



Child Protection & Safeguarding Policy

Jan 2025

This document is based on guidance from Keeping Children Safe in Education (KCSIE) 2023 and Working Together to Safeguard Children 2018. If the Government re-issues this guidance during the 24/25 period, this policy will be updated to be compliant with any changes.

Designated Safeguarding Officer: Liam Kelly

Status & Review Cycle: Statutory Annual

Next Review Date: January 2026

The Life Skills Project Safeguarding Statement 2025

"Safeguarding is a community responsibility"

It is essential to uphold ethical, moral and legal duties to protect and promote the well-being of all children and young people.

Every effort should be made to create an environment where children, young people, and adults feel safe, valued, and respected. They should feel confident to express concerns, trusting that they will be heard and supported.

This policy provides staff and volunteers with a framework to ensure the safety and security of children and vulnerable young adults within the setting. It also informs parents and carers about the measures in place to safeguard their children and young people.

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Personnel & Contacts

Designated Safeguarding Officer (DSO): Liam Kelly

Contact Details: contact@thelifeskillsproject.org, 07446047766

Local Authority Designated Officer (LADO): Surrey County Council LADO

Contact Details: lado@surreycc.gov.uk, 0300 123 1650

Child Protection (CP): C-SPA Child Protection Consultation Line

Contact Details: 0300 470 9100 (Option 3)

Community Interest Company (CIC) Regulator: CIC Regulator UK

Contact Details: cicregulator@companieshouse.co.uk, 02921 507 420

Terminology

Ensuring the safety and well-being of children & young people involves:

- Protecting them from abuse and neglect.
- Preventing any harm to their health or development.
- Making sure they are raised in a safe and supportive environment.
- Taking steps to help them achieve the best possible outcomes.
- Preventing any damage to their physical or mental health or development.

Child Protection is an essential aspect of safeguarding, focusing on actions taken to protect specific children and vulnerable young adults who are experiencing, or are at risk of experiencing, significant harm.

Early Intervention means offering support as soon as any concerns arise or are recognised, at any stage in a child or vulnerable young adult's life.

Staff, Tutors and Teaching Assistants includes everyone working for or associated with the organisation, whether employed or self-employed, full-time or part-time, temporary or permanent, paid or voluntary.

Children refer to anyone under the age of 18. However, The Life Skills Project works with children (up to age 18) and vulnerable young adults (up to age 25), safeguarding measures extend to young people up to age 25, applying appropriate adult processes as needed.

Young People/Person refers to anyone defined as a child, as well as people aged 18 to 25 years.

Parents include birth parents and other adults responsible for raising a child, such as step-parents, foster carers, and adoptive parents.

Social Care refers to the local Children's Services where the child lives, unless the child is a Looked After Child, in which case it refers to the Children's Services in their home authority.

MAP stands for the Surrey Multi-Agency Partnership.

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

DSO means Designated Safeguarding Officer and may also refer to the Deputy Designated Safeguarding Officer (**DDSO**) where applicable.

Introduction

This policy has been developed with consideration of the principles established by the Children Acts 1989 and 2004; the Education Act 2002 (as amended), the Education (Independent School Standards) Regulations 2014, and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended).

All action taken by The Life Skills Project will be in accordance with:

Statutory, national, and local guidance – this includes:

- **Working Together to Safeguard Children (2018)** which sets out the multi-agency working arrangements to safeguard and promote the welfare of children and young people and protect them from harm; in addition, it sets out the statutory roles and responsibilities of settings.
- **'What to do if you are Worried a Child is Being Abused' 2015 - Advice for Practitioners**
- **Keeping Children Safe in Education (KCSIE, 2023)** 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. Whilst The Life Skills project provides specialist tuition and SEN support services, many of the principles within this legislation remain relevant to its practice.
- **Local Guidance from the Local Safeguarding Partnership: Surrey Safeguarding Children Partnership (SSCP) including SSCP Procedures**

This policy applies to all members of staff in the setting. Guidance and documents referred to in this policy:

- **Surrey Safeguarding Children Partnership protocols, guidance and procedures**
- **Working Together to Safeguard Children 2018**

- **Keeping children safe in education 2023**
- **Disqualification under the Childcare Act 2006 (updated 2019)**
- **FGM Act 2003 Mandatory Reporting Guidance 2015 (updated January 2020)**
- **‘What to do if you are worried a child is being abused’ 2015**
- **Teachers' standards**
- **Information sharing advice for safeguarding practitioners**
- SCC Safeguarding Children Missing Education (CME) and Educated Other Than at School (EOTaS) – available on **Surrey Education Services (Education Safeguarding Team Resources Hub)**
- SCC Touch and The Use Of Physical Intervention When Working With Children And Young People – available on **Surrey Education Services (Education Safeguarding Team Resources Hub)**

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

Equalities Statement

With regards to safeguarding we will consider our duties under the **Equality Act 2010**. General duties include: Eliminate discrimination, harassment, victimisation, and other conduct that is prohibited by the Equality Act 2010.

Advance equality of opportunity between people who share a protected characteristic and people who do not share it.

Foster good relations across all protected characteristics between people who share a protected characteristic and people who do not share it.

Details of specific duties are published under The Life Skills Project's equality, diversity, and inclusion statement and measurable objectives. These are available on the website.

Staff are aware of the additional barriers to recognising abuse and neglect in children with Special Educational Needs and Disabilities (SEND).

The Life Skills Project operates in accordance to the principles of and promotes anti-oppressive practice in line of the **United Nations Convention of the Rights of the Child** and the **Human Rights Act 1998**.

Policy Aims

The aims of these procedures are:

- To provide a framework to promote and safeguard the wellbeing of children, young people and vulnerable adults and in doing so ensure statutory responsibilities are met.
- To ensure consistent good practice across the setting and ensure that safeguarding follows a whole setting approach.
- Clarifying safeguarding expectations for members of the setting's community, staff, children, young people and vulnerable adults and their families, as well as carers and other support services and provisions.
- Contributing to the establishment of a safe, resilient, and robust safeguarding culture in the setting built on shared values; that children, young people and vulnerable adults are treated with respect and dignity, taught to treat each other and staff with respect, feel safe, have a voice and are listened to.
- Supporting contextual safeguarding practice recognising that the setting's site can be a location where safeguarding concerns could be noticed, arise or become apparent.
- Setting expectations for developing knowledge and skills within the setting's community (staff, children, young people, parents/carers) to the signs and indicators of safeguarding issues and how to respond to them.
- Early identification of need for vulnerable learners and provision of proportionate interventions to promote their welfare and safety.
- Working in partnership with children, young people, vulnerable adults, parents/carers, and other agencies in the Surrey Safeguarding Children's Partnership.

Policy Principles and Values

- The welfare of the child, young person or vulnerable adult is paramount.
- Maintain an attitude of "It could happen here".

- Maintain a “zero-tolerance” approach to sexual violence and sexual harassment as appropriate for a children, young people or vulnerable adults with more complex social communication needs, so that the most effective learning can take place to help both the initiator and recipient understand the situation so that further incidents can be avoided.
- Children, young people and vulnerable adults have a right to feel safe and secure, they cannot learn effectively unless they do so.
- All children, young people and vulnerable adults have a right to be protected from harm and abuse.
- All staff have a role in the prevention of harm and abuse and an equal responsibility to act immediately on any suspicion or disclosure that may indicate a child, young person or vulnerable adult is at risk of harm, either in the setting or in the community, taking into account contextual safeguarding, in accordance with statutory guidance.
- We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working to protect and safeguard children and young people.
- Whilst the setting will work openly with parents/carers as far as possible, it reserves the right to contact social care or the police, without notifying parents/carers if this is believed to be in the child or young person’s best interests.
- We will always act in the best interests of the child/young person and ensure that our decisions around safeguarding take a child-centred and coordinated approach.

Supporting Children, Young People and Vulnerable Adults

The setting will support children, young people and vulnerable adults:

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

- Promote a caring, safe and positive environment within the setting.
- Encourage self-esteem and self-assertiveness, through the curriculum and through positive relationships within the setting community.
- Respond sympathetically to any requests for time out to deal with distress and/or anxiety.
- Offer details of helplines, counselling, or other avenues of external support when needed and appropriate.
- Liaise and work in partnership with other support services and agencies involved in early help and the safeguarding of children, young people and vulnerable adults.
- Notify social care without delay if there is an immediate risk of significant harm.
- The setting recognises it plays a significant part in the prevention of harm to children, young people and vulnerable adults by providing learners with good lines of communication with Tutors and Teaching Assistants and an ethos of protection.
- Learners that experience challenges with verbal communication will be supported by appropriate communication strategies to ensure they are able to share with us any concerns.
- Staff will be heightened to any other non-verbal indicators of abuse.

The setting aims:

- Establish and maintain an ethos where children, young people and vulnerable adults feel safe and secure, are encouraged to talk and are always listened to.
- Include regular informal check-ins with children, young people and vulnerable adults using appropriate resources and communicational support when required.
- Ensure that all children, young people and vulnerable adults know they can access a trained adult in the setting whom they can approach if they are worried or in difficulty.

- Integrate safeguarding across the curriculum, including embedding and integrating focused opportunities when appropriate which equip children, young people and vulnerable adults with the skills they need to keep themselves and others safe, including online and to know to whom they should turn to for help. Additional resources can be requested for those children and young people that are on Child Protection Plans or vulnerable adults who have historically been subject to abuse. The Life Skills Project also has a wide range of expertise to support children and young people with Autism as well as other additional needs to understand their own needs and vulnerabilities to help safeguard themselves.
- Provide preventative information by creating a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobia and sexual violence and sexual harassment. However, given the needs of some children, young people and vulnerable adults supporting both the recipients and the initiators through a wider approach to social and behavior understanding and development, with an awareness of the possible impact on all influenced parties.
- Ensure all staff are aware of the setting's guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.

Professional Expectations, Roles, and Responsibilities

Role of The Life Skills Project

The Life Skills Project will ensure that:

- Details of the DSO and any DDSO's are available on posters at our Learning Centres.
- The Life Skills Project operates safer recruitment procedures in line with KCSIE 2023 which includes statutory checks on the suitability of staff to work with children, young people and vulnerable adults.
- All staff receive information about The Life Skills Project safeguarding arrangements, the setting's safeguarding statement, staff behaviour policy (code of conduct), Safeguarding and Child Protection policy, the role and name of the Designated Safeguarding Officer (DSO), and **Keeping Children Safe in Education 2023 part 1 and annex B**. All staff will sign to say they have read and understood it. This applies to the Governing body in relation to part 2 of the same guidance.

- All staff receive safeguarding and child protection training (including online safety) at induction in line with advice from **SSCP**. Additional training sessions will be made available to staff which aim to provide opportunities for further safeguarding updates for all staff, to ensure they have access to the relevant skills and knowledge to safeguard children, young people and vulnerable adults effectively.
- All members of staff are trained in online safety and reporting concerns. How to report a safeguarding concern forms part of this training.
- All members of staff maintain a zero-tolerance approach to sexual violence and sexual harassment as appropriate for the needs of the child/young person/vulnerable adult and in collaboration with any other learning that needs to take place.
- All staff have safeguarding and child protection awareness training, updated by the DSO as appropriate, to maintain their understanding of the signs and indicators of abuse.
- The Safeguarding and Child Protection Policy is made available via The Life Skills Project website and a paper copy is available upon request for parents/guardians/carers.
- All parents/guardians/carers are made aware of the responsibilities of staff members with regard to safeguarding and child protection procedures.
- The name of the designated members of staff for safeguarding and child protection and the DSO, are stated on The Life Skills Project website.

Staff Aims:

- Maintain an attitude of “It could happen here” with regards to safeguarding.
- Understand that safeguarding is “everyone’s responsibility”.
- Maintain a “zero-tolerance” approach to sexual violence and sexual harassment as appropriate for our students with complex social communication need and Autism, so that the most effective learning can take place to help both the initiator and recipient understand the situation so that further incidents can be avoided and prevented.
- Read and understand Part 1 of statutory guidance KCSIE (2023). Those working directly with children, young people and vulnerable adults will also be encouraged

to read Annex B.

- Become aware of the systems in place which support safeguarding including reading this Safeguarding and Child Protection Policy and the role of the DSO.
- Know and remember who the DSO and LADO are and how to contact them.
- Be aware of indicators of abuse and neglect understanding that children, young people and vulnerable adults can be at risk of harm inside and outside of the setting, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children, young people and vulnerable adults who may be in need of help or protection.
- Be able to identify learners with more complex needs and take action to keep them safe. Information or concerns about learners will be shared with the DSO where it includes those:
 - Who may need a social worker and may be experiencing abuse or neglect
 - Requiring mental health support
 - May benefit from early help
 - Where there is a radicalisation concern
 - Where a crime may have been committed
- Provide a safe environment in which children and young people can engage in activities and learning.
- Establish and maintain an environment where children, young people and vulnerable adults feel secure, are encouraged to talk and are listened to.
- Ensure children, young people and vulnerable adults know that there are Tutors and Teaching Assistants in the setting who they can approach if they are worried or have concerns. Ensuring those that have challenges with verbal communication can be supported by appropriate communication strategies to ensure they are able to share any worries or concerns. Staff will be encouraged to be heightened to any other non-verbal indicators of abuse.
- All staff are aware that mental health problems can, in some cases, be an indicator that a child, young person or vulnerable adult has suffered or is at risk of suffering abuse, neglect or exploitation.
- Ensure only appropriately trained professionals attempt to make a diagnosis of a mental health problem. Staff, however, may be well placed to observe children,

young people and vulnerable adult day-to-day and identify those whose behavior suggests that they may be experiencing a mental health problem or be at risk of developing one.

- Take immediate action if they have a mental health concern about a child, young person or vulnerable adult that is also a safeguarding concern, following the Safeguarding and Child Protection Policy and procedures.
- Support opportunities within learning for children, young people and vulnerable adults to develop the skills they need to assess and manage risk appropriately and keep themselves safe.
- Attend training in order to be aware of and alert to the signs of abuse and neglect.
- Know how to respond to a child or young person who discloses harm or abuse following training of 'Working Together to Safeguard Children' (2018), and 'What to do if you are worried a child is being abused' (2015).
- Communicate their concerns appropriately to the DSO if they are worried that a child, young person or vulnerable adult is being abused and report these to the DSO immediately that day.
- Be prepared to refer directly to the Children's Single Point of Access (C-SPA), and the Police if appropriate, if there is a risk of significant harm and the DSO is not available.
- Follow the allegations procedures, as set out in this policy and KCSIE 2023, if the disclosure is an allegation against a member of staff, supply staff, volunteer or contactor.
- Report low-level concerns (as defined in KCSIE 2023) about any member of staff/supply staff/volunteer or contractor to the DSO in line with **Surrey LADO guidance**.
- Provide support for children, young people and vulnerable adults subject to early help, child in need or child protection and be involved where appropriate, in the implementation of individual plans to further safeguard vulnerable learners and understand their progress and attainment and maintain a culture of high aspirations for this cohort.
- Listen positively and try to reassure a child, young person or vulnerable adult if approached by them with a safeguarding concern.

- Not to promise complete confidentiality and should explain that they need to pass information to other professionals to help keep the child/ young person/vulnerable adult and/or other children/young people/ vulnerable adults, safe. The degree of confidentiality should always be governed by the need to protect the child/young person/vulnerable adult.
- Notify the DSO or their DDSO's of any child on a child protection (CP) plan or child in need (CIN) plan who has unexplained absence.
- Understand early help and be prepared to identify and support children, young people and vulnerable adults who may benefit from early help. Liaise with other agencies that support children, young people and vulnerable adults who can provide early help.
- Be aware that children, young people and vulnerable adults may not feel ready or know how to tell someone they are being abused, exploited, or neglected, and/or they may does not recognise these experiences as harmful. This could be due to their vulnerability, disability and/or sexual orientation or language/verbal communication barriers.
- Be mindful that the Teacher Standards states that teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties. Whilst The Life Skills project provides specialist tuition and learning and SEN support services, much of the content within these standards remain relevant to its practice.

The Designated Safeguarding Officer (DSO):

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

- Hold the lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems in place) in the setting, this responsibility is not able to be delegated.
- Liaise with the Surrey Country Council and work in partnership with other agencies in line with Working Together to Safeguard Children (2018).
- Where necessary contact Surrey's Child Protection Consultation Line for advice and support (0300 470 9100 option 3).

- Manage and submit a Request for Support Form for a child if there are concerns about suspected harm or abuse, to the C-SPA, and act as a point of contact and support for setting staff. Requests for support should be sent securely by email to cspa@surreycc.gov.uk using the **Request for Support Form** urgent referrals should be made by telephone 0300 470 9100 (and ask for the priority line).
- Report concerns that a child or young person may be at risk of radicalisation or involvement in terrorism, use the **Prevent Referral Form** to refer cases by e-mail to preventreferrals@surrey.pnn.police.uk . If the matter is urgent then Police must be contacted by **dialing 999**. In cases where further advice from the Police is sought **dial 101** or **01483 632982** or **01865 555618** and ask to speak to the Prevent Supervisor for Surrey. The DfE has also set up a dedicated telephone helpline for staff and Governors committees to raise concerns around Prevent (**020 7340 7264**).
- Refer cases where a crime may have been committed to the Police as required. NB: NPCC- **When to call the police** should help DSLs understand when they should consider calling the Police and what to expect when they do.
- Liaise with the “case manager” and Local Authority Designated Officer (LADO) for child protection concerns in cases which concern a member of staff/supply staff/contractor or a volunteer.
- Follow relevant DfE guidance and KCSIE 2023 on ‘Child on Child abuse’ when a concern is raised that there is an allegation of a child abusing another child within the setting.

When there has been a report of sexual violence, make an immediate risk and needs assessment. Additionally, where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis and will be put in place as required.

Be available during term time (during setting hours) for staff in setting to discuss any safeguarding concerns. Appropriate and adequate cover arrangements will be arranged by the DSO when necessary, appropriate and required.

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

Ensure that the names of the DSO and DDSO's, are clearly advertised, with a statement explaining the setting's role in referring and monitoring cases of suspected abuse.

Encourage and promote a culture of listening to children and young people and taking account of their wishes and feelings, amongst all staff.

Access training and support to ensure they have the knowledge and skills required to carry out the role.

Understand the lasting impact that adversity and trauma can have, including on the children and young people's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting positive educational outcomes.

Understand and support the settings delivery with regards to the requirements of the Prevent duty and provide advice and guidance to staff on protecting children from radicalisation.

Liaise with relevant staff, DDSO's on matters of safety and safeguarding and consult Surrey's Effective Family Resilience document to inform decision making and liaison with relevant agencies.

Be alert to the specific needs of children in need and young carers.

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

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

Taking lead responsibility for promoting positive educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at the setting.

Keep accurate records that include all safeguarding concerns.

Ensure each member of staff has access to, and understands, the settings Safeguarding and Child Protection policy procedures.

Ensure that the Safeguarding and Child Protection Policy is reviewed annually, and the procedures and implementation are updated and reviewed regularly.

Promote supportive engagement with parents, guardians and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.

Help promote positive educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and necessary and appropriate staff.

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

(Duties are further outlined in KCSIE (2023, Annex C)

The Deputy Designated Safeguarding Officer(s):

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

Be trained to the same standard as the DSO as per their job description/expectations.

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

In the absence of the DSO, carry out the activities necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the DSO the DDSO will assume all of the functions of the DSO.

Confidentiality, Sharing and Withholding Information

All matters relating to safeguarding and child protection will be treated as confidential and only shared as per the **‘Information Sharing Advice for Practitioners’ (DfE 2018) guidance**, including compliance with General Data Protection Regulation (GDPR).

Information will be shared with staff within the setting who ‘need to know’.

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

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

Reporting and Responding to Safeguarding Concerns

The following procedures apply to all staff working in the setting and will be covered in training to enable staff to understand their role and responsibility.

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

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

All staff are aware that very young children and those in our setting that do not have verbal communication will be supported by appropriate communication strategies and devices to ensure they are able to share with us any worries or concerns. Staff will have a heightened awareness to any other non-verbal indicators of abuse.

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

Make an initial report of the information related to the concern as soon as possible to the DSO, the DDSO or LADO.

details of:

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

The safeguard concern will be reported to the DSO and DDSO's immediately.

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

In the absence of the DSO or DDSO, staff must be prepared to refer directly to C-SPA (and the Police if appropriate) if there is the potential for immediate significant harm or contact the consultation line at the C-SPA for support and advice.

Following a report of concerns the DSO must:

Using the **Effective Family Resilience of Levels of Need** document decide whether or not there are sufficient grounds for suspecting harm, in which case a request for support must be made to the C- SPA and the Police if it is appropriate.

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

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

Where there are doubts or reservations about involving the child/young person's family, the DSO 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 or young person's views should also be considered.

If it is suspected that a child or young person is suffering, or is likely to suffer, harm or abuse the DSO 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 or young person needs urgent medical attention and there is suspicion of abuse the DSO should take the child or young person to the accident and emergency unit at the nearest hospital, having first notified the C-SPA. The DSO 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 or young person requires urgent hospital attention.

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

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

The DSO should also be made aware.

Dealing with Safeguarding Concerns

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

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

appropriate to their age, understanding and preference. Students with limited verbal communication will be supported by appropriate communication strategies and devices to ensure they are able to share with us any worries or concerns. Staff will be heightened to any other non-verbal indicators of abuse.

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

Guiding principles:

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

What happens next?

It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. The member of staff should be informed by the DSO what has happened following a report being made.

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

Safeguarding concerns and allegations made about staff, including volunteers and contractors

Surrey's LADO procedure will be followed where it is alleged that anyone working in the setting that provides education for children or young people under 25 years of age, including supply staff, volunteers and contractors or another adult who works with children or young people has:

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

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

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

In dealing with allegations or concerns against an adult, staff must without delay: **Inform a Company Director**

If an allegation is made against a Company Director, the concerns need to be raised with the LADO.

There may be situations when a Company Director will want to involve the Police immediately if the person is deemed to be an immediate risk to children or young people or there is evidence of a possible criminal offence.

Once an allegation has been received by a Company Director 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 setting 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 setting to seek guidance in following procedures set out in part 4 of KCSIE (2023) 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 setting 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 setting’s values and expected behaviour set out in the staff code of conduct are lived, monitored and reinforced constantly by all staff.

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

Reports should be made to the DDSO in the relevant department in a timely manner. If the DDSO 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.

What is child abuse?

The following definitions are taken from Working Together to Safeguard Children (2018). In addition to these definitions, it should be understood that children can also be abused by being sexually exploited, honour-based violence, forced marriage or female genital mutilation.

Forms of Abuse and Neglect

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

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

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

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

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of

sexual abuse, as can other children.

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

The setting use the **Graded Care Profile 2** tool to support better identification and intervention in cases of neglect. The Surrey **Neglect Risk Assessment Tool** is used to support with the initial identification of neglect.

For further information on indicators of abuse can be accessed via **NSPCC**.

Sexual Violence and Sexual Harassment Between Children in the Setting

Child-on-Child Abuse: Child on Child abuse is taken extremely seriously in our setting. The safety of every child and young person is paramount and we recognise that the perception and experience of the recipient can be of peer on peer abuse and having a significant impact even when the intent of the initiator is perhaps simply around the predictability of the response. Therefore, we will always seek to support both the recipients and the initiators through our wider approach to behaviour management and development, with an awareness of the possible impact upon the children/ young people.

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

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

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

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying) abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery) **UKCIS guidance: Sharing nudes and semi-nudes advice for education settings**
- upskirting / down blousing, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

We believe that all children have a right to attend our setting and learn in a safe environment. Children and young people should be free from harm by adults and other children/ young people at The Life Skills Project.

We recognise that children and young people are capable of abusing other children and their peers and this will be dealt with under our child protection policy and in line with KCSiE (2023).

We are clear that sexual violence and sexual harassment is not acceptable. However, given the needs of our children and young people we will always seek to support both the recipients and the initiators through our wider approach to behaviour management and development, with an awareness of the possible impact on both children or young people.

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

- Making clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It will never be passed off as “banter”, “just having a laugh”, “a part of growing up” or “boys being boys”. We believe that failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children and young people accepting it as normal and not coming forward to report it.
- Recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported.
- Investigating physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts appropriately taking into consideration the needs of our students and the behavioural, sensory seeking or attention seeking causes for some of the actions without the full understanding of their actions.

Prevention

- Taking a whole setting approach to safeguarding and child protection
- Providing training to staff
- Providing a clear set of values and standards, underpinned by the setting’s

behaviour policy and pastoral support; and by a planned programme of evidence-based content delivered through the curriculum.

- Engaging with specialist support and interventions.

Responding robustly to reports of sexual violence and sexual harassment

Children or young people making any report of sexual violence or sexual harassment including “upskirting” (The Voyeurism Offences Act 2019) will be taken seriously, kept safe and be well supported. If the report includes an online element staff will be mindful of the [Searching, screening and confiscation](#) guidance. The key consideration is for staff not to view or forward illegal images of a child or young person. The guidance provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection

Risk Assessment

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

The risk assessment will consider;

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

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

Action:

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the setting should not be downplayed and should be treated equally seriously. A victim should never be given

the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

The DSO will consider:

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

Confidentiality:

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

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

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

Options:

- Manage internally
- Early help intervention
- Request for support to the C-SPA
- Report to the Police (generally in parallel with a request for support to the C-SPA)

All concerns, discussions, decisions and reasons for decision will be recorded.

Ongoing Response:

- The DSO will manage each case individually and will ensure the risk assessment is reviewed regularly with relevant partner agencies, for example the Police and social care.
- Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, settings should be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately.
- Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim.
- The DSO will consider how best to keep the victim and perpetrator a reasonable distance apart on the setting premises and on transport where appropriate.
- Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the setting will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and may lead to the view that allowing the perpetrator to remain in the same setting would seriously harm the education or welfare of the victim (and potentially themselves and other children).
- Where a criminal investigation into sexual assault leads to a conviction or caution, the setting will, if it has not already, consider any suitable sanctions in light of

their behaviour policy, which may include consideration of permanent exclusion. Where the perpetrator is going to remain at the setting, the Headteacher/Principal should continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on setting premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

- The victim, alleged perpetrator and any other children and adults affected will receive appropriate support and safeguards on a case-by-case basis.
- The setting will take any disciplinary action against the alleged perpetrator in accordance with the setting behaviour policy.
- The setting recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.
- The setting will consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.
- The setting recognises that children who have experienced sexual violence display a wide range of responses to their experiences including clear signs of trauma, physical and emotional responses, or no overt signs at all.

Physical Abuse

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

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

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

Sexual violence and sexual harassment towards staff in Specialist Learning Settings with Children, Young People and Vulnerable Adults Who Have Special Educational Needs (SEND)

As indicated previously, where sexualised behaviour occurs, the initiator is often struggling to understand social situations and is looking for a specific and predictable response. Therefore, children can exhibit these behaviours towards staff too.

The Life Skills Project never tolerates these behaviours in the long term, but will look to support the initiators to learn alternatives and that the behaviours being used are unacceptable

The Life Skills Project is aware that and accepts there are some staff who find that they are unable to cope with students who are exhibiting such behaviours, even if they are aware of the difference of intent and understanding, and have been provided with appropriate safeguards.

Action:

A Company Director, in order to safeguard these staff, will risk assess:

- The wishes of the staff recipient and the impact upon them.
- The nature of the incident including whether a crime has been committed and the harm caused.
- Any previous incidents.
- Ongoing risks.
- Other related issues or wider context.

Options:

- Manage internally
- Look to support changes

Harmful Sexual Behaviour (HSB)

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent.

Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. HSB can occur online and/or face-to-face and can

also occur simultaneously between the two. HSB will be considered in a child protection context.

The settings response to HSB:

We will use:

The **Brook Traffic Light Tool** uses a traffic light system to categorise the sexual behaviours of children it can be used to help professionals:

- Make decisions about safeguarding children and young people
- Assess and respond appropriately to sexual behaviour in children and young people
- Understand healthy sexual development and distinguish it from harmful behaviour. By categorising sexual behaviours, the setting can work with other agencies to the same standardised criteria when making decisions and can protect children with a multi-agency approach.

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

Anti-Bullying/Cyberbullying

Our policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. Bullying is a very difficult concept for a large number of cohorts with special educational and additional needs and although it is most definitely not condoned it is managed more frequently through our behaviour policy. There are a number of pupils who are able to recognise and understand what bullying is and it is recognised that it must always be acknowledged and addressed with a pupil where they perceive that bullying has occurred.

It is important that these are fully investigated as it is clear that at times within the context of the school that we are in pupils perceptions of an incident can be confused.

Children and young people with special educational and additional needs can sometimes struggle with understanding social concepts. We are mindful that we may need to provide careful teaching to enable them to understand situations and issue correctly.

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

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

Safety/Cybercrime

The Life Skills Project has an online safety policy which empowers us to protect and educate children, young people, vulnerable adults, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. The setting also has a clear policy on the use of mobile and smart technology (including wearable technology).

We have a clear do's and don't's document in relation to the use of mobile phones.

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

Children and young people are taught about online safety at some points within the curriculum and all staff receive online safety training which is regularly updated. The setting's online safety co-ordinator is Liam Kelly.

The setting will follow the guidance around **harmful online challenges and online hoaxes** when supporting children and sharing information with parents/carers.

Children and young people 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 DSO 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.

Radicalisation, Extremism and Terrorism

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

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

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

Terrorism is 'an action that endangers or causes serious violence to a person/people; causes serious violence to a person/people; causes serious damage to property; or seriously interferes with an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.'

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

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

It is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSO making a Prevent referral.

The DSO should report concerns that a child may be at risk of radicalisation or involvement in terrorism, use the **Prevent Referral Form** to refer cases by e-mail to preventreferrals@surrey.police.uk.

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

To speak to the Prevent Supervisor for Surrey, email:

claire.mcdonald@surrey.police.uk

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

Opportunities are provided in the curriculum to enable children to discuss issues of religion, ethnicity and culture and the setting follows the **Promoting Fundamental British Values Through SMSC**.

A Company Director and the settings DSO will assess the level of risk within the setting and put actions in place to reduce that risk. Risk Assessment may include, due diligence checks for external speakers and private hire of facilities, anti-bullying policy and other issues specific to the setting's profile, community and philosophy.

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

Further information and a list of such indicators can be found at **Radicalisation and Extremism - Examples and Behavioural Traits (educateagainsthate.com)**

Domestic Abuse

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

Domestic Abuse Act received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The

definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards

must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

All children and young people can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, a child or young person may blame themselves for the abuse or may have had to leave the family home as a result.

The setting is enrolled onto the Operation Encompass scheme, a joint project between Surrey Police, Surrey Domestic Abuse Service and Surrey settings. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the DSO in the setting before the child or children arrive at the setting the following day. This ensures that the setting 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.

Homelessness

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

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

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

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

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

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

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

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

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

Child Criminal Exploitation (CCE)

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

County lines is a term used to describe gangs and organised criminal networks involved

in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. Children or young people are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children and young people 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.

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

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

Serious Violence

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

- increased absence from the setting
- a change in friendships or relationships with older individuals or groups
- a significant decline in presentation or engagement in sessions
- signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries
- Unexplained gifts or new possessions could also indicate that children/ young people have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

Staff are aware that violence can often peak in the house just before and after the children / young people attend the setting which includes travelling to and from the setting.

Modern Slavery

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

Female Genital Mutilation (FGM)

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

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

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

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

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

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

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

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

Forced Marriage

A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual, and emotional pressure. It may also involve physical or sexual violence and abuse.

Forced marriage is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.

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

Setting staff should never attempt to intervene directly as a setting, representative of The Life Skills Project or through a third party. Contact should be made with the C-SPA and/or the **Forced Marriage Unit 200 7008 0151**

So-called 'Honour'-based abuse (HBA)

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

HBA might be committed against people who:

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

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

One Chance Rule

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

The setting 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.

Private Fostering Arrangements

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

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

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

Looked After Children (LAC) and Previously Looked After Children (PLAC)

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

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

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

Children with Special Educational Needs and Disabilities (SEND) or Health Issues

Children with SEND or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. These can include:

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

Any reports of abuse will require close liaison with the DSO. The setting will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place

Children Missing Education (CME)

All children and young people are entitled to an efficient, full-time education which is

suitable to their age, ability, aptitude, and any diagnosis they may have. The Life Skills Project provides activities and learning opportunities in addition to full-time education.

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

Where possible the setting will hold more than one emergency contact number for each child or young person.

Pupils Missing Out on Education (PMOOE)

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

The setting will ensure that parents/carers (and the Local Authority where the child has an Education Health Care Plan (EHCP) are given clear information about the setting as an additional, or alternative provision.

Attendance and Behaviour

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

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

The setting will work in partnership with Surrey Police and other partners for reporting children that go missing from the setting site during the setting session or sessions. Staff will be alert to signs of children at risk of travelling to conflict zones, female genital

mutilation and forced marriage.

The DSO and DDSO's will meet to discuss any areas of attendance that need clarification.

Restrictive Physical Intervention

We acknowledge that staff must not use physical intervention, even as a last resort. The setting adopts a preventative approach whereby all staff seek to mediate and manage children and young person's behavior, prior to any such escalation occurring.

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

Whistleblowing

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

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

If it becomes necessary to consult outside the setting, they should speak in the first instance, to the 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](https://www.navexglobal.com) website.

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

Additional Resources

Surrey Safeguarding Children Partnership webpages

Surrey Education Services (surreycc.gov.uk) – Safeguarding Resources Hub

Graded Care Profile 2

NSPCC | The UK children's charity |

NSPCC CEOP ThinkuKnow

Anti Bullying Alliance

Childnet International

Safer Internet Centre

Contextual Safeguarding Network

Lucy Faithfull Foundation

Appendix one:

Sexual Violence

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

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the

penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (NOTE- Settings should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (NOTE– this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party).

What is consent?

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

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

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

Sexual Harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of the setting. When we reference sexual harassment, we do so in the context of child-on-child sexual

harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- sexual “jokes” or taunting
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes. Settings should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim.
- displaying pictures, photos or drawings of a sexual nature
- upskirting (this is a criminal offence), and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of U18s is a criminal offence.
UKCIS Sharing nudes and semi-nudes: advice for education settings
 - sharing of unwanted explicit content
 - sexualised online bullying
 - unwanted sexual comments and messages, including, on social media
 - sexual exploitation; coercion and threats, and
 - coercing others into sharing images of themselves or performing acts they're not comfortable with online.

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