.

Name of adult writing this concern:

Name of concern and adult it involves:

Date written:

Signature:

Please write your concerns below: