CARWARDEN HOUSE COMMUNITY SCHOOL

Child Protection and Safeguarding Policy

(including Child-on-Child Abuse Policy)

Policy author:

Policy Date: September 2026

Review Cycle: Annually Statutory

Adopted by Trustees:

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Designated Safeguarding Trustee: Carol Blunden-Lee

Signed: (Chair of Governors)

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Equality Statement

This policy also reflects, both statutory guidance 'Keeping Children Safe in Education' 2026 (KCSIE), and Surrey Safeguarding Children Partnership (SSCP) Procedures.

The Trustee Board takes seriously its responsibility under section 175/157 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within our school to identify, assess, and support those children who are suffering harm. The Board of Trustees are aware of their obligations under the Human Rights Act 1998 21, the Equality Act 2010, (including the Public Sector Equality Duty23), and the local multi-agency safeguarding arrangements.

This policy applies to all members of staff and Trustees at Carwarden School.

Definitions

In line with Keeping Children Safe in Education 2026, we define **safeguarding** as:

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

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

Early Help (Assessment) means the providing support as soon as any needs emerge or are identified at any point in a child's life.

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

Child includes everyone under the age of 18. Please note that this policy also applies to our 6th Form students aged 18 and over deemed 'vulnerable adults'. 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 Surrey CC Children's Single Point of Access and the Child Protection Consultation line.

Key contacts

Name	Role	Contact details
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Mrs Claire Lenaghan	**Designated Teacher for LAC and PLAC**	claire.lenaghan@carwarden.surrey.sch.uk Telephone: 01276 709080
Mrs Carole Blunden-Lee	**Nominated Child Protection Trustee**	Email: carole.blunden-lee@carwarden.surrey.sch.uk Telephone: 01276 709080
Mr Chris Hamilton	**The Chair of Trustees**	Email: chair@carwarden.surrey.sch.uk Telephone: 01276 709080
Surrey CC Children's Single Point of Access (C-SPA)	**Children's Social Care**	Email: cspa@surreycc.gov.uk Telephone: 0300 470 9100
Rita Dada	**LADO**	Email: LADO@surreycc.gov.uk Telephone: 0300 123 1650 option 3
Surrey Virtual School	**Virtual School**	Email: virtual.school@surreycc.gov.uk
Ms Alex Ewen	**Headteacher**	Email: alexewen@carwarden.surrey.sch.uk Telephone: 01276 709080

We are part of Surrey's local authority. We follow Surrey Safeguarding Children Partnership (SSCP) multi-agency safeguarding arrangements established by the safeguarding partners. Further detail can be found here: Homepage - Surrey Safeguarding Children Partnership

Introduction

"Safeguarding is Everyone's Business"

Carwarden School recognise our moral and statutory responsibility to safeguard and promote the welfare of all students. 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.

Carwarden School is committed to a strong culture of safeguarding, ensuring that all staff embrace the concept of **"it could happen here"** and recognise that **safeguarding is everyone's responsibility**. Carwarden School ensures that pupils are respected, listened to, and supported when raising concerns. We remain child-centred and consider the child's voice, wishes, and lived experience in all safeguarding decisions. Safeguarding is embedded throughout school life, curriculum delivery, policies and decision-making.

We are fully committed to creating a culture of vigilance. We expect everyone who works in and visits our school to share this commitment. We encourage staff, pupils, and visitors to report anything that concerns them, and we will always act in the best interest of the child. Staff recognise that no single practitioner can have a full picture of a child's circumstances and therefore effective information sharing and multi-agency working are essential.

Our pupils are taught how to stay safe, including when online, and to recognise when they may be at risk. We ensure our pupils know how to get help when they need it. In line with the latest Working Together to Safeguard Children, we place importance on contextual safeguarding and consider risks in our local community when assessing the safety of our pupils.

The latest version of this policy is available on the school website and upon request.

1. 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 the school or in the community, taking into account contextual safeguarding, in accordance with statutory guidance.
- We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working to protect and safeguard children.

- 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.

2. Policy Aims

- To demonstrate the school's commitment with regard to safeguarding and child protection to students, parents and other partners.
- To support the child's development in ways that will foster security, confidence and independence.
- To provide an environment in which children and young people feel safe, secure, valued and respected, and feel confident to, and know how to approach adults if they are in difficulties, believing they will be effectively listened to.
- To raise the awareness of all teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.
- To provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we, the school, contribute to assessments of need and support packages for those children.
- To emphasise the need for good levels of communication between all members of staff.
- To provide a robust & structured procedure within the school which will be followed by all members of the school community in cases of suspected abuse.
- To develop and promote effective working relationships with other agencies, especially Early Help providers, the Police, Health and Social Care.
- To ensure that all staff working within our school who have access to children have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory advanced DBS (Disclosure & Barring Service) check (according to KCSIE 2026 guidance), and a single central record is kept for audit. Any visitors to the school will, at all times, be supervised by school staff (they will be provided with an identifying lanyard).
- We comply with the Disqualification under the Childcare Act 2006 guidance issued in August 2018.

3. 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.

- We will promote a caring, safe and positive environment within the school/college.

- We will encourage self-esteem and self-assertiveness, through the curriculum and through positive relationships within the school/college community.
- We will ensure children are taught to understand and manage risk through personal, social, health and economic (PSHE) education and Relationship and Sex Education (RSE) and through all aspects of school/college life, including staying safe online.
- We will respond sympathetically to any requests for time out to deal with distress and/or 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 Assessment and the safeguarding of children.
- We will notify Social Care without delay if there is an immediate risk of significant harm.
- We will provide continuing support to children about whom there have been concerns who leave the school/college by ensuring that information is shared confidentially with the child's new setting. We will ensure the school/college records are forwarded as a matter of priority and within statutory timescales.

4. Prevention / Protection

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

The Carwarden School community will therefore:

- Establish and maintain an ethos where all students feel secure, are encouraged to talk / communicate and are always listened to.
- Include regular consultation with students e.g. through safety questionnaires, participation in anti-bullying projects, asking children to report whether they feel safe in school
- Ensure that all students know there is a trained adult (or adults) in the school whom they can approach if they are worried or in difficulty.
- Include safeguarding across the curriculum, including PSHE, opportunities which equip students with the skills they need to stay safe from harm and to know to whom they should turn for help. Given the SEND needs of our students, this will include teaching the vocabulary and developing the students' understanding of key safeguarding terms (e.g. private, body parts, touch, choice, consent etc.). This will include anti-bullying work, online - safety, road safety, personal safety and independent travel. Preventative education is most effective in the context of a whole-school approach that prepares students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. These will be underpinned by the school's behaviour policy and pastoral support system, as well as by a planned programme of evidence-based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum.

The RSHE curriculum includes;

- Supporting children to develop the skills that form the building blocks of all positive relationships.

- Kindness in relationships.
- How to not only recognise abusive relationships but also report concerns.
- Being clear that sexual violence and sexual harassment are never the fault of the person experiencing it
- 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.

5. Safe School, Safe Staff

We will ensure that:

- The school/college operates safer recruitment procedures in line with KCSIE 2026 and that it includes statutory checks on the suitability of staff to work with children.
- As part of the shortlisting process, the school will carrying 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.
- All staff receive information about the school/college's safeguarding arrangements, the school/college's safeguarding statement, staff behaviour policy (code of conduct), child protection policy, the role and names of the Designated Safeguarding Lead (DSL) and their deputies, and Keeping Children Safe in Education 2026 part 1 in full.
- All staff receive safeguarding and child protection training at induction in line with advice from SSCP which is regularly updated and that they receive safeguarding and child protection updates as required, but at least annually.
- All members of staff are trained in and receive regular updates in online safety and reporting concerns.
- All members of staff maintain a zero-tolerance approach to sexual violence and sexual harassment.
- All staff receive training on the PREVENT duty and undertake a PREVENT update annually.
- All staff and Trustees have regular child protection awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse.
- he Child Protection Policy is made available via the school/college 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 Child Protection Policy and reference to it in the school/college's handbook.
- We provide a coordinated offer of Early Help Assessment 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/college sites at any time and ensure that any groups who use the school premises have child protection policies and procedures in place.
- Community users organising activities for children are aware of the school/college's Child Protection Policy, guidelines and procedures.

- The name of the designated members of staff for child protection, the DSL and deputies, are clearly advertised in the school/college with a statement explaining the school/college's role in referring and monitoring cases of suspected harm and abuse.
- All staff will be given a copy of Part 1 of Keeping Children Safe in Education 2026 and will sign to say they have read and understood it. This applies to the Governing Body (Trustees) in relation to part 2 of the same guidance.

6. Roles and responsibilities

6.1 Designated Safeguarding Lead (and deputies):

- The DSL will take lead responsibility for safeguarding with the support of the Deputy DSLs.
- Be available during term time (during school hours) for staff to discuss any safeguarding concerns.
- Ensure robust cover arrangements are in place for periods when they are unavailable due to illness, leave, or other circumstances.
- Lead on referrals to local authority children's social care; the Channel Programme where there is a radicalisation concern; the DBS where relevant, in relation to allegations of abuse made against staff; and where a crime has been committed, to the Police with reference to the guidance NPCC- When to call the police.
- Act as a source of support, advice and expertise for all staff.
- Have an "It could happen here" approach to safeguarding.
- Act as a point of contact with the safeguarding partners and share information with them as required.
- Liaise with Ms Alex Ewen (the Headteacher) to keep them informed of issues, especially police investigations and ongoing enquiries under section 47 of the Children Act 1989.
- Liaise with the case manager as required and the LADO for child protection concerns in cases which concern a staff member.
- Liaise with school staff (especially pastoral support, behaviour leads, school health colleagues and the SENCO) on matters of safety and safeguarding and consult the SSCP Levels of Need document to inform decision making and liaison with relevant agencies.
- Liaise with the local authority and work in partnership with other agencies in line with Working Together to Safeguard Children.
- Promote engagement with parents and/or carers in safeguarding and promoting the welfare of children.
- Be alert to the specific needs of children in need, those with Special Educational Needs and Disability (SEND) and young carers.
- Take lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues of students and through identifying the impact these may have on attendance, engagement and achievement at school.
- Work with staff to ensure that the school knows the cohort of children who have or have had a social worker, their academic progress and attainment, and maintain high aspirations for this cohort and support staff to enable these students to meet their potential.
- Ensure records are kept in line with good record-keeping practice as outlined in the latest Keeping Children Safe in Education.
- Manage and submit a Request for Support Form for a child if there are concerns about suspected harm or abuse, to the C-SPA, and act as a point of contact and support for school/college staff. Requests for support should be made securely by email to

cspa@surreycc.gov.uk using the Request for Support Form urgent referrals should be made by telephone 0300 470 9100 (and ask for the priority line).

- Report concerns that a child may be at risk of radicalisation or involvement in terrorism, use **Prevent referral form** to refer cases by e-mail to preventreferrals@surrey.pnn.police.uk. If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101 or 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. Follow NSPCC guidelines and advice on when to call the police. DSLs should liaise with and inform the Headteacher of all issues - especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. It expects that the appropriate adult will "support, advise and assist" the young person, and "observe whether the police are acting properly and fairly to respect their rights and entitlements, and inform an officer of the rank of inspector or above if they consider that they are not
- Ensure that this policy and safeguarding procedures are accessible to all new and existing staff, that this is reviewed at least annually and is available publicly.
- Liaise with local safeguarding partners to ensure that staff are aware of any training opportunities and the latest local policies.
- Update training every two years, covering the content outlined in KCSIE, and ensure any Deputy DSLs also renew this training.
- Update own knowledge and skills at least annually.
- Encourage and promote a culture of listening to children and taking account of their wishes and feelings, amongst all staff.
- Have a secure working knowledge of SSCP procedures and understand the assessment process for providing early help and statutory intervention, including the local authority levels of need criteria and referral arrangements.
- Hold and share information in line with the data protection laws (Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), and the Data (Use and Access) Act 2025) and the guidance around information sharing in KCSIE.
- Follow DfE and KCSIE guidance on 'Child on Child Abuse' when a concern is raised that there is an allegation of a child abusing another child within the school/college.
- When there has been a report of sexual violence, make an immediate risk and needs assessment. Additionally, where there has been a report of sexual harassment, the need 15 for a risk assessment should be considered on a case-by-case basis and will be put in place as required.
- Understand the risks associated with online activity and be confident that they have the up to date knowledge and capability to keep students safe whilst they are online at school; 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 record the rationale for decisions made and action taken.
- Keep written records of all concerns, discussions and decisions, including a rationale for those decisions. (This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program.
- Ensure that an indication of the existence of the additional child protection file is marked on the child's school file record.

- Ensure that where children leave the school, their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term to allow the new school or college to have support in place for when the child arrives. Confirmation of receipt is required.
- Ensure that where a student transfers school/college and is on a child protection plan or is a child looked after, their information is passed to the new school/college immediately and that the child's social worker is informed. In addition, consideration should be given to a multi-agency school/colleges transition meeting if the case is complex or on-going.
- If the transit method requires that a copy of the Child Protection file is retained until such a time that the new school/college acknowledges receipt of the original file, the copy should 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 Headteacher 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 the School's child protection policy, staff behaviour policy (code of conduct) and Keeping Children Safe in Education (KCSIE 2026) Part 1 in full 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/college staff, keep a record of attendance and address any absences.
- Ensure that in collaboration with the school leadership and Trustees, the child protection policy is reviewed annually, and the procedures and implementation are updated and reviewed regularly.
- Ensure that the Child Protection Policy is available publicly and that parents are aware that referrals about suspected harm and abuse will be made and the role of the school/college 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 Headteacher and Chair of Trustees, the "Audit of Statutory Duties and Associated Responsibilities" to be submitted annually to the Surrey County Council, Education Safeguarding Team.
- Ensure that the names of the Designated Safeguarding and Deputies are clearly advertised, with a statement explaining the school's role in referring and monitoring cases of suspected abuse.
- The designated safeguarding lead should take lead responsibility for understanding the filtering and monitoring systems and processes in place. These filtering and monitoring systems should also apply to the use of generative AI in education and support the school to use generative AI safely. Information on school child protection policies should include information on appropriate filtering and monitoring on school devices and school networks. The guidance signposts the Department for Education's new filtering and monitoring standards (DfE, 2023b), which support schools to have effective systems in place. Schools and

colleges should consider meeting the DfE's Cyber security standards for schools and colleges (DfE, 2023c).

- Adopt a sensible restrictive intervention policy which outlines the procedures we follow. This includes:
    - Staff must only ever use physical intervention (positive handling) as a last resort, when a child is endangering themselves or others. This must be the minimal force necessary to prevent injury to another person.
    - In the event that intervention must be used, this must be recorded and signed by a witness. All incidents involving positive handling will be recorded in an incident log.
    - Physical intervention of a nature which causes injury or distress to a child may be considered under child protection or disciplinary procedures.
    - Staff will be given 'Safe Practice' guidance to ensure that they are clear about their professional boundaries.
- Have a secure working knowledge of SSCP procedures and understand the assessment process for providing early help and statutory intervention, including the local authority levels of need criteria and referral arrangements.

6.2 Board of Trustees

- Review and approve this policy at each review to ensure that it is consistent with SSCP and statutory requirements and hold the Headteacher to account over its implementation.
- Appoint a safeguarding governor to oversee safeguarding compliance and the effectiveness of this policy.
- Read and understand Keeping Children Safe in Education, and review this guidance at least annually.
- Engage with safeguarding training, including training at induction, that equips the governing body with the skills to provide strategic challenge in relation to safeguarding.
- Under the Counter-Terrorism and Security Act 2015, schools must have "due regard to the need to prevent people from being drawn into terrorism". The governing body holds corporate responsibility for ensuring this duty is met and that the school has proper policies, trained staff leads, and risk assessments in place. The board of trustees must undertake PREVENT training annually.
- Be aware of the data protection laws which place duties on organisations and individuals to process personal information fairly and lawfully and to keep information they hold safe and secure. In addition, adhere to the ICO guidance, which includes information on obligations and how to comply with them.
- Review the filtering and monitoring system and processes to ensure compliance with Keeping Children Safe in Education.
- Ensure that there is a whole school approach to safeguarding.
- Ensure that school has effective safeguarding policies and procedures including a Child Protection Policy, a Staff Behaviour Policy / Code of Conduct, a Behaviour Policy and a response to children who go missing from education.
- Ensure that the school 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.
- Have at least one member of the Board of Trustees who has completed safer recruitment training.

- Ensure that all staff, including temporary staff/supply staff, volunteers and contractors, are provided with the school's child protection policy and if applicable the staff behaviour policy.
- The school has procedures for dealing with allegations of abuse against staff (including the Headteacher), volunteers and against other children and that a referral is made to the DBS and/or the Teaching Regulation Agency (as applicable) if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have had they not resigned.
- The school has policies and processes to deal with any concerns (including allegations) which do not meet the harm threshold, referred to in the KCSiE 2026 guidance as 'low-level' concerns, to manage and record any such concerns and take appropriate action to safeguard children.

6.3 All staff

- Receive appropriate 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.
- Receive safeguarding updates regularly through DSL team or training provider (where appropriate) and at least annually that provide the relevant skills and knowledge to safeguard children effectively.
- Understand Surrey's Family Help arrangements and the distinction between school-led support and support coordinated by the local authority and other safeguarding partners.
- Be able to contribute effectively to Family Help assessments, plans and multi-agency interventions where required.
- Receive training in emerging safeguarding risks including artificial intelligence (AI), deepfakes, misogyny, online misinformation, harmful sexual behaviour and serious violence.
- Understand the process for making referrals to local authority children's social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (child protection) that may follow a referral, along with the role they might be expected to play in such assessments, for example supporting the safeguarding team with collecting information for enquiries or multi-agency meetings.
- Know how to respond to a student who discloses harm or abuse following training of 'Working together to Safeguard Children', and 'What to do if you are worried a child is being Abused' (2015).
- Understand that the process for making referrals locally is through the Children's Single Point of Access (C-SPA), or the police if there is risk of significant harm and the DSL / DDSLs are not available.
- Know what to do if a child tells them they are being abused, exploited, or neglected and maintain an appropriate level of confidentiality.
- Know not to promise a child that they will not tell anyone about a report of any form of abuse.
- Reassure victims that they are being taken seriously and assure them that they are not causing a problem by reporting.
- Be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/ or they may not recognise their experiences as harmful. This should not prevent professional curiosity and discussions with the DSL.
- Know the indicators of abuse, neglect, exploitation and modern slavery, exercise professional curiosity and know that such issues are rarely standalone ones.
- Be aware of extra-familial and/ or contextual risks which occur outside of the families, e.g., sexual abuse, domestic abuse, criminal exploitation, serious youth violence, county lines and radicalisation.

- Be aware that technology is a significant component in many safeguarding and wellbeing issues and the risks young people face online.
- Know how to report concerns about safeguarding practices within the school via whistleblowing procedures or other means.
- Know how to report concerns if staff have a safeguarding concern, or an allegation is made about another member of staff (including supply staff, trainee teachers, volunteers, and contractors) harming or posing a risk of harm to children through the following process:
    - Refer to the Headteacher, who will consider whether an onward referral to the LADO is required
    - Concerns about the Headteacher should be referred to the chair of trustees and
    - Report directly to the LADO where there is a conflict of interest.
- Read and understand part 1 of Keeping Children Safe in Education, and review this guidance at least annually (and part 5 for details on child-on-child abuse).
- Attend and engage with induction training, including reading and understanding our:
    - child protection policy
    - behaviour policy and the measures taken to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying
    - the staff code of conduct
    - safeguarding response to children who go missing from education
- Be able to identify a child or young person who may benefit from early help and liaise with the DSL regarding next steps. These include children who:
    - have special educational needs
    - are disabled
    - are young carers
    - are showing signs of being encouraged into anti-social or criminal behaviour
    - experience difficulties at home, such as domestic abuse, parental substance abuse or parental mental health problems
    - are at risk of being affected by organised crime and county lines
    - are in care, leaving care or preparing to leave care
    - have poor attendance at, or are excluded from, school
    - are young parents (or about to become young parents)
    - are experiencing housing issues
    - misuse drugs or alcohol
    - are viewing harmful online content or experiencing inappropriate or unsafe online relationships
    - are being bullied or bullying others
    - have poor general health ▪ have mental health issues
    - 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
    - is frequently missing / goes missing from education, home or care

6.4 The Headteacher

- In addition to the role and responsibilities of all staff the Headteacher will ensure that:
    - The school fully contributes to inter-agency working in line with Working Together to Safeguard Children 2018 guidance.
    - The Child Protection and Safeguarding Policy and procedures are implemented and followed by all staff.

- That the school has appropriate policies in place that make it clear that sexual harassment, online sexual abuse and sexual violence (including sexualised language) is unacceptable, with appropriate sanctions and support in place.
- That the school's staff have appropriate knowledge of Part 5 the government's 'KCSIE' guidance regarding child-on-child abuse.
- That all children are supported to report concerns about harmful sexual behaviour freely. That concerns are taken seriously and dealt with swiftly and appropriately, and children are confident that this is case. And that comprehensive records of all allegations are kept.
- All staff are aware of the role of the DSL, including the identity of the DSL and any 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.
- That Deputy DSLs are trained to the same standard as the DSL and the role is explicit in their job description.
- Adequate and appropriate DSL cover arrangements are in place for any out of hours/out of term activities.
- Where there is a safeguarding concern that the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Child-centred systems and processes are in place for children to express their views and give feedback.
- 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.
- Students are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.
- That allegations or concerns against staff and other adults are dealt with in accordance with guidance from the Department for Education (DfE), Surrey Safeguarding Children Partnership (SSCP) and Surrey County Council (SCC).
- That statutory requirements are met to make a referral to the Disclosure and Barring Service and additionally in the case of teaching staff the Teacher Regulation Agency where they think an individual has engaged in conduct that harmed (or is likely to harm) a child; or if the person otherwise poses a risk of harm to a child.
- Record "low level concerns" in cases which concern a member of staff/supply staff/contractor or a volunteer. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that will be respected as far as reasonably possible.

7. Responding to and recording concerns

When staff or visitors to the school have a safeguarding concern, they should promptly inform the DSL by creating an initial record on CPOMS.

All staff should know what to do if a child tells them they are being abused, exploited, or neglected, and maintain an appropriate level of confidentiality. All staff should know to act upon concerns about a child's welfare immediately.

All staff should be aware of the following when responding to concerns:

- All staff should know not to promise a child that they will not tell anyone about a report of any form of abuse.
- All staff should be able to reassure victims that they are being taken seriously and assure them that they are not causing a problem by reporting.
- All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/ or they may not recognise their experiences as harmful. This should not prevent professional curiosity and discussions with the DSL.

If a member of staff is concerned about verbal conversations, disclosures, or signs of abuse or neglect, these should be recorded in writing and passed to the DSL immediately. If the member of staff is unsure, they should always speak to the DSL or a deputy regarding their concerns.

The DSL will then decide what action must be taken, which can include:

- Further pastoral support in school
- Referral for universal services and community-based early help and/or Family Help support in accordance with local safeguarding partnership arrangements
- Referral to children's social care

The school recognises the importance of identifying concerns at the earliest opportunity and providing help before issues escalate. All staff should be particularly alert to the potential need for additional support for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs
- has a mental health need
- is a young carer
- is pregnant and/or is a parent themselves
- has exhibited early signs of abusive, violent and/or harmful behaviours
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
- is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation
- is at risk of being radicalised into terrorism
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage, and
- is a privately fostered child.

If the DSL and deputies are not available, a staff member should not wait and should consider speaking to another member of SLT or contacting local children's social care for advice or to make a referral. Any such action should be shared with the DSL as soon as is practically possible.

Parents should be aware that the school can make referrals when there is suspected abuse or neglect, and that our concerns regarding a student will be shared. The school will always seek to share these

concerns and the referral with parents first, unless doing so would put the child at greater risk of harm, where we are advised not to, or where it has not been practicable to do so.

7.1 Reporting and recording concerns

At Carwarden, staff report their concerns to the DSL immediately using CPOMS.

Staff will provide a first-hand summary of their concern or details of a disclosure they have received. They will use professional language and try to capture the incident as it took place or as it was described to them. They will report all concerns in a timely fashion. The safeguarding team will ensure that any action taken or outcome is accurately recorded in line with good record-keeping guidance, which should follow:

- A clear and comprehensive summary of the concern, including:
    - The child / young person's language
    - Dates and times of observations / discussions
    - Any injuries relating to the concern
- Details of how the concern was followed up and resolved, and
- A note of any action taken, decisions reached and the outcome.
- The rationale for the action taken, including where a decision to refer, or not, to external agencies has been made.

Students can confidently report concerns, knowing that these concerns will be taken seriously and that they can express their views and give feedback, too. This can be done through a variety of means, which include speaking with a member of the DSL team, talking with a trusted member of staff, communicating in written or picture form.

The DSL will then:

- Using the SSCP Levels of Need, decide whether or not there are sufficient grounds for suspecting harm, in which case a request for support must be made to the C-SPA and the Police if it is appropriate.
- Normally the school should try to discuss any concerns about a child's welfare with the family and where possible to seek their agreement before making a referral to the C-SPA. However, this should only be done when it will not place the child at increased risk or could impede a Police investigation. The child's views should also be considered. If there are grounds to suspect a child is suffering, or is likely to suffer, harm or abuse the DSL must contact the C-SPA. By sending a Request for Support Form by secure email to: cspa@surreycc.gov.uk. If 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
- If the DSL feels unsure about whether a referral is necessary, they can phone the C-SPA to discuss concerns
- If there is not a risk of significant harm, the DSL will either actively monitor the situation or consider offering early help.
- 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.
- When a child needs 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 20 the C-SPA

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

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

7.2 Dealing with disclosures

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

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

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

7.3 Guiding principles - The Seven Rs

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

Respond

- Respond to the student 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 criticize the alleged perpetrator; the student may care about him/her, and reconciliation may be possible
- Do not ask the student 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 student 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 that 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 (ideally on CPOMS).
- Keep your original notes on file
- Record the date, time, place, persons present and noticeable nonverbal behaviour, and the words used by the child. If the child uses sexual 'pet' words, record the actual words used, rather than translating them into 'proper' words
- If appropriate, complete a body map to indicate the position of any noticeable bruising
- Record facts and observable things, rather than your 'interpretations' or 'assumptions'

Remember

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

Review (led by DSL)

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

7.4 What happens next?

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

If they have concerns that the disclosure has not been acted upon appropriately, they might inform the Headteacher or Safeguarding Trustee of the school and/or may contact the C-SPA.

Receiving a disclosure can be upsetting for the member of staff and the school 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 support might be needed, and staff should be encouraged to recognise that disclosures can have an impact on their own emotions

7.5 Notifying Parents

Carwarden will normally seek to discuss any concerns about a student with their parents. This must be handled sensitively, and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure.

However, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care.

Where there are concerns about forced marriage or honour-based violence parents should not be informed a referral is being made as to do so may place the child at a significantly increased risk.

8. Children who are particularly vulnerable

Carwarden School recognises that some children are more vulnerable to abuse, neglect and exploitation and that additional barriers exist when recognising abuse for some children.

We understand that this increase in risk is due more to societal attitudes and assumptions or child protection procedures which fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment or circumstances.

In some cases, possible indicators of abuse such as a child's mood, behaviour or injury might be assumed to relate to the child's impairment or disability rather than giving a cause for concern. Or a focus may be on the child's disability, special educational needs or situation without consideration of the full picture. In other cases, such as bullying, the child may be disproportionately impacted by the behaviour without outwardly showing any signs that they are experiencing it.

Some children may also find it harder to disclose abuse due to communication barriers, lack of access to a trusted adult or not being aware that what they are experiencing is abuse.

To ensure that all of our students receive equal protection we will give special consideration to children who are:

- Disabled or have special educational need
- Young carers
- Affected by parental substance misuse, domestic abuse or parental mental health needs
- Asylum seekers
- Living away from home / Looked After Child
- Vulnerable to being bullied or engaged in bullying
- Already viewed as a 'problem'
- Living in temporary accommodation
- Live transient lifestyles
- Living in chaotic and unsupportive home situations
- Vulnerable to discrimination on the grounds of race, ethnicity, religion, disability or sexuality (LGTBQ+ / gender questioning)

Take a cautious approach to supporting a gender questioning child and

- Consider the broad range of the individual's needs
- Do this in partnership with their parents (except in rare circumstances where involving the parents would bring a significant risk of harm to the child)
- Include any clinical advice that is available
- Consider how to address wider vulnerabilities, such as the risk of bullying
- At risk of sexual exploitation ▪ Do not have English as a first language
- At risk of female genital mutilation
- At risk of forced marriage
- At risk of being drawn into extremism

9. Anti-Bullying / 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. This includes all forms e.g. cyber, racist, homophobic and gender related bullying. 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 Headteacher and the DSL will also consider implementing child protection procedures. The subject of bullying is addressed at regular intervals in PHSE education.

10.Racist incidents

Our policy on racist incidents is set out separately in our Equalities and Discrimination Policy / Behaviour Policy in line with the Equality Act 2010. We acknowledge that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. Carwarden takes racist incidents seriously and will respond appropriately.

We keep a record of all racist incidents on CPOMS.

11.Online safety

Carwarden recognises that the use of technology has become a significant component of many safeguarding issues, including child-on-child abuse. We recognise that children need to be safeguarded from potentially harmful and inappropriate online material and the school's role within this. Online harms can include exposure to misinformation, disinformation and conspiracy theories, which may contribute to safeguarding risks such as radicalisation, exploitation or emotional harm.

Schools should be alert to these risks when educating pupils about online safety and when assessing emerging safeguarding concerns. Carwarden recognises that artificial intelligence (AI) technologies can create safeguarding risks, including online grooming, harassment, exploitation, misinformation, fraud, radicalisation, deepfake imagery and the creation or sharing of nudes and semi-nudes. Staff receive training to identify and respond to safeguarding concerns arising from the use of AI technologies and during the delivery of online safety education.

The school maintains appropriate information security and access management procedures to ensure that information is safeguarded, stored securely, and accessed only by authorised personnel.

Appropriate technical and organisational security measures protect safeguarding records.

To address this, our school strives to:

- Have clear procedures in place to ensure the online safety of all staff and students

- Educate the school community in the safe and responsible use of online technology
- Set clear expectations for the use of online technology, including mobile phones

Four main areas of risk frame our approach to online safety:

- **content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories
- **contact:** being subjected to harmful online interaction with other users or generative AI applications that simulate this; 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, including those generated using AI and online bullying
- **commerce -** risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

To address the risks above, as a school, we will:

- Teach students about online safety through computing and PSHE lessons and other relevant subjects
- Inform parents about what their child is being asked to do online by the school
- Train all staff on online safety, including filtering and monitoring
- Train all staff in online safety, including at induction

We have clear guidance for our school community on the acceptable use of technology, including mobile phones and smart devices, and our behaviour policy and staff code of conduct align with this. This includes following our online safety policy, having a school online safety co-ordinator (Sue Ann Coskey), and embedding online safety into our teaching curriculum to ensure that student understand risks and appropriate use of their electronic devices.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the DSL (or a deputy), will consider a referral into the Cyber Choices programme. This programme aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

12. Filtering and monitoring

We use the DfE's 'Plan technology for your school' service to assess our filtering and monitoring arrangements and to inform our personalised approach to meeting the standards.

Carwarden uses Smoothwall as a filtering and monitoring system. This filters and monitors for inappropriate websites visited, searches, attempts to access restricted websites and content, and flags for key words which may link to safeguarding concerns. This covers our school network and the following devices: school laptops, iPads and computers. If content is flagged, a member of our safeguarding team will promptly investigate this with the student or staff member who accessed the content.

The DSL has lead responsibility for understanding the filtering and monitoring systems and processes in place. The DSL and deputies monitor the effectiveness of this system through filter and monitoring checks/ checking websites, at least once every academic year. Records are kept for these checks.

The school takes care not to 'over block ' content so that there are not unreasonable restrictions on what students can be taught regarding online safety.

The processes we have in place have been informed by our risk assessment as required by the Prevent Duty.

The DfE has published filtering and monitoring standards which set out that schools should:

- Identify and assign roles and responsibilities to manage filtering and monitoring systems
- Review filtering and monitoring provision at least annually
- Block harmful and inappropriate content without unreasonably impacting teaching and learning
- Have effective monitoring strategies in place that meet their safeguarding needs

We at Carwarden have done the following in relation to this:

- Have clear guidelines for our safeguarding team in relation to investigating inappropriate device usage
- Smoothwall alerts are sent to the safeguarding lead email address to ensure that inappropriate usage is managed accordingly. This email address is accessible to all 5 of our DDSLs as well as the DSL.
- Smoothwall alerts include key-words relating to safeguarding concerns to inform the DSL and deputies which specific content is being accessed
- Smothwall use and restrictions are reviewed annually. Adjustments to release filtered websites that are used to support the curriculum can be reviewed.

When the filtering and monitoring system detects concerning usage, we will record this on **CPOMS** and take appropriate action, including a referral to children's social care when necessary.

For more information on filtering and monitoring, parents and carers can contact our safeguarding team: dsl@carwarden.surrey.sch.uk.
We also refer to the DfE's guidance on the use of generative AI in education (2025) to support our approach to online safety, digital literacy and filtering/monitoring practices.

13.Whistleblowing

At Carwarden, we recognise that adults working in a school may cause harm, including agency staff, visitors, and governors. Any concerns about a member of staff posing a risk of harm to children should be referred to the Headteacher immediately. These concerns could include where anyone working in the school 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
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

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

- Report any concerns about the conduct of any member of staff, volunteer or other adult to the Headteacher immediately.
- If an allegation is made against the Headteacher, the concerns need to be raised with the Chair of Trustees (Chris Hamilton on 01276 709080) as soon as possible. If the Chair of Trustees is not available, then the LADO (Rita Dada) should be contacted directly (0300 123 1650).
- There may be situations when the Headteacher or Chair of Trustees will want to involve the Police immediately if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.
- Once an allegation has been received by the Headteacher or Chair of Trustees they will contact the LADO (as part of their mandatory duty) on 0300123 1650 option 3 LADO or Email: LADO@surreycc.gov.uk 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 from local authority colleagues in following procedures set out in part 4 of 'Keeping Children Safe in Education' (2026) and the SSCP procedures.

- All school staff 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.
- All Staff should be aware of Surrey's Guidance on Behaviour Issues, and the school's own Behaviour Management policy.
- Guidance about conduct and safe practice, including safe use of mobile phones by staff and volunteers will be given at induction.
- We understand that a student may make an allegation against a member of staff or staff may have concerns about another staff member.

Any member of staff or volunteer with concerns about poor or unsafe practice and potential failures in our school's safeguarding regime should contact the headteacher (alexewen@carwarden.surrey.sch.uk) or the Chair of Trustees (chair@carwarden.surrey.sch.uk).

Under the terms of the Public Interest Disclosure Act 1998, you may take your concerns to an external agency where you reasonably believe that:

- you would be victimised by the school
- evidence that you submit in relation to the concern would be concealed or destroyed by the school
- you have previously made a disclosure of substantially the same nature.

We urge staff who take their concerns to external agencies to be careful not to disclose any confidential information. Information that is confidential and should therefore not be disclosed should be outlined in your contract of employment. Note: it is against the law to publish any information which may lead to the identification of a worker who is subject to an allegation.

If it is felt that concerns must be raised with external agencies, you can contact:

- Children's Social Care Services

- Police
- NSPCC
- Protect
- Health and Safety Executive
- Audit Commission
- Local Citizens Advice Bureau
- Department for Education / ESFA
- Ofsted

The NSPCC whistleblowing helpline can also be contacted via telephone (0800 028 0285) or email (help@nspcc.org.uk). More information can be found in our Whistleblowing Policy.

14. Children potentially at greater risk of harm

At Carwarden, we recognise that children with social workers may potentially be at greater risk of harm and need further support. Children may need this support due to abuse, neglect, exploitation or complex family circumstances. Our staff are aware that these students may face additional barriers to their attendance, learning or behaviour. We take these needs into account and liaise regularly with the relevant social worker to put appropriate support in place.

We also recognise that low or erratic attendance and Children Missing Education (CME) may be an indicator of abuse or neglect. All staff should be aware that children being absent from school or college, particularly repeatedly and/or for prolonged periods. Children missing education can act as a vital warning sign of a range of safeguarding possibilities, which may include abuse, neglect, sexual abuse, exploitation, child criminal exploitation, county lines involvement, mental health problems, risk of substance misuse and honour or faith-based abuse.

Furthermore, Carwarden recognises that some children and young people may experience emotionally based barriers to attending school. Emotionally Based School Non-Attendance (EBSNA) describes difficulties attending school where emotional stress, anxiety, mental health needs, neurodevelopmental needs, sensory needs, bullying, social difficulties or other underlying factors may contribute to a pattern of absence or difficulties engaging in education. At Carwarden, EBSNA is not seen as a behavioural choice or parental non-compliance. The school will seek to understand the underlying barriers to attendance and ensure that the child's voice remains central to assessment and support. Where a pupil is experiencing EBSNA, the school will work collaboratively with the pupil, parents / carers, pastoral staff, attendance lead, DSL and relevant external agencies to identify needs, reduce barriers and develop an appropriate support plan. Staff should remain alert to the possibility that persistent absence may indicate wider safeguarding concerns. Any concerns identified alongside attendance difficulties must be reported to the DSL in accordance with the school's safeguarding procedures.

We know that early intervention is essential to help prevent the risks of a child going missing in the future. Our pastoral teams track attendance thoroughly, address concerns without delay, and liaise with our Attendance Lead where needed. 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.

We ensure that pupils who are expected to attend Carwarden but fail to take up their place or cannot be located are referred to the local authority in line with local procedures and statutory guidance, such as *Children Missing Education: statutory guidance for local authorities and schools* (DfE, 2025). In line with DfE statutory guidance (2025), the school will undertake appropriate reasonable enquiries

to establish a child's whereabouts, working jointly with the local authority where required, before any referral or removal from roll takes place. The DSL will be aware of any students who may be considered CME and will work with the Attendance Lead to ensure that any safeguarding concerns are reviewed, that the advice of external agencies is sought, and that local procedures are followed.

We also strongly encourage parents and carers to supply us with two emergency contacts for their child, update their contact details without delay if they change, and share our procedures for notifying the school of an absence with all parents. When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

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 to be lesbian, gay, or bisexual can be just as vulnerable.
At Carwarden, we recognise the importance of supporting pupils who may be questioning their gender identity. We take a cautious approach that considers the individual needs of each child, working in partnership with parents (other than in exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child). We also consider any available clinical advice and seek additional non-clinical professional advice where relevant (e.g. the SENCO), including involving the DSL to address wider vulnerabilities. We endeavour to reduce the additional barriers faced by pupils in this group and to create a culture in which all pupils feel able to speak out and share their concerns with staff.

Carwarden will have regard to current DfE guidance on children who are questioning their gender. Decisions will be made on an individual basis, taking into account safeguarding, wellbeing, educational needs, parental involvement where appropriate, privacy considerations, and relevant professional advice.

All of our students have been identified as having SEN and each have an EHCP. Children with special educational needs (SEN), disabilities or certain health conditions can face additional safeguarding barriers when recognising abuse and neglect for reasons including:

- assumptions that indicators of possible abuse, such as behaviour, mood and injury, relate to the child's disability without further exploration
- being more prone to peer group isolation or bullying than other children
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges
- the need for intimate care and/or being more reliant on adults for care
- cognitive understanding- being able 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.

At Carwarden, we identify students who may be more at risk of harm and take action to ensure their safety, including:

- Providing 1:1 support accordingly
- Appropriate staff training
- Undertaking risk assessments and safety plans where necessary

For further details, please refer to the SEND policy.

15.Children attending Alternative Provision (AP)

When placing pupils in Alternative Provision (AP), we remain responsible for their safety and wellbeing. We undertake robust quality assurance (including acquiring letters of assurance, undertaking risk assessments and doing initial visits to new alternative provisions) to ensure that the AP provider has appropriate safeguarding arrangements in place.

Additionally, we agree safeguarding arrangements with providers prior to our students attending APs to ensure that our students are effectively safeguarded. We maintain ongoing contact with the provider through our Inclusions and Pathway lead, monitor attendance, and remain alert to any emerging concerns.

Furthermore, our Inclusion and Pathways lead does frequent check-ins for our students who attend APs. These responsibilities apply regardless of the number of hours a pupil attends the AP setting.

16.Records and information sharing

We recognise the importance of information sharing between practitioners and local agencies. We are proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging or when a child is already known to the local authority's children's social care.

The school is also part of Operation Encompass. This national initiative ensures the police share information with the DSL about any domestic abuse incidents to which a child has been present. This allows the DSL to provide timely support to the child as required by the start of the next school day.

Our safeguarding records include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved by School
- a note of any action taken, decisions reached and the outcome

We have due regard to the relevant data protection principles, understanding that the data protection laws place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. At Carwarden, we understand that the data protection Laws do not prevent the sharing of information to keep children safe.

In line with our mandatory duty, Carwarden will notify our local authority if we become aware of any private fostering, to allow the local authority to check that the arrangement is suitable and safe for the child. Private fostering occurs when a child under the age of 16 (under 18 if disabled) is provided with care and accommodation by a person who is not a parent, a person with parental responsibility for them, or a relative, in their own home.

17. Site safety

All staff members are responsible for ensuring the buildings and school site are secure and for reporting any concerns that arise.

The identities of all visitors and volunteers entering the school are checked. Visitors are expected to sign in and out, to display a visitor's badge while on the school site, and to be supervised at all times. Any individual who is unknown or not identifiable will be challenged by our staff for clarification and reassurance.

The school will not accept the behaviour of any individual, parent, or anyone else who threatens the school's security or makes others, children, or adults feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse the person access to the school site and advice being sought from our local safeguarding partners.

18. Child-on-child abuse

18.1 Context

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

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

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

18.2 Policy

In line with our strong commitment to safeguarding, at Carwarden we believe that all children have a right to learn in a safe environment and take a whole-school approach to child-on-child abuse, which includes preventative work, appropriate responses, and a zero-tolerance approach to abuse.

Our staff recognise that children of any age or gender can be capable of abusing other children, which can happen both inside and outside of school and online. This behaviour will be dealt with in line with our Behaviour Policy and will not be tolerated.

This child-on-child abuse can include, but is not limited to:

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

- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- serious physical assault and harm, or the threat of harm with a weapon
- harmful sexual behaviour, including misogyny, sexual violence and sexual harassment.
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual making or sharing of nudes and semi nudes, including those generated using AI
- upskirting, which is a criminal offence
- initiation/hazing-type violence and rituals

All the above are examples of abuse and should never be tolerated or passed off as "banter," "just having a laugh", "boys will be boys" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.
We recognise that the gendered nature of child-on-child abuse makes it more likely that girls will be victims and boys perpetrators, but all reports will be taken seriously. All concerns should be passed on to the DSL (or a deputy).

The school recognises that misogyny may contribute to harmful sexual behaviour, sexual harassment, sexual violence, online abuse and coercive behaviour. Staff will actively challenge misogynistic attitudes, language and behaviour and respond through safeguarding and behaviour procedures. The school educates pupils about respectful relationships, consent, equality and the impact of discriminatory and misogynistic behaviour.

We minimise the risk of child-on-child abuse through:

- Taking a whole school / college approach to safeguarding and child protection
- Providing training to all staff
- Providing a clear set of values and standards, underpinned by the school / college's behaviour policy and pastoral support; and by a planned programme of evidence-based content delivered through the curriculum (eg. PSHE)
- Engaging with specialist support and interventions
- Providing pastoral programmes, including assemblies and other key messages.
- Our Relationships, Sex and Health Education (aligned with current DfE guidance). The link to our RHE/RSHE policy can be found here.

All staff understand the importance of challenging inappropriate behaviours between peers and their role in preventing and responding to child-on-child abuse. Our staff understand that even if there are no reports of child-on-child abuse in our school, it does not mean child-on-child abuse is not happening-it may be the case that it is just not being reported. Children can report any child-on-child abuse to any member of staff.

Any cases of child-on-child abuse will be thoroughly investigated, with the victim always being taken seriously and both the victim and alleged perpetrator given appropriate support. Support will take the child's wishes into account and may include increased pastoral support, a mentor, access to counselling and a referral to external services. We will liaise wventioith the police and children's social care as necessary. Where there has been a report of sexual violence, an immediate risk assessment will be made, considering the needs of the victim, the alleged perpetrator, and our other pupils. All allegations of child-on-child abuse will be recorded in our safeguarding files.

In cases where self-generated intimate images and/or videos, including those generated using AI, e.g., deepfakes, have been shared, we follow the guidance given to schools and colleges by the UK Council for Internet Safety (UKCIS): Sharing nudes and semi-nudes (March 2024).

School recognises that some children and young people may feel worried about their own or someone else's sexual thoughts or behaviours. In such cases, pupils can access confidential advice and support through the Lucy Faithfull Foundation's Shore Space service: https://www.shore.space.

We record these incidents in line with our normal record-keeping process. Staff must record their concern or the disclosure immediately using CPOMS.

19.Responding to reports of sexual violence and sexual harassment

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

If the report includes an online element staff will be mindful of the Searching, Screening and Confiscation: advice for schools 2022 guidance.

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

Staff taking a report will never promise confidentiality.

Parents or carers should usually be informed (unless this would put the child at greater risk).

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

Appendix 1: Types of abuse and safeguarding concerns

KCSIE splits abuse into four main categories:

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

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless, unloved, inadequate, or valued only insofar as they meet another person's needs. It may include verbal abuse, such as persistent criticism, belittling, or name-calling, as well as 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 beyond a child's developmental capabilities, as well as overprotection, limiting exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

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

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

There are a number of other safeguarding concerns that ALL staff need to be aware of. These are detailed further in Part 1 of Keeping Children Safe in Education (2026), which all staff should read:

Child Criminal Exploitation (CCE): 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. The victim may have been criminally exploited even if the activity appears consensual. CCE can also occur through the use of technology.

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
- regularly miss school or education, or do not take part in education

County lines: 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, using dedicated mobile phone lines or other forms of "deal line". 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. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence towards victims (and their families) if they attempt to leave the county lines network.

Serious violence: where children are involved with serious violent crime, which may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation. Indicators may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. There is a range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Staff must immediately report concerns regarding a child carrying, possessing, displaying or expressing an intention to use a weapon to the DSL or Deputy DSL. The DSL will assess risk and determine appropriate safeguarding action, including partnership working with police and other agencies where required.

Child Sexual Exploitation (CSE): can be a one-off occurrence or a series of incidents over time and ranges from opportunistic to complex organised abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child 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. Indicators can be similar to the indicators of CCE, as well as:

- referring to older children or adults as 'boyfriends' or 'girlfriends'; and
- children who suffer from sexually transmitted infections or become pregnant.

CSE and CCE can be committed or facilitated by an organised network or gang, and the victim may identify as being part of this group.

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

The National Referral Mechanism (NRM) is the UK's framework for identifying and supporting victims of exploitation and modern slavery. Whatever form it takes, exploitation and modern slavery are child

abuse, and relevant child protection procedures must be followed if modern slavery or trafficking is suspected.

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.

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

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

Domestic abuse: 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:

(a)physical or sexual abuse;
(b) violent or threatening behaviour;
(c) controlling or coercive behaviour;
(d) economic abuse (adverse effect on the victim to acquire, use or maintain money or other property; or obtain goods or services); and
(e) psychological, emotional or other 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. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). Exposure to domestic abuse can have a serious, long-lasting emotional and psychological impact on children and therefore, children are now classified as victims and not merely witnesses where domestic abuse occurs. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

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

Children may also cause harm to other family members, often referred to as child to parent or care giver abuse.

Homelessness: being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. 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. It should also be recognised 16-that, in some cases, 16- and 17-year-olds may be living independently of their parents or guardians, for example, through their exclusion from the family home, and they will require a different level of intervention and support.

Honour or faith-based abuse (including female genital mutilation and forced marriage): encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

Forced marriage: forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. Schools and colleges can play an important role in safeguarding children from forced marriage.

Since February 2023, it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

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

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a **statutory duty** upon teachers to report to the police where they discover that FGM appears to have been carried out on a girl under 18. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students. If a victim discloses that FGM has been carried out on them, teachers must personally report to the police.

The duty does not apply to at-risk or suspected cases; these should be discussed with the DSL in line with our referral process.

We recognise that potential risk factors may include when:

- a female child is born to a woman who has undergone FGM
- a female child has an older sibling or cousin who has undergone FGM
- a woman/family believe FGM is integral to cultural or religious identity
- a parent or family member expresses concern that FGM may be carried out on the girl
- a girl talks about FGM in conversation, for example, a girl may tell other children about it
- a child is taken on a long holiday to a country where FGM is prevalent

Radicalisation: We recognise that children may be susceptible to extremist ideology and radicalisation. As with other safeguarding risks, staff should be alert to changes in children's behaviour that could indicate they may need help or protection.

Our school adheres to the Prevent duty, and we have "due regard to the need to prevent people from becoming terrorists or supporting terrorism". We build pupils' resilience to radicalisation by providing a safe environment for debating controversial issues, and promoting fundamental British values.

Staff should be alert to changes in children's behaviour that could indicate they may need help or protection. Staff should use their judgement in identifying children who might be susceptible to radicalisation and act proportionately, which may include the designated safeguarding lead (or deputy) making a Prevent referral.

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying or advocating violence, especially to other faiths or cultures
- intolerance of difference, including faith, culture, gender, race or sexuality

All our staff receive training on the Prevent duty through Judicium Education. All staff and trustees undertake a PREVENT update annually.

Opportunities are provided in the curriculum to enable students to discuss issues of religion, ethnicity and culture and the school follows the DfE advice Promoting Fundamental British Values as part of SMSC (spiritual, moral, social and cultural education) in Schools (2014).

The Board of Trustees, the Headteacher and the Designated Safeguarding Leads (DSLs) 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.

When any member of staff has concerns that a Student 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 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.

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

All staff in the school have completed training in how to make a Prevent referral.

As part of managing the risk of radicalisation, we have clear protocols for ensuring that any visiting speakers, whether invited by staff or by children themselves, are suitable and appropriately supervised. In England, the Prevent duty complements schools' other responsibilities to ensure that speakers do not undermine the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs. Our protocols include checking how reputable they are, checking content, vetting assurances.

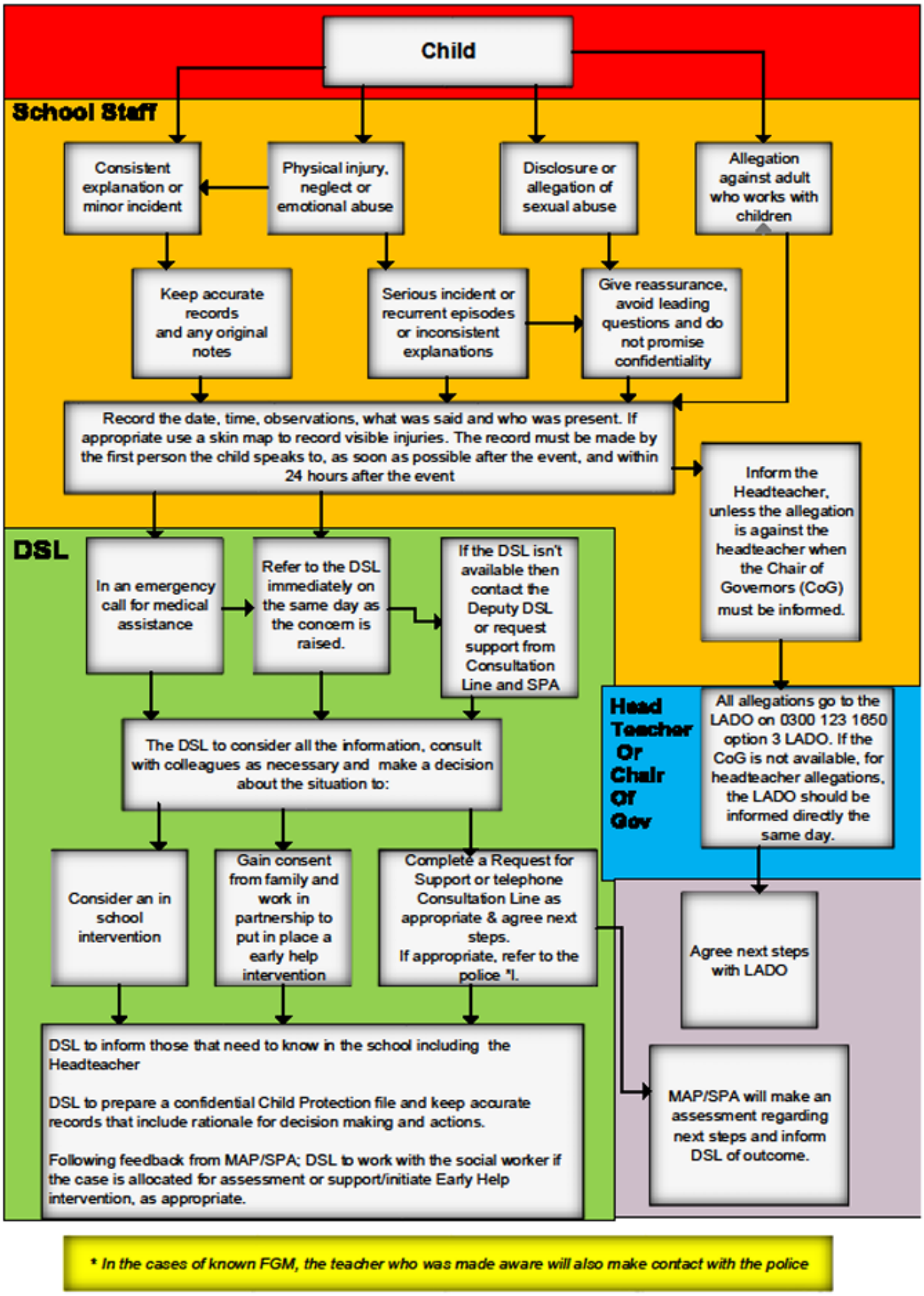
Mental health: all staff are aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Where staff have a concern about a child's mental health that is also a safeguarding concern, they should contact the DSL or a deputy DSL and report and record their concerns in line with this policy (see section 5).

Staff should be alert to indicators including:

- significant changes in behaviour
- persistent anxiety or distress
- withdrawal from social situations
- ongoing difficulties sleeping
- self-harm
- neglect of personal care
- expressions of hopelessness or suicidal ideation

Where staff believe a child is at immediate risk of harm, emergency services will be contacted straight away by either calling 999 or seeking urgent medical assistance.

Appendix 2: Child Protection Procedures Flowchart



Appendix 3: Brook Sexual Behaviours Traffic Light Tool

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.

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 and 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 5-9

- feeling and touching own genitals
- curiosity about other children's genitals
- curiosity about sex and relationships, e.g. differences between boys and girls, how sex happens, where babies come from, same-sex relationships
- sense of privacy about bodies
- telling stories or asking questions using swear and slang words for parts of the body

Green behaviours 9-13

- solitary masturbation
- use of sexual language including swear and slang words
- having girl/boyfriends who are of the same, opposite or any gender
- interest in popular culture, e.g. fashion, music, media, online games, chatting online
- need for privacy
- consensual kissing, hugging, holding hands with peers

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 5-9

- questions about sexual activity which persist or are repeated frequently, despite an answer having been given
- sexual bullying face to face or through texts or online messaging
- engaging in mutual masturbation
- persistent sexual images and ideas in talk, play and art
- use of adult slang language to discuss sex

Amber behaviours 9-13

- 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
- verbal, physical or cyber/virtual sexual bullying involving sexual aggression
- LGBT (lesbian, gay, bisexual, transgender) targeted bullying
- exhibitionism, e.g. flashing or mooning
- giving out contact details online
- viewing pornographic material
- worrying about being pregnant or having STIs

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 5-9

- frequent masturbation in front of others
- sexual behaviour engaging significantly younger or less able children
- forcing other children to take part in
- sexual activities
- simulation of oral or penetrative sex
- sourcing pornographic material online

Red behaviours 9-13

- exposing genitals or masturbating in public
- distributing naked or sexually provocative images of self or others
- sexually explicit talk with younger
- children
- sexual harassment
- arranging to meet with an online acquaintance in secret
- genital injury to self or others
- forcing other children of same age, younger or less able to take part in sexual activities
- sexual activity e.g. oral sex or intercourse
- presence of sexually transmitted infection (STI)
- evidence of pregnancy

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?

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

What can you do?

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

Green behaviours

- solitary masturbation
- sexually explicit conversations with peers
- obscenities and jokes within the current cultural norm
- interest in erotica/pornography
- use of internet/e-media to chat online
- having sexual or non-sexual relationships
- sexual activity including hugging, kissing, holding hands
- consenting oral and/or penetrative sex with others of the same or opposite gender who are of similar age and developmental ability
- choosing not to be sexually active

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

- accessing exploitative or violent pornography
- 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
- concern about body image
- taking and sending naked or sexually provocative images of self or others
- single occurrence of peeping, exposing, mooning or obscene gestures
- giving out contact details online
- joining adult- only social networking sites and giving false personal information
- arranging a face to face meeting with an online contact alone

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

- exposing genitals or masturbating in public
- preoccupation with sex, which interferes with daily function
- sexual degradation/humiliation of self or others
- attempting/forcing others to expose genitals
- sexually aggressive/exploitative behaviour
- sexually explicit talk with younger children
- sexual harassment
- non-consensual sexual activity
- use of/acceptance of power and control in sexual relationships
- genital injury to self or others
- sexual contact with others where there
- is a big difference in age or ability
- sexual activity with someone in authority and in a position of trust
- sexual activity with family members
- involvement in sexual exploitation and/or trafficking
- sexual contact with animals
- receipt of gifts or money in exchange for sex

Appendix 4 -Safer recruitment

Our single central record (SCR) records information on the checks carried out on staff and volunteers. Copies of these checks, where appropriate, will be located in individuals' personnel files. We follow the guidance from Keeping Children Safe in Education and best practice, as outlined below.

New staff

When appointing new staff, we will:

- verify a candidate's identity, including checking the name on a birth certificate where this is available
- obtain (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity)
- obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available
- verify the candidate's mental and physical fitness to carry out their work responsibilities
- verify the person's right to work in the UK
- if the person has lived or worked outside the UK, make any further checks the school or college consider appropriate
- verify professional qualifications, as appropriate
- ensure a candidate to be employed to carry out teaching work is not subject to a prohibition order issued by the Secretary of State using the GOV.UK website
- check that a person taking up a management position is not subject to a section 128 direction made by the Secretary of State. This check is completed using the guidance on GOV.UK
- Seek two references, including from the current employer, before interview and ask specific questions about the suitability of the candidate to work with children
- Conduct a search (via an online search engine)on shortlisted candidates, reviewing publicly available material for any incidents or issues and notify applicants of this process

Where concerns arise through searches or other vetting checks, these will be explored proportionately and fairly as part of the recruitment process and recorded appropriately.

Agency and third-party staff

For agency and third-party staff, we will obtain written confirmation that the employment business supplying the member of supply staff has carried out the relevant checks and sought the appropriate certificates, the date the confirmation was received and whether an enhanced DBS certificate check has been provided.

Where we place a pupil with an Alternative Provision (AP) provider, we retain responsibility for the safeguarding of that pupil. As part of our due diligence, we require written confirmation from the AP provider that appropriate safeguarding checks have been completed on all individuals working at the AP setting, consistent with those we would undertake for our own staff. We apply the same expectations to AP providers as we do to any external provider engaging with our pupils.

Trainee/student teachers

Where applicants for initial teacher training are salaried by the school, we will carry out all necessary checks. Where trainee teachers are fee-funded, we will ensure that the training provider has carried out the necessary checks and that we obtain written confirmation of these checks.

Existing staff

If we have any concerns about an existing member of staff's suitability to work with children, we will carry out the relevant checks as if the member of staff were a new member of staff. If a member of

staff moves from a post that is not in regulated activity to a post in regulated activity, we will ensure the relevant checks for that regulated activity have been carried out.

We will follow our legal duty to refer to the DBS if a member of staff has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- the harm test is satisfied in respect of that individual
- the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence
- the individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left

Volunteers

We will never leave an unchecked volunteer unsupervised or working in a regulated activity. We will obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity. We will conduct a risk assessment when deciding whether to obtain an enhanced DBS certificate for any volunteer not engaged in regulated activity, and will retain a record of this assessment.

Trustees

All trustees will have an enhanced DBS check without barred list information. A barred list check will be completed if a governor is in regulated activity. All governors will also have a Section 128 check.

Contractors

We will ensure that any contractor whose work provides them with the opportunity for contact with children will have the appropriate checks. Those contractors engaging in regulated activity will have an enhanced DBS check, including barred list information.

For all other contractors who are not engaging in regulated activity, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check will be required.

Appendix 5 - Statement of procedures for dealing with allegations of abuse against staff

This appendix applies to all cases where it is alleged that a staff member, supply teacher or volunteer 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; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

We will deal with any allegation of abuse against a member of staff or volunteer quickly, in a fair and consistent way that provides effective protection for the child and supports the person who is the subject of the allegation. We recognise our duty of care to our employees and will provide effective support for anyone facing an allegation, including a named contact if the person is suspended. We will advise staff to contact their trade union representative.

Allegations of abuse against staff should be reported without delay to the Headteacher. Where the concern is about the Headteacher, this should be reported to chair of trustees. If a member of staff perceives a conflict of interest, they can refer directly to the LADO, following local procedures. The LADO contact details are available in the key contacts.

The following definitions will be used when determining the outcome of any investigation:

- **Substantiated**: there is sufficient evidence to prove the allegation
- **Malicious**: there is sufficient evidence to disprove the allegation, and there has been a deliberate act to deceive
- **False**: there is sufficient evidence to disprove the allegation
- **Unsubstantiated**: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence
- **Unfounded**: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Initial consideration when dealing with an allegation

The Headteacher or (where the Headteacher is the subject of an allegation) the Chair of Trustees should discuss the allegation immediately with the local authority designated officer. This discussion will consider the nature, content and context of the allegation and agree on a course of action. There may be situations when the case manager will want to involve the police immediately, for example, if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. Where there is no such evidence, the case manager will discuss the allegations with the designated officer to help determine whether police involvement is necessary. The case manager will inform the accused person about the allegation as soon as possible after consulting the designated officer. Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.

If the initial sharing of information leads to a decision that no further action is to be taken regarding the individual facing the allegation or concern, this decision and a justification for it will be recorded by both the case manager and the designated officer, and agreement reached on what information should be put in writing to the individual concerned and by whom. The case manager will then consider with the designated officer what action should follow both in respect of the individual and those who made the initial allegation. If the allegation is about physical contact, the strategy

discussion or initial evaluation will take into account that school staff are entitled to use reasonable force to control or restrain children in certain circumstances.

Where it is clear that an investigation by the police or children's social care services is unnecessary, or the strategy discussion or initial evaluation decides that is the case, the designated officer will discuss the next steps with the case manager. In those circumstances, the options open to the school or college depend on the nature and circumstances of the allegation and the evidence and information available. This will range from taking no further action to dismissal or a decision not to use the person's services in future. Suspension will not be the default position: an individual should be suspended only if there is no reasonable alternative.

In some cases, further enquiries will be needed to enable a decision about how to proceed. If so, the case manager will discuss with the designated officer how and by whom the investigation will be undertaken. In straightforward cases, the investigation should normally be undertaken by a senior member of our staff. In other circumstances, the allegation will require an independent investigator.

In managing allegations, the designated safeguarding lead (or a deputy) is responsible for looking after the child's welfare, ensuring that they are not at risk and referring cases of suspected abuse to the local authority children's social care as required.

Parents or carers of the child or children involved will be informed of the allegation as soon as possible if they are not already aware of it. However, where a strategy discussion is required, or police or children's social care services need to be involved, the case manager will not do so until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers. Parents or carers will be kept informed about the progress of the case. Parents will be reminded of the requirement to maintain confidentiality about any allegations made against teachers whilst investigations are ongoing. If parents or carers wish to apply to the court to have reporting restrictions removed, they should be told to seek legal advice.

If the accused person resigns or ceases to provide their services, this will not prevent an allegation from being followed up. We will ensure that a referral to the DBS is made if the four criteria at the start of this appendix are met. We will also consider whether a referral to the Secretary of State is appropriate.

Following a criminal investigation or prosecution, the police should inform the school and the designated officer immediately when the investigation and any subsequent trial are complete, or if it is decided to close the investigation without charge or to discontinue prosecution after the person has been charged. In those circumstances, the case manager will discuss with the designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed.

If the allegation is substantiated and the person is dismissed or the person's services are no longer used, or the person resigns or otherwise ceases to provide their services, the designated officer will discuss with the case manager and their personnel adviser whether the school or college will decide to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. In the case of a member of the teaching staff, the case manager and the personnel officer will discuss with the designated officer whether to refer the matter to the TRA for consideration of prohibiting the individual from teaching.

Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the case manager will consider how best to facilitate this and consider how the person's contact with the child or children making the allegation can best be managed.

Allegations against a teacher who is no longer teaching will be referred to the police. Historical allegations of abuse will also be referred to the police.

Confidentiality
The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is under investigation or being considered.

The case manager will take advice from the designated officer, police and children's social care services to agree the following:

- who needs to know and, importantly, exactly what information can be shared
- how to manage speculation, leaks and gossip
- what, if any, information can be reasonably given to the wider community to reduce speculation
- how to manage press interest if, and when, it should arise.

Record keeping and references
Details of allegations found to be malicious will be removed from personnel records. For all other allegations, a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached are kept in the confidential personnel file of the accused, and a copy is provided to the person concerned. Records will be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

Cases in which an allegation was proven to be false, unsubstantiated or malicious will not be included in employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious will also not be included in any reference.

Timescales
Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week.
If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days.
If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days.

Suspension
Suspension will not be an automatic response to an allegation; all options to avoid suspension will be considered before taking that step. Suspension will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal.

Based on an assessment of risk, the following alternatives will be considered by the case manager before suspending a member of staff:

- redeployment within the school so that the individual does not have direct contact with the child or children concerned
- providing an assistant to be present when the individual has contact with children
- redeploying to alternative work in the school so the individual does not have unsupervised access to children
- moving the child or children to classes where they will not come into contact with the member of staff, making it clear that this is not a punishment and parents have been consulted; or

temporarily redeploying the member of staff to another role in a different location, for example, to an alternative school or work for the local authority

If immediate suspension is deemed necessary, the rationale and justification for this course of action will be agreed upon and recorded by both the case manager and the designated officer.

Supply staff, trainee teachers and contracted staff
We will ensure that any allegations against individuals not employed by Carwarden, such as supply teachers, trainee teachers, or contracted staff, are properly dealt with. We will not decide to stop using a supply teacher or trainee teacher due to safeguarding concerns without first finding out the facts and liaising with our Local Authority Designated Officer (LADO) to determine a suitable outcome. We will discuss with the agency or teacher training provider whether it is appropriate to suspend the teacher. We will inform the agency or teacher training provider of our process for managing allegations and invite their Human Resources Manager or equivalent to meetings as appropriate.

Learning lessons
At the conclusion of a case in which an allegation is substantiated, we will review the circumstances with the designated officer to determine whether any improvements are needed to the school's procedures or practices to help prevent similar events in the future.

Non-recent allegations
Abuse can be reported no matter how long ago it happened. Where an adult makes an allegation to our school that they were abused as a child, the individual will be advised to report the allegation to the police. We will report any non-recent allegations made by a child to the LADO.

Low-level concerns
In line with Section Two of Part Four of Keeping Children Safe in Education, we recognise the importance of creating a culture of openness, trust, and transparency to encourage all staff to share low-level concerns with the right person so that they can be addressed appropriately. The purpose of our approach to low-level concerns is to ensure that our values are constantly lived, monitored, and reinforced by staff. Our values are outlined in more detail in our Staff Code of Conduct.

The term 'low-level' concern does not mean that the concern is insignificant; it means that a staff member, supply teacher or volunteer does not seem to have:

- 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; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

A low-level concern covers any concern, no matter how small, even if it is no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

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

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

- being over-friendly with children;

- having favourites;
- taking photographs of children on a personal mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or
- humiliating pupils.

Such behaviour can exist on a spectrum. Our school's response to low-level concerns is an extension of our Code of Conduct. Staff can share their concerns confidentially in a simple, easy way. It is imperative that, where staff have concerns, they share them as outlined in this policy to support the development of a culture of expected behaviour and to promote our school values.

Low-level concerns about a member of staff, supply staff, volunteer or contractor should be reported to the headteacher.
The headteacher will have oversight of all recorded concerns and has ultimate decision-making power in respect of all low-level concerns.

Any concerns about the headteacher should be reported to the chair of trustees.

All low-level concerns will be recorded in writing. Each record will include details of the concern, the context in which it arose, and the action taken. The name of the individual who raised the concern should be noted. Still, if that individual wishes to remain anonymous, that will be respected to the extent reasonably possible.

Records will be kept confidential, held securely, and will comply with the data protection laws.

Records will be reviewed to identify potential patterns of concerning, problematic, or inappropriate behaviour. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or by referring to the LADO, where a pattern of behaviour moves from a low-level concern to meeting the harm threshold. We will also consider whether wider cultural issues exist in the school that may have enabled the behaviour to occur. If this is found to be the case or a contributory factor, we may review our policies and deliver additional training where we consider this will minimise the likelihood of the events happening again.

Links to other policies:
- SEND Policy
- Staff Code of Conduct including acceptable use
- Online Safety Policy
- Anti-Bullying Policy
- Behaviour Policy
- Equalities and Discrimination Policy

Appendix 6: Further Advice / Resources / Policy & Document links

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

Childline: http://www.childline.org.uk/pages/home.aspx

CEOPSThinkuknow: http://www.thinkuknow.co.uk/

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/

Surrey County Council Education Safeguarding Team

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

Guidance and documents referred to in this policy

- Surrey Safeguarding Children Partnership protocols, guidance and procedures
- Working Together to Safeguard Children 2026
- Disqualification under the Childcare Act 2006 (updated 2019)
- FGM Act 2003 Mandatory Reporting Guidance 2016 (updated 2020)
- 'What to do if you are worried a child is being abused' 2015
- Teacher Standards 2011
- Information Sharing Advice for Practitioners' guidance 2018 (updated 2026)
- DfE Children Missing Education 2025
- DfE Restrictive interventions, including use of reasonable force, in schools 2026
- The Equality Act 2010
- Searching, Screening and Confiscation: Advice for schools 2022
- Carwarden House School Policies including Behaviour, Anti-Bullying, Equal Opportunities, Staff Behaviour (Code of Conduct), Online safety, Whistle Blowing, PSHE / RSE, Intimate Care, Physical intervention, E-safety (including staff use of mobile phones), Complaints, Supporting Students with Medical needs (inc. the administration of medicines).
- KCSIE 2026 includes many new resources including a **video on supporting children** who are victims of sexual abuse; a link to the **South West Grid for Learning**, a charity providing support regarding technology & abuse; **The Marie Collins Foundation**, a harmful-sexual-abuse support service; a **County Lines Toolkit** for professionals; Government guidance on **Forced Marriage; LGFL 'Undressed"**, a resource to help educate children about the dangers of getting tricked into undressing online.