



The SWAN Trust

Safeguarding and Child Protection

Policy 2026

Safeguarding Governor:
Designated Safeguarding Leads:
Status & Review Cycle:
Next Review Date:

Mr R Clark
Mrs J Larsen (Infants) / Mrs G Condon (Juniors)
Statutory Annual
September 2027

Contents

Introduction and Policy Aims	5
Definitions	5
Key Personnel.....	6
Children’s Services	7
Children’s Single Point of Access (C-SPA).....	7
Emergency Duty Team (EDT)	8
Local authority designated officer (LADO).....	8
The Law (legislation and statutory guidance)	8
Regulations and safeguarding requirements relating to school premises	10
Roles and responsibilities.....	10
All School Staff:	10
The Headteacher:.....	11
The Designated Safeguarding Lead	11
The Deputy Designated Safeguarding Lead(s):	13
The Governing Body/Proprietor/Management Committee	13
The Safeguarding Link Governor/Trustee	14
What to do if you have concerns about a child’s welfare	15
If a child is in immediate danger, or is suffering or likely to suffer significant harm	15
Disclosures	15
Handling a disclosure	15
After a child has made a disclosure	16
Recording a disclosure or safeguarding concern	16
Concerns about a child who is not in immediate danger, or is suffering or likely to suffer significant harm...	16
How children can report concerns.....	16
Early help.....	17
Referral to children’s services	17
If a child has experienced or is at risk of female genital mutilation	18
Teachers	18
Other members of staff.....	18
Concerns about nudes or semi-nudes	18
Viewing the imagery	20
Deletion of images	20
Child-on-child abuse (including harassment and violence)	20
Responding to allegations of child-on-child abuse	20
Responding to allegations of sexual harassment and sexual violence	21

Unsubstantiated, unfounded, false or malicious reports	22
If a child who has experienced sexual violence or sexual harassment asks the school not to make a referral	22
Concerns about mental health.....	23
Concerns about extremism and radicalisation	23
Confidentiality, Sharing and Withholding Information.....	24
Notifying parents or carers	24
Record Keeping	25
Concerns or allegations made about adults in our school	25
Low-level concerns.....	26
Whistleblowing	27
Online safety and the use of smart devices.....	27
The 4Cs	28
Mobile phones and smart technology (including smart watches and glasses)	28
Media recordings, audio, image and video (including digital files)	29
Filtering and monitoring	29
Remote education.....	29
Information security and access systems	29
Children potentially at greater risk of harm	30
Children who have a social worker	30
Children looked after and previously looked after	30
Young Carers	31
Children with special educational needs, disabilities and health issues	31
Safeguarding children with medical conditions.....	32
Children who are lesbian, gay or bisexual	32
Children who are questioning their gender	32
Identified areas of risk for our school	33
Lettings and off-site arrangements.....	33
Extended school and off-site arrangements.....	33
Training.....	34
Designated safeguarding lead.....	34
Governors/Trustees	34
All staff	35
The designated teacher for children who are looked after (CLA)	36
Teaching and learning.....	36
Linked policies	37
Appendix 1: Types of abuse and specific safeguarding concerns.....	38

Indicators of abuse.....	39
Specific safeguarding concerns	39
Children absent from education	39
Anti-Bullying	40
Guidance for schools on colleges on gender questioning children (currently in draft, to be finalised).....	40
Physical Intervention.....	40
Contextual safeguarding	41
Child sexual exploitation (CSE) and child criminal exploitation (CCE)	41
Child sexual exploitation (CSE).....	41
Child criminal exploitation (CCE).....	42
Serious violence	43
Children who run away or go missing from education, home or care	44
Mental health.....	44
Domestic Abuse	45
Homelessness.....	45
Child-on-child abuse (including harassment and violence)	46
Child-on-child sexual harassment and sexual violence	47
Harmful Sexual Behaviour (HSB).....	47
Upskirting	48
Sharing nudes and semi-nudes	48
So-called 'honour'-based abuse, including FGM and forced marriage	49
Female genital mutilation (FGM)	49
Forced marriage	50
One Chance Rule	50
Private Fostering	51
Preventing radicalisation and extremism	52
Child abuse linked to faith or belief	53
Fabricated or induced illnesses.....	53
Appendix 2 Allegations Against Staff Policy, including low level concerns.....	58

Introduction and Policy Aims

The Hermitage Schools have a duty to keep children safe. This includes how we protect children from experiencing harm and how we should respond when we suspect or confirm that a child is being harmed.

Children are at the centre of everything we do at The Hermitage Schools. We are committed to providing our children with a sense of belonging and an environment that is welcoming, safe, valuable and respectful. Adults in our school know that keeping children safe is everybody's responsibility and that all children, regardless of age, gender, culture, language, race, ability, sexual identity, religion or lack of religion have equal rights to protection and opportunities.

We aim to make sure that:

- The welfare of the child is paramount.
- All staff maintain an attitude of "It could happen here".
- We will always act in the best interests of the child and ensure that our decisions around safeguarding take a child-centred and coordinated approach.
- The school has a clear process in place, that is shared with and followed by all members of the school community, when there is a safeguarding concern.
- Our staff are well trained to recognise the signs of abuse, neglect and exploitation such that they understand what their responsibilities are and how they should respond when they identify a concern.
- We keep track of children known or thought to be at risk of harm.
- We communicate well with all those involved when there is a concern about a child, including parents/carers, other children, staff and agencies. This includes sharing information quickly and appropriately with external agencies, such as the police and children's services, to get children the support and help they need in good time.

Definitions

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

- Providing help and support to meet the needs of children as soon as problems emerge (this bullet point is new)
- 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
- Making sure that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

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

Child(ren) includes everyone under the age of 18.

Child looked after (CLA) used internally in Surrey County Council rather than looked after child (used in statutory guidance)

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

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

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

The local safeguarding partnership has three partners:

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

MAP refers to the Surrey Multi-Agency Partnership.

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

School Unless otherwise specified, 'school' means all schools, whether maintained, non-maintained or independent schools, including academies and free schools, non-maintained special schools, maintained special schools and alternative provision, including pupil referral units.

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.

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. This includes, but is not limited to, employed staff, contractors, volunteers, governors/trustees, supply staff and self-employed staff.

Statutory means what has been decided or is controlled by the law. **Statutory guidance** tells us what schools and local authorities must do to follow the law.

The Hermitage Schools will publish our safeguarding and child protection policy on our website and hard copies will be available on request from the school office.

Key Personnel

Designated Safeguarding Lead (DSL) at Hermitage Infant School is: Mrs J Larsen

Contact details:

DSLinfant@hermitage.surrey.sch.uk

01483 474981

Designated Safeguarding Lead (DSL) at Hermitage Junior School is: Mrs G Condon

Contact details:

DSLjunior@hermitage.surrey.sch.uk

01483 472047

Deputy DSL(s) are: Mrs C Spires, Mrs D Quirk, Mr S Greenwood, Mrs C Blackwell, Mrs K Nguyen, Mrs R Knight, Mrs S Boulcott, Miss L Dean

Contact details:

01483 472047

The nominated Safeguarding Governor is: Mr R Clark

Contact details:

r.clark@hermitage.surrey.sch.uk

01483 472047

The Executive Headteacher is: Mrs C Spires

Contact details:

exehead@swantrust.co.uk

01483 472047

The Chair of Governors is: Mrs L Lawford

Contact details:

L.Lawford@hermitage.surrey.sch.uk

01483 472047

Designated teacher for Children Looked After (CLA) is Miss B Foster

Contact details:

orchard@hermitage.surrey.sch.uk

01483 472047

Inclusion Lead/Special educational needs and disabilities coordinator (SENDCo) is Mrs D Quirk

Contact details:

inclusion@hermitage.surrey.sch.uk

01483 472047

Designated member of staff for Young Carers is Mrs K Nguyen

Contact details:

hslw@hermitage.surrey.sch.uk

01483 472047

Children's Services

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

Anyone can contact the C-SPA about a child, young person or parent/carer who needs support in Surrey. This could be a concern about how the child is developing, issues that the parent or carer is experiencing, or you suspect a child is being neglected or subjected to physical, sexual, or emotional abuse.

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

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

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

Requests for support should be sent securely by email to cspa@surreycc.gov.uk using the Request for Support Form.

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

Emergency Duty Team (EDT)

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

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

Phone: 01483 517898

Email: edt.ssd@surreycc.gov.uk

Local authority designated officer (LADO)

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

The LADO can be contacted by:

Email: LADO@surreycc.gov.uk

Telephone: 0300123 1650 option 3

Online: [LADO Referral Form](#)

The Law (legislation and statutory guidance)

In addition to Surrey Safeguarding Children Partnership's (SSCP) [arrangements](#), The Hermitage Schools also follow the laws and statutory guidance below:

- [Working Together to Safeguard Children](#) which sets out the multi-agency working arrangements to safeguard and promote the welfare of children and young people and protect them from harm; in addition, it sets out the statutory roles and responsibilities of schools.
- [‘What to do if you are Worried a Child is Being Abused’ 2015 - Advice for Practitioners](#)
- [Keeping Children Safe in Education \(KCSIE, 2026\)](#) is statutory guidance issued by the Department for Education (DfE) which all schools and colleges must have regard to when carrying out their duties to safeguard and promote the welfare of children.
- [Early years foundation stage \(EYFS\) statutory framework](#) is statutory guidance which sets standards that school and childcare providers must meet for the learning, development, and care of children from birth to 5 years in Ofsted registered settings. Should be read alongside KCSIE where children aged 0 to 5 attend school-based nurseries or reception classes.

- [Relationships and sex education \(RSE\) and health education - GOV.UK](#) This is statutory guidance from the Department for Education issued under Section 80A of the Education Act 2002 and section 403 of the Education Act 1996
- [Education Act 2002](#), section 175 and [The Education \(Independent School Standards\) Regulations 2014](#) places a duty on maintained schools, including academies, to keep children safe and promote their welfare.
- The [Children Act 1989](#) is the main source of child safety law for England and Wales. The Act gives the basis for most of children's services' duties and responsibilities towards children and their families. It also provides the legal framework for the child protection system. The [2004](#) amendment is used alongside the Act.
- The [Children Act 1989 Care Planning, Placement and Case Review](#) sets out what responsibilities education settings have for children looked after by the local authority.
- [The Human Rights Act 1998](#) sets out the core rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the [European Convention on Human Rights](#) (the Convention) that apply in the UK. Experiencing harassment, violence, and/or abuse, including that of a sexual nature, may breach any or all of these rights.
- [The Equality Act 2010](#) states that schools and colleges must not unlawfully discriminate against children because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (called protected characteristics). Therefore, we can take positive action to deal with disadvantages affecting our children with protected characteristics to make sure their needs are met. The [Equality Act 2010: advice for schools](#) advises us further.
- **Sport** – As children get older, some sports are typically taught and played in single-sex groups. The Equality Act 2010 contains an exception in relation to single-sex sport whereby we can separate children according to their biological sex without discriminating lawfully against them where physical strength, stamina or physique of the average girl would put her at a disadvantage in competition with the average boy (or vice versa) or to ensure safety. Where there are no safety concerns and a child makes a request relating to how they participate, we will consider the request in light of the advice on “considering requests for support with social transition” (see KCSIE page 65).
- [The Public Sector Equality Duty \(PSED\)](#) states that we have to be mindful of the need to eliminate unlawful discrimination, harassment and victimisation. Some children may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic or transphobic bullying, or racial discrimination. It is important to make sure we foster good relations between those who share a protected characteristic and those who do not, and work to make sure children have equal opportunities. We give specific attention to this duty when we write our policies or make any decisions about how our school is run.
- [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) and the [Childcare Act 2006](#) set out who is disqualified from working with children. Remove if this does not apply to your school (only applies to schools with children under 8).

Regulations and safeguarding requirements relating to school premises

Toilets - We do not allow children into toilets designated for the opposite biological sex. Separate toilets are provided for boys and girls aged 8 and over. Should a child not want to use the toilet designated for their biological sex, we will consider whether we can provide an alternative toilet facility which will not compromise the safety, comfort, privacy or dignity of the child or of other children. All such requests will be recorded, communicated and reviewed regularly.

More legislation is covered throughout this policy in their relevant sections. Some government guidance is not statutory - instead it supports practitioners, like school staff, in the decisions we make to keep children safe. Where possible, links to non-statutory guidance have been included in the relevant sections.

Roles and responsibilities

Everybody in our school has a responsibility for safeguarding. Some members of our school have specific safeguarding responsibilities.

All School Staff:

Sign to say they have read and understood Part 1 of statutory guidance KCSIE (2026) annually.

Have a responsibility to provide a safe environment in which children can learn.

Have a responsibility to establish and maintain an environment where children feel secure, are encouraged to talk and are listened to.

Will follow the school's procedures for identifying and reporting any concerns and issues about the school's online filtering and monitoring systems.

Will follow the school's safeguarding and child protection processes and procedures, sharing information quickly when they have a concern about a child's safety and wellbeing, even when they are unsure.

Will, whenever necessary, refer safeguarding or child protection concerns to external agencies, such as the police, children's services and the LADO.

Attend safeguarding training appropriate to their role and are familiar with key policies, including this policy and the staff behaviour policy (code of conduct).

Create a culture where children who identify as lesbian, gay, bisexual, or are questioning their gender feel safe, can speak out and share concerns.

Will be aware of indicators of abuse, neglect, exploitation and modern slavery (see below) understanding that children can be at risk of harm inside and outside of the school, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse, neglect and exploitation so that staff are able to identify cases of children who may be in need of help or protection.

What staff need to know is covered in the training section of this policy.

The Headteacher will ensure:

This policy and other safeguarding related policies and procedures (such as the staff behaviour policy, whistle blowing procedures) are shared at induction, understood by all staff, including temporary staff and volunteers, and are being followed at all times.

Staff receive safeguarding training that is updated regularly.

Parents and carers are aware of this policy and where they can access a copy.

The DSL is given the additional time, funding, training, resources, and support needed to carry out the role effectively and there is cover by an equivalently trained deputy if the DSL is absent.

Visitors are appropriately supervised or escorted, where necessary.

Systems are in place for children to express their views and give feedback, which are used to inform the whole school approach to safeguarding.

They become the 'case manager' when an allegation is raised about a member of staff and make the final decision regarding all low-level concerns.

There are enough staff per child (staff ratios), where relevant and applicable.

Each child in the Early Years Foundation Stage is assigned a key person.

Appropriate arrangements are put in place for the supervision of staff who have contact with children and families.

The Designated Safeguarding Lead:

The DSL has the lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). The DSL is a senior member of staff from our school's leadership team. The Hermitage Schools have deputy DSLs to support the DSL in their role. While the DSL may hand over some activities to a deputy, the DSL will always have the ultimate responsibility for keeping children safe.

The full responsibilities of the DSL and the deputy DSL(s) are listed in their DSL job descriptions. The DSL's responsibilities include, but are not limited to:

Reading and following KCSIE.

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

Ensuring there are cover arrangements in place when the DSL is unavailable due to illness, leave, or other circumstances. This will include any Deputy DSLs accessing a shared mailbox to ensure that safeguarding concerns are received, monitored and acted upon without delay.

Working together with all staff to understand the whole picture when there are safeguarding concerns, providing them with advice, support and expertise.

Contributing to the assessment of children, including taking part and/or supporting staff to take part in [strategy discussions](#), [child protection conferences](#) and meetings between multiple agencies.

Working together with and supporting parents/carers and families who may be facing challenging circumstances and, when there are safeguarding concerns, making parents/carers aware of the school's role in making referrals about suspected abuse, neglect and exploitation.

Understanding the importance of sharing information, including making appropriate referrals to relevant agencies (for example, children's services, the police, the Channel Programme and/or the Disclosure and Barring Service (DBS)) and supporting staff who make referrals directly.

Understanding and following Surrey Safeguarding Children Partnership (SSCP) safeguarding procedures

Have a secure working knowledge of SSCP procedures and understand the assessment process for providing early help and statutory intervention, in line with Surrey's [Continuum of Need Indicators](#).

Keeping the headteacher up to date with safeguarding issues.

Having the lead responsibility for online safety, including oversight and checking the effectiveness of the school's filtering and monitoring systems and their reports.

Being aware of the requirement for children to have an Appropriate Adult, as described in [PACE Code C 2019](#).

Making sure child protection files are up to date and kept as per [record keeping](#) section.

Making sure that all staff have access to this policy (and the wider safeguarding procedures), the policy is available publicly and reviewed annually.

Making sure that all adults who work in or for the school have an adequate and appropriate safeguarding induction, regularly updated safeguarding training and annually sign to say they have read the relevant part of KCSIE.

Working alongside the Local Governing Committee and Board of Trustees and headteacher to review and update procedures and how they are being implemented, including jointly completing and submitting the biennial (s157 s175) Statutory Audit for Safeguarding Arrangements and Termly Safeguarding Data Collections via PHEW to Surrey County Council.

Promoting the educational outcomes of children who have or had a social worker, by sharing appropriate child protection information with the teacher and leaders.

Encouraging a culture of listening to children, taking into account their wishes and feelings when any plans are put in place to protect them.

The Deputy Designated Safeguarding Lead(s):

Will be trained to the same standard as the DSL and the role is explicit in their job description.

Will take on the designated safeguarding lead's responsibilities if they are unavailable. If the designated safeguarding lead is long-term absent, a deputy will temporarily take over as the designated safeguarding lead.

Further responsibilities of the DSL are listed elsewhere in this policy. For a detailed explanation of the DSL's responsibilities, see Annex C of KCSIE.

The Local Governing Committee

The [Academy trust governance guide](#) sets out the roles, responsibilities and legal duties for Local Governing Committees and Boards of Trustees

All members of Local Governing Committee understand and fulfil their responsibilities to ensure that:

Safeguarding, and the child's best interests, wishes and feelings, are considered in everything the school does. Everyone at the school is involved in the whole school approach to safeguarding and online safety is a theme throughout.

The school's policies, procedures and training follow the local safeguarding partnership arrangements and the law, including the school's duties under the Human Rights Act 1998, Data Protection Act 2018 and Equality Act 2010.

The school's leadership team are held to account for the school's safeguarding arrangements.

Safeguarding is a standing item on the agenda for Local Governing Committee and Trust Board meetings.

The appointed designated safeguarding lead (DSL) is given the additional time, funding, training, resources and support needed to carry out the role effectively.

An experienced Governor takes leadership responsibility for the school's safeguarding arrangements.

There is an appointed designated teacher for looked after children who is appropriately trained.

The Local Governing Committee takes into account children who are more at risk of harm and any barriers that can make it difficult to recognise abuse and/or neglect, for example children with special educational needs and disabilities (SEND).

Safeguarding and child protection files are maintained as set out in Annex C of KCSIE.

The school adds to multi-agency working and shares information appropriately and in a timely manner.

All staff receive regular safeguarding information, updates and in-depth training.

Staff sign to say they have read the appropriate part of KCSIE. Local Governors and Trustees sign to say they have read and understood KCSIE and this policy.

Children are taught about keeping safe, including when online.

The governing body does all that they reasonably can to limit children's exposure to online risks from the school's online IT systems and assign a member of the senior leadership team and a Local Governor to ensure standards are met.

Appropriate safer recruitment processes and procedures are in place.

Procedures are in place to identify and address children absent from education, including persistent absence, and when safeguarding concerns coincide.

There are procedures for reporting and managing safeguarding concerns about adults who work for the school. The CEO will manage any allegations against the Headteacher.

There are effective safeguarding arrangements for when the site is being hired/let.

All members of the Local Governing Committee and Board of Trustees receive safeguarding training at induction, which is regularly updated.

The SSCP is informed in line with local requirements about the discharge of duties via the Biennial (s 157 s 175) Statutory Audit for Safeguarding Arrangements and Termly Safeguarding Data Collections via [PHEW](#) to Surrey County Council.

The Safeguarding Link Governor

They meet with the DSL and visit the school regularly asking questions that allow them to monitor how the school's safeguarding policies and procedures are being put into practice.

Each year, they are part of the biennial safeguarding audit, led by the DSL and headteacher, and make sure it is submitted via Phew.

They are the governing board's/board of trustee's safeguarding specialist, feeding back their findings following school visits and meetings with the DSL.

They attend appropriate training that guides them in how to monitor and progress any areas of weakness in the school's safeguarding arrangements.

They keep up to date with the SSCP's safeguarding arrangements and guidance.

What to do if you have concerns about a child's welfare

If staff have concerns about a child's welfare, they must act on them immediately by following the procedures below. Our staff can use the [What to do if you're worried a child is being abused](#) guidance with the school's procedures. We work hard to make sure our staff and safeguarding team are approachable and available, such that anyone can speak to them about any concern quickly, no matter how small or whether there is evidence.

We recognise the significant emotional impact being involved with or aware of safeguarding incidents can have. **Approach our safeguarding team if you need any support during or following a safeguarding incident.** The names of the DSL and deputy are clearly advertised around the school and are available on our website: <https://www.hermitageschools.com/safeguarding>

If a child is in immediate danger, or is suffering or likely to suffer significant harm

Call the police on **999** if a child is in immediate danger. **Anyone** can make a referral to children's services if a child is suffering or likely to suffer significant harm. Usually, the DSL or deputy makes the referral. For children's services' contact details, **click here**. If you make a direct referral, you will update the DSL or a deputy as soon as is practically possible.

Disclosures

We recognise that it takes a lot of courage for a child to disclose they are being harmed. Staff know that:

- Children may not feel ready or know how to tell someone they are being harmed.
- The child may not realise what is happening to them is harmful.
- They may feel embarrassed, humiliated or are being threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.

Our staff know they must show professional curiosity, i.e. explore and try to understand what is happening for a child, rather than take what is being said on face value or making assumptions. We encourage staff to ask the child if they are OK or if they can help in any way. A child who makes a disclosure may have to tell their story more than once, such as to the police and social workers. At The Hermitage Schools, we know how important it is that a child's first experience of talking to a trusted adult about a worry is a positive one.

Handling a disclosure

- Listen to them carefully and believe in what they are saying. Do not be afraid of silence moments.
- Be careful not to express your own views or feelings and stay calm.
- Do not investigate. Only ask enough questions to work out if you need to share this matter with the DSL or a deputy. Only ask open questions, such as: How? When? Who? Where?, and open statements, such as "Tell me", "Describe" and "Explain". Otherwise, you may invalidate your and the child's evidence in any later court proceedings.
- If there are injuries or marks on the child, do not examine the child intimately or take pictures.

- Reassure them that they have done the right thing by telling you. Do not say to the child that you wish they had told you sooner.
- Do not automatically offer physical touch to comfort the child. Consider what may be comforting for the child, rather than how you prefer to be comforted.
- Tell the child it is not their fault, and you are taking them seriously.
- Explain what you will do next. Tell the child that you cannot keep what they have told you a secret and that you will pass this information onto someone who can help.

After a child has made a disclosure

- Write up the conversation as soon as possible.
- Make sure the DSL or a deputy is aware of the disclosure. If appropriate, contact children's services and/or the police directly and tell the DSL as soon as possible.
- Do not share the disclosure with **anyone** else unless children's services, the police or another relevant agency involved in the safeguarding process tells you to.
- Get support for yourself if you need it.

Recording a disclosure or safeguarding concern

- Record the date, time, place and persons present.
- Use the child's own words, verbatim where possible, and stick to the facts. Avoid making assumptions and do not put your own judgement on it.
- Record any noticeable non-verbal behaviour. Detail any visible marks or injuries and record them on a body map.
- Keep any original notes you have made on file.
- If some/all staff are using a paper form, add in that staff should sign and date the write-up.
- Do not ask children to make written statements themselves or sign records.

Concerns about a child who is not in immediate danger, or is suffering or likely to suffer significant harm

First, speak to the DSL or a deputy. If in exceptional circumstances, the DSL or a deputy are not available, this will not delay you from taking appropriate action. Instead, you will speak to a member of the senior leadership team or take advice from children's services, if necessary.

How children can report concerns

In our school, it is essential that children can tell us how they are feeling and know we will take it seriously. We aim to create an environment full of 'reachable moments' which encourages children to feel safe enough to open up about their concerns. Children can confidently report any worries they have about their lives, both in and out of school, by:

- Speaking to an adult they trust.
- Putting a written or an anonymous disclosure in a worry box/worry monster – available in all classrooms.
- Contacting the NSPCC Childline, either by phone or online.

At The Hermitage Schools, children are reminded regularly of who they can speak to about any worries. This takes place within the classroom settings by the class teachers as part of the PSHE curriculum, on posters

around the school, and during assemblies including the annual NSPCC 'Speak Out, Stay Safe' assembly, for all children.

We know children try to get their voice heard not just through what they say but how they behave, as pointed out in the NSPCC's [voice of the child briefing](#). When there are behavioural issues or changes in a child's behaviour we take a safeguarding first approach, including considering if the child is communicating an unmet need and/or abuse. For children who are pre-verbal or non-verbal, observing behaviour and presentation is even more important for understanding the child's lived experience.

Early Help

Early Help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. At The Hermitage Schools, we are keen to provide support to families as soon as a problem becomes visible. If an early help assessment is appropriate, the DSL or a deputy will lead on working together with other agencies and set up an inter-agency assessment, as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

Our DSL and/or deputy use the [Helping families early - Surrey County Council](#) information to explore emerging needs and – with consent from the child or family, complete an Early Help Assessment to ensure all identified needs are supported by the appropriate agencies. The partnership's [Early-Help-Strategy-2024-2027](#) sets out their aims for how professionals work effectively together to provide early help.

If early help support is appropriate, it will be kept under constant review. A referral to children's services may be required if the child's situation doesn't appear to be improving. The DSL is aware of the local escalation policy and procedures.

We are aware any child may benefit from support before statutory intervention, including from universal services and community-based Early Help, or the targeted early help level of Family Help. Staff who work directly with children will be particularly alert to the potential need for early help for children listed under Part 1, paragraph 17 of KCSIE.

Referral to children's services

Concerns about a child or a disclosure should be discussed with the DSL who will help decide whether a referral to children's services is appropriate. The DSL and deputy are aware of [the Continuum of Support for Children and Families in Surrey](#) and [Continuum of Support Indicators](#) which will be used to inform their response to any safeguarding concern. If a referral is needed, then the DSL should make it. However, anyone, including children, can make a referral and if for any reason a staff member thinks a referral is appropriate and one hasn't been made, they can and should consider making a referral themselves. Where referrals are not made by the DSL, the DSL should be informed as soon as possible.

The school should try to discuss any concerns about a child's welfare with the parent/carer and where possible obtain their consent before making a referral to the C-SPA. However, the school should not discuss concerns with parents/carers when:

- it would place the child at increased risk
- or sexual/organised abuse is suspected
- or the fabrication of an illness is suspected
- or it could impede a Police investigation or Social Work enquiry

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

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

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

If you have not had any feedback from children's services within 72 hours of making the referral, this must be followed up. If after a referral, the referrer is dissatisfied with the response from children's services and/or the child's situation does not appear to be improving, the DSL (or whoever made the referral) should press for re-consideration to ensure their concerns have been addressed and, most importantly, the child's situation improves. The [local escalation policy \(Finding a Solution Together \(FaST\) resolving professional differences procedure](#) will be used, where necessary.

If a child has experienced or is at risk of female genital mutilation

Female genital mutilation (FGM) is illegal in England. It involves removal, part removal or injury to the female genital internal or external organs for non-medical reasons. It is sometimes known as 'cutting' or female 'circumcision'.

Teachers

For this section only, teachers means qualified teachers or persons who are employed or engaged to carry out teaching work in schools and other institutions. All staff should speak to the DSL (or a deputy) when a concern about female genital mutilation (FGM) arises. If a teacher suspects that FGM has been carried out on a child or believes that the child is at risk of FGM, they will follow their internal safeguarding procedures.

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

Other members of staff

Other members of staff who establish that an act of FGM appears to have been carried out on a child or suspect a child is at risk of FGM, will follow the same procedures as with any other concern, i.e. will speak to the DSL or a deputy and follow local safeguarding procedures.

Useful links:

[Mandatory reporting of female genital mutilation: procedural information](#)

Concerns about nudes or semi-nudes

Responding to any incident that comes to your attention:

- **Report** it to your designated safeguarding lead (DSL) or equivalent immediately, using the school's reporting procedures set out in this policy.
- **Never** view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal.
- **If you have already viewed the imagery** by accident (e.g. if a young person has shown it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- **Do not delete** the imagery or ask the young person to delete it.
- **Do not** ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL or a deputy.
- **Do not** share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- **Do not** say or do anything to blame or shame any young people involved.
- **Do** explain to them that you need to report it and reassure them that they will receive support and help from the DSL or a deputy.

Staff reserve the right to confiscate a device in the possession of a child if they have concerns about sharing nudes or semi-nudes in relation to the device. This is consistent with the [Searching, screening and confiscation: advice for schools](#) guidance.

The DSL will follow the government's [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) guidance. Once they are aware of an incident, the DSL will hold an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.

The initial review meeting will consider the initial evidence and aim to establish:

- Whether there is an immediate risk to any child or young person.
- If a referral should be made to the police and/or children's social care.
- If it is necessary to view the image(s) in order to safeguard the child or young person – in most cases, images or videos should not be viewed.
- What further information is required to decide on the best response.
- Whether the image(s) has been shared widely and via what services and/or platforms. This may be unknown.
- Whether immediate action should be taken to delete or remove images or videos from devices or online services.
- Any relevant facts about the children or young people involved that would influence risk assessment.
- If there is a need to contact another education school or individual.
- Whether to contact parents or carers of the children or young people involved – in most cases they should be involved.

The DSL will make an immediate referral to the police and/or children's services if:

- The incident involves an adult.
- There is reason to believe that a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs).

- What they know about the images or videos suggests the content depicts sexual acts that are unusual for the young person's developmental stage or are violent.
- The images involve sexual acts and any child in the images or videos is under 13.
- They have reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example if they are presenting as suicidal or self-harming.
- They become aware of the making or sharing of nudes or semi-nudes.

If none of the above applies, we can decide to respond to the incident without involving the police or children's services. We may escalate the incident at any time if further information/concerns are disclosed at a later date. First, the DSL will be confident that they have enough information to assess the risks to any child involved and the risks can be managed within our school's pastoral support, behaviour procedures and, if appropriate, the local network of support.

The DSL or a deputy will contact children's services if any child or young person involved is already known to them. If, because of the investigation, the DSL (or equivalent) believes there are wider issues that meet the threshold for children's services' involvement, they will make a referral in line with this policy and local safeguarding procedures.

Viewing the imagery

The decision to view any imagery will be based on the professional judgement of the DSL or a deputy and will comply with this policy. Imagery will never be viewed if the act of viewing will cause significant distress or harm to a child. If a decision is made to view imagery, the DSL will be satisfied that viewing:

- Is the only way to make a decision about whether to involve other agencies because it is not possible to establish the facts from any child or young person involved.
- Is necessary to report it to a website, app or suitable reporting agency (such as the IWF) to have it taken down or support the child or parent/carer in making a report.
- Is unavoidable because a child or young person has presented it directly to a staff member or nudes or semi-nudes have been found on a school device or network.

Deletion of images

If the school has decided that other agencies do not need to be involved, then consideration will be given to deleting imagery from devices and online to limit any further sharing. This decision will be based on the DSL's or a deputy's judgement in line with the guidance. There is further information in the Sharing nudes and semi-nudes section of this policy.

Child-on-child abuse (including harassment and violence)

Responding to allegations of child-on-child abuse

- Follow the 'handling a disclosure' procedure set out above. You must make a record of the allegation and inform the DSL or a deputy.
- If the DSL and a deputy are not available due to emergency circumstances, the staff member will speak to a member of the senior leadership team and/or contact the relevant children's services.

The DSL or a deputy will make a decision from the following options depending on the level of risk or harm:

1. Manage the concern internally providing pastoral support to all those involved.
2. Complete an early help assessment.
3. Make a referral to children's services and/or, where necessary, the police. The DSL may choose to consult children's services to assist them with making a decision.
4. The police will still be informed of any criminal offences. If the child is aged under the criminal age of responsibility, the police will take a welfare approach.

The DSL or a deputy will contact the parents or carers of the children involved at the earliest opportunity and where appropriate. Records will be kept of all concerns, discussions had, decisions made and any outcomes reached. If a criminal offence has been committed or is being investigated, the DSL will work closely with the police to avoid impacting the criminal process while protecting children or following disciplinary procedures.

Where the DSL, children's services or the police decide the concern should be handled by the school internally, we will thoroughly investigate the concern using our behaviour policy and processes. A risk assessment and prevention plan will be completed when a safeguarding risk has been identified. The plan will be monitored and a date set for a follow-up evaluation with everyone concerned. We will support all children involved in the incident, including the child/ren who displayed the behaviour and the children who experienced it. Support may take the form of sessions with the schools' ELSA (Emotional Literacy Support Assistant) or, where appropriate, referral to an outside agency.

Responding to allegations of sexual harassment and sexual violence

Using the DSL's or a deputy's professional judgement, the school will make decisions about and address the incident based on the Brook Traffic Light Tool. We will request the support of other agencies, such as children's services and the police, if necessary.

We follow the local safeguarding arrangements below when an allegation of sexual violence and/or sexual harassment has been made.

Green light: sexual behaviours are typical and developmentally appropriate.

They are:

- Spontaneous, curious, light-hearted, easily diverted, enjoyable, mutual and consensual
- Appropriate to the child's age and development
- Activities or play among equals in terms of age, size and ability levels.
- These behaviours provide opportunities to talk, explain and provide support.

Orange Light: cause concern

Orange light sexual behaviours cause concern because of:

- Persistence, intensity, frequency or duration
- The type of activity for the age and stage of development
- Inequality in age, size, power or developmental ability
- Risk to the health and safety of the child or others
- Unusual changes in a child's behaviours.

These behaviour signals should not be ignored and signal the need to monitor and provide targeted support.

Red light: indicate/cause concern

Red light sexual behaviours indicate or cause harm because they are:

- Excessive, compulsive, coercive, forceful, degrading or threatening
- Secretive, manipulative or involve bribery or trickery
- Not appropriate for the age and stage of development
- Between children or young people with a significant difference in age, developmental ability or power
- Abusive or aggressive.

These behaviours signal the need to provide immediate protection and follow up support.

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

A risk and needs assessment will be completed for all reports of sexual violence and on a case-by-case basis for reports of sexual harassment. The assessment, which will be kept under review, will consider:

- Whether there may have been other people impacted by the behaviour.
- The person known to be impacted by the behaviour, especially their protection and support.
- The alleged instigator of the behaviour.
- All children (and, if appropriate, staff) at the school, especially any actions that are appropriate to protect them from the alleged instigator or future harm.
- The time and location of the incident and any action that can make the school safer.

Unsubstantiated, unfounded, false or malicious reports

If a report is found to be unsubstantiated, unfounded, false or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's services may be appropriate. If a report is shown to be deliberately invented or malicious, we will consider whether any disciplinary action is appropriate according to our behaviour policy.

If a child who has experienced sexual violence or sexual harassment asks the school not to make a referral

If the child does not give consent to share information, the DSL or a deputy will balance the victim's wishes against their duty to protect them and other children on a case-by-case basis. If a child is at risk of harm, is in immediate danger or has been harmed, a referral should be made to children's services, and as assault by penetration (for example rape or penetration with an object) are crimes, reports should be referred to the police. As stated above, a police referral will still be made for children under the age of criminal responsibility.

We will do all we reasonably can to protect the anonymity of any children involved in any report, including weighing up what staff need to know and any support that will be put in place. Further, we will take into account the potential impact of social media in facilitating the spreading of rumours and exposing the child's identity.

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, our DSL and a deputy will be aware of anonymity, witness support, and the criminal process in general so they

can offer support and act appropriately. They will be guided by the CPS: Safeguarding Children as Victims and Witnesses advice.

Concerns about mental health

If you have a mental health concern about a child that is also a safeguarding concern, you will speak to the DSL or a deputy immediately, unless the child is in immediate danger, in which case you will call the police first.

Although you may be well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one, only appropriately trained professionals should attempt to diagnose a mental health illness. Where necessary, the DSL or a deputy will make a referral to Children's Single Point of Access (CSPA)

Useful links:

[Mindworks Surrey](#)

[Surrey Young Suicide Prevention Toolkit](#)

[The Surrey Self-Harm Protocol](#)

[Install - R;pple Suicide Prevention](#)

Concerns about extremism and radicalisation

Extremism is the vocal or active opposition to our fundamental British values. Radicalisation is the process of a person legitimising support for, or use of, terrorist violence. See [radicalisation and extremism](#) in Appendix 1 for more information.

If you have a concern that a child may be at risk of radicalisation or involvement in terrorism and they are in **immediate danger**, contact the police on 999. If the child is not in immediate danger, speak with the DSL or a deputy as a first point of call.

The DSL may decide to discuss their concerns with children's services and will make referrals to the police Prevent team and/or the Channel programme, where necessary. The DSL will need to seek the individual's consent when referring to the Channel programme.

[Prevent referral form](#) to refer cases by e-mail to preventreferrals@surrey.pnn.police.uk .

(email address solely for prevent referrals and not general enquires).

In cases where further advice from the Police is sought dial 101 or 07795 043842 or 01865 555618 and ask to speak to the Prevent Supervisor for Surrey.

Prevent leads

Claire McDonald, Prevent Supervisor, Surrey Police:

claire.mcdonald@surrey.police.uk - 07795 043842

Lara Bowden, Project Officer, Surrey County Council:

lara.bowden@surreycc.gov.uk

Helene Morris – Department for Education (DfE) Regional Prevent Co-ordinator for Southeast - Counter-Extremism. Department for Education Prevent Coordinator for South-East
Prevent.SouthEast@service.education.gov.uk

[National Prevent referral form \(healthysurrey.org.uk\)](https://healthysurrey.org.uk)

Staff and Local Governors can also raise concerns by emailing counter.extremism@education.gsi.gov.uk, but this is not to be used in emergency situations. If you believe you have information relating to terrorism, you can call the anti-terrorist hotline on 0800 789 321. To report extremism in education, including allegations against staff and institutions, use [this link](#)

Confidentiality, Sharing and Withholding Information

Please read in conjunction with The SWAN Trust Data Protection Policy.

The SWAN Trust and our schools takes our responsibility to protect and look after the data (information) we hold about children and our families seriously. The Data Protection Act (DPA) 2018, the General Data Protection Regulation (GDPR) and the Data (Use and Access) Act 2025 guide us in how to do so. Under the DPA 2018, we will share information without consent if ‘the safeguarding of children and individuals at risk’ is our reason for doing so, and

- it is not possible to gain consent
- it cannot be reasonably expected that a practitioner (for example, teacher) gains consent, or
- to gain consent would place a child at risk

The government’s [information sharing advice for safeguarding practitioners](#) supports staff who have to make decisions about sharing information. Staff are aware they can look at the [data protection in schools toolkit](#) or speak to a member of the safeguarding team if they are unsure about sharing information. Government guidance emphasises that: “The Data Protection Act 2018, GDPR and Data (Use and Access) Act 2025 do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.”

To keep children safe, we will share information in a timely manner including sharing information with agencies and professionals in line with the Working Together to Safeguard Children 2023 guidance. We respect that safeguarding matters are personal to families, so the DSL, deputy and headteacher will only share information about a child to members of staff and professionals on a need-to-know basis.

All staff are aware that they cannot make a promise to a child to keep secrets that might impact on the child’s safety or wellbeing. Instead, staff should tell the child that they may need to pass information on to others who can help and protect them.

Notifying parents or carers

At The Hermitage Schools, working alongside and supporting families is a key priority. This involves being open and transparent with parents and carers when we have concerns about their child’s welfare, and/or we need to request support from other services to make sure the child’s situation improves. If we believe notifying parents or carers could increase the risk to the child or cause further harm, we will seek advice from children’s services about how and when parents or carers should be updated. It is legitimate to share concerns without

a parent's or carer's consent when there is good reason to do so and that sharing the information would improve the safeguarding of the child in a timely manner.

Useful links:

[Information Sharing](#)

[For organisations | ICO](#)

[Sharing information to safeguard children and young people in the education sector in the UK | ICO](#)

Record Keeping

Each child has a safeguarding file where all safeguarding concerns and referrals are stored. The designated safeguarding lead is responsible for keeping written records of all concerns, discussions and decisions, including the rationale for those decisions. Records reflect the reason why referrals are or are not made to another agency, such as children's services or the Prevent program. Safeguarding files will be stored securely, and access will be limited to those who need it. The schools use CPOMS (Child Protection Online Management System), a secure online recording and reporting system. While all staff can log concerns on the system, only DSLs and Deputy DSLs can access pupils records and reports.

When a child leaves our school, the DSL will make sure that their safeguarding file is transferred to the new education school or college within 5 days of an in-year transfer or within 5 days of the start of a new term. This will be securely transferred separately from their main file, and a confirmation of receipt will be requested and kept. Where appropriate, the DSL will share information in advance of the child transferring particularly where the information would support an assessment of risk to others in the school as well as the individual pupil, so support can be put in place ready for when the child starts. When a child starts our school, we will make sure key staff are aware of the safeguarding file as soon as possible.

If The Hermitage Infant or Junior School is the last school that the child attends, their safeguarding file will be securely stored by the school until their 25th birthday is reached, when it will be securely disposed of.

Concerns or allegations made about adults in our school

If you have a low-level concern or have an allegation to make about a member of staff (see the definition for staff on page 9) presenting a risk to children, speak to the headteacher as soon as practically possible. This includes any concerns in school, out of school, online and/or offline. The procedures for dealing with allegations against members of staff and a low-level concerns are in Appendix 2.

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

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

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

Where the allegation is in relation to a member of supply staff or trainee teacher, the school will inform the agency/teacher training provider of the process for managing allegations and ensure they are fully involved in enquiries.

The school may also receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities).

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

Report any concerns to the Headteacher immediately, who will consider whether an onward referral to the LADO is required.

If an allegation is made against the Headteacher, the concerns need to be raised with the CEO as soon as possible. If an allegation is made against the CEO, the concerns need to be raised with the Chair of Trustees as soon as possible. If they are not available, then the LADO should be contacted directly

There may be situations when the Headteacher and/or CEO 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, CEO and/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/carers 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 Social Care and/or the Police.

If the matter is investigated internally, the LADO will advise the school to seek guidance in following procedures set out in part 4 of KCSIE (2026) and the SSCP procedures.

Low-level concerns

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

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

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

The Hermitage Schools create an environment where staff are encouraged and feel confident to self-refer where they have found themselves in a situation.

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

Useful links:

[Surrey Safeguarding Children Partnership Procedures Manual Allegations Against Staff or Volunteers](#)
[Surrey Safeguarding Children Partnership Procedures Manual Non-recent Abuse Policy](#)

Whistleblowing

A whistleblower is a worker who reports certain types of wrongdoing. All staff have a duty to do so. We aim to create an environment where staff feel able to raise concerns about poor or unsafe practice and potential failures in how we manage safeguarding. Any concerns should be raised with the senior leadership team and will be taken seriously. The SWAN Trust has a separate whistleblowing policy, which lists the procedures for raising concerns. The SWAN Trust Whistleblowing Policy is available on the schools' website.

Whistleblowing regarding the Headteacher should be made to the CEO whose contact details should be available to staff.

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

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

Where staff feel unable to raise a concern with our senior leadership team or feel that their genuine safeguarding concerns are not being addressed, there are other options available to them, such as the NSPCC whistleblowing advice line. Staff can call 0800 028 0285 from 8am-8pm or email: help@nspcc.org.uk.

Online safety and the use of smart devices

This section summarises The Hermitage Schools' whole school approach to online safety and the use of smart devices (e.g. mobile phones, smart watches, tablets etc). Our detailed approach is covered in our SWAN Smart Phone Policy and our schools' online policy, which are available to view on the school website. The Hermitage Schools understand the significant and essential role that we have in making sure children are protected from potentially harmful and inappropriate online material. We consider online safety in every aspect of school life.

Our aim is to:

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

We fulfil our aims by:

- Ensuring appropriate filtering and monitoring systems are in place on the school's network and devices.
- Educating children to learn how to keep themselves safe when online (using the government's [Teaching online safety in schools](#) guidance), what to do if they are harmed or spot a risk and what the consequences are if they break the school rules about online safety.

- Engaging with parents and carers about what online safety looks like.
- Making sure our whole school approach is reflected in all relevant policies.
- Regularly training staff on online safeguarding risks and how to be online safely.
- Making sure children, staff, parents/carers, Governors/Trustees and volunteers sign an understandable acceptable use agreement that covers how they should use the school's IT systems and their mobile and smart technology.
- Making parents, carers, children and staff aware that staff can search an electronic device they have confiscated. See [Searching, Screening and Confiscation](#).

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

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

The 4Cs

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

Content: being exposed to illegal, inappropriate or harmful content, for example: pornography, 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. If children or members of staff report any issues, we will report it to the Anti-Phishing Working Group (<https://apwg.org/>).

Mobile phones and smart technology (including smart watches and glasses)

Many children have unlimited and unrestricted access to the internet via mobile phone networks; therefore children could be harmed or harm others online when at school. This may include sexually harassing, bullying and the making or sharing of nudes or semi-nudes (often via large chat groups). To protect children from these risks while they are at our school, our approach to mobile and smart technology is that no Smart Phones are allowed in school from September 2026.

Please see our Mobile Phone Policy and Online Safety Policy for further information, including filming and photography by parents at school events.

All schools should be mobile phone-free environments by default; anything other than this should be by exception only.

The Hermitage Infant School will follow government guidance for early years settings, on how mobile phones, cameras and other electronic devices with imaging and sharing capabilities are used in the school. Please see: [Safeguarding children and protecting professionals in early years settings: online safety considerations](#)

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

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

Filtering and monitoring

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

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

Remote education

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

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

Information security and access systems

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

Children are taught about online safety throughout the curriculum, and all staff receive online safety training which is regularly updated. All online safety concerns should be reported to the DSL.

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

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the DSL will consider a referral into the [Cyber Choices](#) programme.

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

Useful links:

[Childnet International](#)

[Safer Internet Centre webpages](#)

[Generative AI: product safety expectations](#)

[Generative artificial intelligence \(AI\) in education - GOV.UK](#)

[Using AI in education settings: support materials - GOV.UK](#)

Children potentially at greater risk of harm

At The Hermitage Schools, we know that all children need to be protected from harm. In addition, we recognise that some groups of children are potentially at greater risk of harm. The information below highlights some of the groups of children this applies to, however there are several other groups not listed.

Children who have a social worker

Children may need a social worker due to safeguarding or welfare needs. Children may need help due to abuse, neglect and/or complex family circumstances. The Hermitage Schools recognise that a child's difficult experiences and trauma can leave them vulnerable to further harm, as well as disadvantaging them educationally.

Children's services share with us which children have a social worker. Once we are aware of this information, we will use it to make decisions in the child's best interest, i.e. their safety, welfare and educational outcomes. When a child has a social worker, safeguarding is at the heart of every decision we make, such as how we react to unauthorised absence or children missing education, which themselves carry additional risks. When necessary, we offer extra in-school support to our children who have a social worker, such as ELSA or HSLW support for the family.

The Virtual School is a statutory service that exists to provide advice and support for children who have a social worker, children placed in care and previously looked after, such that they have the opportunity to meet their full educational potential. Where needed, our school works with the Virtual School to support these children.

Children looked after and previously looked after

These children are particularly vulnerable. The most common reasons for children becoming looked after is as a result of abuse and/or neglect. Staff will have the skills and knowledge to keep children looked after and previously looked after safe. Appropriate staff will have the information they need in relation to a looked-after child's legal status. For example, who has parental responsibility, who is not permitted to have contact and who is not permitted to know where the child is being educated, and the level of decision-making power the

local authority has given the carer. The designated teacher for children looked after is Miss B. Foster. The designated governor/trustee for children looked after is Mr R. Clark.

The statutory guidance [Designated teacher for looked-after and previously looked after children](#) contains further information on the role and responsibilities of the designated teacher. The designated teacher ensures that the school has the up-to-date details of the allocated social worker and the Virtual School headteacher in the local authority that looks after the child. The Virtual School has an additional role of managing extra funding which is used to support children looked after. The designated teacher will work with the Virtual School Head to discuss how the funding can be used to best support the child.

Useful links:

[Surrey Children's Services Procedure Manual Supporting the Education and Promoting the Achievement of Children with a Social Worker, Looked After and Previously Looked After Children](#)
[Promoting the education of children with a social worker and children in kinship care arrangements: virtual school head role extension](#)

Young Carers

At The Hermitage Schools, we are alert to the needs of young carers and recognise that caring responsibilities can impact on their attendance, attainment, behaviour and wellbeing. Early identification of these children is essential. We will liaise with appropriate services including additional support from external partners or the local authority and health services, to ensure young carers receive the right support at the right time.

Children with special educational needs, disabilities and health issues

Our Special Educational Needs Co-ordinator and DSL work closely together to safeguard and support children who have special educational needs and disabilities (SEND), in particular when there are any reports of abuse. Our safeguarding curriculum, i.e. the ways we teach children to keep themselves and others safe, is adapted to meet the needs of children with SEND, including 1:1 adult support where appropriate and the use of visual aids and prompts adapted to individual needs.

The Hermitage Schools are aware that children with SEND or certain medical or physical health conditions can face additional safeguarding challenges both online and offline, such as:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.
- These children being more prone to peer group isolation or bullying (including prejudice-based bullying), than other children.
- The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs, and the communication barriers and difficulties in managing or reporting these challenges.
- The need for intimate care or that these children are isolated from others and are more likely to be independent on adults for care
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools, or the consequences of doing so.

We offer additional pastoral support for children with SEND, including

- ELSA sessions
- 1:1 adult support where appropriate to need

Useful links:

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

Safeguarding children with medical conditions

Incidents relating to the management of a pupil's medical condition (including allergies) will not normally require a safeguarding referral. However, **[name of school]** will consider a referral where concerns indicate that a child may be at risk of neglect, abuse, or exploitation because of their medical condition. This may include situations where important medical information is withheld from the school or where a child is repeatedly sent to school without essential medication, placing them at risk. Staff will follow the school's procedures for supporting pupils with medical conditions and report to the Designated Safeguarding Lead (DSL) where safeguarding concerns arise.

Useful links:

[Supporting pupils with medical conditions at school - GOV.UK](#)

[Allergy safety in schools - GOV.UK](#)

Children who are lesbian, gay or bisexual

Staff at The Hermitage Schools know that a child or young person being lesbian, gay, or bisexual is not in itself a risk factor for harm but they can sometimes be vulnerable to discriminatory bullying. We will take steps to prevent discriminatory bullying and put appropriate sanctions in place where this has been reported.

Children who are questioning their gender

The Hermitage Schools recognise that some children and young people may question their gender and may require support, understanding and careful consideration. The welfare, wellbeing and safeguarding of the child will always be the primary consideration in any decision-making. Responses will be individualised and based on the child's age, needs, wishes, circumstances and best interests. Staff will listen respectfully, respond sensitively and avoid making assumptions, while remaining alert to any safeguarding concerns, vulnerabilities, mental health needs, bullying, online harms or other risks that may affect the child.

The Hermitage Schools will normally work in partnership with parents/carers when supporting a child who is questioning their gender. However, where involving parents/carers could place a child at risk of significant harm, appropriate safeguarding procedures will be followed, and advice will be sought from the DSL. Any requests relating to social transition or other significant changes will be considered carefully on a case-by-case basis, with decisions informed by safeguarding considerations, professional judgement and, where appropriate, advice from relevant agencies. The school will take all reasonable steps to protect children who are questioning their gender from bullying, harassment, discrimination, abuse and victimisation and will maintain appropriate records of concerns, decisions and support arrangements.

Identified areas of risk for our school

The Hermitage Schools share community partnership intelligence using the community partnership intelligence form [Partner services | Surrey Police](#) or via the Youth Engagement Officers to make our neighbourhood police aware of any information of concern we receive about the local area. The DSL attends the triannual Police and Education Intelligence Briefings.

Identified areas of risk for our school include:

- Areas on the school site where children may feel unsafe.
- School is situated on a busy road.
- School is situated close to a train line.
- Children with English as an additional language.
- School is situated close to a large secondary school.

Useful links:

[Youth and school engagement | Surrey Police](#)

[Safer Communities Programme | Healthy Surrey](#)

[Surrey Healthy Schools | Healthy Surrey](#)

[Partner services | Surrey Police](#)

Lettings and off-site arrangements

If your school has a lettings agreement policy, refer to it here and where it can be found. When services or activities are provided by the governing body/board of trustees, under the direct supervision or management of our school staff, the safeguarding procedures listed in this policy will apply. This may not be the case when we hire or rent out our school to other organisations or individuals, such as community groups, sport associations and extra-curricular activities providers. We will make sure there are arrangements in place to keep children safe, regardless of whether they are children at our school.

To make sure the provider has the appropriate safeguarding arrangements in place, we will follow the government's [Keeping children safe during community activities, after-school clubs and tuition](#) non-statutory guidance. This includes checking that the provider has completed the essential pre-employment checks on their staff and that their staff are suitable to be around children. Where appropriate, we will seek assurance and check their safeguarding policies and procedures, as well as establish what the arrangements are for the provider to liaise with our school on safeguarding matters. We will terminate our agreement with the provider if they do not follow the safeguarding requirements listed in the agreement.

Extended school and off-site arrangements

Where extended school activities are provided and managed by the school, our own safeguarding and child protection policy and procedures apply. When our children attend off-site activities, we will ensure that effective child protection arrangements, informed by thorough risk assessments, are in place.

When our children attend an alternative provision provider, we continue to be responsible for their safety and wellbeing. We will satisfy ourselves that the placement can meet the child's needs and obtain written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. checks that we would otherwise perform on our own staff. This includes written confirmation that the alternative provider will inform us of any arrangements that may put the child at risk (i.e. staff changes), so that we can ensure ourselves that appropriate safeguarding checks have been carried

out on new staff. We will always know where a child is based during school hours. This includes having a record of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. We will regularly review the alternative provision placements we make. Reviews will be at least half termly to provide assurance that the child is regularly attending, and the placement continues to be safe and meets the child's needs. Where safeguarding concerns arise, the placement will be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed. We follow the [statutory guidance for alternative provision](#).

Where a parent/carers expresses their intention to educate their child at home (also known as elective home education), we will work together with the parent/carers and other professionals to ensure that this decision has been made in the best interests of the child. We recognise that this is particularly relevant for children who have SEND, are vulnerable and/or have a social worker.

Useful links:

[Education provision for SEND - Surrey County Council](#)

[Alternative Provision: Alternative Curriculum Pathways and Reintegration Support - Surrey County Council](#)

Training

Designated Safeguarding Lead

The designated safeguarding lead will attend regular training to prepare and assist them in leading the school's safeguarding response and approach. Additional training or research may be required as local, or school specific safeguarding issues arise. Minimally, the designated safeguarding lead will:

- That on appointment, the DSL and DDSL initially undertake Surrey DSL 'New to Role' with 'Refresher' training at least every two years as well as attending DSL network events, to refresh knowledge and skills.
- Stay up to date with safeguarding knowledge, resources and changes.
- Have a good understanding of, and form a good relationship with, the Surrey Safeguarding Children Partnership by attending the triannual DSL Network events, sharing the learning with staff as appropriate and making sure staff are aware of any safeguarding training on offer.
- Attend harmful sexual behaviour and Prevent awareness training.
- Receive and share safeguarding (including online safety) updates (for example, via email, e-bulletins, and staff meetings) with staff.
- Make sure staff have regularly updated safeguarding training, updating staff who miss training at the earliest opportunity.
- Gain an understanding of how the school's filtering and monitoring systems work and how they can be best used to keep children safe at The Hermitage Schools.

Governors and Trustees

All governors receive safeguarding and child protection training (including online safety) at induction, which prepares them for testing and challenging the school's procedures and policies, making sure they are working as they should. The training will be regularly updated. Further:

- The **Local Governing Committee** will make sure the designated safeguarding lead has the time and resources to attend training.
- The **CEO and Chair of Trustees** will receive training about managing allegations against the headteacher to assist them in the eventuality that an allegation is made.

- The **Local Governing Committee** will make sure that online safety is a theme in all staff training.
- Senior members of the board will make sure that those involved with the recruitment and employment of staff to work with children have received appropriate safer recruitment training.
- The link safeguarding Governor and Trustee will make sure that staff and Governors and Trustees attend safeguarding training at induction and regularly after that. The link safeguarding Governor and Trustee will attend regular training and receive e-bulletins or equivalent to stay up to date with the latest statutory guidance.

The Local Governing Committee and Board of Trustees will make sure at least one member of every recruitment panel has completed safer recruitment training within the last five years. The SWAN Trust has a separate safer recruitment policy that explains what safeguarding checks are completed before employment to make sure those who work with children are suitable.

Useful links:

[Check a teacher's record](#)

[Individuals prohibited from managing or governing schools](#)

All staff

Trustees and Governors recognise the expertise that staff build up by managing safeguarding concerns on a daily basis and, as a result, have the opportunity to contribute to and shape staff training and this policy. All staff receive safeguarding and child protection training (including online safety) at induction. The training is regularly updated and reflects the whole school approach to keeping children safe. In addition, staff receive regular, at least annual, safeguarding updates (for example, via email, e-bulletins and staff meetings) to provide them with what they need to keep children safe.

Our training ensures that staff:

- Can spot the signs of possible abuse, neglect and exploitation.
- Know the school's safeguarding procedures and their role in carrying them out.
- Have awareness of and understand their role in the early help process and the process for making a referral to the local authority's children's services, including what may follow after a referral.
- Know what to do if a child tells them they are being harmed, including how to manage this information confidentially.
- Understand the reasons why children may not feel ready or know how to tell someone that they are being harmed.
- Receive Prevent training, which will prepare them for identifying children at risk of being radicalised into terrorism and how to challenge extremist ideas.
- Understand what cyber security the school has in place to keep children and staff safe when online at school and how to report any issues.
- Understand what ineffective filtering and monitoring systems look like and how to report any concerns or issues.
- Know that children who identify as or are perceived to be lesbian, gay, bisexual or questioning their gender can be targeted by other children.
- Know what to do if they have concerns about a member of staff (including supply staff, trainee teachers, volunteers and contractors) posing a risk of harm to children.

We make sure that staff members provided by other agencies and third parties, for example supply teachers and contracted staff (such as catering staff) are aware of this policy, our school's safeguarding procedures, and have received appropriate safeguarding training.

All staff, including governors, receive annual safeguarding training at the start of each school year or on induction if employment starts after the beginning of the academic year.

Volunteers, including work experience students, are given basic safeguarding training on their first visit to the school and updated as and when necessary to their voluntary position.

The headteacher will receive training about managing allegations against staff to assist them in the eventuality that an allegation is made.

The designated teacher for children who are looked after (CLA)

We follow the [Role and responsibilities of the designated teacher](#)'s statutory government guidance. The designated teacher will have training to make sure they understand the needs of children looked after/previously looked after and how they can best be supported to have the same opportunities as their peers. They will work closely with [Surrey Virtual School](#) accessing their training and forums to stay up to date.

Teaching and learning

At The Hermitage Schools, we aim to prevent our children from coming to any harm. We recognise how important it is that we teach and role-model to children how to keep themselves and others safe. Our curriculum meets the needs of all children, including those with SEND and/or have been abused.

Safeguarding is included in all areas of teaching and learning, including:

- Life Skills (PSHE) lessons.
- SMSC and RSE lessons.
- Weekly Values assemblies.
- Anti-bullying Week activities.
- Well-being week activities.
- Annual NSPCC 'Speak Out, Stay Safe' assemblies and workshops.

Linked policies include:

- Online Safety Policy
- ICT Policy
- ICT Acceptable Use Policy for Staff
- Social Media Policy
- Behaviour and Wellbeing Policy
- Mobile Phone Policy
- Anti-bullying Policy
- Life Skills Policy
- RSE Policy

Any disclosures made during learning time will be addressed sensitively and followed up confidentially with the child, following the school's safeguarding guidelines, including reporting to the DSL and logging on CPOMS.

If specific safeguarding issues arise during the school year, the headteacher will make sure the curriculum is adapted to cover current issues.

Useful links:

[Relationships Education, Relationships and Sex Education and Health Education guidance](#)

[Promoting children and young people's mental health and wellbeing - GOV.UK](#)

[Promoting Fundamental British Values as part of SMSC in schools](#) (guidance for maintained schools on promoting basic important British values as part of pupils' spiritual, moral, social and cultural (SMSC))

[SMSC requirements for independent schools](#) (guidance for independent schools on how they should support pupils' spiritual, moral, social and cultural development)

[PSHE: Relationships & Sex Education and Health Education Guidance](#)

[PSHE Drug Education Teaching and Learning Resource EYFS-KS5](#)

[Surrey Young People's Substance Misuse | Catch22](#)

[Teaching about relationships, sex and health - GOV.UK](#)

Linked policies

This policy is one of a range of documents that set out what our responsibilities are and how we should carry them out. Other relevant documents include the policies listed below:

- Anti-bullying Policy
- Attendance Policy
- Behaviour and Wellbeing Policy
- Curriculum policies including Life Skills & RSE
- Equality Policy
- Health & Safety Policy
- Intimate Care Policy
- Mobile Phone Policy
- Online Safety Policy
- Parental Concerns/Complaints
- Procedure for managing allegations against staff (including low-level concerns)
- Restrictive Intervention Policy
- Risk assessments
- Safer Recruitment & Selection Policy
- Social Media Policy
- Staff behaviour Policy / Code of Conduct
- Supporting Pupils with Medical Needs & First Aid Policy
- SWAN Smartphone Policy
- SWAN Whistleblowing Policy
- Visual Images Policy

Appendix 1: Types of abuse and specific safeguarding concerns

These appendices are based on the Department for Education's KCSIE guidance.

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

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

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or 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. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

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 caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

We use the following guidance to help identify and address cases of neglect.

[Abuse & Neglect - Surrey Safeguarding Children Partnership](#)

[Graded Care Profile 2](#)

[Surrey Neglect Screening Tool](#)

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

Indicators of abuse

The following list, provided by the [NSPCC](#), covers some common indicators of abuse and neglect.

- unexplained changes in behaviour or personality
- becoming withdrawn
- seeming anxious
- becoming uncharacteristically aggressive
- lacks social skills and has few friends, if any
- poor bond or relationship with a parent
- knowledge of adult issues inappropriate for their age
- running away or going missing
- always choosing to wear clothes which completely cover their body
- patterns of repeated lateness or absence

It is important that staff report all of their concerns, however minor or insignificant they may think they are – they do not need ‘absolute proof’ that the child is at risk.

Specific safeguarding concerns

This section is based on Annex B of KCSIE. Annex B includes further information about other safeguarding issues to be aware of. **All concerns under this section should be addressed in line with the [What to do if you have concerns about a child’s welfare section](#) of this document, unless stated otherwise.**

Children absent from education

All staff will be aware that children missing from education or persistently absent, without explanation and/or for prolonged periods can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. Further, it may also indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so called ‘honour’-based abuse or risk of forced marriage. We are also aware that absence can increase any existing safeguarding risks.

Attendance is closely monitored at The Hermitage Schools to support us in identifying abuse and acting early. Our staff will be aware of our school’s unauthorised absence and children missing education procedures. We notify children’s services if a child who has a social worker is absent from school without a suitable explanation. To support the school’s procedure for addressing children missing or absent from education, we make sure we have more than one emergency contact number for each child. We work in partnership with Surrey County Council Inclusion Service when patterns of absence give rise to concern, including notifying them when a child leaves our school without a new school being named.

Our attendance policy and procedures are set out in a separate document, which can be found here: [Policies - The Hermitage School - Inspire, Learn, Achieve](#). The schools follow the government's [Working together to improve school attendance](#) statutory guidance which sets out how schools must work with the local authority children's services where school absence indicates safeguarding concerns.

Useful links:

[The Inclusion Service Resources Area \(Surrey Education Services\)](#)

[Inclusion Service - Pupils missing out on education \(PMOOE\) \(Surrey Education Services\)](#)

[Children Missing Education statutory government guidance](#)

[Surrey Safeguarding Children Partnership Procedures Manual Children Missing Education](#)

Anti-Bullying

Our setting's policy on anti-bullying is set out in our Anti-Bullying Policy, which includes measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying).

We keep a record of known bullying incidents which is shared with and analysed by the Governing body/Proprietor/Management Committee. All staff are aware that children with SEND and/or children who identify as Lesbian, Gay, Bisexual, or questioning their gender, those from minority ethnic backgrounds, children open to children's services and children from low-income families are more susceptible to being bullied/victims of child abuse.

Risks can be compounded where children who have additional vulnerabilities lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

Useful links:

[Surrey Safeguarding Children Partnership Procedures Manual Bullying](#)

[Behaviour in schools](#) (advice for schools, including advice for appropriate behaviour between pupils)

[Relationships Education, Relationships and Sex Education and Health Education guidance](#)

[Preventing bullying - GOV.UK](#)

[Guidance for schools on colleges on gender questioning children](#) (currently in draft, to be finalised)

Physical Intervention

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

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

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

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

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

Contextual safeguarding

Contextual safeguarding, also known as 'risk outside the home', is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

The Hermitage Schools will maintain records of concerns about contextual safeguarding in accordance with our safeguarding procedures. We know the importance of information sharing, therefore if we identify contextual safeguarding concerns about the local area we will share this information with relevant partners. If there is a specific concern about a child, we will consult with children's services.

Useful links:

[Tackling Child Exploitation multi-agency Practice Principles](#)
[Contextual Safeguarding Network webpages](#)

Child sexual exploitation (CSE) and child criminal exploitation (CCE)

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including financial exploitation and county lines) and sexual exploitation. In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator and/or through violence or the threat of violence.

Both can occur online. Children can be exploited by adult males or females, as individuals, an organised network or gang, and the victim may identify as being part of this group. CCE and CSE can affect children both male and female and can include children who have been moved (trafficked). This may constitute modern slavery. They may also be exploited by other children, who themselves may be experiencing exploitation. Where this is the case, it is important that the child perpetrator is also recognised as a victim. Our staff will be aware of a range of factors that could make a child more vulnerable to exploitation. We will provide additional support to children who have been exploited to help keep them in education.

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

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

Child sexual exploitation (CSE)

CSE is a form of child sexual abuse which can affect any child. Sexual abuse 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 clothing. It may include non-contact activities,

such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse, including via the internet.

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

CSE can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Some additional specific indicators that may be present in CSE are children who:

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

See the [Sharing nudes and semi-nudes](#) section below for details about 'sextortion'.

Child criminal exploitation (CCE)

At The Hermitage Schools, we recognise children involved in CCE are victims, despite their engagement in crime. A child may have been criminally exploited even if the activity appears to be consensual. Staff will be aware that girls are at risk of criminal exploitation too, and that both boys and girls who are being criminally exploited may be at higher risk of sexual exploitation.

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

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

Useful links:

[Surrey Safeguarding Children Partnership Procedures Manual Child Sexual Exploitation](#)

[Surrey Safeguarding Children Partnership Procedures Manual Child Sexual Abuse in the Family Environment](#)

[Surrey Safeguarding Children Partnership Procedures Manual Child Criminal Exploitation](#)

[Crime - Surrey Safeguarding Children Partnership](#)

[Child sexual exploitation - Surrey County Council](#)

[Child sexual exploitation | Surrey Police](#)

[CEOP Safety Centre](#)

[Home | CSA Centre](#)

[Centre of expertise on child sexual abuse](#)

[Preventing Child Sexual Exploitation](#)
[Lucy Faithfull Foundation webpages](#)
[Child sexual exploitation: definition and guide for practitioners](#)

Serious violence

Staff at The Hermitage Schools will be aware that serious violence may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying and can also be associated with criminal exploitation.

Staff will report any concerns about a child carrying or using a weapon (or expressing intent to do so) to the DSL or DDSL.

Staff will be aware of the indicators, which may signal children are at risk from, or are involved in serious violence.

These may include:

- increased absence from school.
- a change in friendships or relationships with older individuals or groups.
- a significant decline in performance.
- signs of self-harm or a significant change in wellbeing.
- signs of assault or unexplained injuries.
- unexplained gifts or new possessions (could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation).

All staff are aware of the range of risk factors increasing the likelihood of involvement in serious violence, such as:

- being male.
- having been suspended, spent time in Alternative Provision or permanently excluded from school.
- having experienced child maltreatment.
- having been involved in offending, such as theft or robbery.

Being the victim of, carrying out or allegedly carrying out serious violence (e.g. knife crime) may indicate that a child is involved in county lines.

Useful links:

[Home Office – Serious Violence Strategy, April 2018](#)
[Homepage - Surrey Safeguarding Children Partnership](#)
[Crime - Surrey Safeguarding Children Partnership](#)
[Preventing youth violence and gang involvement government guidance](#)
[Criminal exploitation of children and vulnerable adults: county lines government guidance](#)
[Child exploitation | Catch22](#)
[Keeping kids safe - Children's Commissioner for England | Children's Commissioner for England](#)

Children who run away or go missing from education, home or care

The Hermitage Schools recognise that children who run away, go missing or are absent from education and their normal residence are potentially vulnerable to abuse, exploitation, offending and placing themselves in situations where they may suffer physical harm. The statutory guidance [Children Who Run Away or go Missing from Home or Care](#) requires that every child or young person who runs away or goes missing must be offered a return home interview (RHI) within 72 hours of their return.

Useful links:

[Multi agency risk assessment conferences | Healthy Surrey](#)

Mental health

With mental health problems, a child might find the ways they are frequently thinking, feeling or reacting becoming difficult, or even impossible, to cope with. Mental health problems affect around 1 in 6 children. The Hermitage Schools recognise 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.

Staff will be trained to recognise the signs of a child who may be experiencing a mental health problem. If a child is struggling with their mental health, self-harming, has an eating disorder or is experiencing suicidal ideation and making plans to end their life, there are likely to be potential warning signs. These could include:

- significant changes in behaviour
- ongoing difficulty sleeping
- withdrawing from social situations
- not wanting to do things they usually like
- physical signs of self-harm or neglecting themselves.

The Hermitage Schools aim to promote positive mental health for all staff and children. To do so, we take into account the government's [Mental health and behaviour in schools guidance](#). We will ensure early targeted support is provided and liaise with/refer to specialist services where needed. The DSL will consider whether to inform parents/carers to support the child's wellbeing, where doing so would not place the child at additional risk.

Our mental health lead is: Mrs D Quirk (Inclusion Lead)

Any concerns regarding a child's mental health should be reported immediately so that a referral to the school's Mental Health Support Team can be discussed or a request for support made to Children's Services.

Useful Links:

[Mindworks Surrey](#)

[Mind](#)

[NSPCC: Child mental health](#)

[Homepage - Surrey Safeguarding Children Partnership](#)

[Mental health and behaviour in schools - GOV.UK](#)

[Promoting Children and Young People's Emotional Health and Wellbeing GOV.UK](#)

[Better Health Every Mind Matters | Campaigns | Campaign Resource Centre](#)

Domestic Abuse

Domestic abuse can include a wide range of behaviours and may be a single or pattern of incidents. This form of abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional, and includes coercive or controlling behaviour. It can take place inside and outside the home. The Domestic Abuse Act 2021 states that 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 including physical, sexual, emotional abuse and stalking).

These experiences can have a serious and long-term impact on a child's health, well-being, development and ability to learn. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. The Act states that domestic abuse occurs between at least two people over the age of 16. Therefore, legally, some older children can also commit domestic abuse either in their own intimate relationships or against their parents/carers.

The Hermitage Schools have signed up to the police initiative Operation Encompass, a scheme between Surrey Police, Surrey Domestic Abuse Service and Surrey schools. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the DSL in the school before the child or children arrive at the school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs.

Useful links:

[Surrey Safeguarding Children Partnership Procedures Manual - Domestic Abuse](#)

[Homepage - Surrey Safeguarding Children Partnership](#)

[Surrey Against Domestic Abuse Strategy 2024-2029 | Healthy Surrey](#)

[Multi agency risk assessment conferences | Healthy Surrey](#)

[Request information under Clare's Law: Make a Domestic Violence Disclosure Scheme \(DVDS\) application | Metropolitan Police](#)

[NSPCC-UK domestic abuse Signs Symptoms Effects](#)

[Refuge what is domestic abuse/effects of domestic abuse on children](#)

[Safe Young Lives | Young people & domestic abuse - SafeLives](#)

[Domestic abuse: specialist sources of support - GOV.UK](#) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)

Homelessness

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

Indicators that a family may be at risk of homelessness include household debt, including new poverty induced by the pandemic; rent arrears; domestic abuse and antisocial behaviour; and/or the family being asked to leave a property. If a child has been harmed or is at risk of harm, a referral to children's social care will be made.

Useful links:

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

Child-on-child abuse (including harassment and violence)

We recognise that children can abuse other children, often referred to as child-on-child abuse. It can happen inside and outside school and online. This can include, but is not limited to:

- bullying (including online bullying, prejudice-based and discriminatory bullying).
- abuse between children in an intimate relationship.
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (including when a child encourages or threatens physical abuse online).
- physical assault and harm, or the threat of harm with a weapon
- sexual violence, such as rape, assault by penetration and sexual assault (including when a child encourages or threatens this online).
- harmful sexual behaviour, sexual violence and sexual harassment – which may include misogyny/misandry.
- sexual harassment, such as sexual comments, jokes and online sexual harassment.
- consensual and non-consensual making or sharing of nudes and semi-nudes, including those generated using AI.
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- upskirting and initiation/hazing type violence and rituals.

Older children may use any type of child-on-child abuse to ‘recruit’ younger children into gangs, especially in areas where gangs are prevalent. Young people experiencing child sexual exploitation first hand may be forced to ‘recruit’ other young people using types of child-on-child abuse. We are aware that boys are more likely to carry out child-on-child abuse and girls are more likely to be impacted by it, but all child-on-child abuse is unacceptable and will be taken seriously.

The Hermitage Schools do not tolerate child-on-child abuse. We know that even when there are no reported cases, it could still be happening but yet to be reported. We do not downplay child-on-child abuse, especially sexual violence and sexual harassment, as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” as this can lead to a culture of unacceptable behaviour, misogyny and an unsafe environment for children. For children to feel safe at our school, we make sure they know child-on-child abuse is not acceptable behaviour and how to report it to a trusted adult if they are experiencing or witnessing it.

All staff are aware that child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator. Child-on-child abuse is preventable, and staff know how to recognise behaviours and indicators of risk early and that timely, evidence-based support can be key to preventing children from going on to commit abuse or violence.

It is our duty to minimise the risk of child-on-child abuse. We do this in the following ways:

- Our staff read this policy.
- Our staff are trained to spot the signs that a child is, or may be experiencing, child-on-child abuse and how to report it. They maintain an attitude that ‘it could happen here’.
- Our staff challenge any inappropriate behaviour between children, including the use of derogatory language.

- The behaviour policy, which includes our whole school response to abuse, makes sure everyone knows how to behave and how to respond consistently when children show unacceptable or abusive behaviour.
- In all areas of school life, such as lessons, assemblies and in the playground, we teach children how to act and to treat other people, including when they are online.
- We have effective systems in place for children to report child-on-child incidents.

Child-on-child sexual harassment and sexual violence

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

The Hermitage Schools take a zero-tolerance approach to sexual harassment and sexual violence.

We know that harmful sexual behaviour (HSB), sexual harassment and sexual violence can happen between two children of any age or sex, from a group of children to a single child or group of children, online and face to face. It is more likely that girls will be impacted by sexual harassment and sexual violence and more likely it will be perpetrated by boys. HSB exists on a continuum and may escalate into sexual harassment or sexual violence. They are never acceptable, and we will not tolerate them. National and local research has made us aware of the prevalence and normalisation of harassment and abuse in school-aged children. No reports does not mean it is not happening here at The Hermitage Schools.

Alongside girls, these groups are at higher risk of sexual harassment and sexual violence:

- children with SEND.
- children who are lesbian, gay, bisexual or questioning their gender or who are perceived to be lesbian, gay, bisexual or questioning their gender by their peers.

Children who are victims of sexual harassment and sexual violence will likely find the experience stressful and distressing. This will, in all likelihood, negatively affect their educational attainment and be worsened if the alleged perpetrator(s) attends the same school. If a child reports an incident, they will be reassured that they have done the right thing by telling a trusted adult, will be taken seriously, supported and kept safe. We will further reassure those affected that the law is there to protect them, not criminalise them.

We are aware that when a child reports sexual violence or harassment, this may only be the start of a larger disclosure that could transpire over time. When there are reports, we will always consider the effectiveness of our policies and procedures and whether any changes are necessary to reduce the risk of it happening again. This will be in line with the school maintaining a culture of safeguarding. The Hermitage Schools follow Part 5 of KCSIE when considering our response to sexual violence and sexual harassment. These are mainly captured in the [child-on-child abuse section](#) of this policy.

Harmful Sexual Behaviour (HSB)

Children's sexual behaviours exist on a continuum. HSB refers to problematic, abusive and violent sexual behaviours that are developmentally inappropriate and may cause developmental damage. HSB can occur online or face-to-face. We will always consider HSB in a child protection context. The Hermitage Schools recognise that children displaying harmful sexual behaviours have often experienced their own abuse and trauma and they will be offered appropriate support.

When considering HSB, we will take into account the ages and the stages of development of the children. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference in age, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

Our DSL and deputy will:

- have a good understanding of HSB.
- assist in planning the curriculum aimed at preventing HSB.
- ensure staff spot and report inappropriate behaviour to prevent an escalation.
- incorporate our approach to sexual harassment and sexual violence into the whole school approach to safeguarding.

The Hermitage Schools' curriculum addresses these issues via the following topics according to the age and stage of development of our children:

- healthy and respectful relationships
- what respectful behaviour looks like
- gender roles, stereotyping, equality
- body confidence and self-esteem
- consent

Useful links:

[Responding to children who display sexualised behaviour](#)
[Sexual development and behaviour in children | NSPCC Learning](#)
[Surrey Safeguarding Children Partnership Procedures Manual- Harmful Sexual Behaviour](#)
[NSPCC Harmful Sexual Behaviours](#)
[Stop it Now](#)
[Shore Space](#)

Upskirting

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

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

Sharing nudes and semi-nudes

This is defined as the sending or posting of nudes or semi-nudes images, videos or live streams online by young people under the age of 18 ([UKCIS, 2024](#)). It is a form of child sexual abuse. All incidents will be dealt with as safeguarding concerns. The primary concern at all times will be the welfare and protection of the children

involved. While sharing nudes and semi-nudes of themselves or their peers breaks the law, we know it is important to avoid criminalising young people unnecessarily.

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

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

So-called 'honour'-based abuse, including FGM and forced marriage

So-called 'honour'-based abuse (HBA) means 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. We are aware this abuse often involves a wider network of family or community pressure and can include multiple perpetrators. Therefore, we will consult with children's services before taking any form of action to reduce the dynamic and additional risk factors that might be present as a result.

Female genital mutilation (FGM)

Female genital mutilation (FGM) means 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. The DSL will make sure that staff have appropriate training to prepare them for spotting signs that a child has been affected by FGM or is at risk of FGM.

What to do if you have concerns about a child's welfare section of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM has been carried out or suspects that a child is at risk of FGM.

Signs that FGM might happen:

- A relative or someone known as a 'cutter' visiting from abroad.
- A special occasion or ceremony takes place where a girl 'becomes a woman' or is 'prepared for marriage'.
- A female relative, like a mother, sister or aunt has undergone FGM.
- A family arranges a long holiday overseas or visits a family abroad during the summer holidays.
- A girl has an unexpected or long absence from school.
- A girl struggles to keep up in school.
- A girl runs away – or plans to run away - from home ([NSPCC](#)).

Signs FGM might have taken place:

- having difficulty walking, standing or sitting.
- spending longer in the bathroom or toilet.
- appearing quiet, anxious or depressed.

- acting differently after an absence from school or college.
- reluctance to go to the doctors or have routine medical examinations.
- asking for help – though they might not be explicit about the problem because they are scared or embarrassed ([NSPCC](#)).

Useful information:

[Female Genital Mutilation Statutory Guidance](#)

[Surrey Safeguarding Children Partnership Procedures Manual Female Genital Mutilation](#)

Forced marriage

A forced marriage is non-consensual. Either person could be forced/pressured in several ways, including physically, psychologically, financially, sexually and emotionally. It is a criminal offence in England and Wales.

An arranged marriage is different. The families of both spouses take a leading role in arranging the marriage, but the choice of whether or not to accept the arrangement remains with those who are considered for marriage.

We are aware that the legal age for marriage in the UK has risen to 18, regardless of parental consent. The DSL will follow the local safeguarding procedure and, if necessary, seek advice from the Forced Marriage Unit on 020 7008 0151 if a concern comes to their attention.

Useful information:

[Freedom charity](#)

[Handling cases of forced marriage guidance](#)

[National FGM Centre](#)

[Forced marriage](#)

[Karma Nirvana](#)

One Chance Rule

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

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

Modern slavery is a crime whereby a person uses another person, by means of deception or coercion, as a possession for the purposes of exploitation. We are aware modern slavery exists in the UK and that some victims are children.

Common places modern slavery occurs includes:

- The sex industry, including brothels.
- Retail: nail bars, hand car washes.
- Factories: food packing.

- Hospitality: fast-food outlets.
- Agriculture: fruit picking.
- Domestic labour: cooking, cleaning and childminding.

Victims can be forced into criminal activities such as cannabis production, theft or begging.

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

Useful links:

[Crime - Surrey Safeguarding Children Partnership](#)

[Modern slavery - GOV.UK](#)

[Modern slavery: how to identify and support victims](#)

[Behind the Behaviour: Identifying the criminal exploitation of migrant children | ECPAT UK](#)

[Protecting children from trafficking and modern slavery | NSPCC Learning](#)

[Surrey Safeguarding Children Partnership Procedures Manual Children from Abroad, including Victims of Modern Slavery, Trafficking and Exploitation](#)

Private Fostering

Definition: A privately fostered child is a child under 16 (or 18 if disabled) who is cared for by an adult who is not a parent, grandparent, aunt, uncle, step parent (including civil partnerships), sister or brother where the child is to be cared for in that person's home for 28 days or more.

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

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

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, (as per section 66(1)(a) and (b) of the Children Act 1989) with the agreement of the child's parents. It applies to children under the age of 16 years old or 18 years old if the child is disabled.

Looked After Children by the local authority or those who are placed in residential settings, children's homes or hospitals are not considered to be privately fostered.

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

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

The Hermitage Schools are aware that, by law, a parent or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. The Schools have a duty to inform children's services of this arrangement if they have not been notified, but we will encourage parents and private foster

carers to do so in the first instance. Where a member of staff becomes aware that a child may be in a private fostering arrangement, they will raise this with the DSL and the DSL will notify the C-SPA immediately.

Useful links:

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

Preventing radicalisation and extremism

While some children are more susceptible, any child can be radicalised into terrorism. We take our [statutory duty](#) to prevent children from becoming terrorists or supporting terrorism seriously.

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence. It can occur over a period of time or quickly.

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

Terrorism is an action that:

- endangers or causes serious violence to a person/people
- causes serious damage to property, or
- seriously interferes or disrupts an electronic system.

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

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

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

The [Educate against hate](#) government website lists signs that could indicate that a child is being radicalised:

- becoming increasingly argumentative
- refusing to listen to different points of view
- unwilling to engage with children who are different
- becoming abusive to children who are different
- embracing conspiracy theories
- feeling persecuted
- changing friends and appearance

- distancing themselves from old friends
- no longer doing things they used to enjoy
- converting to a new religion
- being secretive and reluctant to discuss their whereabouts
- changing online identity
- having more than one online identity
- spending a lot of time online or on the phone
- accessing extremist online content
- joining or trying to join an extremist organisation

If you have concerns that a child may be at risk of radicalisation or involvement in terrorism, go to [Concerns about extremism and radicalisation section](#) of this policy.

Useful links:

[Crime - Surrey Safeguarding Children Partnership](#)

[Prevent | Healthy Surrey](#)

[For Professionals - Prevent and Channel | Healthy Surrey](#)

[Protecting children from radicalisation: the prevent duty](#)

[Advice For Families | Counter Terrorism Policing](#)

Child abuse linked to faith or belief

This type of abuse can happen anywhere across any community and/or religion. There are a variety of definitions associated with abuse linked to faith or belief. It can include, but is not limited to, the concept of belief in:

- Witchcraft and spirit possession, demons or the devil acting through children or leading them astray (traditionally seen in some Christian beliefs).
- The evil eye or djinns (traditionally known in some Islamic faith contexts) and dakini (in the Hindu context).
- Ritual or multi-murders where the killing of children is believed to bring supernatural benefits or the use of their body parts is believed to produce potent magical remedies.
- use of belief in magic or witchcraft to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation.

If you suspect a case of child abuse linked to faith or belief, follow the safeguarding procedures in this policy. In addition, the Metropolitan Police's Project Violet team can be contacted on the non-emergency, 24/7 number: 101.

Useful links:

[Child abuse linked to faith or belief | Surrey Police](#)

[Short YouTube introduction video](#)

Fabricated or induced illnesses

Staff at The Hermitage Schools are alert to the issues surrounding fabricated or induced illnesses.

Fabricated or induced illness (FII) is a rare form of child abuse. It happens when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child. Our supporting

children with medical needs policy details our procedure for ensuring reported medical needs are evidenced by medical professionals.

Useful link:

[The Royal College of Paediatrics and Child Health \(RCPCH\) guidance](#)

Appendix 2

Allegations Against Staff Policy, including low level concerns

Section 1: allegations that may meet the harm threshold

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the Headteacher, or the CEO where the Headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position and 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 there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- 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 the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the Trust

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and local authority children's social care where they have been involved.

Definitions for outcomes of allegation investigations

- **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, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation

- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis that supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or local authority children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or local authority children's social care services, where necessary). Where the police and/or local authority 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
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or local authority children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to local authority children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or local authority children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with local authority children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

Early Years

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The Headteacher will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

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

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or local authority children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to local authority children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

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

The case manager will take advice from the LADO, police and local authority children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation

- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with local authority children's social care or the police as appropriate.

We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations that have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

After any cases where the allegations are substantiated, the case manager will review the circumstances of the case with the LADO to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school 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 designated officer at the local authority
- Examples of such behaviour could include, but are not limited to:
- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating children

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

Responding to low-level concerns

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's code of conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the Data Protection Act 2018 and the UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harm threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues that would ordinarily be included in a reference, such as misconduct or poor performance