



Safeguarding and Child Protection Policy

1. Introduction

1.1. This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002, and aligns with current government publications, including:

- Working Together to Safeguard Children (WTSC) - December 2023
- 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
- Keeping Children Safe in Education (KCSIE) September 2025
- Surrey Safeguarding Children Partnership (SSCP) procedures.

1.2. The policy also reflects the:

- Counter-Terrorism and Security Act 2015 (Prevent Duty)
- Domestic Abuse Act 2021
- Online Safety Act 2023
- Sexual Violence and Sexual Harassment Between Children in Schools and Colleges (DfE Advice)
- UKCIS guidance: Sharing nudes and semi-nudes (2020, reviewed 2023)

1.3. The School's Board of Governors takes seriously its responsibility under Section 175/157 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014 and the Non-Maintained Special Schools (England) Regulations 2015 to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within the School to identify, assess, and support those children who are suffering harm.

1.4. Reed's School recognises that all adults - including temporary staff, volunteers and governors - have a full and active part to play in protecting pupils from harm, and that the child's welfare is our paramount concern. (Please note that wherever the word 'staff' is used, it covers ALL staff on site, including ancillary supply and self-employed staff, contractors, volunteers working with children etc., and governors). Therefore, safeguarding is the responsibility of all staff, and it is important to note that anyone can make a referral to children's social care.

1.5. 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 school or in the wider community. This includes consideration of contextual safeguarding and environmental factors, in accordance with statutory guidance.

1.6. We acknowledge that multi-agency partnership working protects children and reduces risk. The School will actively engage with safeguarding partners and relevant agencies to ensure children are protected and supported effectively.

1.7. Whilst the School will work openly with parents as far as possible, it reserves the right to contact social care or the Police, without notifying parents if this is believed to be in the child’s best interests.

1.8. The aims of this policy are:

- “To demonstrate the School’s commitment to safeguarding and child protection to pupils, parents and external partners.”
- “To raise the awareness of all teaching and non-teaching staff of their responsibilities to safeguard children by identifying and reporting possible cases of abuse.”
- “To enable the School to effectively contribute to Early Help, assessments of need and support for those vulnerable children.”
- “To provide robust school systems and procedures that are followed by all members of the School community in cases of suspected abuse.”
- “To develop and promote effective working relationships with safeguarding partners, in particular Early Help services, the police, health and social care.”
- “To ensure that all staff who have substantial access to children have been checked for suitability, including identity verification, qualification check, and enhanced DBS clearance (as required by KCSIE).”
- “To maintain a single central record (SCR) for audit purposes.”

1.9. Reed’s Chair of Governors is Marcus Baker. Reed’s School’s Designated Safeguarding Lead (DSL) is Mr Lukas Pytel. The School’s nominated Governor for Safeguarding is Maureen Adams, who has regular contact with the School’s DSL.

1.10. Reed’s School’s Chair of Governors, Nominated Safeguarding Governor and Deputy DSLs are listed in the table below. These nine (9) DSL members of staff make up the School’s Child Protection Team, have undertaken the required compulsory training through SSCP (including DSL ‘New to Role’ or ‘Update’ training) and will update their training every 2 years. The Headmaster, Mr Mark Hoskins, is also trained to DSL level. A number of other pastoral staff have completed SSCP modules to enhance the School’s provision. Mr Balls, Mr Michael and Mr Pytel are members of the School’s Senior Leadership Team (SLT).

Chair of Governors	Mr Marcus Baker	01932 869042	mbaker@reeds.surrey.sch.uk	
Nominated Safeguarding Governor	Mrs Maureen Adams	01932 869044	madams@reeds.surrey.sch.uk	

Designated Safeguarding Lead (DSL)	Mr Lukas Pytel	01932 869044	lpytel@reeds.surrey.sch.uk	1
Deputy DSL	Mr Alex Balls Deputy Head Staff	01932 588023	aballs@reeds.surrey.sch.uk	2
Deputy DSL	Mr Adrian Blackman Head of Tennis	01932 869044	ablackman@reeds.surrey.sch.uk	3
Deputy DSL	Mr Jono Douthwaite Head of The Close	01932 869044	jdouthwaite@reeds.surrey.sch.uk	4
Deputy DSL	Mr Terry Ha Head of House	01932 869090	tha@reeds.surrey.sch.uk	5
Deputy DSL	Mrs Amy Michael Head of Girls	01932 869044	amichael@reeds.surrey.sch.uk	6
Deputy DSL	Mr Luke Michael Deputy Head Pupils	01932 869090	lmichael@reeds.surrey.sch.uk	7
Deputy DSL	Ms Emily Souter Head of House	01932 869044	esouter@reeds.surrey.sch.uk	8
Deputy DSL	Ms Zoe Rice Deputy Head of Sixth Form	01932 869044	zrice@reeds.surrey.sch.uk	9

2. Safe School, Safe Staff

2.1. Reed's School ensures that it operates a safer recruitment procedure that includes statutory checks on staff suitability to work with children.

2.2. All members of the Board of Governors understand and fulfil their responsibilities, namely, to ensure that:

- there is a compliant Safeguarding and Child Protection policy and Staff Code of Conduct
- the School operates safer recruitment procedures by ensuring that there is at least one person on every recruitment panel that has completed Safer Recruitment training
- the School has procedures for dealing with allegations of abuse (including low level concerns) against staff and volunteers and to make a referral to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have had they not resigned.
- a member of the Senior Leadership Team (SLT) has responsibility for child protection as the Designated Safeguarding Lead (DSL).

- on appointment, the DSLs undertake interagency training (SSCP Modules 1&2) and undertake DSL 'New to Role' and the 'Update' Course every 2 years. At least one of the School's DSLs attend the Surrey Safeguarding Education Area Meetings to maintain close links with SSCP and to be up to date with issues.
- all staff read at least Part one of the most recent KCSIE
- all staff have safeguarding training (on induction and updated regularly as appropriate in line with SSCP advice which includes Prevent and online safety, mental health, child-on-child abuse plus other informal updates)
- any weaknesses in Safeguarding and Child Protection are remedied immediately
- a member of the Board of Governors is nominated to liaise with the local authority on Child Protection issues and in the event of an allegation of abuse made against the Headmaster
- Safeguarding and Child Protection policies and procedures are reviewed annually and that the Safeguarding and Child Protection Policy is available on the school website and read and understood by all staff
- the Board of Governors and the School's Pastoral Committee considers and audits how children are taught about safeguarding.
- enhanced DBS checks and other necessary checks are in place for all Governors of Reed's School

2.3. The DSLs who are involved in recruitment, the Head of HR, and at least one member of the governing body will also complete Safer Recruitment training to be renewed every 5 years.

2.4. All members of staff and volunteers are provided with child protection awareness information at induction so that they know with whom to discuss a concern.

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

2.6. All other staff and governors have child protection awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse. We provide child protection training regularly, and at least annually, to all school staff, including the Headmaster, to ensure that their skills and expertise are up to date and relevant. It is intended that all staff are aware of the Early Help process and their role in it and that they are aware of the referral process. All staff complete on-line initial training in child protection as well as training specific to Reed's School during their induction programme. The induction training covers the Safeguarding and Child Protection Policy, online safety including an understanding of the School's systems of filtering and monitoring, child-on-child abuse, mental health, upskirting, the role and identities of the DSL and deputies, KCSIE Part One (all staff), the School's Behaviour, Rewards and Sanctions Policy, children absent from education and the Staff Code of Conduct.

- 2.7. All members of staff, volunteers, and governors know how to respond to a pupil who discloses abuse to them. It is emphasised that sensitivity is needed when receiving a disclosure; for example, that leading questions are not to be asked and that children are listened to (particularly if responding to reports of sexual violence and sexual harassment). It is stressed in staff training that staff should not assume that someone else will take action to safeguard children and should share information which may be critical in keeping them safe. School Prefects and Student Mentors are given training at the beginning of each academic year on appropriate action to take should they receive any allegation of abuse.
- 2.8. All parents are made aware of the responsibilities of staff members with regard to child protection procedures through publication of the School's Safeguarding and Child Protection Policy on the School website, and reference to it in our Parents' Handbook.
- 2.9. Reed's School will seek to ensure the suitability of adults working with pupils from Reed's School at any time. Assurance is gained that the staff of any other organisation have been checked for suitability if they supervise the school's pupils on a site other than the school.
- 2.10. Community users organising activities for children are aware of the School's safeguarding and child protection guidelines and procedures.
- 2.11. The School will ensure that safeguarding and child protection type concerns or allegations against adults (including low level concerns) working at Reed's School are dealt with in accordance with guidance from the Department of Education (DfE), Surrey Safeguarding Children Partnership (SSCP) and Surrey County Council (SCC). This will mean that all disclosures meeting the threshold of an allegation will be referred without delay to the local area designated officer (LADO) for advice. A referral will be made to the Disclosure and Barring Service (DBS) and, additionally in the case of teaching staff, the Teacher Regulation Agency (TRA), where it is thought an individual has engaged in conduct that harmed (or may have harmed) a child, if the individual has possibly committed a criminal offence against or related to a child, if they have behaved towards a child or children in a way that indicates they may pose a risk of harm to children or if they have behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- 2.12. The School's procedures will be regularly reviewed and updated. The Safeguarding and Child Protection Policy will be signed off by the Chairman of Governors.
- 2.13. The name of the designated members of staff for Child Protection, the Designated Safeguarding Leads, will be clearly advertised in the school, with a statement explaining the school's role in referring and monitoring cases of suspected abuse.
- 2.14. All new members of staff will be given a copy of, the Staff Code of Conduct and Safeguarding and Child Protection Policy, with the DSLs' names clearly displayed, as part of their induction into the school.

- 2.15. Governors complete safeguarding training annually, including reading KCSIE Part 1 and 2 and completing Child Protection Refresher 2025 online training, and are asked to demonstrate their understanding through formal or informal review.
- 2.16. The Safeguarding and Child Protection Policy is available publicly on the school website. All staff must sign to indicate that they have read, understood and agree to abide by the Safeguarding and Child Protection Policy (this policy) and Staff Code of Conduct in its entirety. Staff who work directly with children must read at least Part One and Annex B of the current Keeping Children Safe in Education document. Staff who do not work directly with children must read Part One of the current Keeping Children Safe in Education. Members of the Senior Leadership Team should also read Part Two of the current Keeping Children Safe in Education.
- 2.17. Reed's School aims to provide all pupils with the relevant information, skills and attitudes to help them resist abuse and prepare for the responsibilities of adult life including home and family. We aim to give pupils the confidence to speak to staff on issues of neglect, abuse and deprivation, believing they will be effectively listened to.
- 2.18. Staff treat pupils with respect and all pupils are expected to treat each other and staff with respect.
- 2.19. Skills are delivered to pupils through the Curriculum and especially via Citizenship, Personal, Social and Health Education (CPSHE) which covers Relationships, Sex and Health Education.
- 2.20. All pupils are taught personal safety and respect for their bodies in CPSHE and at numerous other opportunities (tutor periods, assemblies, house and year group meetings)
- 2.21. The School uses the curriculum and other forums such as house and year group meetings to raise pupils' awareness and build confidence so that pupils have a range of contacts and strategies should ensure their own protection and understand the importance of protecting others.
- 2.22. The School creates an environment and ethos in which children feel secure, their viewpoints are valued, they are encouraged to talk, and they are listened to, with concerns taken seriously. All pupils can report concerns anonymously if they wish via the Tootoot website or App.
- 2.23. The School provides suitable support and guidance so that pupils have a range of appropriate adults whom they feel confident to approach if they are in difficulties.
- 2.24. The School ensures sufficient account has been taken of the nature and other significant features of the school in provision made for safeguarding, such as for boarding and the Reed's School Foundation.
- 2.25. Pupils who have a social worker may be more vulnerable to further harm and may also face educational barriers to attendance, learning, behaviour and poor mental health. The School will liaise with social workers and others to put in place

appropriate support on a case by case basis for these pupils as they may potentially be at greater risk of harm.

2.26. The School is 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. Staff are made aware that mental health concerns about a pupil may also be a safeguarding concern and thus should be raised immediately as a safeguarding concern by speaking to one of the DSL team or reporting via **MyConcern**. The School's Self-Harm Flow Chart will be followed when cases are disclosed. (See Appendix Six)

2.27. The School is aware that pupils may be at risk from or get involved with serious violent crime. Indicators of this may be increased absence from School, changes in friendship or relationships with older pupils, a decline in performance, signs of self-harm or unexplained injuries.

2.28. The School looks carefully at the role models the School offers pupils through staffing, materials used, selection of curricular content and other experiences.

2.29. The School impresses upon pupils the importance of rejecting violence and inappropriate use of power and control as a means of resolving conflict.

2.30. The School regularly reviews and evaluates its school policies and practices of social control and behaviour modification.

2.31. The School commits to preventing impairment of children's mental and physical health, giving pupils opportunities to understand and develop strategies for coping with stress.

2.32. The School gives all pupils the opportunities to learn about child development and good parenting.

2.33. All pupils have access to a School Counsellor by making an appointment through the Pastoral Administrator and have access to an 'independent listener', Childline, the Office of the Children's Commissioner and other support agencies.

2.34. Online safety is an integral part of the School's CPHSE curriculum and a focus of House and Year Group meetings and assemblies. All pupils in Forms 1-5 must complete the Online Safety Alliance's Certificate of Online Safety before they are handed their iPads, and this provides further education regarding online safety. Pupils in the Sixth Form are also expected to complete additional Online Safety training and adhere to the Acceptable Use Policy when using their personal devices on the School network.

2.35. The School uses robust filtering and monitoring systems that align with the DfE's "Plan Technology for Your School" tool and the Online Safety Act 2023. Online risks are assessed across the 4 Cs: content (including misinformation and disinformation), contact, conduct, and commerce. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate, and harmful materials online; reduce the risk of children being subjected to harmful online interaction with others; and help manage online behaviour that can increase a child's likelihood of, or causes,

harm. Further details of the School's approach to online safety can be found in the School's Online Safety Policy and Cyberbullying Policy alongside our Acceptable Use Policy which also include detail on the use of mobile technology in School (and accessing 3G, 4G and 5G technology on School premises) and the School's IT arrangements to ensure that children are safe from terrorist and extremist material when accessing the internet through the School's systems.

2.36. The DSL monitors and responds to emerging online threats including the use of artificial intelligence (AI), deepfake technology, and potentially exploitative chatbots. These are covered in online safety training and pupil education.

2.37. Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Abuse can be categorised into four distinct types:

- Physical Abuse
- Sexual Abuse
- Emotional Abuse
- Neglect

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

2.39. **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child-on-child abuse) in education and all staff should be aware of it and of their school or colleges policy and procedures for dealing with it.

2.40. **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally

inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

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

2.42. **All staff** should be aware that children can abuse other children. Abuse by one or more pupils against another pupil is often referred to as child-on-child abuse (see paragraph 4.3 below). With such issues, it is important that the School's Behaviour, Rewards and Sanctions Policy, Anti-Bullying Policy and Cyberbullying Policy complement each other so that all cases can be reported easily by pupils, knowing their concerns will be treated seriously. However, it is recognised that even if no child-on-child cases are reported such abuse may still be taking place, but simply not reported. Child-on-child abuse may be multifaceted, with for example online and face to face abuse occurring together. It is also recognised that child-on-child abuse can happen at School and off site, and also online. The School will refer more serious cases of such abuse to an external safeguarding agency if there is reasonable cause to believe that a child may have suffered or be likely to suffer significant harm, or where a child is in need of support from an external agency. Similarly, the School will follow the Department for Education guidance 'Sexual Violence and Sexual Harassment Between Children in Schools and Colleges' and the UK Council for Internet Safety's advice 'Sharing nudes and semi-nudes' if such issues are disclosed. In cases of uncertainty, the DSL should be informed and an appropriate course of action followed as soon as possible.

2.43. **Upskirting** is a criminal offence under the Voyeurism (Offences) Act 2019 and typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

3. Responsibilities

3.1. The designated DSLs are responsible for:

3.1.1. Referring a child if there are concerns about possible abuse or neglect, to the Surrey Multi-Agency Partnership (MAP), and acting as a focal point for staff to

discuss concerns. If at any time there is a risk of immediate serious harm to a child, a referral should be made to children's social care immediately. Referrals should be made in writing, following a telephone call using the Request for Support Form.

- 3.1.2. Reporting 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. If the matter is urgent then the 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).
- 3.1.3. Referring cases where a crime may have been committed to the Police as required.
- 3.1.4. Liaising 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.
- 3.1.5. Keeping detailed, accurate records (either written or using MyConcern), that include all concerns about a child, even if there is no need to make an immediate referral, and record the rationale for decisions made and action taken.
- 3.1.6. Ensuring that all such records are kept confidentially and securely and are separate from pupil records in accordance with our Table of Retention Periods, or until they are provided to the child's next school. Files will be transferred within 5 days for an in-year transfer or within 5 days of the start of the new term. When transferring child protection files to the next school, where possible this should be done in person with a signature to acknowledge safe receipt. Information transferred to the new school should allow support measures, such as learning support, to be in place. If the file needs to be posted, a copy will be made until the new school provides written confirmation of receipt, at which point the copy will be destroyed.
- 3.1.7. Ensuring that an indication of the existence of the additional safeguarding file above is marked on the pupil records.
- 3.1.8. Liaising with other agencies and professionals.
- 3.1.9. Ensuring that either they or the staff member attend case conferences, core groups, or other multi-agency planning meetings, contribute to assessments, and provide a report which has been shared with the parents.
- 3.1.10. Being aware of pupils who have a social worker.

- 3.1.11. Ensuring that any pupil currently with a child protection plan who is absent in the educational setting without explanation for two days is referred to their key worker's Social Care Team.
- 3.1.12. Sharing relevant information about the welfare, safeguarding and child protection issues with staff (in line with information sharing principles) to promote educational outcomes for pupils.
- 3.1.13. Liaising with the senior mental health lead where safeguarding concerns are linked to mental health.
- 3.1.14. Organising child protection induction and regular update training, at least annually, for all school staff.
- 3.1.15. Providing, with the Headmaster, an annual report for the governing body, detailing any changes to the policy and procedures; training undertaken by the DSL, and by all staff and governors; number and type of incidents/cases, and number of children on the child protection register (anonymised).

4. Supporting Children

- 4.1. The School recognises that it 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. It also recognises that a child who is abused or witnesses abuse and/or violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth.
- 4.2. The School accepts that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.
- 4.3. The School recognises the need to minimise the risk of child-on-child abuse, which may include, but may not be limited to:
 - bullying (including cyberbullying, prejudice-based and discriminatory bullying);
 - abuse in intimate personal relationships between peers;
 - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
 - sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
 - sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;

- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

4.4. The most important consideration for all staff in relationship to child-on-child abuse is that the School adopts a 'zero tolerance' approach. Staff must take seriously all disclosures or reports of child-on-child abuse, and take action where they believe a child may be at risk from it. All such cases must be reported to the DSL and they will be recorded (using **MyConcern**), investigated and dealt with appropriately and in accordance with statutory guidance.

4.5. Pupils can report cases of child-on-child abuse to any member of staff, to a pastoral leader, via surveys or confidentially using the Tootoot App, knowing that their concerns will be treated seriously.

4.6. It is also recognised that girls are more likely to be victims and boys perpetrators of such abuse, but that all child-on-child abuse is unacceptable. The nature of the School, being all boys up to the Sixth Form, means that staff will be made aware of all forms of child-on-child abuse.

4.7. Where there has been a report of sexual violence, the DSL (or a deputy) should make an immediate risk and needs assessment. Risk assessments should be recorded and should be kept under review. At all times, the School will actively consider the risks posed to all pupils and put adequate measures in place to protect pupils and keep them safe.

4.8. The School will do all it can to support the alleged victims, alleged perpetrators and other children affected by such abuse. With this in mind, the School will work to avoid contact between victim and alleged perpetrator. This may involve suspension from school as a neutral act until the matter has been fully investigated by external agencies and the School.

4.9. Reed's School will:

- promote a caring, safe and positive environment within the School, with the stance that abuse is abuse and should never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". This "zero tolerance" approach to all forms of abuse, including child-on-child abuse is important.

- encourage self-esteem and self-assertiveness, through the curriculum and through positive relationships within the School community.
- ensure children are taught to understand and manage risk through Personal, Social, Health and Economic Education (PSHE) and Relationship and Sex Education (RSE) and through all aspects of school life. This includes online safety.
- responding sympathetically to any requests for time out to deal with distress and anxiety.
- offer details of helplines, counselling or other avenues of external support.
- liaise and work in partnership with other support services and agencies involved in Early Help and the safeguarding of children.
- notify Social Care immediately if there is a significant concern.
- provide continuing support to a child about whom there have been concerns who leaves the school by ensuring that information is shared under confidential cover to the child's new setting and ensure the school records are forwarded as a matter of priority and within statutory timescales.

4.10. The School recognises that children with special educational needs and disabilities (SEND) or certain health conditions can be more prone to peer group isolation or bullying (including prejudice-based bullying) than other children and will consider extra pastoral support for those children. They may also face communication barriers and difficulties in managing or reporting incidents. To help identify and support any issues with these children and, where necessary, specific training is provided to staff in this area of the School.

4.11. The School recognises that children who are LGBT or who are perceived to be LGBT can be targeted by other children and can be vulnerable. We recognise the need for the School to reduce additional barriers faced by these children and to provide a safe space for them to speak out or share their concerns with a member of staff.

4.12. The School recognises that children can be particularly vulnerable in residential settings and are alert to the potential for child-on-child abuse. Boarding staff are aware of this added potential vulnerability and are proactive in monitoring behaviour in boarding houses.

4.13. The School is aware that some of its Foundation pupils may be more vulnerable and so are supported before they join the School and during their time at the School.

4.14. The School's designated person to promote the educational achievement of children who are 'looked after' is Mr Lukas Pytel, who is the School's DSL and has undertaken appropriate training. The DSL will liaise with the Virtual School responsible for each looked after child; it is the Virtual School that has overall responsibility for them.

5. Confidentiality & Sharing Information

- 5.1. 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 the school who 'need to know'.
- 5.2. It is stressed in staff training that staff should not assume that someone else will take action to safeguard children and should share information which may be critical in keeping them safe.
- 5.3. 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 2018 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.
- 5.4. 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 Headteacher or DSLs will only disclose information about a child to other members of staff on a 'need to know' basis.
- 5.5. All staff will always undertake to gain parent/carers consent to refer a child to Social Care unless to do so could put the child at greater risk of harm or impede a criminal investigation.

6. Supporting Staff

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

7. Safeguarding concerns and allegations made about staff, including supply teachers, volunteer and contractors

- 7.1. Surrey's LADO procedure will be followed where it is alleged that anyone working in the School, including supply staff, volunteers and contractors or another adult who works with children has:
 - behaved in a way that has harmed a child, or may have harmed a child and/or
 - possibly committed a criminal offence against or related to a child and/or
 - behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children and/or

- behaved or may have behaved in a way that indicates that they may not be suitable to work with children. This also includes behaviour that may have happened outside of the setting. This is known as transferable risk.
- 7.2. The School may also receive an allegation relating to an incident that happened when an individual or organisation was using their premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities).
- 7.3. In dealing with allegations or concerns against an adult, staff must without delay:
- Report any concerns to the Headmaster immediately.
 - If an allegation is made against the Headmaster, the concerns need to be raised with the Chair of Governors as soon as possible. If the Chair of Governors is not available, then the LADO should be contacted directly.
 - There may be situations when the Headmaster 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 or Chair of Governors, they will contact the LADO (as part of their mandatory duty) on 0300 123 1650 option 3 LADO or Email: 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.
 - In liaison with the LADO, the School 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 the School to seek guidance in following procedures set out in part 4 of 'Keeping Children Safe in Education' (2025) and the SSCP procedures.
- 7.4. All staff at Reed's School should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.
- 7.5. The School's Staff Code of Conduct gives more guidance on this issue, including the distinction between an allegation and a low-level concern. All staff should be aware of the Staff Code of Conduct and will be required to sign that it has been understood.
- 7.6. Guidance about conduct and safe practice, including safe use of mobile phones and social media by staff and volunteers will be given at induction. Detailed information is available in the Social Media Policy and in the Staff Code of Conduct.
- 7.7. The School recognises the possibility that adults - including Governors, volunteers, supply or trainee teachers and agency staff - working in the School may harm

children. The School adopts a culture of “it could happen here” and any concerns about the conduct of other adults in the School should be acted upon without delay.

7.8. Further details can be found in the School’s Low-Level Concern’s Policy.

8. Whistleblowing

8.1. The School recognises that children cannot be expected to raise concerns in an environment where staff fail to do so.

8.2. All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues. If it becomes necessary to consult outside the school, they should speak in the first instance, to the Area Education Officer/LADO following the Whistleblowing Policy.

8.3. Further details can be found in the Whistleblowing Policy.

9. Physical intervention, restraint and reasonable force

9.1. Reed’s School acknowledges that staff must only ever use physical intervention as a last resort, when a child is endangering themselves or others, and that at all times it must be the minimal force necessary and for the minimum period of time to prevent injury to another person or to safeguard them. Further information regarding physical intervention can be found in the School’s Restraint and Reasonable Force policy.

9.2. Such events should be recorded and signed by a witness and reported to the DSL, and to the Deputy Head (Staff).

9.3. Staff training takes place with regards to the use of reasonable force, restraint and physical intervention.

9.4. The School understands that physical intervention of a nature which causes injury or distress to a child may be considered under child protection or disciplinary procedures.

9.5. Reed’s School recognises that touch can be appropriate in the context of working with children, and there is guidance for staff to ensure they are clear about their professional boundary. This guidance can be found in the Staff Code of Conduct, Contractor Code of Conduct and the Restraint and Reasonable Force policy.

10. Anti-bullying

10.1. The School’s policy on anti-bullying is set out in a separate document and it is acknowledged that to allow or condone bullying may lead to consideration under child protection procedures. This includes all forms of discriminatory remarks. It is acknowledged that “banter” should never be tolerated as it may constitute a form of abuse. A record is kept by the Deputy Head (Pupils) of known bullying and racist incidents as well as cases of sexual violence and sexual harassment. It is recognised

that abuse can take place by one or more pupils against another pupil and that this can also take place online.

10.2. In such cases, it is important that incidents are reported and dealt with appropriately. This may be dealt with according to the School's Anti-Bullying and Cyberbullying policies. However, if 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 and should be reported directly to the School's DSL. In cases of uncertainty, the DSL should be informed, and an appropriate course of action followed as soon as possible.

11. Radicalisation & Extremism

11.1. Since 2010, when the Government published the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people and families from violent extremism. There have been several occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

11.2. Reed's School values freedom of speech and the expression of beliefs/ideology as fundamental rights underpinning our society's values. Both pupils and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

11.3. The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. Reed's School is clear that this exploitation and radicalisation should be viewed as a safeguarding concern.

11.4. Definitions of radicalisation and extremism, and indicators of vulnerability to radicalisation are in [Appendix Three](#). Staff should be aware that changes in pupils' behaviour may indicate they are in need of help or protection. As well as referring to [Appendix Three](#), staff should use their professional judgement to identify pupils who might be at risk of radicalisation and to act proportionately, speaking to one of the DSLs to decide if further action should be taken.

11.5. Reed's School seeks 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. Staff are trained to understand their responsibility under the Prevent Duty, which is included as part of their induction and is raised through regular update

training. Staff also undertake the online Channel Awareness module. The DSL has undertaken Workshop to Raise Awareness of Prevent (WRAP) training.

11.6. Governors, the Headmaster and the DSL will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessment may include the use of school premises by external agencies, anti-bullying policy and other issues specific to the school's profile, community and philosophy.

11.7. This will be reviewed as part of the annual 'Audit of Statutory Duties and Associated Responsibilities' that is monitored by the local authority and the Surrey Safeguarding Children Partnership.

11.8. Response to issues linked to radicalisation

11.8.1. When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak to the Headmaster and/or to the DSL. They should then follow normal safeguarding procedures. If the matter is urgent then Surrey Police must be contacted by dialling 999. In non-urgent cases where police advice is sought then dial 101. The Department of Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).

11.8.2. Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most young people do not become involved in extremist action. For this reason, the appropriate interventions in any particular case may not have any specific connection to the threat of radicalisation, for example they may address mental health, relationship or drug/alcohol issues.

12. Prevention

12.1. It is recognised that the School plays a significant part in the prevention of harm to our pupils by providing them with good lines of communication with trusted adults, supportive friends and an ethos of protection.

12.2. In focussing on prevention, the School:

- Works to establish and maintain an ethos where children feel secure and are encouraged to talk and are always listened to.
- Includes regular consultation with children e.g., through regular surveys, participation in anti-bullying week and through various student committees and other pastoral structures.
- Takes steps so that, as far as reasonably practicable, all children know there are a number of adults in the School whom they can approach if they are worried or in difficulty.
- Includes safeguarding across the curriculum, including PSHE, opportunities which equip children with the skills they need to stay safe from harm and to know to

whom they should turn for help. In particular this will include anti-bullying work, online safety, accessing emergency services, road safety and other training.

- Takes steps to make all staff aware of school guidance for their use of mobile technology via the Staff Code of Conduct and other policies. Staff training provides opportunity for discussion of the safeguarding issues around the use of mobile technologies and their associated risks.
- Requires all pupils to read and sign an Acceptable Use Policy when using the School network and devices. The network is filtered and monitored by the School's IT Services Department who report their findings to the DSL. There are a number of pupil Digital Leaders who promote online safety.

13. Domestic Abuse

13.1. The Domestic Abuse Act 2021 introduced the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse ensures that different types of relationships are captured, including ex-partners and family members.

13.2. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. It involves the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected". Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Slapping, punching, kicking, bruising, rape, ridicule, constant criticism, threats, manipulation, sleep deprivation, social isolation, and other controlling behaviours all count as abuse.

13.3. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

13.4. **Appendix One** of this policy details the signs and symptoms of a child suffering or witnessing domestic abuse, which are similar to other forms of abuse or neglect. **Appendix One** also gives details of Operation Encompass and helplines which may be helpful in dealing with such cases.

14. Children Missing Education (CME)

14.1. Attendance, absence and exclusions are closely monitored. A child persistently absent from education is a potential indicator of neglect, including sexual abuse and sexual or criminal exploitation. The DSL will monitor unauthorised absence and take appropriate action in line with the Absence and Attendance Policy.

15. Health & Safety

- 15.1. The School's Health & Safety policy, set out in a separate document, reflects the consideration it gives to the protection of our children both physically within the School environment and when away from the School undertaking school trips and visits.

16. Monitoring & Evaluation

- 16.1. The School's Safeguarding and Child Protection Policy and Procedures will be monitored and evaluated by:

- the Board of Governors
- the Headmaster
- the Senior Leadership Team
- the Pastoral Committee and in Pastoral Leaders' Meetings
- regular meetings of the School's DSLs
- pupil surveys and questionnaires
- scrutiny of attendance data
- the Health and Safety Committee and scrutiny of a range of risk assessments
- review of parental concerns and parent questionnaires

17. Associated School Policies

- Absence and Attendance Policy
- Anti-Bullying Policy
- Behaviour, Rewards & Sanctions Policy
- Complaints Procedure
- Counselling Services Policy
- Countering Cyberbullying Policy
- Staff Disciplinary and Capability Procedures
- Eating Disorders, Drugs, Smoking and Alcohol Policy Statements
- Education Guardians Policy
- Equal Opportunities Statement
- First Aid Policy
- Health and Safety Policy
- Intimate Care Policy
- Low Level Concerns Policy
- Pupil Welfare Strategy
- Restraint and Reasonable Force Policy
- Medication Policy
- Missing Child Policy and Procedures When A Child Is Not Collected on Time
- Online Safety Policy
- Safer Recruitment Policy
- School Trips, Excursions and Expeditions Policy
- Security and Workplace Safety Policy
- Relationships and Sex Education Policy

- Sexual Relationships Policy
- Staff Code of Conduct
- Staff Disciplinary and Capability Procedures
- Staff Grievance Procedure
- Staff Handbook
- Supervision Policy
- Visitor Access Policy
- Whistleblowing Policy

18. Other key advice

- Allegations against and low level concerns about staff (the School refers to Keeping Children Safe in Education in all cases)
- Working Together to Safeguard Children (2023)
- Mandatory Reporting of Female Genital Mutilation – procedural information” (Home Office and DfE, October 2015)
- Further links to advice on specific issues in KCSIE

19. Surrey Safeguarding Children’s Partnerships Contacts

19.1. To make a referral to Children’s Services in Surrey, contact is made with the Multi-Agency Partnership (MAP) at csmash@surreycc.gov.uk or by telephoning the Single Point of Access on 0300 470 9100.

19.2. For concerns and advice regarding child protection allegations against staff contact the Duty LADO. Contact details are as follows:-

Telephone: 0300 200 1006
 Email: LADO@surreycc.gov.uk

19.3. The LADO provides advice and presides over the investigation of any allegation or suspicion of abuse directed against anyone working in the school.

Compiled By: Designated Safeguarding Lead	Revision Number: 22 (December 2025)
Reviewed By: Senior Leadership Team & Nominated Safeguarding Governor Approved By: Governing Body	Next Revision Date: Autumn 2026

Appendix One - Recognising Signs of Child Abuse

20. Categories of Abuse:

- Physical Abuse
- Emotional Abuse (including Domestic Abuse)
- Sexual Abuse
- Neglect

21. Signs of Abuse in Children:

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

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

22. Risk Indicators

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

- Must be regarded as indicators of the possibility of significant harm
- Justifies the need for careful assessment and discussion with designated/named/lead person, manager, (or in the absence of all those individuals, an experienced colleague)
- May require consultation with and/or referral to Children's Services
- The absence of such indicators does not mean that abuse or neglect has not occurred.

22.2. In an abusive relationship the child may:

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

22.3. The parent or carer may:

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

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

23. Recognising Physical Abuse

23.1. The following are often regarded as indicators of concern:

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

23.2. Bruising

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

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

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

23.3. Bite Marks

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

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

23.4. Burns and Scalds

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

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

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

23.5. Fractures

23.5.1. Fractures may cause pain, swelling and discolouration over a bone or joint. Non-mobile children rarely sustain fractures. There are grounds for concern if:

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

23.6. Scars

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

24. Recognising Emotional Abuse

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

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

24.3. The following may be indicators of emotional abuse:

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

25. Recognising Signs of Sexual Abuse

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

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

25.3. Some behavioural indicators associated with this form of abuse are:

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

25.4. Some physical indicators associated with this form of abuse are:

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

11.5 The School will use, and trains staff in the use of, the Brook Sexual Behaviours Traffic Light Tool to make decisions about safeguarding children and young people.

26. Sexual Abuse by Young People

26.1. The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour

is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, sending and receiving nudes or semi-nudes (youth-produced sexual imagery or sexting), fetishism, upskirting, bestiality and sexual abuse against adults, peers or children.

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

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

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

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

27. Assessment

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

- Equality: consider differentials of physical, cognitive and emotional development, power and control and authority, passive and assertive tendencies
- Consent: agreement including all the following: understanding that is proposed based on age, maturity, development level, functioning and experience
- Knowledge of society's standards for what is being proposed
- Awareness of potential consequences and alternatives
- Assumption that agreements or disagreements will be respected equally
- Voluntary decision
- Mental competence
- Coercion: the young perpetrator who abuses may use techniques like bribing, manipulation and emotional threats of secondary gains and losses that is loss of love, friendship, etc. Some may use physical force, brutality or the threat of these regardless of victim resistance.

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

28. Recognising Neglect

28.1. Evidence of neglect is built up over a period of time and can cover different aspects of parenting. Indicators include:

- Failure by parents or carers to meet the basic essential needs e.g., adequate food, clothes, warmth, hygiene and medical care
- A child seen to be listless, apathetic and unresponsive with no apparent medical cause
- Failure of child to grow within normal expected pattern, with accompanying weight loss
- Child thrives away from home environment
- Child frequently absent from school
- Child left with adults who are intoxicated or violent
- Child abandoned or left alone for excessive periods

29. Child Sexual Exploitation (CSE)

29.1. Child sexual exploitation is a form of 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.

29.2. The victim may have been sexually exploited even if the sexual activity appears consensual.

29.3. 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.

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

29.5. The School is 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.

29.6. The DSL will consider the published Surrey Safeguarding Children's 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.

29.7. In all cases if the DSL identifies any level of concern the DSL should contact the MAP and email a Request for Support Form. If a child is in immediate danger the police should be called on 999.

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

29.9. The School includes the risks of sexual exploitation in the PSHE and SRE 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.

29.10. Indicators of CSE may include:

- Acquisition of money, clothes, mobile phones etc without plausible explanation;
- Gang-association and/or isolation from peers/social networks;
- Exclusion or unexplained absences from school, college or work;
- Leaving home/care without explanation and persistently going missing or returning late;
- Excessive receipt of texts/phone calls;
- Returning home under the influence of drugs/alcohol;
- Inappropriate sexualised behaviour for age/sexually transmitted infections;
- Evidence of/suspicious of physical or sexual assault;
- Relationships with controlling or significantly older individuals or groups;
- Multiple callers (unknown adults or peers);
- Frequenting areas known for sex work;
- Concerning use of internet or other social media;
- Increasing secretiveness around behaviours; and
- Self-harm or significant changes in emotional well-being.

30. Child Criminal Exploitation (CCE)

30.1. CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.

30.2. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

30.3. Staff should be aware that that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff should be aware that girls are at risk of criminal exploitation too. However, there are certain risk factors, such as being male, being absent from School, having experienced child maltreatment or being involved in crime which may increase the likelihood of involvement in serious crime. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

30.4. Some of the following can be indicators of CCE:

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

30.5. 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.

30.6. 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.

30.7. Teenagers can be particularly vulnerable 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.

30.8. Criminal exploitation of children is a typical feature of county lines criminal activity.

31. County Lines

31.1. County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”.

31.2. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

31.3. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

- 31.4. 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.
- 31.5. 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.
- 31.6. Any concerns that a child is being or is at risk of being criminally exploited will be passed without delay to the DSL. The School is 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.
- 31.7. A request for support to the MAP 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 MAP. If there is concern about a child's immediate safety, the Police will be contacted on 999.

32. Domestic Abuse

- 32.1. In April 2021, the Domestic Abuse Act 2021 received Royal Assent and introduced a statutory definition for the first time.
- 32.2. The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:
- physical or sexual abuse;
 - violent or threatening behaviour;
 - controlling or coercive behaviour;
 - economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
 - psychological, emotional or other abuse.
- 32.3. People are 'personally connected' when they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.
- 32.4. The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person.
- 32.5. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

32.6. The school is 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.

32.7. The **National Domestic Abuse helpline** can be called free of charge and in confidence, 24 hours a day on **0808 2000 247**.

33. Nudes and semi-nudes (previously referred to as youth produced sexual imagery or sexting)

33.1. The practice of children sharing images, videos or live streams via text message, email, sharing between devices (such as via AirDrop), social media, gaming platforms, forums 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.

33.2. Nudes and semi-nudes refers to images, videos and live streams where:

- A person under the age of 18 creates and shares nudes and semi-nudes of themselves with a peer under the age of 18.
- A person under the age of 18 shares nudes and semi-nudes 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 nudes and semi-nudes created by another person under the age of 18.

33.3. All incidents of this nature should be treated as a safeguarding concern and in line with the UKCCIS guidance '[Sharing Nudes and semi-nudes](#)'. The overview below gives a brief guide but the full document will be referred to in all cases.

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

33.3.2. If a member of staff becomes aware of an incident involving nudes and semi-nudes they should follow the child protection procedures and refer to the DSL as soon as possible.

33.3.3. 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 the nudes and semi-nudes.

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

33.3.5. 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.

33.3.6. At any point in the process if there is concern a child has been harmed or is at risk of harm a request for support should be made to the MAP or the Police as appropriate.

33.3.7. Immediate request for support 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 and involves anyone aged 12 or under.
- There is reason to believe a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example the child is presenting as suicidal or self-harming.

33.4. 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 Headmaster, to respond to the incident without referral to the MAP or the Police.

33.5. During the decision making the DSL will consider the following when deciding if a child is at risk of harm, in which case a referral will be appropriate:

- why was the nude or semi-nude shared? Was it consensual or was the child or young person put under pressure or coerced?
- has the nude or semi-nude been shared beyond its intended recipient? Was it shared without the consent of the child or young person who produced the image?
- has the nude or semi-nude been shared on social media or anywhere else online? If so, what steps have been taken to contain the spread?
- how old are any of the children or young people involved?
- did the child or young person send the nude or semi-nude to more than one person?
- do you have any concerns about the child or young person's vulnerability?
- are there additional concerns if the parents or carers are informed?

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

33.7. The DSL will record all incidents of nudes and semi-nudes, including the actions taken, rationale for actions and the outcome.

Appendix Two – Honour-based Abuse, Forced Marriage and Female Genital Mutilation

34. Honour-based Abuse

34.1. So-called ‘honour-based’ abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff must speak to the DSL.

35. Forced Marriage (FM)

35.1. This is an entirely separate issue from arranged marriage. It is a human rights abuse and falls within the Crown Prosecution Service definition of domestic violence. Young men and women can be at risk in affected ethnic groups. Whistleblowing may come from younger siblings. Other indicators may be detected by changes in adolescent behaviours. Never attempt to intervene directly as a school or through a third party. Always call either the Contact Centre or the Forced Marriage Unit on 020 7008 0151.

36. Female Genital Mutilation (FGM)

36.1. It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM. Reed’s School acknowledges its mandatory reporting duty which requires all “known” cases of FGM in Under 18s to be reported to the police.

36.2. Further details on the procedure for reporting cases of FGM can be found in the document “Mandatory Reporting of Female Genital Mutilation – procedural information” (Home Office and DfE, October 2015).

36.3. What is FGM?

36.3.1. It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons. It is a form of child abuse and violence against women.

36.3.2. There are four types of procedure:

- Type 1: Clitoridectomy – partial/total removal of clitoris
- Type 2: Excision – partial/total removal of clitoris and labia minora
- Type 3: Infibulation - entrance to vagina is narrowed by repositioning the inner/outer labia
- Type 4: all other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

36.4. Why is it carried out?

36.4.1. Belief that:

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

36.5. Is FGM legal?

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

36.5.2. Circumstances and occurrences that may point to FGM happening are:

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

36.6. Signs that may indicate a child has undergone FGM:

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

36.7. The 'One Chance' Rule

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

Appendix Three - Indicators of Vulnerability to Radicalisation

37. Introduction

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

37.2. 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.

37.3. 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.

37.4. 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.

37.5. 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.

37.6. 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; a feeling of failure; rejection of civic life;
- Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration;
- Special Educational Need – students/pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

37.7. 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.

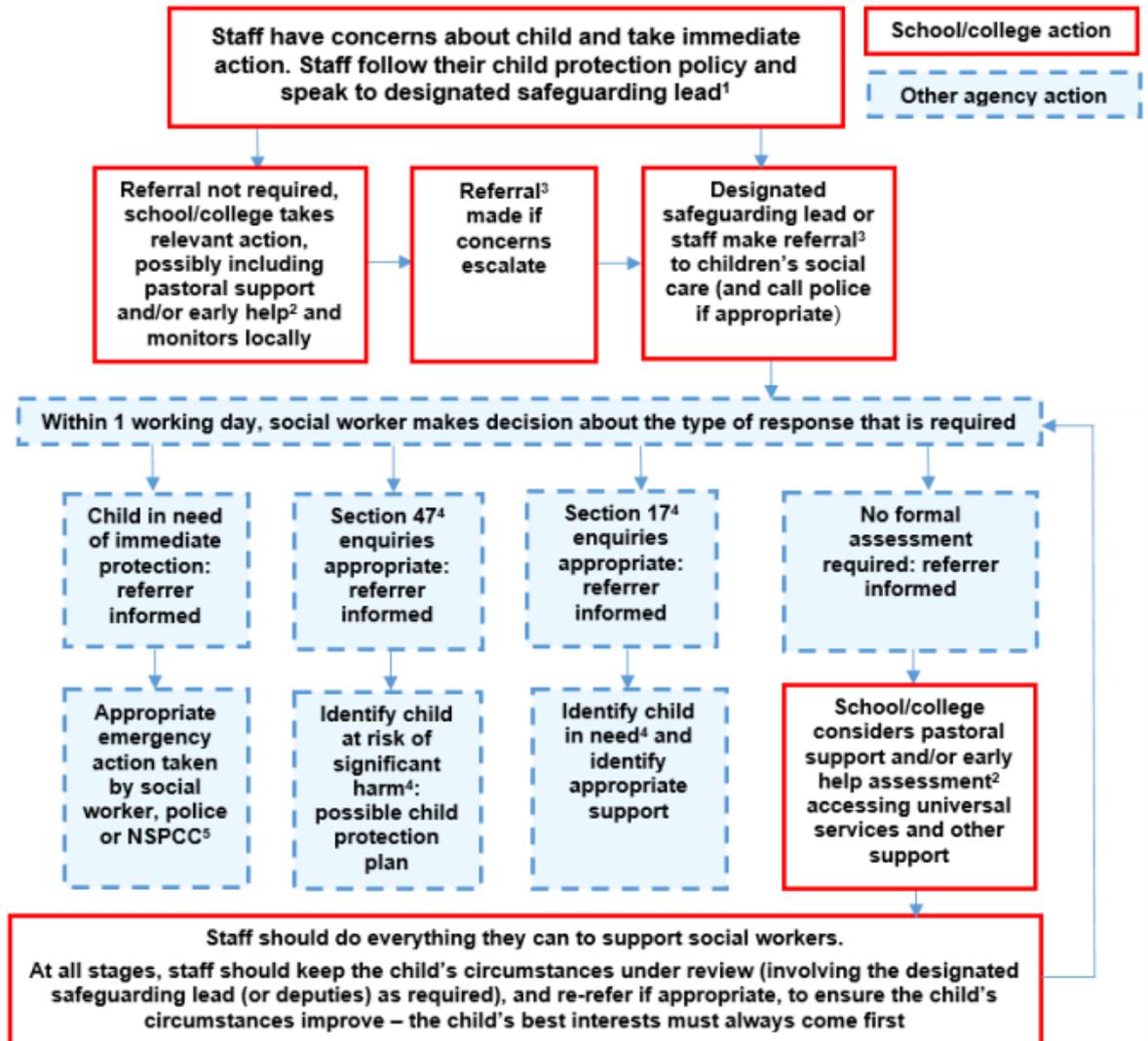
37.8. More critical risk factors could include:

- 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.

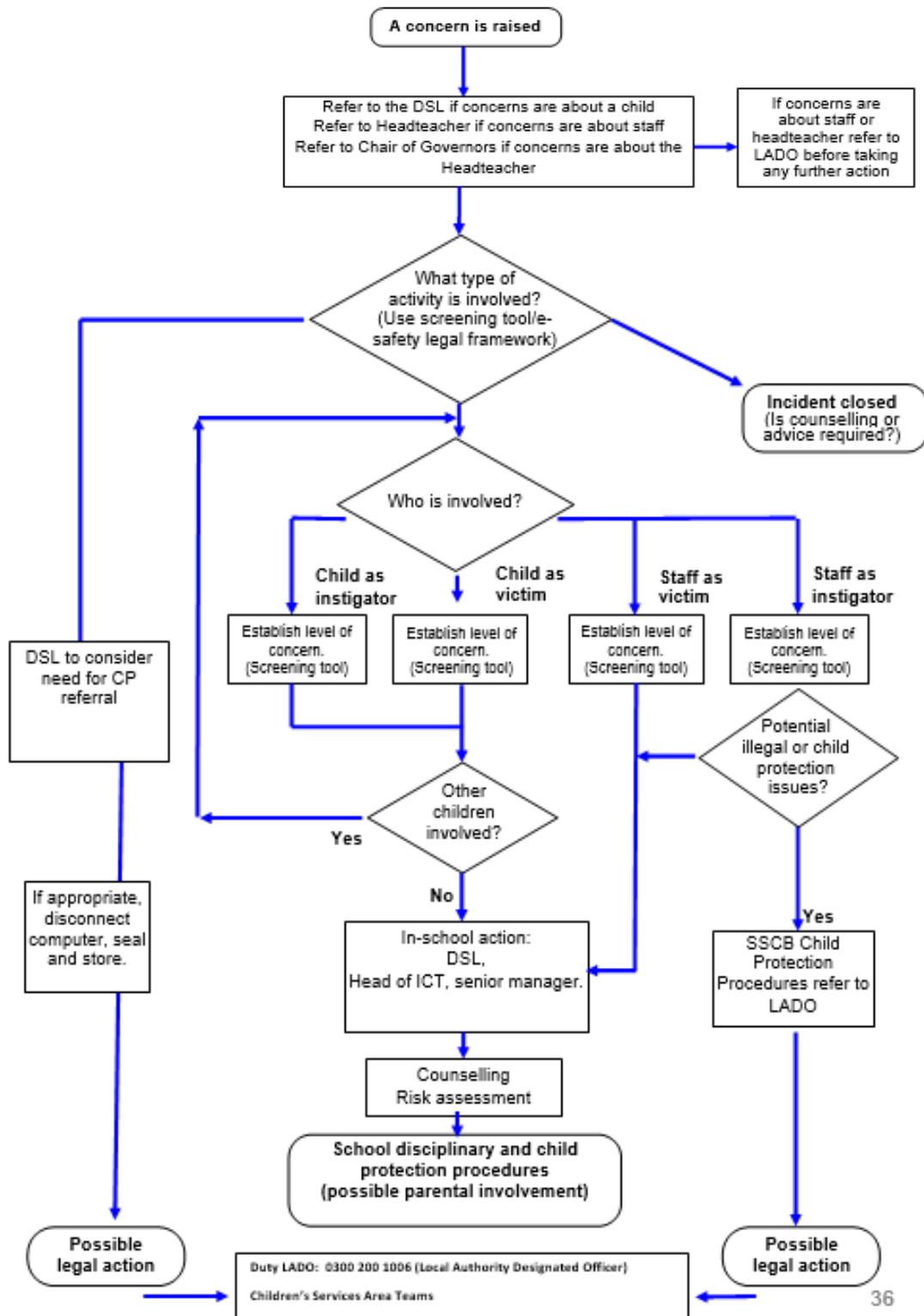
37.9. The Department of Education guidance The Prevent Duty can be accessed via this link. [Prevent duty guidance: England and Wales \(2023\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/prevent-duty-guidance-england-and-wales-2023)

Appendix Four – Process to be followed if there are concerns about a child

Actions where there are concerns about a child



Appendix Five - What to do if you have an Online Concern



Appendix Six – Self-Harm Flow Chart

Should a student disclose they are self-harming or there is an immediate danger of a student self-harming, the School will follow this flow chart:

