SUTTON GRAMMAR SCHOOL

SAFEGUARDING POLICY

The Board of Trustees and staff at Sutton Grammar School are committed to providing a safe and happy learning environment, promoting equality and diversity and ensuring the well-being of all members of the school community. It is their clear intention to promote good behaviour and to exercise their responsibilities in ensuring the safeguarding and welfare of all students and staff within this community.

Staff member with responsibility:	Kate Ross, Deputy Head
Nominated trustee:	Gina Bannerman
Reviewed by:	Board of Trustees
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Safeguarding Policy Statement:
At Sutton Grammar School we are committed to safeguarding children and young people, and we expect everyone who works in our school to share this commitment. Schools and their staff are an important part of the wider safeguarding system for children. This system is described in the statutory guidance Working Together to Safeguard Children.

Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families has a role to play. To fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, always, what is in the **best interests** of the child.

No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

Safeguarding and promoting the welfare of children is defined as:

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

All staff should remain vigilant and maintain an 'it could happen here' mindset.

The procedures contained in this policy apply to all staff and governors and are consistent with those of:

Keeping Children Safe in Education 2026

Working Together to Safeguard Children 2026

Children's Wellbeing and Schools Act 2026

Crime and Policing Act 2026

Sutton Local Safeguarding Children Partnership.

London Safeguarding Children's Procedures

The London Children Safeguarding Partnership Threshold - Continuum of Need Matrix

Whole school approach to safeguarding

We take a whole-school approach to safeguarding. This means that safeguarding and child protection are at the forefront of, and underpin, everything we do. Pupils and students are listened to and feel safe. We have created a culture of vigilance where pupils' welfare is actively promoted. Pupils are listened to and feel safe.

We know children learn best when they are healthy, safe and secure, when their individual needs are met and when they have positive relationships with the people caring for them. We aim to have a school which is welcoming, safe and stimulating and where children are able to enjoy learning and grow in confidence. All necessary steps are taken to keep children safe and well.

Pupils are taught about safeguarding and how to keep themselves and others safe, including online. Our preventative education programme is taught through the school's inclusive and high-quality sex and health education (RSHE) curriculum and our Personal Development lessons . This curriculum helps to prepare pupils for the opportunities and responsibilities of adult life and support prevention of harms by helping young people understand and identify when things are not right. Preventative education is also reinforced through assemblies and workshops, and is fully inclusive and age appropriate. As demonstrated through our school ethos, behaviour policy and preventative education programme, we take a zero tolerance approach to all forms of sexism, racism, misogyny/misandry, homophobia, biphobia, sexual violence/harassment, derogatory behaviour or other forms of physical violence and conflict. We promote an inclusive, anti-discriminatory culture where racism, and other forms of discriminatory behaviour are recognised, challenged and addressed as part of our safeguarding responsibilities.

Role	Name	Contact
Designated Safeguarding Lead	Ms Kate Ross	kateross@suttongrammar.school T: 020 8661 4501 M: 07501 938707
Deputy DSL	Mrs Kerry Lapsley	kerrylapsley@suttongrammar.school T: 020 8642 3821 ex222
	Mr Alex Marsh	alexmarsh@suttongrammar.school T: 020 8642 3821 ex 205
	Mr Chris Robson	chrisrobson@suttongrammar.school T: 020 8642 3821 ex 207
Safeguarding Governor	Ms Gina Bannerman	ginabannerman@suttongrammar.school

Online Safety Lead	Mr Alex Marsh	As above
Children Looked After Lead	Ms Kate Ross	As above
Young Carer Lead	Mrs Kerry Lapsley	As above

Key External Contacts:

Organisation	**Contact**
Children's First Contact Service (CFCS)	T: 020 8770 6001 (9am-5pm) or 020 8770 5000 (out of hours Emergency Duty Team)
Local Authority Designated Officer (LADO)	T: 020 8770 4776 lado@sutton.gov.uk
NSPCC Whistleblowing Helpline	T: 0800 0280285 (8am-8pm Monday to Friday) help@nspcc.org.uk
CAMHS Spa – Sutton	0203 513 3800 (Monday to Friday 9am-5pm) 0800 208 8000 (out of hours)
Prevent Lead	Ammar Bhatty Ammar.bhatty@sutton.gov.uk

If you believe a child is **at immediate risk** of significant harm or injury, you must call the police on **999**.

PART ONE: What All Staff Should Know, Look Out For and Do

All staff must have read and understood:

- Part One of Keeping Children Safe in Education 2026
- **Working Together to Safeguard Children 2026**
- **What to do if you're worried a child is being abused: advice for practitioners**
- Safeguarding Policy (including Child Protection procedures and the procedures to deal with child-on-child abuse)
- Online Safety Policy
- Behaviour, Rewards and Sanctions Policy
- Attendance Policy
- Staff Code of Conduct including low level concerns, allegations against staff and whistleblowing
- Mobile Phone Policy

All staff must ensure they know:

- Who the Designated Safeguarding Lead and Deputies are and what their roles are
- How to follow the school's reporting and record-keeping procedures
- What to do if a child tells them they are being abused, exploited, or neglected
- The signs and indicators of abuse and neglect and how to report concerns

Links to other guidance

This policy and procedure also accords with other school policies and statutory guidance – a full list can be found in Appendix D.

The Role of School Staff

All staff have a responsibility to provide a safe environment in which children can learn. Because of their day-to-day contact with children, school staff are best placed to identify concerns early, provide help for children and prevent concerns from escalating. All staff should be prepared to identify children who may benefit from Family Help. Family Help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

The Teachers' Standards 2012 state that teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

All staff must be **'professionally curious'** - this means maintaining an open mind and asking questions to understand what is happening to a child. All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or are being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the designated safeguarding lead (or a deputy) if they have concerns about a child.

All staff should recognise that children may experience prejudice-based harm, including racism, faith-based prejudice, and other forms of discrimination. Such experiences may affect a child's welfare, wellbeing, mental health, and willingness to seek help. Staff should be alert to the signs and impact of prejudice-based harm and ensure that concerns shared with the designated safeguarding lead (or a deputy).

It is also important that staff determine how best to build trusted relationships which facilitate communication with children and young people.

Read: What to Do if You're Worried a Child is Being Abused

What To Do If You Have Concerns About A Child

Staff working with children are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child.

If staff notice any indicators of abuse/neglect or signs that a child may be experiencing a safeguarding issue, they should discuss their concerns **immediately** with the DSL or DDSL and then details of their concern should be recorded on the school's online safeguarding reporting system – CPOMS- as soon as possible.

If the DSL or one of the DDSLs is not available, staff should speak to a member of the SLT and/or take advice from children's social care.

Once concerns have been reported, the school will decide whether to:

• manage any support for the child internally via the school's own pastoral support processes, including considering where doing so does not place the child at additional risk, whether the designated safeguarding lead (or a deputy) should inform parents or carers to further support the child's wellbeing,
• undertake a family help assessment, or
• make a referral to statutory services, for example as the child could be in need, is in need or is suffering, or likely to suffer harm.

Where there is a safeguarding concern, leaders will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. (KCSIE 2026, para 120)

Staff should not assume a colleague, or another professional will take action and share information that might be critical in keeping children safe. Early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care (such as a child in need or a child with a protection plan). Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers supports staff who have to make decisions about sharing information. This advice includes the seven golden rules for sharing information and considerations with regard to data protection laws.

Safeguarding Concern Response Flowchart

All staff are expected to know what to do if a child tells them they are being abused, exploited, or neglected. Staff are required to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the designated safeguarding lead (or a deputy) and local authority children's social care. Staff should never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.

Staff should reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse and/or neglect. Nor should a victim ever be made to feel ashamed for making a report.

SAFEGUARDING CONCERN — RESPONSE FLOWCHART For any member of staff who sees, hears or is told something that worries them about a child's welfare
CONCERN ARISES — staff member notices signs, receives a disclosure, or observes something worrying

1	**RECEIVE:** Listen and Observe. **If a child is disclosing:** listen calmly without interrupting, do NOT promise confidentiality, do NOT ask leading questions, do NOT suggest words. Let the child speak at their own pace. Remain calm. Do not show shock or disgust. **Ask OPEN questions:** Who? What? Where? When? How do you feel? **T – Tell me what you mean** **E - Explain what you mean** **D- Describe what you mean**

2	**RECORD IMMEDIATELY – write in pen** • **Factually using the child's exact words. Do NOT paraphrase.** • **Describe what you saw including the child's demeanour. Be specific and factual.** • **Note: date, time, location, who was present, sign and date and hand to DSL and** • **Record on the school's online reporting system** – CPOMS

3	**REPORT TO DSL -** Do not delay • Find and tell the DSL or a member of the safeguarding team immediately • Do NOT wait until end of day. • Do NOT speak to parents without DSL advice.

Is the child in IMMEDIATE danger right now?

YES — IMMEDIATE DANGER → Call 999 immediately → Call CFCS on 020 8770 6001/5000 → Stay with the child until help arrives	**NO — NO IMMEDIATE DANGER** → DSL assesses the concern. → Do not leave child alone if distressed. → Proceed to Step 4.

4	**DSL ASSESSES THE CONCERN** DSL reviews online reporting tool history, gathers information, considers all known context. Is this a child protection concern (CFCS/police threshold) or an Early Support and Family Help need? If unclear, DSL seeks telephone advice from CFCS or Gill Bush (Cognus) before deciding.

Does this meet the threshold for referral to Children's Social Care or Police?
See: Sutton LSCP Threshold Guidance Document

YES — REFER TO CFCS / POLICE → DSL contacts CFCS: 020 8770 6001. → cfcs@sutton.gov.uk → Police 101 or 999 if criminal. → Parents informed unless this increases risk.	**NO — Universal Support or Early Support/Family Help** → Internal pastoral support / monitoring. → DSL puts in a referral to CFCS for Early Support/Family Help following Sutton LSCP Threshold Guidance → TAC if multi-agency needed. → Decision recorded on CPOMS.

5	**RECORD OUTCOME ON SCHOOL'S ONLINE REPORTING SYSTEM** – CPOMS All decisions, actions, referrals and outcomes recorded on CPOMS on the same day. Include CFCS reference number if referred. Review dates set. Parents notified unless contra-indicated. The staff member who raised the concern is informed of outcome.

ONGOING MONITORING & REVIEW — DSL reviews all open cases; escalate immediately if concern increases

Support Before Statutory Intervention

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. **All school and college staff should be particularly alert to the potential need for additional support for a child who**:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is pregnant and or is a parent themselves
- has exhibited early signs of abusive, violent and/or harmful behaviours
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines (see Appendix B)
- is frequently missing/goes missing from education, home or care
- has been repeatedly removed from the classroom, experienced multiple suspensions, is on a part-time timetable, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
- is at risk of exploitation, modern slavery, trafficking, including criminal or sexual exploitation
- is at risk of being radicalised into terrorism
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of honour or faith-based abuse such as Female Genital Mutilation or Forced Marriage, and
- is a privately fostered child.

(Para. 18, Keeping Children Safe in Education 2026)

Universal Support Services and Community Based Intervention

For children with no additional needs, all their health and developmental needs will be met by universal services, including Family Hubs, community groups and parenting programmes, which can be accessed **without a referral**. These are children who consistently receive child focused care giving from their parents or carers. Professionals can signpost families to universal support services in their local area, such as:

- Family Hubs | Sutton Information Hub
- Together for Sutton. - Together for Sutton
- Sutton Local Safeguarding Children Partnership - Parents & Carers

Community Based Early Help Assessment

If children do not require the support of statutory children's services, the designated safeguarding lead (or a deputy) will lead the liaison with other agencies and setting up an inter-agency assessment as appropriate.

Staff may be required to support other agencies and professionals in carrying out this assessment, in some cases acting as the lead practitioner. Further guidance on effective assessment of the need for Family Help can be found in Working Together to Safeguard Children. Any such cases will be kept under constant review and consideration given to a referral to local authority children's social care for assessment for statutory services if the child's situation does not appear to be improving or is getting

worse. Alternatively, qualified lead practitioners (i.e. not a social worker) who may lead assessments before statutory intervention can continue to lead work with families up to and including section 17.

Early Support and Family Help is a spectrum of support for children with additional needs, requiring coordination by a lead professional for multi-agency support. This includes children requiring specialist services (Section 17) to maintain a satisfactory level of health or development. See Sutton LSCP Threshold Guidance Document

This work is underpinned by the Government Supporting Families Criteria and Sutton's Families First Approach outlined on p.8-9 of the Sutton LSCP Threshold Guidance.

The Early Support end of the spectrum includes children:

- Who may be **vulnerable** and showing **early signs of abuse and/or neglect**;
- Whose needs are not clear, not known or not being met
- Who may be subject to adult focused care giving. These are children who require a lead professional for a co-ordinated approach to the provision of additional services such as family support services, parenting programmes and Family Hubs centres, **with family consent.**

The Family Help end of the spectrum includes children:

- Who **require specialist services** in order to achieve or maintain a satisfactory level of health or development or to prevent significant impairment of their health and development and/or who are disabled. They may require longer term intervention from specialist services
- Whose needs, in some cases, may be secondary to the adult's needs

The London Children Safeguarding Partnership Threshold - Continuum of Need Matrix helps professionals identify when a child may need additional support to achieve their full potential. It provides information on the levels of need and gives examples of some of the factors that may indicate a child or young person requires additional support. See Column 2 'Targeted Early Help.'

Statutory Children's Social Care Assessments and Services

Where a child is suffering, or is likely to suffer from harm, a referral to local authority children's social care and if appropriate the police, must be made immediately. Referrals will follow the local referral process.

Risks Outside of the Home

Local authority children's social care assessments will consider where children are being harmed in contexts outside of the home, therefore the school will ensure that it provides as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

*Contextual Safeguarding 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. (*About us | Contextual Safeguarding)

Children In Need

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled.

The London Children Safeguarding Partnership Threshold - Continuum of Need Matrix provides examples of when a child may be classed as a Child in Need – see Column 3, Child in Need.

Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

Details of Sutton's protocols for assessment and support can be found: Sutton Local Safeguarding Children Partnership - LSCP Protocols and **LBS Procedures.**

Children Suffering Or Likely To Suffer Significant Harm

Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment. This includes all forms of abuse, neglect and exploitation. Details of what the local authority will do can be found here**: Sutton CFCS Operating Protocol.**

The London Children Safeguarding Partnership Threshold - Continuum of Need Matrix provides examples of significant harm - see Column 4, Child Protection/Significant Harm.

Actions for the referrer: The referrer should follow up if information is not forthcoming. If social workers decide to carry out a statutory assessment, staff should do everything they can to support that assessment, supported by the designated safeguarding lead (or a deputy) as required.

If, after a referral, the child's situation does not appear to be improving, and/or there is strategic disagreement between agencies, the referrer should consider following local escalation procedures to ensure their concerns have been addressed and, most importantly, that the child's situation improves. See Sutton LSCP Escalation Policy for the process to be followed where a disagreement is not resolved at management levels.

Abuse, Neglect and Exploitation

All staff should be aware of the 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 and neglect so that staff are able to identify cases of children who may be in need of help or protection.

Abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.

Extra Familial Harms

All staff, but especially the designated safeguarding lead (and deputies) should 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 abuse (including harassment and exploitation)
- domestic abuse in their own intimate relationships (teenage relationship abuse - including physical, sexual, emotional abuse, and stalking)
- criminal exploitation (including financial exploitation)
- serious youth violence
- county lines (see Appendix B)
- Radicalisation

Online Abuse
All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline.

Children can also abuse other children online, this can take the form of:

- abusive, harassing, and misogynistic/misandrist messages,
- the non-consensual making or sharing of nudes or semi-nudes, especially around chat groups,
- the sharing of abusive images and pornography to those who do not want to receive such content.

Actions:
In all cases, if staff are unsure, they should always speak to the designated safeguarding lead or a deputy.

Indicators Of Abuse and Neglect and Required Actions
Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. 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.**

Outlined below are the main types of abuse, neglect and exploitation, as defined in *Part One of Keeping Children Safe in Education 2026.* A full list of specific forms of abuse and safeguarding issues can be found in **Appendix B.**

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.

Signs:
- Marks, bruises, burns, scalds, bite marks, scars– note size, shape, colour, location on body

- Child wearing clothes to hide parts of their body or reluctance to get changed for PE
- Changes in behaviour: fear of certain individuals, flinching when approached or touched

A full list of signs can be found at: **Protecting children from physical abuse | NSPCC Learning**

Actions:
Record any marks on a Body Map – do **not** take photos, do **not** ask the child to remove any clothing.
If a child **living in Sutton discloses they have been physically chastised:**

1. Inform the DSL
2. DSL to unpick by asking the child open questions
3. Do not contact or speak to parents about it
4. DSL must phone CFCS and follow their guidance on next steps

Emotional Abuse

Emotional abuse is 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 **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.

Signs:

- Low self-esteem, lacking in confidence and being withdrawn/quiet
- Struggling to focus or concentrate
- Struggling to make or maintain friends, lack social skills
- Displaying aggressive behaviour

For a full list of signs, see: Preventing emotional abuse | NSPCC Learning

Actions:
Speak to the DSL and record your observations and concerns on CPOMS.

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.

- **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.
- Children can be sexually abused within the family, an institution or a community setting, and are more likely to know their abuser than not.
- 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's policy and procedures for dealing with it.

"I Wanted Them All to Notice." - National Review into Child Sexual Abuse Within the Family Environment, 2024

Most children who are being sexually abused **do not tell anyone** about it at the time; instead, they may show other emotional, behavioural and physical signs and indicators of their abuse. Professionals must familiarise themselves with the signs and indicators of child sexual abuse.

Sutton LSCP Child Sexual Abuse Toolkit

Sutton LSCP Child Sexual Abuse Protocol

All Sutton staff must read Signs and indicators of child sexual abuse | CSA Centre and must complete eLearning | CSA Centre to familiarise themselves with the signs of child sexual abuse.

Emotional and behavioural signs may include:

- Avoiding the abuser– the child may dislike or seem afraid of a particular person and try to avoid spending time alone with them
- Sexually inappropriate behaviour– children who have been abused may behave in sexually inappropriate ways or use sexually explicit language
- Changes in behaviour– a child may start being aggressive, withdrawn, clingy, have difficulties sleeping, have regular nightmares or start wetting the bed
- Changes in their mood, feeling irritable and angry, or anything out of the ordinary
- Changes in eating habits or developing an eating problem
- Difficulty concentrating and learning, and their grades may start to dro
- Alcohol or drug misuse
- Self-harm

Physical signs may include:

- Bruises
- Bleeding, discharge, pains or soreness in their genital or anal area;
- Sexually transmitted infections;
- Pregnancy

Signs of online sexual abuse may include:

- Spending a lot more or a lot less time than usual online, texting, gaming or using social media;
- Being distant, upset or angry after using the internet or texting;
- Being secretive about who they're talking to and what they're doing online or on their mobile phone;

- Having lots of new phone numbers, texts or email addresses on their mobile phone, laptop or other device.

Harmful Sexual Behaviour (HSB): HSB is sexual behaviour that is outside of what is appropriate for the age or development of the child and may be as a result of sexual abuse suffered by the child. Children and young people demonstrate a range of sexual behaviours as they grow up, and this is not always harmful. Sexualised behaviour sits on a continuum with five stages (Hackett, 2010) and is shown in the table below:

Appropriate	Inappropriate	Problematic	Abusive	Violent
The type of sexual behaviour that is considered 'appropriate' for a particular child depends on their age and level of development.	This may be displayed in isolated incidents, but is generally consensual and acceptable within a peer group.	This may be socially unexpected, developmentally unusual, and impulsive, but have no element of victimisation.	This often involves manipulation, coercion, or lack of consent	This is very intrusive and may have an element of sadism

Sexual development and behaviour in children | NSPCC Learning

Actions: See Appendix A – Responding to concerns or disclosures of child sexual abuse
All staff should read Communicating with children | CSA Centre

- If a child spontaneously tells a professional that they are being or have been sexually abused, they have already identified that professional as the person they feel safest with; regardless of any organisational policies or procedures, there should be **no attempt to get the child to speak to anyone else initially**. While it may be necessary for other professionals to speak to the child later (when a social worker or police officer needs to talk to the child as part of an investigation, for example), every attempt should be made to limit the number of people the child is asked to talk to
- **If a child has told someone else (such as a friend) that they are being abused, and that person has informed you of this:** Inform the DSL who will decide who will talk to the child
- **If you have noticed changes in the child's behaviour or anything else that has given you cause for concern:** it is important that **you** speak with the child – by showing them that it is you who has noticed things, you are helping to build their trust in you. Record your observations and conversation and inform the DSL.

Neglect

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

Para. 369 of *Working Together to Safeguard Children 2026* also includes:

- a parent or carer failing to provide suitable education

A full list of the types and signs of neglect can be found on the Sutton LSCP Neglect Toolkit, which can be found at: Sutton Local Safeguarding Children Partnership - LSCP Policy & Practice (suttonlscp.org.uk)

Actions: Neglect is not a single event – it is persistent and cumulative over time. Therefore, staff need to record their observations in detail to support the DSL to build up a picture of neglect.

Safeguarding Issues and Required Actions

All staff should have an awareness of safeguarding issues that often overlap and can put children at risk of harm (including but not limited to those listed below). The following behaviours and indicators can be signs that children are at risk:

- drug taking and/or alcohol misuse
- unexplainable and/or persistent absences from education
- serious violence, criminal exploitation (including that linked to county lines), radicalisation
- consensual and non-consensual making and sharing of nudes and semi-nudes

(Para.29 Keeping Children Safe in Education 2026)

Information on some of the issues are outlined below. A full list of safeguarding issues can be found in Annex A of Keeping Children Safe in Education 2026 and Appendix B of this policy.

Artificial Intelligence (AI) Safeguarding Risks

The school follows the guidance from the National Crime Agency (NCA) Child Sexual Abuse Material Generated by Artificial Intelligence

AI-Child Sexual Abuse Material (AI-CSAM)

Staff will receive training on how AI can be used to create AI-CSAM (AI-Child Sexual Abuse Material)

Photorealistic images: AI can be used to create highly realistic manipulated images and videos of a child or young person. This can be done by altering existing photos or videos or creating entirely AI-generated sexual abuse content. Even if the material is not photorealistic, it is still illegal. It is an offence to possess a prohibited image of a child, including AI-generated images which are not deemed photorealistic, including cartoons, illustrations and animations. (Section 62 of the Coroners and Justice Act 2009).

Deepfakes: AI-generated or AI-manipulated images, videos or audio content that falsely represents a person as saying or doing something they did not do, often designed to appear realistic and/or authentic.

Real child sexual imagery can also be used to feed AI models to create new image sets and videos of existing survivors.

Nudifying: 'Nudifying' or 'undress' AI tools can be used to digitally remove clothing from images creating sexual abuse imagery of a child or young person.

Blackmail and Financially Motivated Sexual Extortion: Offenders may create AI-CSAM as a way to blackmail a child into sending them indecent images, or for financial gain where they threaten to release the images of the child unless payment is made (**Financially Motivated Sexual Extortion – see Appendix B for more details**).

Child sexual abuse material is always illegal, regardless of how it is created. Section 1 of the Protection of Children Act 1978 criminalises the taking, distribution and possession of an "indecent photograph or pseudo photograph of a child" (anyone under the age of 18). The use of AI does not lessen the impact or harm caused to victims. The harm to victims is always significant, regardless of the method used to create the CSAM.

Actions: Responding to an Incident of AI-CSAM
Any incident involving AI-CSAM should be treated with the same level of care, urgency and safeguarding response as any other incidence involving child sexual abuse material
1. Report to the DSL immediately
2. Do not share, download or save the content – even for reporting purposes. The decision to view any imagery should be based on the professional judgement of the DSL (or equivalent). The DSL should never copy, print, share, store or save them; this is illegal. For further information, please see UK Government's Guidance 'Sharing nudes and semi-nudes: How to respond to an incident'
3. Encourage the young person not to delete anything that could be used as evidence, such as messages, images, videos, usernames and URL links.
4. Report it to the site, app or network hosting it.
5. Report it to the Police. Call 101, or 999 if you believe the child or young person is in immediate danger
6. Consider wellbeing support. As with any form of CSA, victims may need support to manage the emotional and psychological impact. Make victims of AI-CSAM aware of support in your setting and locally.
7. Signpost children and young people to use the Report Remove tool from the IWF and Childline to report AI-CSAM that has been shared or might be shared online.

Child On Child Abuse (Including Harassment And Violence)

The school takes a zero-tolerance approach to abuse, and recognises that it should never be passed off as "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. Staff are expected **to challenge** inappropriate behaviours between children that are abusive in nature; do not downplay or dismiss behaviours as 'just banter.'

All staff should know and understand that:

- Children can abuse other children; it can happen inside or outside of school or college and online. All staff have an important role to play in preventing it and responding where they believe a child may be at risk from it.
- Child on child abuse is preventable - timely, evidence-based support can be key to preventing children from going on to commit abuse or violence.
- **Even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported**
- Child-on-child abuse is a safeguarding issue for both the victim and alleged perpetrator.
- For some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys perpetrators
- All child-on-child abuse is unacceptable and will be taken seriously

(Para.30-36 of Keeping Children Safe in Education 2026)

Procedures to minimise the risk of child-on-child abuse
As a school we will minimise the risk of child on child abuse in a number of ways including: by providing a developmentally appropriate PSHE curriculum through our Personal Development curriculum which develops students' understanding of healthy relationships, acceptable behaviour, consent and keeping themselves safe; as well as ensuring that students feel safe expressing themselves regardless of their sex, disability, race, religion, sexual orientation or gender identity; having high expectations of behaviour; having clear consequences for unacceptable behaviour; having systems for students to raise concerns with staff (e.g online safeguarding reporting system), knowing that they will be listened to, valued and believed; and having robust risk assessments and providing targeted work for students identified as a potential risk to others.

Reporting abuse
Pupils can report abuse to a member of the Safeguarding or Pastoral Teams, or another trusted adult in school. Pupils can also report via the school's online reporting systems on the school website: the Safeguarding Reporting System and the Hear It? Report It system. The school and staff promote these systems via tutor time programme; the tutor dashboard; the pastoral televisions around school and via assemblies to ensure that they are understood and accessible. Staff let pupils know that all reports are taken seriously.

Dealing with allegations of child-on-child abuse
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and safety plan into place for all children involved (including the child who has been harmed, the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a child who has been harmed or alleged perpetrator(s).
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.
- If the incident is a criminal offence, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator.
- The school will ensure appropriate specialist support is available for victims and perpetrators, and liaise with external agencies as required to provide this support.
- The parents of both the child who has been harmed and the child against whom the allegation has been made, will be kept up to date and informed throughout the process

- Any online forms of child-on-child abuse, such as sharing of indecent images or online harassment, will be treated seriously and addressed promptly.

All staff should know that child-on-child abuse is preventable, as well as knowing how to recognise behaviours and indicators of risk early. KCSIE (2026) paras 31-37 and paras 192-193.

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice based incidents
- 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)
- serious physical assault and harm, or the threat of harm with a weapon
- 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
- harmful sexual behaviour, sexual violence and sexual harassment – which may include misogyny/misandry. ***Part Five of this guidance sets out how the school will respond to reports of this nature***
- 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 (which is a criminal offence), 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.

(Para. 37 of Keeping Children Safe in Education 2026)

Actions: Follow the school's reporting procedures immediately.
The school will phone the police immediately and refer to CFCS immediately following reports of:

- Serious physical assault and harm, or the threat of harm with a weapon
- Sexual violence
- Causing someone to engage in sexual activity without consent
- Upskirting

The school will follow the guidance from: when-to-call-the-police--guidance-for-schools-and-colleges.pdf

Following instances of harmful sexual behaviour, the school will follow Safety planning in education | CSA Centre

If made aware of the consensual and non-consensual making and sharing of nudes and semi-nudes:

Staff must **not** ask to see or share the images. Inform the DSL immediately. The school will contact CFCS and follow Sharing nudes and semi-nudes: advice for education settings working with children and young people

See Part 5 of this policy for information and procedures regarding **Child on Child Sexual Harassment and Sexual Violence.**

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

Both CCE and CSE 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 into taking part in criminal or sexual activity.** It may involve an 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. This can be committed or facilitated by 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 (commonly referred to as trafficking) for the purpose of exploitation. This may constitute modern slavery, and further information is available in the Modern Slavery statutory guidance.

Children who are criminally exploited should have their vulnerabilities recognised by adults and professionals, (particularly older children), and **should be treated as victims**. **It is not possible for a child to give informed consent to engage in criminal or other exploitative activity**, and **they cannot give consent to be exploited, abused or trafficked.**

See Annex B for further signs and indicators of CCE and CSE and resources.

As part of staff training, the school will use Spotting the Signs Tool & Training - Brook. The Spotting the Signs Tool (2023) is designed to help professionals ask the right questions to identify potential abuse or exploitation in children and young people. The Tool is designed to facilitate a conversation with the child or young person to help understand their situation better.

Actions for the DSL: In accordance with the Modern Slavery statutory guidance, a relevant child protection and modern slavery referral will be completed where a potential victim of CCE or CSE is identified. DSLs will follow Sutton LSCP Multi-Agency Protocol for Safeguarding Adolescents and Sutton LSCP Threshold Guidance

Child Criminal Exploitation (CCE)
Some specific forms of CCE can include:

- children being forced or manipulated into transporting drugs or money through county lines (see Appendix B for County Lines definition)
- working in cannabis factories
- shoplifting or pickpocketing
- being forced or manipulated into committing vehicle crime or
- threatening/committing serious violence to others.

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. Children who are criminally exploited should have their vulnerabilities recognised by adults and professionals (particularly older children) and should be treated as victims. **It is not possible for a child to consent to be exploited, abused or trafficked, and they may not recognise that it is happening to them.**

The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff should be aware that girls are at risk of criminal exploitation too. Both boys and girls being criminally exploited may be **at higher risk of sexual 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.** This can be committed by an individual or an organised network and most sexual abuse is committed by those previously known to the victim. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship. As with CCE, victims are not always recognised and can be criminalised for actions they take whilst under coercion. Children can be manipulated, groomed, and exploited without fully understanding the abuse they are experiencing.

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.** 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. Types of domestic abuse include:

- intimate partner violence
- abuse by family members
- teenage relationship abuse (including physical, sexual, emotional abuse, and stalking)
- child to parent abuse
-

(Para. 45 and pg 163 Keeping Children Safe in Education 2026)

The government has issued Domestic Abuse:statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children. This document is referred to by the school to inform staff training. A comprehensive list of the types of domestic abuse can be found in Chapter 3: Recognising Domestic Abuse. Some of the types of abuse staff should be aware of include:

Physical abuse, violent or threatening behaviour:
This includes:

- Being, or threatened to be, kicked, punched, pinched, pushed, dragged, shoved, slapped, scratched, strangled, spat on and bitten
- **Causing harm by damaging or denying access to medical aids or equipment** – for example a deaf person may be prevented from communicating in sign language or may have their hearing aids removed

- **Harming someone whilst performing 'caring' duties**, which are often performed by relatives. This is especially relevant for individuals who are heavily dependent on others, such as disabled people and may involve force feeding, over-medication, withdrawal of medicine or denying access to medical care
- **Non-fatal strangulation**: This is a criminal offence. Non-fatal strangulation can be used as a form of assault in domestic abuse and a history of strangulation can increase the risk of an eventual fatality. Visible marks are not always present; the absence of marks should not undermine an account of non-fatal strangulation.

Controlling or coercive behaviour – this includes:

- **Controlling or monitoring the victim's daily activities and behaviour**, including making them account for their time, dictating what they can wear, what and when they can eat, when and where they may sleep
- **Controlling a victim's access to finances**, including monitoring their accounts or coercing them into sharing their passwords to bank accounts in order to facilitate economic abuse
- **Isolating the victim from family, friends and professionals** who may be trying to support them, intercepting messages or phone calls
- **Using children to control the victim,** e.g. threatening to take the children away

For more information, see Controlling or coercive behaviour: statutory guidance framework (accessible) - GOV.UK

Harassment or stalking: Where harassment or stalking occurs, and the perpetrator and victim are 16 or over and "personally connected", this behaviour falls within the scope of the statutory definition of domestic abuse in the 2021 Act. For example, it may constitute physical abuse, threatening behaviour, controlling or coercive behaviour, or emotional or psychological abuse.

Stalking Protection Act: statutory guidance for the police - GOV.UK

Verbal abuse: Verbal abuse may amount to emotional or psychological abuse, threatening behaviour, or controlling or coercive behaviour. Examples include:

- Repeated yelling and shouting
- Abusive, insulting, threatening or degrading language
- Discriminating against someone or mocking them about their disability, sex or gender identity, gender reassignment, religion or faith belief, sexual orientation, age, physical appearance etc

Technology-facilitated abuse: Perpetrators can use technology, including social media to abuse victims. This can happen during and after the relationship. Examples include:

- 'Trolling' with abusive, offensive or deliberately provocative messages via social media platforms or online forums
- Image-based abuse – for example, the creation of false / digitally altered images and the non-consensual distribution, or threat thereof, of private sexual photographs and films with the intent to cause the person depicted distress ('revenge porn')
- 'Upskirting' which involves someone taking a picture under another person's clothing without their knowledge.

'Honour'-based abuse: 'Honour'-based abuse is a crime or incident which has or may have been committed to protect or defend the perceived honour of the family and/or community, or in response

to individuals trying to break away from constraining 'norms' of behaviour that their family or community is trying to impose. 'Honour'-based abuse can include physical, emotional or psychological abuse.

Forced marriage and **FGM** are potential forms of 'honour'- based abuse. Forced marriage involves the use of violence, threats or any other form of coercion against a person with the intention or belief that the conduct may cause a person to enter into a marriage without consent. This includes non-binding traditional, or unofficial marriages. More information about forced marriage and FGM can be found in the multi-agency statutory guidance and practice guidelines on forced marriage and the multi-agency statutory guidance on FGM.

The school follows The London Child Protection Procedures Safeguarding Children Affected by Domestic Abuse and Violence

Sutton Domestic Abuse Support Service (DASS) provides confidential support to victims in Sutton DASS | Cranstoun

Further information on the types of domestic abuse and sources of support can be found in Appendix B.

Operation Encompass

The school works in collaboration with the Metropolitan Police Service as part of its legal commitments under Operation Encompass. Operation Encompass is an information-sharing scheme between the police and relevant education settings operating in all police forces across England and Wales. In November 2025, a new statutory duty was placed on the police to notify a child's education setting, and where relevant, local authorities, if they have reasonable grounds to believe a child may be a victim of domestic abuse. This includes all children:

- connected to a household where they have attended a domestic abuse incident;
- who are physically present at the incident
- who are not physically present during the incident
- situations where a child might reside in another household temporarily or permanently.

Actions for the DSL: The Designated Safeguarding Lead will be the key adult for Operation Encompass notifications. The DSL will use the information that has been shared, in confidence, to ensure the wellbeing of the child. The school may be able to make provisions or adjustments to assist the child and their family.
For queries, the DSL should contact Sutton Operation Encompass: SNMailbox.SafeguardingMASHSutton@met.police.uk

Operation Encompass does not replace statutory safeguarding procedures or referrals and applies solely to domestic abuse incidents. Where appropriate, the school should make a referral to local authority children's social care if they are concerned about a child's welfare. *(P.164, Keeping Children Safe in Education 2026)*
Home : Operation Encompass
Safeguarding Commonly Asked Questions – Cognus-

Female Genital Mutilation (FGM)

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

Section 5B of the Female Genital Mutilation Act 2003 places a statutory duty upon teachers to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. *Those failing to report such cases may face disciplinary sanctions.* It will be rare for teachers to see visual evidence, and they should not be examining pupils or students. *(p.173 Keeping Children Safe in Education 2026)*

Actions:

- Inform the DSL immediately and follow your school's reporting procedures

and

- The **teacher** who discovered it **must report this to the police themselves**. See Mandatory reporting of female genital mutilation: procedural information - GOV.UK for further information.
- It will be rare for teachers to see visual evidence, and they should **not** be examining pupils or students.
- **The DSL** will follow *Sutton FGM Flowchart* p.2 'Sutton Under 18's FGM Referral Pathway' which can be found here: Sutton Local Safeguarding Children Partnership - Female Genital Mutilation (FGM)

More information about FGM can be found here: Sutton Local Safeguarding Children Partnership - Female Genital Mutilation (FGM)
FGM Fact Sheet

Mental Health

All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, suicidal ideation or risk of suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. 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 which education staff are well placed to recognise.

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.

Not every child who exhibits these behaviours is suicidal or has a mental health concern. However, staff are well placed to identify these and other potential warning signs. In doing so they can identify children who may be struggling with their mental health and contemplating suicide and offer support and vital early intervention. **The school will ensure that any interventions offered to children are evidenced as safe and effective and appropriate for the need and phase of education.**

Actions for school staff:
If staff have a concern about a child's mental health that is also a safeguarding concern, follow the school's reporting procedures and speak to the designated safeguarding lead or deputy.

If staff feel that a child is in danger, they should call 999 or arrange for them to be taken to A&E immediately by a parent/carer or other suitable person.

If a child needs help urgently for their mental health, but it's not an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option.

Actions for the DSL: To ascertain whether there is a potential safeguarding concern – and the level of possible need - refer to Sutton LSCP Threshold Guidance 'Categories of Concern Under the Spectrum of Need – Mental and Emotional Health (pink)'
Educational Psychology – Cognus

Self-Harm and Suicidal Ideation

As part of our RSHE curriculum, we address suicide prevention. Many aspects of suicide prevention are addressed through the mental wellbeing curriculum embedded within our Personal Development curriculum . We consider carefully when it is suitable to deliver suicide prevention content, taking into account the age, maturity, and personal experiences of pupils as well as the views of parents and the confidence and skills of teachers. This is in line with the guidance from p.25-26 of statutory Relationships Education, Relationships and Sex Education and Health Education guidance Details of the school's approach can be found in our RSE Policy. When creating our suicide prevention curriculum, we have followed the following guidance from the charity Papyrus: 'Building Suicide-Safer Schools and Colleges'

Staff training: The school will consult mental health professionals and put in place high quality, evidence-based staff training before addressing suicide directly with secondary aged pupils (e.g. Cognus Educational Psychology team), to ensure that staff have the knowledge and skills to do this safely. We will ensure teachers use language and content that is accurate, straightforward and appropriate to the level of understanding of the class. Staff will be trained to take particular care not to discuss instructions or methods of self-harm or suicide and avoid using emotive language, videos or images.

Only staff who have completed training will be allowed to deliver this aspect of our Personal Development curriculum.

Self-harm is defined as when somebody intentionally damages or injures their body. It's usually a way of coping with or expressing overwhelming emotional distress. However, the intention is more often to punish themselves, express their distress, or relieve unbearable tension. Sometimes the reason is a mixture of both. Self-harm can also be a cry for help and some individuals may go on to complete a suicide attempt. Although some people who self-harm are at a high risk of suicide, many people who self-harm don't want to end their lives. In fact, self-harm may help them cope with emotional distress, so they don't feel the need to kill themselves.

Suicidal ideation or suicidal thoughts are when somebody feels like they want to die. Suicidal thoughts or an overwhelming desire to complete suicide usually happens during episodes of low mood or depression. Suicidal ideation is usually not followed by actions to complete suicide.

Suicidal intent is when somebody wants to die and has a plan to complete suicide. Suicidal intent must always be considered as high risk. Call 999 or take the child to A&E immediately.

Actions:
If staff feel that a child is in danger, they should call 999 or take them to A&E immediately.

If a child needs help urgently for their mental health, but it is **not** an emergency, staff can get help from NHS 111 online or call 111 and select the mental health option or contact:

Sutton SPA Crisis Line : 020 3513 3800 (Mon-Fri, 9am-5pm) or 0203 228 5980 (out of hours)

Actions for the DSL:

- DSLs must follow the *Sutton LSCP Management of Young People Who Self Harm or Have Suicidal Ideation* protocol, available here: Sutton Local Safeguarding Children Partnership - LSCP Protocols
- To identify and respond to suspected self-harm or suicide clusters, the DSL will follow:
- 2025 Sutton Suicide Cluster Response Plan.pdf
- Cluster Response Plan Infographic.pdf

Preventing Radicalisation

Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of the school's safeguarding approach.

Extremism is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

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 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.

Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern.

All staff will receive prevent training as part of induction: Prevent duty training: Learn how to support people susceptible to radicalisation | ; and as part of the school's annual safeguarding CPD programme.

It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn into terrorism. *(Keeping Children Safe in Education 2026)*

Actions:
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, and share these concerns with the DSL. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately.
Phone 999 or the Anti-Terrorism hotline on 0800 789 321 immediately if you think a pupil:

- Is about to put themselves or others in immediate danger
- Appears to be involved in planning to carry out a criminal offence

Actions for the DSL:

- If you have a non-urgent concern about terrorism, email: prevent@sutton.gov.uk
- Follow Sutton Preventing terrorism and radicalisation 2026 roadmap
- If your concerns fall into the 'medium' risk outlined in Managing risk of radicalisation in your education setting - GOV.UK or if you have any doubts, **you should make a prevent referral immediately:** National Prevent referral form
- If your concerns fall into **the 'high' risk category, you should contact the police immediately.**

Making a referral to Prevent - GOV.UK
Statutory Prevent Duty | London Borough of Sutton
The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK
Educate Against Hate - Prevent Radicalisation & Extremism
Online Safety – ACT Early

The Prevent Duty

All schools and colleges are subject to a duty under section 26 of the Counter- Terrorism and Security Act 2015, in the exercise of their functions, to have "due regard to the need to prevent people from becoming terrorists or supporting terrorism". This duty is known as the Prevent duty.
The Prevent duty is part of the school's wider safeguarding obligations.

The safeguarding team and senior leaders will ensure that they familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 141-210, which are specifically concerned with education (and also covers childcare). The school's designated safeguarding lead (and any deputies) will ensure that they are aware of local procedures for making a Prevent referral. Prevent referrals are first assessed by police and may be passed to a multi-agency Channel panel.

Serious Violence

Serious violence is a continuing safeguarding concern. It may involve physical assault, carrying, threatening with, or using weapons, often in the context of peer conflict or bullying, and it can also be associated with criminal exploitation. The school plays a key role in protecting children from violence, safeguarding victims, as well as those who may be at risk of, or are involved in violence (who may also be victims themselves).

Staff should be alert to signs that a child may be at risk of or involved in serious violence. These risks are higher for children with disrupted education (e.g. suspensions, permanent exclusions, time in alternative provision) or a history of offending. Staff should also be alert to when children might be at highest risk around the school day (for example immediately after school).

For those considered at risk, early, evidence-based support will be put in place, including access to trusted adults, social and emotional skills support and targeted interventions such as mentoring or therapeutic support.

When a new child joins the school and where information indicates a risk to others and/or the individual pupil, for example where a pupil has previously carried, threatened with, or used a knife or

weapon, we will assess risk and put in place a safety and support plan for when the child arrives. (para. 152 Keeping Children Safe in Education 2026).

Further information on indicators, risk factors, and protective actions relating to serious violence is provided in Annex B.

Actions: Staff should report **any** concerns about a child carrying or using a weapon (or expressing intent to do so) to the designated safeguarding lead (or a deputy), who will assess the risk and take appropriate action. Where relevant this will include any action needed to de-escalate peer conflict.

DSLs: Details of the Sutton Community Safety Team and Police Contacts can be found on the Sutton Contact Sheet.

Record Keeping and Information Sharing

All concerns, discussions, actions taken and decisions made, and the reasons for those decisions, should be recorded in writing on CPOMS.

This Information must be kept confidential and stored securely.

Records should include:

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

If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or a deputy).

Staff should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to local authority children's social care. When deciding what information to share, the school will consider:

- the relevancy of the information, including to the current safeguarding risk,
- what is necessary for the receiving setting to know, and
- whether it is clearly presented and appropriately contextualised.

The data protection laws do not prevent 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 safeguard and promote the welfare and protect the safety of children. *(Para. 147 and 148 Keeping Children Safe in Education 2026).* If in any doubt about sharing information, staff should speak to the designated safeguarding lead (or a deputy).

Information sharing advice for safeguarding practitioners - GOV.UK

Transfer of safeguarding information when a pupil moves school:

Where a pupil joins or leaves the school, the Designated Safeguarding Lead will ensure that relevant safeguarding information is transferred securely and without delay to the receiving or new school, in accordance with statutory guidance.

Where safeguarding information indicates that a pupil may pose a risk of harm to themselves or others, the DSL will ensure that relevant information is shared with the receiving school before the pupil starts wherever reasonably practicable, so that appropriate safeguarding arrangements can be put in place.

The school will ensure that safeguarding information transferred to another school is appropriately contextualised and that receipt is confirmed. Where a pupil is permanently excluded, the school will follow the statutory requirements concerning the transfer of the Common Transfer File and safeguarding information and will retain responsibility for safeguarding arrangements until the transfer has been completed.

Referrals to Children's Social Care

As outlined in para. 13 of KCSIE 2026, staff will be made aware of the criteria, including the level of need, for when a case should be referred to local authority children's social care for assessment and for statutory services under Section 47 of the Children Act 1989.

Immediate Protection for children in acute need/significant harm.

Where a child is suffering, or is likely to suffer from significant harm, a referral to local authority children's social care and if appropriate the police, (see when to call the police: guidance for schools and colleges (npcc.police.uk)) must be **made immediately**. Children's Services will assess the case under Section 47 of the Children Act 1989 and convene a strategy meeting to determine further actions. Where there is an immediate need to protect a child, the police should be contacted via telephone on 999.

Referrals should be made to the local authority where the child lives, following the borough's local referral process.

For children living in Sutton:

- **Telephone CFCS: 020 8770 6001 or 020 8770 5000 (out of hours)**
- **Complete the CFCS Referral Form** ensuring you read and refer to Sutton LSCP Threshold Guidance to inform your referral

Report a concern about a child | London Borough of Sutton

For children living in Merton:

- **Telephone Children and Families Hub (Mon–Fri, 9:00 am – 5:00 pm): 020 8545 4226 or 020 8545 4227.**
- **Out of Hours Emergency Duty Team: Call 020 8770 5000.**
- **Email: candfhub@merton.gov.uk**
- **Website: Merton Safeguarding Children Partnership [1, 2]**

For children living in Croydon:

- **Telephone 020 8255 2888 (Monday to Friday, 9:00 AM to 5:00 PM) for the Multi-Agency Safeguarding Hub.**
- **Out of Hours: Call 020 8726 6400 for emergencies**
- **Online Reporting: Submit details via the Croydon Council Child Protection Portal. [1, 2, 3]**

For children living in Kingston:

- **For concerns regarding a child or young person at risk of abuse or neglect, contact the Single Point of Access (SPA) Team via Kingston Council:**
- **Phone (Mon–Thu, 8:00 am – 5:15 pm / Fri, 8:00 am – 5:00 pm): 020 8547 5008**
- **Out of Hours (Evenings and Weekends): 020 8770 5000**

PART 2: The Management of Safeguarding

Role of Designated Safeguarding Lead and Cover Arrangements

Part 2 of Keeping Children Safe in Education 2026 sets out the responsibility of governing bodies, proprietors and management committees and a detailed outline of the roles and responsibilities of the Designated Safeguarding Lead. The school will ensure that the designated safeguarding lead has the appropriate status, authority, skills and experience within the school to carry out the duties of the post. The role carries a significant level of responsibility and the postholder will be given the additional time, funding, training, resources, and support needed to carry out the role effectively.

The names and contact details of the safeguarding team can be found on page 4 of this policy.

Availability

During term time, the designated safeguarding lead (or a deputy) will always be available during school hours for staff in the school to discuss any safeguarding concerns.

Cover arrangements

If the Designated Safeguarding Lead is not in school, staff should:

To ensure continuity of safeguarding responsibilities, the school has robust cover arrangements for periods when the designated safeguarding lead is unavailable due to illness, leave, or other circumstances. The school has three appropriately trained DDSLs to ensure full and effective cover for DSL absence, who all have appropriate level access to CPOMS to ensure continuity of responsibilities. Weekly Safeguarding Team meetings ensure that all DDSLs are fully up to date with all current safeguarding cases within school and can support appropriately. In addition, all school staff are alerted when the DSL is unavailable so they are aware who they should speak to if they have a safeguarding concern. The school's Safeguarding Mobile is accessible to all DDSLs.

These arrangements ensure that safeguarding concerns are received, monitored, and acted upon without delay. *(para.129 Keeping Children Safe in Education)*

Managing referrals

The designated safeguarding lead will refer cases:

- of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required, and
- where a crime may have been committed to the Police as required

Multi-Agency Working

As outlined in Working Together to Safeguard Children, as a school, we are fully engaged, involved and included in safeguarding arrangements in the local area. We work with Sutton Local Safeguarding Children's Partnership (LSCP) and act in accordance with local arrangements, following Sutton LSCP protocols and procedures. We work with local authority children's social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of family help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans.

All staff should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to local authority children's social care.

Staff Training

At induction, all staff will undergo safeguarding and child protection training (including online safety which includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring). Staff will also have training on the Behaviour Policy; the Staff Code of Conduct; the safeguarding response to children who go missing from education, on repeat occasions and/or prolonged periods or where the absence is persistent or unexplainable; and the role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies)

Staff training will be regularly updated and will be in line with advice from our local safeguarding partners. In addition, all staff will receive regular safeguarding and child protection updates, including online safety as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

A central record of all staff training and Safeguarding Team training is kept by the DSL. This is reviewed regularly and used to help plan the school's annual Safeguarding CPD programme to ensure that all staff have appropriate training to enable them to carry out their safeguarding duties effectively.

Reporting on Safeguarding

Safeguarding is a standing item on all Trust meetings. The Board of Trustees receive termly safeguarding reports from the DSL to ensure the board can monitor the school's compliance, highlight any issues and plan for improvements. This report includes information on: staff safeguarding training; an audit of policies and review dates; number of initial referrals made; number of pupils subject to a Child Protection Plan; number of Looked After Children; number of allegations against staff; safer recruitment information; and filtering and monitoring compliance.

The designated teacher and designated safeguarding governor meet termly.

The DSL also leads on the completion of the annual S175 audit and returns all requested information to the LSCP within the given time frame. This is a working document and is used to inform future action planning and development around safeguarding. The S175 audit is reviewed by the Safeguarding Governor and any actions taken to the Trust Board.

Teaching Safeguarding – Preventative Education

Children are taught about how to keep themselves and others safe, including online. Lessons are tailored to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs and/or disabilities (SEND). Relevant topics are included within Relationships, Sex and Health Education following statutory guidance.

The school plays a crucial role in preventative education. A planned programme of evidence based RHE/RSHE is delivered in regularly timetabled lessons and reinforced throughout the whole curriculum. The programme is fully inclusive and age and stage of development appropriate. This programme tackles, at an age-appropriate stage, issues such as:

- supporting children to develop the skills that form the building blocks of all positive relationships
- healthy and respectful relationships

- boundaries, consent and kindness in relationships
- stereotyping, prejudice and equality
- body confidence and self-esteem
- how to recognise and report concerns about an abusive relationship, including coercive and controlling behaviour
- the concepts of, and laws relating to all forms of sexual harassment, and abuse, and how to access support
- what constitutes sexual harassment and sexual violence and why these are always unacceptable, emphasising that it is never the fault of the person experiencing it, and
- understanding online harms such as sharing images, the prevalence of deepfakes, pornography and misogynistic influencers and when and where to seek help.

See the school's RSE Policy.

Online Safety

Pupils are safeguarded from potentially harmful and inappropriate online material. We take a whole school approach to online safety by protecting and educating pupils, students, and staff in their use of technology through a number of ways such as our online safety curriculum; and regular staff training (e.g. via Alan MacKenzie staff training videos). We have established mechanisms to identify, intervene in, and escalate any concerns where appropriate.

The school's Online Safety Policy outlines the school's approach to the four areas of risk:

1. **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.
2. **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.
3. **Conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of self-generated intimate images and/or videos including those generated using AI e.g. deepfakes, sharing other explicit images and online bullying.
4. **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. **If we feel our pupils, students or staff are at risk, we will report it to the Anti-Phishing Working Group (https://apwg.org/).**

See our Online Safety Policy.

We recognise that technology, and risks and harms related to it, evolve, and change rapidly. Therefore, the school carries out an annual review of its approach to online safety, supported by an annual risk assessment that considers and reflects the risks children face.

Artificial Intelligence (AI)

- The school understands the safety considerations and legal responsibilities of using Generative AI and follow the guidance from Generative artificial intelligence (AI) in education - GOV.UK
- The school uses Generative AI in accordance with its AI protocols and acceptable-use arrangements; where Generative AI is used by staff or pupils, the school will assess associated safeguarding, privacy, data protection, equality and intellectual property risks and ensure that appropriate controls, training and supervision are in place

- consider online safety, including AI, when creating and implementing their school or college approach to safeguarding and related policies and procedures
- consult Keeping children safe in education
- refer to our generative AI product safety expectations
- refer to the filtering and monitoring standards to make sure they have the appropriate systems in place, including filtering and monitoring approaches that cover generative AI

Training: All staff will complete training on identifying and mitigating key risks associated with safeguarding, ethics, data protection, and intellectual property, as part of their annual safeguarding CPD.

Protecting our setting's images from AI manipulation and abuse
The school is using the guidance: Image guidance for education settings - UK Safer Internet Centre, developed by the UK Online Harms Early Warning Working Group on best practice and considerations on the use of photos and videos across schools' online platforms, to inform its approach to addressing the risk of AI image manipulation.

The school is developing the following image security practices as part of our approach:

- Reviewing our use of images and ensuring images used now do not contain identifiable information that could be used to harm or blackmail an individual (e.g. full names or faces).
- Reviewing our use of images and using imagery that is harder to misuse or abuse, for example using photos taken from a distance, blurred images or images taken from over the shoulder.
- Applying privacy settings to help limit who can view and share content
- Including image security awareness and practices in staff training and policies

All staff will be trained to:

- recognise and respond to incidents of image-based abuse (e.g. non-consensual sharing, manipulation or threats involving student imagery) with emphasis on prevention and safe practice.
- ensure any immediate safeguarding response prioritises the student's safety, dignity and emotional wellbeing.
- report any blackmail or threats involving imagery to the police as a criminal matter, alongside following internal safeguarding procedures.

Filtering and Monitoring
The school follows The Department for Education's filtering and monitoring standards.

Filtering refers to the technology preventing access to harmful or inappropriate content, whilst monitoring refers to the practical steps staff take to ensure harmful or inappropriate access is not made. We make sure that any school devices used away from the school site are also subject to filtering and monitoring procedures. All our staff undertake training to understand the risks of poor filtering and monitoring, and know how to share their concerns.

- The following members of staff are responsible for the management of filtering and monitoring systems: Ms Kate Ross (DSL); Mr Alex Marsh (Online Safety Lead); Mr Jeffrey Addy (IT Manager)
- The above staff will review filtering and monitoring provision at least annually
- The school uses LGfL filtering system to block harmful and inappropriate content without unreasonably impacting teaching and learning

- We use SENSO for monitoring, alongside staff in-person monitoring, that meet our school's safeguarding needs
- The school has used the LGfL Online Safety Audit and Risk Assessment to self-assess against the filtering and monitoring standards and receive personalised recommendations on how to meet them

Mobile Phones

We follow the DfE guidance on Mobile phones in schools . Our school is a mobile phone-free environment. Pupils in years 7-11 do not have access to their mobile phone throughout the school day including during lessons, the time between lessons, breaktimes and lunchtimes. Sixth Form students have access to their phones in designated areas, at specific times.

Please see the school's Mobile Phone Policy.

The Use of 'Reasonable Force' and Other Restrictive Interventions

There are limited circumstances when it is appropriate for staff to use 'reasonable force' to safeguard children. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. The school follows the DfE guidance Use of reasonable force and other restrictive interventions guidance

Please refer to the school's Use of Restrictive Interventions Policy.

Use of School Premises for Non-School Activities

Where services or activities are provided separately by another body, the school will:

- seek assurance that the provider concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed)
- ensure that there are arrangements in place for the provider to liaise with the school on these matters where appropriate.

This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll.

The school will follow the guidance in Out-of-school settings: safeguarding guidance for providers

Alternative Providers

Where the school places a pupil with an alternative provision provider, we will continue to be responsible for the safeguarding of that pupil and will adhere to the guidance in Part 2 of Keeping Children Safe In Education 2026.

Children Potentially at Greater Risk of Harm

Whilst all children should be protected, we recognise that some groups of children are potentially at greater risk of harm than others (both online and offline). The list below highlights some of those groups:

Black, Asian and Mixed Heritage Children

Whatever the form of abuse, neglect and exploitation, staff should:

Be inclusive, anti-discriminatory and responsive to the needs and experiences of children and families of different ethnic, cultural and religious backgrounds. Practitioners should remain alert to any bias in

practice that may adversely impact particular groups or communities and consider children foremost in terms of their vulnerability to harm. For instance, care should be taken to ensure children of particular ethnic backgrounds are not treated as older than they are. (p.84 of Working Together to Safeguard Children).

Adultification: *The concept of adultification is when notions of innocence and vulnerability are not afforded to certain children. This is determined by people and institutions who hold power over them. When adultification occurs outside of the home it is always founded within discrimination and bias. (*Adultification bias within child protection and safeguarding)

Children who need a social worker (Child in Need and Child Protection Plans)

Where a child has a social worker, the Designated Safeguarding Lead will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.

Where children need a social worker, this will inform decisions about safeguarding (for example, responding to unauthorised absence or to a child missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Children who are absent from education

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines.

Paragraph 128 of Working Together to Safeguard Children 2026 also states: *Where children are not receiving education, either because they are persistently missing school, or are not registered at a school and not receiving a suitable education otherwise, this could be a possible indicator of neglect, abuse or exploitation or could in itself constitute neglect in severe and sustained cases.*

The school's response to persistently absent pupils, and children missing education (CME) supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where a child is already known to local authority children's social care and needs a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

The school follows the statutory guidance in Working together to improve school attendance which sets out how schools must work with local authority children's services where school absence indicates safeguarding concerns.

See the school's Attendance Policy.

School Attendance – Cognus

Children Missing Education (CME)

The school follows the DfE statutory guidance contained in Children missing education. This includes information the school will provide to the local authority when removing a child from the school roll at standard and non-standard transition points, along with how the school should be supporting local authorities with joint reasonable enquiries to help identify and support children missing in education.

For further information, see: Children Missing Education – Cognus

Elective Home Education (EHE)

When a parent/carer expresses their intention to remove a child from school with a view to educating at home, we will make it clear that this is not a decision we would ever recommend. We will liaise with other professionals to coordinate further discussion with parents/carers where possible. This will be particularly important where a child has SEND, is vulnerable, and/or has a social worker. Where the decision to home educate raises safeguarding concerns, the DSL (or deputies) will seek further advice from Children's Social Care.

Elective Home Education – Cognus

Children Requiring Mental Health Support

All staff should be aware that mental health problems can, in some cases, develop into safeguarding concerns. This could include self-harm, signs of an eating disorder, suicidal ideation or suicide. They could also be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

The school has an important role to play in supporting the mental health and wellbeing of our pupils. We take a whole school approach to mental health and wellbeing e.g. through the school's mental health and well-being curriculum; promoting positive mental health and signposting via the tutor programme and assemblies; well-being clubs and activities; and our Pastoral Mentors.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, we recognise that education staff have an important part to play and therefore we are committed to fulfilling the following four key roles:

1. **Promoting good mental wellbeing and preventing the onset of mental illness:** We do this through Personal Development lessons; the tutor programme and assemblies; signposting; our pastoral system; our Pastoral Mentors; and working with Sutton Education Psychology Service and school nursing.

Promoting children and young people's mental health and wellbeing - GOV.UK

2. **Observing pupils and identifying early those who may be experiencing mental health problems or being at risk of developing one:** all staff are expected to share concerns immediately.
3. **Ensuring early targeted support is provided:** We provide ELSA; work with Sutton EWS service; have Pastoral and Student Support Officers; a school counsellor and Educational Psychologist.
4. **Liaison with/referral to specialist services where needed:** For example CAMHS

Looked after children and previously looked after

Staff will be provided with the skills, knowledge and understanding to keep looked after children and previously looked after children safe. Appropriate staff have access to the information they need in relation to a child's looked after legal status and contact arrangements.

The Designated Teacher for Looked After and Previously Looked After Children is: Ms Kate Ross (DSL). This member of staff works with local authorities to promote the educational achievement of registered pupils who are looked after or previously looked after.

The **Virtual School Head (VSH)** manages pupil premium plus for looked after children. The Designated Teacher works with the VSH to discuss how funding can be best used to support the progress of looked after children in school and meet the needs identified in the child's Personal Education Plan (PEP).
Sutton Virtual School – Cognus

Children with a social worker
The Virtual School Head also has non-statutory responsibility for the strategic oversight of:

- educational attendance
- attainment, and
- progress

of children with a social worker. Recognising attendance as a key factor in safeguarding, Virtual School Heads work with local authorities to set and report on ambitious targets to improve their attendance.

Children in Kinship Care
Sutton Virtual School acts as a local authority champion to promote the educational outcomes of children in kinship care. This includes children in kinship care through child arrangement orders, special guardianship and those living in kinship care who are or were looked after.

"Kinship carers are family or friends who step up, often during an unexpected crisis, to care for a child when their parents aren't able to." Kinship.org.uk

Kinship carers are usually grandparents, aunts or uncles, brothers or sisters, a stepparent, stepbrother or stepsister, or someone who isn't related but knows the child well.

Kinship – Cognus

Sutton Virtual School – Cognus

Care Leavers
Local authorities have on-going responsibilities to the children who cease to be looked after and become care leavers. That includes keeping in touch with them, preparing an assessment of their needs and appointing a Personal Advisor who develops a pathway plan with the young person. That plan describes how the local authority will support the care leaver to participate in education or training.

Actions for the DSL: The DSL will have details of the local authority Personal Advisor appointed to guide and support the care leaver and will liaise with them as necessary regarding any issues of concern affecting the care leaver.

Young Carers
A young carer is someone aged under 18 who cares for a friend or family member who, due to illness, disability, a mental health problem or an addiction, cannot cope without their support.

We remain alert to the needs of young carers, recognising that caring responsibilities can impact on their attendance, attainment, behaviour and wellbeing. We recognise that early identification is essential to ensure young carers receive support, at the right time and by the appropriate services including additional support from external partners, or local authority and health services.

YOUNG CARERS | Sutton Carers Centre

Actions: If staff are made aware or suspect that a child is a young carer, they must inform the DSL.

We support young carers; at our school by early identification; a named point of contact who champions young carers within the school – Mrs Kerry Lapsley; we have close links to Sutton's Young Carers Lead who runs drop-in sessions at school, meets individually with some of our young carers and delivers assemblies across the school. We ensure that all staff, both pastoral and academic, are aware of young carers within the school so that they can receive any support necessary.

Children with special educational needs, disabilities or health issues

Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. Additional barriers can exist when recognising abuse, neglect and exploitation in this group of children and **these will form part of staff training. Adultification bias** can also apply to children with disabilities, for example, children with learning disabilities may be expected to demonstrate levels of independence or emotional regulation that do not align with their developmental profile.

Children with special educational needs and disabilities (SEND) | NSPCC Learning

SEND Support – Cognus

See the school's SEND Policy and Information Report.

Staff will be trained to understand that:

- They should not make assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- These children are more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- Children with SEND or certain medical conditions being potentially more disproportionately impacted by behaviours such as bullying, and may not outwardly show any signs
- Communication barriers and difficulties in managing or reporting these challenges means that these children risk not understanding that what is happening to them is abuse
- The need for intimate care, dependence on adults for care and/or isolation from others brings additional safeguarding vulnerabilities and risks
- These children may have issues over 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.

Actions:

- **Any reports of abuse involving children with SEND** will involve close liaison with the designated safeguarding lead (or a deputy) and the special educational needs coordinator (SENCO).
- The school will consider extra pastoral support and attention for these children
- The school will ensure any appropriate support for communication is in place

Safeguarding children with medical conditions

The fact that there has been an incident relating to the management of a child or young person's medical condition (including allergies) would not in and of itself warrant a referral to local safeguarding partners. A safeguarding referral would only be needed where an incident highlighted concern that the child or young person might be at an increased risk of being neglected, abused or exploited by persons inside or outside of their family unit because of their medical condition. This might occur where relevant information about a child or young person's medical condition is not provided to the school or where they are repeatedly sent without essential medication, thereby putting the individual at risk. *Para.252 Keeping Children Safe in Education 2026.*

The school follows the statutory guidance Supporting pupils with medical conditions at school and Allergy safety in schools -

Actions: All staff must follow the policy and protocols outlined in the school's Supporting Children with Medical Conditions Policy and the school's Allergy Safety Policy

Staff training: All staff will watch training videos provided by the School Nursing Team: https://www.suttonhealthandcare.nhs.uk/complexneeds. These videos are for use solely by school staff. The school will keep a record of staff accessing this training.

Where a child cannot attend school because of a mental and/or physical health need, we will work with the London Borough of Sutton, as per Supporting pupils at school with medical conditions – Cognus which defines the policy, organisation, and arrangements for cooperating with parents and health professionals to ensure children and young people with medical conditions have full access to education.

Children who are lesbian, gay or bisexual

A child or young person being lesbian, gay, or bisexual is not in itself a risk factor for harm; however, they can sometimes be vulnerable to discriminatory bullying. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

Our Anti-bullying Policy outlines how we address vulnerabilities such as the risk of bullying and take steps to prevent it, and sanctions we have in place.

Children who are questioning their gender

The school will not initiate any action in this area. Where a child or their parent has raised a request relating to social transition, the school will follow the guidance outlined in Paragraph 252-282 of Keeping Children Safe in Education 2026.

Parents and carers have the leading role in the lives of their children, and this area is no exception. Therefore, where a child who is questioning their gender asks for support from the school, we will engage parents/carers as a matter of priority and treat their views with importance. Staff will not adopt any changes relating to social transition unless a decision has been made by the school and the child's parents/carers have been involved. However, in the rare circumstances where involving parents or carers would constitute a greater risk to the child than not involving them, the designated safeguarding lead will determine what action is needed to safeguard the child, before the parents or carers are contacted or any decisions are taken.

In cases where a child confides in a member of staff about their feelings but **does not** ask the school to make changes to how they are treated, staff do not need to break any confidence **unless there is a related safeguarding risk**. The school will follow usual procedures where a conversation with a child

raises concerns about the child's wellbeing or safety, including involving parents or carers where appropriate.

As a school, we have a statutory duty to safeguard and promote the welfare of all children. We will consider how best to fulfil that duty towards a child who is questioning their gender, as well as their peers, ensuring that any agreed course of action takes account of the impact on all of those affected. This means that the first step when considering a child's request for support with social transition will be to consider what is in **the best interests of the child and other children**, and a decision relating to social transition may not be the same as a child's wishes.

In the vast majority of cases, the school will work with parents or carers to determine what is in the best interests of the child and will consider any clinical evidence or advice and seek any additional non-clinical professional advice where relevant (for example from the SENCO), including involving the designated safeguarding lead. The school will consider everything that could be affecting a child, including whether they have any wider health issues or neurodiversity.

Living in stealth

The school is particularly conscious of the vulnerabilities of children who have fully socially transitioned from an early age and may be living in stealth (that is, school friends/staff may be unaware of their biological sex). The Cass Review emphasised that these children are likely to approach puberty in a fearful and anxious state.

Actions: The school will involve the designated safeguarding lead in these cases.

Obligations under the Equality Act and Human Rights Act

As well as complying with safeguarding obligations as above, the school must also comply with the duties under the Equality Act 2010 and the Human Rights Act 1998. In line with the responsibilities of schools to adhere to the highest standards of safeguarding for the children and young people in their care, alongside obligations under the School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014, the school **will not allow pupils into toilets, changing rooms, or boarding or residential accommodation designated for the opposite sex, with no exceptions**. Similarly, where we have implemented single-sex sports as being necessary for safety reasons, there will be no exceptions and pupils will not be allowed to participate in sports designated for the opposite sex.

Site Security

All people on the site must adhere to the guidelines within this policy. Laxity can cause potential safeguarding issues to arise. Therefore:

- Gates should be locked at playtimes and lunchtimes.
- All Exit Doors should be closed to prevent intrusion.
- The school will not request DBS checks and barred list checks, or ask to see DBS certificates, for visitors not in regulated activity (for example children's' relatives or other visitors attending a sports day). The Headteacher will use his/her professional judgment about the need to escort or supervise visitors.
- For visitors who are attend in a professional capacity, their ID will be checked, and assurance will be sought that the visitor has had the appropriate DBS check (or that the visitor's employers have confirmed that their staff have appropriate checks).
- Children will never be allowed to leave school during school hours without parental agreement, confirmation of the reason and clarification as to whether the child will be picked up or has parental consent to leave the school site independently; if the school cannot get hold of parents, then the student will remain on site.

- Should a child leave the school premises without permission, staff have been informed never to chase after a child, but rather to report immediately to the office. Then parents and police will be informed of the circumstances.
- All visitors are required to sign in at the main school reception where they will be given a visitor's badge, a lanyard containing safeguarding information, and be given a Safeguarding and Safety Information Leaflet to read. These will be returned to the main school reception on departure.

Terrorism (Protection of Premises Act) - Martyn's Law

The Act intends to improve organisational preparedness and protective security across the UK. It requires that those responsible for certain premises and events take steps to prepare for potential terrorist attacks and help keep people safe in the event of an attack. All UK schools are classed as 'standard tier' premises. The school is required to have appropriate public protection procedures in place, so far as reasonably practicable. These procedures are designed to reduce the risk of physical harm if a terrorist attack occurs on the premises or in the immediate vicinity.

The school will therefore ensure it has:

1. Evacuation Procedures (for moving people away from danger and out of the premises)
2. Invacuation Procedures (for moving people to a safer place within the school)
3. Lockdown Procedures (for securing the school to prevent movement into or out of the premises)
4. Communication Procedure (for rapidly communicating information and instructions)

All staff must be aware of the above procedures and their individual responsibilities.

Procedures will be practised, tested and reviewed at least once a year. Procedures will be reviewed and updated periodically.

Terrorism (Protection of Premises) Act 2025 Statutory Guidance

PART 3: Safer Recruitment

Recruitment Process

The safe recruitment of staff in schools is the first step to safeguarding and promoting the welfare of the children in education. The school adopts recruitment procedures that deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities in our school. In our recruitment and selection of staff and volunteers we will always adhere to the government guidance contained within Working Together to Safeguard Children and Keeping Children Safe in Education 2026.
Those involved with the recruitment and employment of staff to work with children have received appropriate safer recruitment training, as outlined in Part 3 of Keeping Children Safe in Education 2026.

We will ensure that:

- Two people will be involved in shortlisting and that, for good practice, the people involved in shortlisting carry out the interview
- We always follow up gaps in previous employment,
- We always require specific references from employers for the last 5 years
- For all posts, paid and voluntary, the appropriate Disclosure and Barring Service (DBS) information has been received.
- In addition to obtaining the DBS certificate, anyone who is employed to teach will undergo an additional check to ensure that they are not prohibited from teaching.
- As part of due diligence, we will consider carrying out online checks on shortlisted candidates. We will inform shortlisted candidates that online searches may be done as part of due diligence checks.
- We explore all potential concerns
- For good practice, our interview panel includes at least one member of staff who has completed safer recruitment training

Please refer to our Safer Recruitment Procedures for more information.

Regulated Activity
Regulated activity includes:

a) paid and unpaid work that involves teaching, training, instructing, caring for or supervising children, or providing advice or guidance on physical, emotional or educational well-being, or driving a vehicle only for children;
b) any other type of paid work for a limited range of establishments (known as 'specified places', which include schools and colleges), with the opportunity for contact with children.

Work under (a) or (b) is **regulated activity only if done frequently, on more than 3 days in a 30-day period or overnight.**

Some activities are always regulated activities, regardless of frequency. This includes:
c) relevant personal care, or health care provided by or provided under the supervision of a health care professional:

- personal care includes helping a child with eating and drinking for reasons of illness or disability or in connection with toileting, washing, bathing and dressing for reasons of age, illness or disability;
- health care means care for children provided by, or under the direction or supervision of, a regulated health care professional.

Regulated activity will not be:

paid work in specified places which is occasional and temporary and does not involve any of the activities in (a) above.

The full legal definition of regulated activity is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012 and The Crime and Policing Act 2026. And more information can be found on p.83 of Keeping Children Safe in Education 2026

More information on regulated activity can be found on p.81 of Keeping Children Safe in Education 2026.

Single Central Record

The school maintains a single central record (SCR) of pre-appointment checks and follows the guidance in Part 3 of Keeping Children Safe in Education 2026.

The SCR covers **all school staff** including teacher trainees on salaried routes, agency and third-party supply staff, even if they work for one day. The single central record must indicate whether the checks outlined in paragraph 349 of Keeping Children Safe in Education 2026 have been carried out or certificates obtained, and the date on which each check was completed or certificate obtained.

The SCR will be checked regularly by a member of the Senior Leadership Team and the Safeguarding Governor. Governors will ensure they have assurance that these checks are regularly being carried out.

Agency and Third-Party Staff (supply staff)

The school will:

- Obtain written notification from any agency, or third-party organisation, that they have carried out the same checks as the school would otherwise perform on any individual who will be working at the school (or who will be providing education on the school's behalf, including through online delivery)
- Ensure that written notification confirms the enhanced DBS check certificate has been obtained by either the employment business or another such business
- Obtain a copy of the certificate from the agency where the agency or organisation has obtained an enhanced DBS certificate before the person is due to begin work at the school, **which has disclosed any matter or information**, or any information was provided to the employment business.
- Obtain an enhanced DBS certificate with children's barred list information from the agency or third party, where the position requires a children's barred list check, prior to appointing the individual
- Check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

Where the school uses contractors to provide services, the school follows the statutory requirements outlined in Part 3 of Keeping Children Safe in Education 2026.

The school will ensure that any contractor, or any employee of the contractor, who is to work at the school, has been subject to the appropriate level of DBS check. Contractors engaging in regulated activity relating to children will require an enhanced DBS check (including children's barred list information).

For all other contractors who are not engaging in regulated activity relating to children, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including children's barred list information) will be required. In considering whether the contact is regular, it is irrelevant whether the contractor works on a single site or across several sites. In cases where the contractor does not have opportunity for regular contact with children, a basic DBS check will be required.

Under **no circumstances** will a contractor on whom no checks have been obtained be allowed to work unsupervised or engage in regulated activity relating to children.

If a contractor is self-employed, the school will either obtain the DBS check, or request to see the certificate if the self-employed person has obtained their own check. The school will ensure that the DBS check is at the level required.

The school will always check the identity of contractors on arrival at the school.

Trainee/Student Teachers

Where applicants for initial teacher training are salaried by the school or college, the school or college will ensure that all necessary checks are carried out, including obtaining an enhanced DBS check (including children's barred list information).

Where trainee teachers are fee-funded, **it is the responsibility of the initial teacher training provider to carry out the necessary checks.** The schools will obtain written confirmation from the provider that it has carried out all pre appointment checks that the school would otherwise be required to perform, and that the trainee has been judged by the provider to be suitable to work with children.

Visitors

For visitors who are on site in a professional capacity, the school will check ID and be assured that the visitor has had the appropriate DBS check (or obtain confirmation from the visitor's employers that their staff have appropriate checks).

The school will not request DBS checks or barred list checks, or ask to see existing DBS certificates, for visitors such as children's relatives or other visitors attending a sports day. The Headteacher will use their professional judgement about the need to escort or supervise such visitors.

External speakers

Careful consideration will be given to the suitability of any external organisations invited in, for example, speakers. We will assess the education value and age-appropriateness of what is going to be delivered. The following checks will be carried out:

- The speaker's website
- Online search of the speaker
- Testimonials from other schools
- As part of the school's existing duties regarding political impartiality, we require assurance that any presentation of political issues is balanced. Political impartiality in schools guidance explains the existing legal requirements.
- The school will check all content, slides and resources before the speaker attends school to check suitability

As outlined in The Prevent duty, we will carry out the checks above to ensure speakers are suitable. We will also ensure that speakers **are supervised at all times by a member of staff**, and that school

facilities are not used in ways that could promote extremist or radicalising views. When deciding whether to host a particular speaker, we will consider carefully whether the views being expressed, or likely to be expressed, constitute views that are used to encourage people into participating in or supporting terrorism, or are shared by terrorist groups. When hosting a speaker (either during or outside of school hours) or visiting a speaker, the school will carry out the following research before agreeing to host:

- The topic of the event (including the purpose of the speaker's visit and the appropriateness for the audience)
- The speaker's reputation and who may be prompted to attend, particularly whether the speaker or members from the organisation they represent have a reputation for causing disruption at venues
- Any risks to the school's reputation and ethos
- The status of the speaker, including their previous comments, by carrying out due diligence, which might include speaking to other settings who have hosted the speaker
- Whether we believe there may be potential for speakers to use language intended to stir up hatred or incite violence
- The views of the Community safety team/ local police/ LA Prevent co-ordinator if we have concerns

See Hosting-Speakers-on-School-Premises-May-2026.pdf

Volunteers

Regular or Overnight Volunteers

The Crime and Policing Act 2026 made changes to **regulated activity**. Volunteers will be classed as working in **regulated activity** if they volunteer:

- **on more than 3 days in a 30-day period.** Where a person volunteers in multiple settings, each instance of teaching, training, instructing, caring for or supervising a child counts towards the 'on more than 3 days in a 30-day period' period condition. For example, if they volunteer for 4 days a month, even if each of the 4 days in that month is in a different school, then they are considered to be in regulated activity
- **overnight on a school trip**

See Regulated activity: removal of the supervision exemption (comes into force 1 September 2026) - GOV.UK and para. 383 of Keeping Children Safe in Education 2026.

Where this applies, the school will obtain an enhanced DBS check with children's barred list information. Where an individual meets the period condition (more than 3 days in a 30 day period) by volunteering at multiple settings, the school will work with the other settings to decide who should apply for the enhanced DBS check with barred list information, and that information will then be supplied by the individual to each setting.

Volunteers may also choose to join the DBS Update Service at the point that a DBS check is applied for. This is free for volunteers and allows portability of a DBS check across different education settings.

The school will also obtain an enhanced DBS check for all volunteers who provide personal care on a one-off basis in school.

Existing Volunteers in Regulated Activity

Where the school has an existing volunteer who will now be in regulated activity from 1 September 2026 because of the changes brought in by the Crime and Policing Act 2026, we will check their children's barred list status. This will be done by obtaining an enhanced DBS check with children's barred list information. The school may obtain a standalone barred list check where either:

- the school wishes to allow the volunteer to undertake regulated activity prior to obtaining the enhanced DBS check certificate; or
- the school has recently obtained an enhanced DBS check without children's barred list information, and there has been no break in service since that certificate was issued.

Volunteers Not in Regulated Activity

Under **no circumstances** will a volunteer on whom no checks have been obtained be left unsupervised or allowed to work in regulated activity.

Whilst volunteers play an important role and are often seen by children as being safe and trustworthy adults, the nature of voluntary roles varies, so the school will **undertake a written risk assessment** and use professional judgement and experience when deciding what checks, if any, are required. **The risk assessment will consider:**

- the nature of any work with children,
- what the school knows about the volunteer, including formal or informal information offered by staff, parents and other volunteers,
- whether the volunteer has other employment or undertakes voluntary activities where referees can advise on their suitability, and
- where the role is not regulated activity, whether another level of DBS check might be appropriate, such as an enhanced DBS check without barred list information, for volunteers who would be in regulated activity but do not volunteer frequently, or a basic DBS check for any other volunteer who may have access to children.

Adults who Supervise Children on Work Experience

When organising work experience placements, the school will ensure that the placement provider has policies and procedures in place to protect children from harm and that they follow the health and safety expectations in Young people at work: Work experience - HSE

If the person providing the teaching, training, instruction or care or supervision to the child on a work experience placement or activity will be doing so **frequently or for more than three days in a 30-day period, or overnight, this is a regulated activity**. We will not allow someone on the barred list to take part in regulated activity.

Other individuals in the workplace who are **not** involved in teaching, training, instructing or caring for or supervising the child on a work experience placement or activity are not in regulated activity.
The school will be unable to request that a work experience provider obtains an enhanced DBS check with children's barred list information for staff supervising children aged 16 to 17 on work experience. *(para. 409 Keeping Children Safe in Education 2026)*
Activity undertaken by a person aged **16 plus** on work experience which takes place in a specified place, such as a school or sixth form college, and gives the opportunity for contact with children, may itself be considered to be regulated activity relating to children. In these cases, the work experience provider e.g. school or sixth form college will consider whether a DBS enhanced check should be requested for the child in question. DBS checks cannot be requested for children under the age of 16.

(para.406-410 Keeping Children Safe in Education 2026)

Children Staying with Host Families (Homestay)
If the school arranges a homestay, we will consider if the arrangements made for hosting meet the criteria for regulated activity and, if so, ensure that the appropriate DBS checks are made.

Private Fostering
Private fostering occurs when a child under the age of 16 (under 18 for children with a disability) is provided with care and accommodation by a person who is **not a parent, person with parental responsibility for them or a relative in their own home.**

A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer.

Actions: Where the arrangements come to the attention of staff, they must inform the DSL.

The school must then notify the local authority to allow the local authority to check the arrangement is suitable and safe for the child. If the school is involved (whether or not directly) in arranging for a child to be fostered privately, the school will notify the local authority of the arrangement as soon as possible after the arrangement has been made.

Sutton Local Safeguarding Children Partnership - Private Fostering

How the School Ensures the Ongoing Safeguarding of Children and Our Legal Reporting Duties as Employers

Ongoing Vigilance for All Staff
As a school, we have processes in place for continuous vigilance and for maintaining an environment that deters and prevents abuse and challenges inappropriate behaviour.

To support this, we create a culture and environment in which staff feel comfortable to discuss matters both within, and where it is appropriate, outside of the workplace (including online), which may have implications for the safeguarding of children. As set out in Part one, Part two and Part four of Keeping Children Safe in Education 2026, we ensure that all staff understand the process and procedures to follow if they have a safeguarding concern about another staff member.

Existing Staff and Volunteers
There are limited circumstances where the school will need to carry out new checks on existing staff or volunteers. These are when:

- an individual working or volunteering at the school moves from a post that was not regulated activity with children into work which is considered to be regulated activity with children. In such circumstances, the relevant checks for that regulated activity **will** be carried out
- there has been a break in service of 12 weeks or more, or
- there are concerns about an individual's suitability to work with children.

Duty to refer to the Disclosure and Barring Service
When an allegation is made, an investigation will be carried out to gather enough evidence to establish if it has foundation. We will ensure we have sufficient information to meet the referral duty criteria explained in the DBS referral guidance, which can be found on GOV.UK.

There is a legal requirement for the school to make a referral to the DBS where we remove an individual from regulated activity (or would have removed an individual had they not left), and we believe the individual has:

- engaged in relevant conduct in relation to children and/or adults, and/or
- satisfied the harm test in relation to children and/or vulnerable adults, and/or
- been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence.

This duty applies equally to paid staff and volunteers where they were engaged in regulated activity.

The DBS will consider whether to bar the person. Detailed guidance on when the school will refer to the DBS (including what is the harm test and relevant conduct), and what information must be provided, can be found on GOV.UK.

Referrals will be made as soon as possible when an individual is removed from regulated activity. This could include when an individual is suspended, redeployed to work that is not regulated activity, dismissed or when they have resigned (or for a volunteer, ceased to volunteer at the school). The school will ensure that as much relevant information as possible is provided.

Duty to consider referral to the Teaching Regulation Agency

Where the school, as the teacher's employer, dismisses or ceases to use the services of a teacher because of serious misconduct, or where we might have dismissed them or ceased to use their services had they not left first, we will consider whether to refer the case to the Secretary of State, as required by sections 141D and 141E of the Education Act 2002. The school will continue to have regard to its duties under the PSED. The Secretary of State may investigate the case, and if there is a case to answer, will then decide whether to make a prohibition order in respect of the person. Details about how to make a referral to the TRA can be found on GOV.UK.

PART 4: Safeguarding concerns or allegations made about staff, including supply teachers, trainee teachers, volunteers and contractors

Concerns or Allegations That May Meet the Harm Threshold

Actions: Staff should inform the Headteacher if a member of staff, including supply teachers, volunteers and contractors 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. This includes behaviour that may have happened outside of school, that might make an individual unsuitable to work with children, this is known as transferable risk. case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

If the Headteacher is the subject of an allegation, the allegation must be made to the Chair of the Trust

Actions for the Headteacher/Governor: The Local Authority Designated Officer (LADO) must be contacted to discuss the nature, content and context of the allegation, and agree a course of action, including whether a referral must be made.

How to contact the LADO

Monday to Friday, 9am to 5pm:

Call: 020 8770 4776 (voicemail)
Email: LADO@sutton.gov.uk

You can fill out an online form to make a referral, or email for a downloadable form.

They will try to respond within 24 hours.

Actions for the DSL: Where the school identifies that a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, the DSL (or a deputy) will contact local authority children's social care and, as appropriate, the police immediately.

When an allegation is made, the school will consider the following two aspects:

• **Looking after the welfare of the child** - the designated safeguarding lead (or a deputy) will be responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care as described in Part one of this guidance.
• **Investigating and supporting the person subject to the allegation** - the case manager will discuss with the LADO the nature, content and context of the allegation, and agree a course of action.

When dealing with allegations, the school will follow the guidance in Part Four of Keeping Children Safe in Education and the Sutton LSCP LADO Protocol

Dealing with Allegations against People Working with Children |

All staff will receive the following training on induction: The Role of the LADO

Concerns or Allegations That Do Not Meet the Harm Threshold - 'Low-Level' Concerns

As part of our whole school approach to safeguarding, we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. This approach will also protect those working in or on behalf of the school from becoming the subject of potential false low-level concerns or misunderstandings.

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 or college may have acted in a way that:

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

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

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating children.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

Actions: All concerns about adults must be shared responsibly with the Headteacher.

Actions for the Headteacher: Headteacher to discuss Low Level Concerns with the LADO as it is unknown if the LADO holds more information.

These will be recorded and dealt with appropriately. This enables the school to:

- identify inappropriate, problematic or concerning behaviour early,
- minimise the risk of abuse, and
- ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the school.

The school's Low-Level Concerns Policy and Staff Code of Conduct sets out the school's procedures for responding to reports of 'low-level' concerns and reinforce our expectations of staff behaviour.

Whistleblowing

Where a staff member feels unable to raise an issue with the Headteacher or the Chair of Governors/Trustee, or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:

- general advice on whistleblowing can be found at whistleblowing for employees
- the NSPCC Whistleblowing Advice Line is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally, or have concerns about the way a concern is being handled by the school. Staff can call 0800 028 0285 (08:00 to 20:00 Monday to Friday, and 09:00 to 18:00 at weekends) or email help@nspcc.org.uk

See the school's Whistleblowing Policy for more details.

PART 5: Child-on-Child Sexual Harassment and Sexual Violence

This part of the policy outlines how the school will respond to all signs, reports and concerns of **harmful sexual behaviour (HSB), child-on-child sexual harassment and sexual violence**. This

includes incidents occurring outside of the school premises, and/or online. What to look out for and indicators of abuse are set out in Part 1 of this policy.

Zero-Tolerance Approach to Sexual Harassment and Sexual Violence

Sutton Grammar School takes a whole-school approach to safeguarding. We take a zero-tolerance approach to sexual harassment and sexual violence; it is never acceptable, and it will be not tolerated. It should never be passed off as "banter", "just having a laugh", "a part of growing up" or "boys being boys". We recognise that failure to challenge it can lead to a culture of unacceptable behaviour, misogyny, an unsafe environment and in worst case scenarios, a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it. In addition to this, we have a robust preventative education programme in place via our Personal Development curriculum, which is reinforced through assemblies, the tutor programme, external speakers and workshops which helps us to create an environment where all children feel safe, supported, and respectful of their peers.

As outlined in the statutory Relationships Education, Relationships and Sex Education and Health Education guidance, "*relationships education has an important role in supporting young people to develop the skills they need to build healthy relationships and grow into kind and respectful adults.*

"Pupils understand that anyone can be a victim of sexual violence, regardless of sex, sexual orientation, gender reassignment or any other protected characteristic, and that the victim is never to blame."

Both within and beyond the classroom, staff should be conscious of everyday sexism, misogyny, homophobia and stereotypes. All staff must take action to build a culture where prejudice is identified and tackled. Staff have an important role in modelling positive behaviour and avoiding language that might perpetuate harmful stereotypes.

Pupils will be taught to understand the importance of challenging harmful beliefs and attitudes and the links between sexism and misogyny and violence against women and girls. Where misogynistic ideas are expressed at school, staff must challenge the ideas, rather than the person expressing them. This is in line with the guidance on p.38 of Relationships Education, Relationships and Sex Education and Health Education guidance *'Addressing sexual harassment and sexual violence.'*

The school recognises, acknowledges, and understands the scale of Harmful Sexual Behaviour, sexual harassment and sexual violence 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. We recognise the escalatory nature of misogyny and the benefits of early identification to support our approach to minimising the risk of HSB, sexual harassment and sexual violence.

Staff should be aware that:

- it is more likely girls will be the victims of sexual harassment and sexual violence, and
- It is more likely it will be perpetrated by boys.
- **Children with disabilities are three times more likely to be abused than their peers.**

Any report of HSB, sexual harassment or sexual violence will be taken seriously. All victims will be reassured that they are being taken seriously and that they will be supported and kept safe.

All staff should always act in the best interests of the child and follow general safeguarding principles. Immediate steps will be taken to support and protect the victim, the alleged perpetrator(s) and any other affected children.

Systems to Enable Children to Report Abuse

The school has clear, well-promoted, and accessible systems that enable children to confidently report abuse, and we make it clear that their concerns will be taken seriously.

Pupils can report abuse to a member of the Safeguarding or Pastoral Teams, or another trusted adult in school. Pupils can also report via the school's online reporting systems on the school website: the Safeguarding Reporting System and the Hear It? Report It system. The school and staff promote these systems via tutor time programme; the tutor dashboard; the pastoral televisions around school and via assemblies to ensure that they are understood and accessible. Staff let pupils know that all reports are taken seriously.

Harmful Sexual Behaviours (HSB)

The umbrella term 'harmful sexual behaviour' (HSB) applies to behaviour occurring **online, face-to-face (both physically and verbally), or both, and is never acceptable**. Harmful Sexual Behaviour (HSB) can occur between two or more children of any age and sex. It can occur also through a group of children towards a single child or towards another group of children. HSB exists on a continuum and may escalate into sexual harassment or sexual violence.

HSB will always be considered within a child protection context.

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive or violent. Behaviour that is problematic, abusive or violent is developmentally inappropriate and may cause developmental damage. Advice on stages of typical sexual development and behaviour for different age groups can be found in Sexual development and behaviour in children | NSPCC Learning.

All staff will receive training on HSB as part of the school's Safeguarding CPD programme.

When assessing HSB, the school will take into account the ages and developmental stage of the children involved. Sexual behaviour between children may be considered harmful if there is a significant age difference, typically more than two years' difference or if one is pre-pubescent and the other is not. However, a younger child may also abuse an older child, especially if they hold power over them, e.g., due to a disability or physical size. **The school will follow the advice on responding to children who display sexualised behaviour available in Responding to children who display sexualised behaviour.**

Actions:

- All staff are expected to challenge and report behaviours, potentially criminal in nature, such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.
- Concerns about HSB must always be reported to the DSL who will consider them within a child protection context.

The DSL (and deputies) will be trained to a level which gives them a good understanding of HSB. This knowledge supports the school's preventative education programme; ensures effective safeguarding policies; as well as a whole school approach to safeguarding.

HSB can, in some cases, progress on a continuum. Where a child displays inappropriate behaviour such as misogyny, **the school will provide early intervention** to help to prevent escalation to more serious abuse such as sexual harassment and sexual violence.

Children who display HSB will also be offered appropriate support as the school recognises that they have often experienced their own abuse and trauma. The DSL will follow guidance from The Centre of Expertise on CSA Safety Planning in Education which provides practical support for those in education settings to respond to children's needs and safety when incidents of harmful sexual behaviour occur. These include:

- Talking to the children involved, and their families
- Considering risks and potential responses
- Drawing up, sharing and implementing a safety plan
- How the school can best help all children involved

Nudes and Semi-Nudes

Nudes and semi-nudes, including where generated by AI, refers to the creation, sending or posting of nude or semi-nude images by young people under the age of 18. The term 'images' includes all visual content, such as photographs, videos and livestreams. The term 'nudes' is used because it is the most widely understood by young people and best captures the full range of image-sharing behaviours covered in Keeping Children Safe in Education 2026.

Images may be taken by the child themselves (sometimes referred to as 'self-generated imagery') or taken or created by another person. They may also be digitally altered or wholly generated using artificial intelligence, including what are sometimes described as 'deepfakes' or 'deep nudes'.

The school takes a safeguarding approach in response to **all** incidents involving the sharing of nude or semi-nude images, regardless of whether they are consensual or non-consensual. All such incidents require a safeguarding response, with a proportionate approach that considers the age, development, and circumstances of the children involved, as well as any elements of coercion, exploitation or vulnerability.

Taking and sharing nude photographs (including those generated using AI e.g. deepfakes) of those aged under 18 is a criminal offence. The DSL will consult UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people and contact the police as per the guidance.

Sexual Harassment

Sexual harassment refers to 'unwanted conduct of a sexual nature' which can occur both online and offline and inside and outside of school. In this context it specifically relates to child-on-child sexual harassment. Such behaviour can:

- violate a child's dignity,
- make them feel intimidated, degraded or humiliated, and
- create a hostile, offensive or sexualised environment.

Examples of sexual harassment can include:

- sexual "jokes" or taunting,

- sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothing or appearance and using sexualised names,
- physical behaviour, such as deliberately brushing against someone, or interfering with someone's clothes - the school will assess when such behaviour crosses into sexual violence and will talk to and consider the experience of the victim,
- displaying pictures, photos or drawings of a sexual nature,
- upskirting (this is a criminal offence) - the DSL will report this to the police in addition to CFCS.

Online sexual harassment, which may occur independently, or as a broader pattern of sexual harassment and/or sexual violence, may include:

- consensual and non-consensual making or sharing of nudes and semi-nudes
- sharing of unwanted explicit content
- sexualised online bullying
- unwanted sexual comments and messages, including, on social media
- sexual exploitation; coercion and threats,
- coercing others into sharing images of themselves or performing acts they're not comfortable with online.

Actions for the DSL: For a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis.

Sexual Violence

The school recognises that child-on-child sexual violence **can and does occur**, both inside and outside of school.

In para. 543 of Keeping Children Safe in Education 2026, the term sexual violence refers to specific sexual offences under the Sexual Offences Act 2003. Full definitions of the offences below can be found in Appendix B:

- **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.
- 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).

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

What is sexual consent? | Rape Crisis England & Wales

Actions: Staff **must** inform the DSL immediately. If for any reason the DSL is unavailable, you must report to CFCS and the police.
Contact Children's First Contact Service on **020 8770 6001** or **020 8770 5000** out of hours.
Make a referral: https://sutton.gov.uk/w/report-a-concern-about-a-child

Responding to a Report of HSB, Sexual Harassment and/or Sexual Violence

The Immediate Response to a Report

Children may struggle to verbally disclose abuse. Instead, they may show signs or behave in ways that signal distress, hoping that adults will notice and react. Disclosures may come indirectly, for example, through a friend, an overheard conversation that suggests a child has been harmed, or noticeable changes to a child's own behaviour which may indicate that something is wrong. Certain children may face additional barriers to disclosure especially children with vulnerabilities related to disability, sex, ethnicity, or sexual orientation. **Staff should act immediately on any concerns about a child's welfare, rather than wait to be told.**

Staff should recognise that a child is likely to disclose to **someone they trust**, this could be anyone within the school. Staff should recognise the significance of being chosen as a confidant and respond with empathy.

Managing reports:

- If possible, manage the report with two members of staff present (preferably one of them being the designated safeguarding lead or a deputy)
- All victims must be 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 the school environment should be treated with equal seriousness.
- Victims should never be made to feel that they are causing a problem by reporting or ever be made to feel ashamed for coming forward.
- Leading questions should be avoided but staff **can** ask children **if they have been harmed and what the nature of that harm was e.g. *"Have you been harmed? Tell me about the harm/How were you harmed?"***
- Staff should explain that the law exists to protect children and young people, not criminalise them, and should do so in such a way that is reassuring and avoids alarming or distressing them.
- Do not promise confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead (or a deputy) or local authority children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to.
- Ideally, staff should wait until the end of the conversation to write a detailed summary, allowing the staff member to give the child their full attention. If notes are taken during the

report, especially when a second staff member is present, care must be taken to remain engaged and not appear distracted. **It is essential a written record is made** - record only what the child says, without interpretation or personal opinion. These notes may be used in statutory assessments and/or criminal investigations, and

- if the designated safeguarding lead (or a deputy), is not present during the report, they must be informed as soon as practically possible.

(Para. 558 Keeping Children Safe in Education 2026)

See Appendix A – Responding to concerns or disclosures of child sexual abuse

Staff training: All staff will be trained to manage reports appropriately.

Actions for the DSL: The designated safeguarding lead (or a deputy) will lead the school's response and will ensure they are familiar with local referral processes. They will also engage with local authority children's social care as needed and ensure they are familiar with local specialist support services for all children involved (including victims and alleged perpetrators) and know how to access them when needed.

Confidentiality

Only essential staff and agencies will be involved – those directly supporting the child/ren or participating in any investigation.

The designated safeguarding lead (or a deputy), will consider:

- informing parents or carers, unless doing so increases the risk to the victim,
- referring to local authority children's social care if the child is at risk of harm, in immediate danger, or has been harmed, and
- reporting crimes such as rape, assault by penetration or sexual assault to the police. Even 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.

Ultimately, the designated safeguarding lead (or a deputy) will balance the victim's wishes **with the duty to protect them and other children.** If the designated safeguarding lead (or a deputy) does make a referral to local authority children's social care and/or a report to the police against the victim's wishes, it will be handled with care. The decision will be explained to the victim and appropriate specialist support offered.

Anonymity

Where an allegation of sexual harassment or sexual violence is progressing through the criminal justice system, the school will refer to Safeguarding Children as Victims and Witnesses | The Crown Prosecution Service which outlines the importance of anonymity, witness support, and the criminal process in general, so that the school can offer support and act appropriately.

As part of good safeguarding practice, the school will take reasonable steps to protect the anonymity of **all** children involved. Amongst other things, this includes carefully deciding, based on the nature of the report, which staff need to know about the report and what support that will be provided for the children involved. The school will also consider the potential impact of social media, which can spread rumours and compromise victims' identities, referring to the guidance outlined in paragraphs 566 and 567 of Keeping Children Safe in Education 2026 and in Childnet's cyberbullying guidance.

Risk and Needs Assessment

Following a report of sexual violence, the designated safeguarding lead (or a deputy) will carry out an **immediate risk and needs assessment**. The risk and needs assessment for a report of sexual violence will consider:

- the victim's safety and support needs
- potential other victims
- the alleged perpetrator(s)
- the wider school community, including staff and students, and any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms, and
- the location and time of the incident, with steps to improve safety in that area.

Risk and needs assessments will be recorded (on CPOMS), regularly reviewed and used to inform ongoing safeguarding decisions. At all times, the school will be actively considering the risks posed to all pupils and put adequate measures in place to protect them and keep them safe.

In cases of sexual violence, professional risk assessments by social workers or sexual violence specialists are likely to be required. The school's risk assessment is not intended to replace the detailed assessments of expert professionals. Professional assessments will be used to inform the school's approach to supporting and protecting pupils and updating our own risk assessment.

Action following a report of HSB, sexual harassment and/or sexual violence

The designated safeguarding lead (or a deputy) is likely to have a complete safeguarding picture and will lead the initial response by the school considering:

- the victim's wishes regarding how they want to proceed
- any power imbalance between the children such as differences in age, maturity, or social status. Consider if the victim has a disability or learning difficulty,
- whether the alleged incident was isolated or part of a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature),
- importance of understanding intrafamilial harm and support for siblings if needed

See para. 571 and 572; and pages 150-151 of Keeping Children Safe in Education 2026 for a full list of considerations and initial considerations for children sharing a classroom.

Options to Manage a Report

The school will consider every report on a case-by-case basis. When to inform the alleged perpetrator(s) will be carefully considered. If a referral to local authority children's social care and/or the police is made, then the designated safeguarding lead (or a deputy) will consult with those agencies to determine next steps, including how and when to inform the alleged perpetrator(s) of the allegations.

When managing reports, the school will consider the four common scenarios outlined in para. 573 of Keeping Children Safe in Education. Below is a summary of the four scenarios – see para.573 onwards for full details of each scenario.

1. **Manage internally:** In some cases, such as one-off incidents of HSB or sexual harassment, it may be appropriate for the school to manage the situation internally, using the behaviour policy and providing pastoral support, without involving statutory services.

2. **Universal services and community based Early Help assessment:** In line with managing internally, the school may decide that the children involved do not require referral to statutory services but may benefit from other support. Universal services and community based Early Help play a crucial role in identifying emerging problems and providing support at an early stage.
3. **Referrals to Family Help – including targeted Early Help and local authority children's social care:** Some children and families may require more targeted support than that offered at the universal and community based Early Help level. Family Help means both targeted early help and support and services delivered under s.17 of the Children Act 1989. Where a child has been harmed, is at risk of harm, or is in immediate danger, the school will make a referral to local authority children's social care.
4. **Reporting to the police:** Any report to the police will generally be in parallel with a referral to local authority children's social care.

Whatever the response, it will be underpinned by the principle that there is a zero-tolerance approach to sexual harassment and sexual violence, that it is never acceptable, and it will not be tolerated. All concerns, discussions, decisions and their rationale will be clearly recorded in writing.

Ongoing Response

Safeguarding and supporting the victim

The following principles are based on effective safeguarding practice and will guide any decisions regarding safeguarding and supporting the victim:

- The needs and wishes of the victim will be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim, if they wish, will be able to continue in their normal routine. Overall, the priority will be to make the victim's daily experience as normal as possible, so that the school is a safe space for them
- The school will consider the age and the developmental stage of the victim, the nature of the allegation(s) and the potential risk of further abuse. We recognise that, by the very nature of sexual harassment and sexual violence, a power imbalance is likely to have been created between the victim and alleged perpetrator(s)
- The victim will never be made to feel they are the problem for making a report or made to feel ashamed for making a report
- The school will consider the proportionality of the response. Support will be tailored on a case by-case basis.
- The school recognises that sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre (SARC).
- In all scenarios, decisions and actions will be regularly reviewed and relevant policies will be updated to reflect lessons learnt. Where the school identifies a pattern of concerning, problematic or inappropriate behaviour, we will decide on a course of action. For example, extra teaching time and/or staff training may be delivered to minimise the risk of incidents happening again.

Support:

- We recognise that victims may not share everything at once and might disclose information gradually. Therefore, we will keep communication open and supported. When it is clear that ongoing support is needed, the school will ask the victim whether they would like a designated trusted adult (for example, their form tutor or designated safeguarding lead or a deputy) to

talk to about their needs. The choice of this adult will be the victim's (wherever reasonably possible) and will be respected and supported.

- Children who have experienced sexual violence display a very wide range of responses to their experience, including in some cases clear signs of trauma, physical and emotional responses, or no overt signs at all. The school will remain alert to the possible challenges of detecting those signs and show sensitivity to the needs of the child (e.g. about attendance in lessons) irrespective of how overt the child's distress is.
- The school will avoid any actions that would isolate the victim, in particular from supportive peer groups. However, some victims may find it difficult to follow a full-time timetable and may wish to withdraw from certain lessons and activities. This will be based on the victim's needs. If required, the school will provide a physical space for victims to withdraw to.
- If the school needs to maintain protective and supportive measures for victims over an extended period, we will work with local authority children's social care and other agencies as required.
- The school will take all reasonable steps to protect the victim from bullying or harassment as a result of any report they have made.
- Whilst the victim will be given all the necessary support to remain in the school, if trauma prevents the victim being unable to do this, alternative provision or a move to another school may be considered to enable them to continue to receive suitable education. This will only be at the request of the victim and following discussion with their parents or carers. If the victim does move to another educational institution (for any reason), the new educational institution will be made aware of any ongoing support needs. The designated safeguarding lead (or a deputy) will take responsibility to ensure this happens (and will discuss with the victim and, where appropriate their parents or carers as to the most suitable way of doing this) as well as transferring the child protection file.

Victim and alleged perpetrator sharing classes and spaces

In the event of a report, the school will carefully consider the question of the victim and alleged perpetrator(s) sharing classes and sharing space at school or college and will refer to and follow the guidance on p.150 of Keeping Children Safe in Education 2026.

Safeguarding and supporting the alleged perpetrator(s) and children and young people who have displayed harmful sexual behaviour (HSB)

The following principles are based on effective safeguarding practice and will help shape any decisions regarding safeguarding and supporting the alleged perpetrator(s):

- As well as safeguarding the victim (and the wider pupil/student body), the school will also need to provide the alleged perpetrator(s) with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary. We will consider the age and the developmental stage of the alleged perpetrator(s), the nature of the allegations and frequency of allegations.
- We will consider the proportionality of the response. Support (and sanctions) will be considered on a case-by-case basis. We recognise that the alleged perpetrator(s) may potentially have unmet needs (in some cases these may be considerable) as well as potentially posing a risk of harm to other children.
- Advice will be taken, as appropriate, from local authority children's social care, specialist sexual violence services and the police.
- It is important that the perpetrator(s) is/are also given the correct support to try to stop them re-offending and to address any underlying trauma that may be causing this behaviour. Addressing inappropriate behaviour, including sexism and misogyny, can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

Advice on behaviour in schools is clear that teachers can sanction pupils whose conduct falls below the standard which could be reasonably expected of them. If the perpetrator(s) is to be excluded the decision must be lawful, reasonable and fair. Further information about exclusions can be found in statutory guidance for schools: Suspension and Permanent Exclusion from maintained schools, academies and pupil referral units in England.

- We recognise that school can be a significant protective factor for children who have displayed HSB, and continued access to school, with a comprehensive safeguarding management plan in place, is an important factor we will consider before final decisions are made. If an alleged perpetrator does move to another educational institution (for any reason), the DSL (or a deputy) will ensure that the new educational institution is made aware of any ongoing support needs and where appropriate, potential risks to other children and staff.

Sanctions and the alleged perpetrator(s)

Advice on behaviour in schools is clear that teachers can sanction pupils whose conduct falls below the standard which could be reasonably expected of them.

Disciplinary action can be taken whilst other investigations by the police and/or local authority children's social care are ongoing. The fact that another body is investigating or has investigated an incident does not in itself prevent the school from coming to its own conclusion, on the balance of probabilities, about what happened, and imposing a penalty accordingly. This will be carefully considered on a case-by-case basis. The designated safeguarding lead (or a deputy) will take a leading role.

The school will consider if, by taking any action, it would prejudice an investigation and/or any subsequent prosecution. Careful liaison with the police and/or local authority children's social care will help the school make a determination. The school will also consider whether there are circumstances that make it unreasonable or irrational for the school to reach its own view about what happened while an independent investigation is considering the same facts.

Working with parents and carers

The school will, in most instances, engage with both the victim's and the parents or carers of the alleged perpetrator(s) when there has been a report of sexual violence (this might not be necessary or proportionate in the case of sexual harassment and will be considered on a case-by-case basis). The exception to this rule is if there is a reason to believe informing a parent or carer will put a child at additional risk.

The school will work with relevant agencies, such as local authority children's social care and/or the police, to consider what information they provide to the respective parents or carers about the other child involved and when they do so, so that a consistent approach is taken to information sharing.

The Designated Safeguarding Lead (or a deputy) will meet the victim's parents or carers with the victim present to discuss what arrangements are being put in place to safeguard the victim and understand their wishes in terms of support they may need and how the report will be progressed. The attendance of other agencies will be considered on a case-by-case basis.

The Designated Safeguarding Lead (or a deputy) will also meet the parents or carers of the alleged perpetrator(s) to discuss any arrangements that are being put into place that impact an alleged perpetrator(s), such as, for example, moving them out of classes with the victim and what this means for their education. The reason behind any decisions will be explained and support for the alleged perpetrator(s) will be discussed. The attendance of other agencies will be considered on a case-by-case basis.

The school recognises that parents and carers may well struggle to cope with a report that their child has been the victim of a sexual assault or is alleged to have sexually assaulted another child. Details of organisations that support parents are provided in Annex A of Keeping Children Safe in Education 2026 and the school will signpost parents and carers to this support.

Safeguarding other children

The school recognises that witnessing sexual violence, especially rape and assault by penetration, is likely to be traumatic and support may be required.

Following any report of sexual harassment or sexual violence, it is likely that some children will take "sides". The school will do all it can to ensure both the victim and alleged perpetrator(s), and any witnesses, are not being bullied or harassed.

Social media is very likely to play a central role in the fall out from any incident or alleged incident. There is the potential for contact between victim and alleged perpetrator(s) and a very high likelihood that friends from either side could harass the victim or alleged perpetrator(s) online and/or become victims of harassment themselves.

School transport is a potentially vulnerable place for a victim or alleged perpetrator(s) following any incident or alleged incident. The school or college, as part of its risk and needs assessment, should consider any additional potential support needs to keep all of their children safe.

APPENDIX A: Responding to concerns or disclosures of child sexual abuse

The school follows the actions outlined in Sutton LSCP Child Sexual Abuse Strategy 2026-29 and The CSA Centre Response Pathway which is being fully implemented by Sutton LSCP. This is an **interactive online resource** developed by the Centre of Expertise, centred on children's needs, to guide professionals through how they can protect and support children and their families when there are concerns of sexual abuse.

The Response Pathway sets out how to respond to concerns of child sexual abuse at key points: from first concerns and early help safeguarding through to child protection and criminal justice responses.

Initial response – How to Respond When...

You have concerns that a child or young person is being or has been sexually abused

We will follow the guidance is the Centre of Expertise on CSA guidance How to respond when you have concerns that a child or young person is being or has been sexually abused

Remember: Staff should act immediately on any concerns about a child's welfare, rather than wait to be told.

A child tells you they are being sexually abused

We will follow the Centre of Expertise on CSA guidance How to respond when a child tells you they are being or have been sexually abused

This includes:

- Reassuring victims 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.
- Treating abuse that occurs online or outside the school environment with equal seriousness.
- Ensuring victims are never made to feel that they are causing a problem by reporting or ever be made to feel ashamed for coming forward.
- Staff should explain that the law exists to protect children and young people, not criminalise them, and should do so in such a way that is reassuring and avoids alarming or distressing them.

Receive: Listen to what is being said without displaying shock or disbelief. Accept what is being said without judgment and take it seriously.

Reassure: Reassure the child that they have done nothing wrong, it's not their fault and that you take what they have said seriously. Acknowledge how difficult it must have been for them to talk.

Do not promise confidentiality or agree to keep a secret. Tell the child that you will need to tell some people but only those whose job it is to protect children.

React: Do not investigate, interrogate or decide if the child is telling the truth.
Do not ask leading questions – the child explain to you in his or her own words.
Do not ask the child to repeat what they have said to you to another member of staff.
Do not confront the alleged abuser.

DO ask open questions e.g. "Is there anything else you would like to tell me?"
DO ask children if they have been harmed and what the nature of the harm was.
DO report what the child has told you immediately.

Record: Make some notes in pen and write them up in detail as soon as possible.
Record the date, time, place and the actual words used by the child including any swear words or slang. Sign your notes.
Keep it factual – record exact statements and observable things, not your interpretations or assumptions.
Do not destroy your original notes in case they are needed in court.

Report: Under The Crime and Policing Act 2026, there is a statutory duty for individuals undertaking key roles with responsibility for children and young people in England to report sexual abuse when they are made aware of it.

The Crime and Policing Act 2026 establishes a clear legal requirement for **anyone** in regulated activity relating to children in England to report to the police or local authority if they are made aware a child is being sexually abused; either by being told about it by a child or perpetrator or witnessing the abuse themselves.

A report must be made as soon as reasonably practicable to prevent the risk of further harm, but in circumstances which involve risk to the life of child this may be delayed for a maximum of seven days in order to manage that risk.

Child sexual abuse images have been discovered

We will follow the guidance in the Centre of Expertise on CSA guidance How to respond when child sexual abuse images have been discovered

This includes:

- Staff should not view or forward illegal images of a child.
- Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK 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. See Searching, screening and confiscation in schools - GOV.UK

Someone comes to you with information that a child is being or has been sexually abused

We will follow the Centre of Expertise on CSA guidance: How to respond when someone comes to you with information that a child is being or has been sexually abused

Approach

Referrals

Making a referral: We will follow the Centre of Expertise on Child Sexual Abuse guidance Making a referral to children's social care and/or reporting to the police and Sutton LSCP Threshold Guidance Part 2: When children's social care/criminal justice agencies are involved outlines what happens once CFCS and the police have been informed.

If there is insufficient evidence to make a referral to children's social care or contact the police, but we have concerns that a child may have been sexually abused or be at risk of sexual abuse, we will follow the guidance in: Acting on your concerns when a referral is not made

When the threshold for intervention by children's social care or the police is not met, we recognise that this does not mean that there are no concerns or that the abuse has not taken place. Therefore, we will continue to be vigilant, maintain professional curiosity and support the child, following the guidance: When the threshold for intervention by children's social care is not met

Supporting the child's relationship with their family and friends

It is vital for all professionals to support the child's relationships with their families and friends, especially if statutory agencies are not or no longer involved in the child's life. Even if those agencies are involved, do not assume that supporting the child's relationships with their family and friends is someone else's responsibility.

The school will follow the guidance in: Supporting the child's relationships with their family and friends

Support

Supporting the child's education

In line with Priority 4 of the action plan in the Sutton LSCP Child Sexual Abuse Strategy 2026-29, the school will ensure children are supported in their education by maintaining their engagement in learning and guaranteeing their safety from harm by peers within the school environment, following recommendations from: https://csapathway.uk/education.pdf

The DSL will follow guidance from The Centre of Expertise on CSA Safety Planning in Education which provides practical support for those in education settings to respond to children's needs and safety when incidents of harmful sexual behaviour occur. These include:

- Talking to the children involved, and their families
- Considering risks and potential responses
- Drawing up, sharing and implementing a safety plan
- How the school can best help all children involved

Supporting the child's emotional health and wellbeing

In line with Priority 5 of the action plan and p.36 of Safety planning in education | CSA Centre the school will, in consultation with the child:

- Identify a separate safe space for each child to go to if they feel upset or stressed
- Provide the child with an 'exit card' so that they can discreetly leave lesson activities if they feel upset or stressed
- Teach the child calming strategies which will form part of their 'emotional toolkit' to support them during moments of dysregulation, distraction or distress
- Arrange for the child to have a fidget item/sensory toy or a pre-prepared calm box they can use during moments of dysregulation, distraction or distress
- or have a 'code question' that indicates they need some time out. Be clear about where they need to go at these times, and whether supervision is required. Older children may make use of a social space, gym or library.

Consider how any instances of the child leaving their learning will be followed up, so that issues can be addressed

- access to an emotional toolkit to support them in regulating their emotions, and
- an 'exit card' if they would like to leave a lesson to speak to someone or regulate their emotions.

We will follow recommendations from: emotionalhealthandwellbeing.pdf

5	**Supporting the child's emotional health and wellbeing**	To ensure children's emotional health and wellbeing are supported by providing them with opportunities to talk about their feelings and ensure that they have access to resources and support.

Supporting the child's physical health and wellbeing

In line with Priority 6 of the action plan, the school will follow recommendations from: physicalhealthandwellbeing.pdf

6	**Supporting the child's physical health and wellbeing**	To ensure there are opportunities for the child to discuss their physical wellbeing, and for any specific needs to be addressed by professionals.

APPENDIX B - SAFEGUARDING ISSUES
This appendix contains brief details of some of the issues, any additional local protocols or guidance staff should be aware and/or any specific actions that should be taken, as well as links to organisations and resources.
Up-to-date information, local resources and services can be found at: Safeguarding Commonly Asked Questions – Cognus

Bullying	**Resources**	Preventing bullying including cyberbullying – DfE advice
Child abduction and community safety incidents	**Definition**	Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns, for example, people loitering nearby or unknown adults engaging children in conversation.
	Actions	Child abduction: Call 999 immediately. Other community safety incidents that are not an emergency: Call 101
Child Criminal Exploitation (CCE) and modern slavery	**Definition & signs**	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. 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. Children who are criminally exploited should have their vulnerabilities recognised by adults and professionals, (particularly older children), **and should be treated as victims. It is not possible for a child to give informed consent to engage in criminal or other exploitative activity, and they cannot give consent to be exploited, abused or trafficked.** It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It

		is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation. Sutton LSCP Child Exploitation Awareness - Child Criminal Exploitation To support conversations with children and young people: Spotting the Signs Tool & Training - Brook
	Actions for DSL	DSL to follow Sutton LSCP Multi-Agency Protocol for Safeguarding Adolescents Further information is available in the Modern Slavery statutory guidance. In accordance with this guidance, **a relevant child protection and modern slavery referral should be completed where a potential victim of CCE or CSE is identified.** The National Referral Mechanism (NRM) is the UK's framework for identifying and supporting victims of exploitation and modern slavery. Whatever form it takes, exploitation and modern slavery is child abuse and relevant child protection procedures must be followed if modern slavery or trafficking is suspected, as per the Modern Slavery: statutory guidance for England and Wales (under s49 of the Modern Slavery Act 2015) and non-statutory guidance for Scotland and Northern Ireland (accessible version) - GOV.UK
Child Sexual Exploitation and modern slavery	**Definition & signs**	CSE is a form of child sexual abuse. 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 and most sexual abuse is committed by those previously known to the victim. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship. As with CCE, victims are not always recognised and can be criminalised for actions they take whilst under coercion. This remains a significant concern, as professionals continue to encounter cases where children are manipulated, groomed, and exploited without fully understanding the abuse they are experiencing. Further information on signs of a child's involvement in sexual exploitation: Child sexual exploitation: guide for practitioners. To support conversations with children and young people: Spotting the Signs Tool & Training - Brook Sutton LSCP: Child Exploitation Awareness - Child Sexual Exploitation
	Actions for DSL	DSL to follow Sutton LSCP Multi-Agency Protocol for Safeguarding Adolescents The National Referral Mechanism (NRM) is the UK's framework for identifying and supporting victims of exploitation and modern slavery. Whatever form it takes, exploitation and modern slavery is child abuse and relevant child protection procedures must be followed if modern slavery or trafficking is suspected, as per the Modern Slavery: statutory guidance for England and Wales (under s49 of the Modern Slavery Act 2015) and non-statutory guidance for Scotland and Northern Ireland (accessible version) - GOV.UK
Child to Parent or Care Giver Abuse	**Definition**	A form of abuse: Children may also cause harm to other family members, often referred to as child to parent or care giver abuse (Para. 24 of KCSIE 2026) A form of domestic abuse: Types of domestic abuse include intimate partner violence, abuse by

		family members, teenage relationship abuse and child to parent or care giver abuse. (p. 161 of KCSIE 2026)
	Resources	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)
County Lines	**Definition & Signs**	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". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults 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 can be targeted and recruited into county lines in a number of locations including any type of schools (including special schools), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. A number of the indicators for CCE and CSE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who: • go missing (from school or home) and are subsequently found in areas away from their home • have been the victim, perpetrator or alleged perpetrator of serious violence (e.g. knife crime) • are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs

		• are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection • are found in accommodation that they have no connection with, often called a 'trap house' or 'cuckooing' or hotel room where there is drug activity • owe a 'debt bond' to their exploiters, and • have their bank accounts used to facilitate drug dealing. Further information on the signs of a child's involvement in county lines is available in guidance below – see Resources & Support.
	Resources & support	Child exploitation disruption toolkit (accessible) - GOV.UK County Lines Toolkit For Professionals | The Children's Society Sutton LSCP Child Exploitation Awareness - County Lines County Lines Support | Catch22 National Child Criminal Exploitation Support Service - Missing People
	Actions for DSL	DSL to Follow Sutton LSCP Multi-Agency Protocol for Safeguarding Adolescents As county lines is a form of criminal exploitation, a First Responder who identifies any potential victim of county lines exploitation should complete the relevant child protection and modern slavery referrals as detailed in the Modern Slavery statutory guidance. **With the child's consent and after speaking to children's social care,** you could make a referral to: Young Londoners affected by violence and exploitation - Safer London **VESS London (Violence and Exploitation Support Service) has highly skilled caseworkers who provide long term and trauma-informed support to children and young people in London who are affected by violence and exploitation.**
Children and the Court System	**Definition**	Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed.

	Resources	There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds. The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers. **Children with family members in prison:** Prisoners' Families Helpline
Children who are absent from education and Children Missing Education (CME)	**Definition**	All staff should be aware that children being absent from school, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect such as sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, honour or faith-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school unauthorised absence procedures and children missing education procedures. A child 'Missing Education' is a child of compulsory school age who is NOT a registered pupil at a school and is NOT receiving suitable education otherwise than at a school (e.g. home educated or receiving paid for tuition).
	Actions for the DSL	DSL to follow Sutton LSCP Children Missing Education Policy and Children Missing Education – Cognus

Cyber Crime	**Definition**	Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include: • unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded • 'Denial of Service' (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources, and, • making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.
	Actions for the DSL	The DSL should consider referring into the **Cyber Choices** programme. Read: when-to-call-the-police--guidance-for-schools-and-colleges.pdf
Domestic Abuse	**Definition**	The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduced the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, 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. Under the statutory definition, 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). Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse.

		Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government has issued statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children. Signs and indicators can be found at: Domestic abuse | NSPCC
	Resources & Signposting	Sutton DASS | Cranstoun Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. What is domestic abuse? - Refuge 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) Safe Young Lives | Young people & domestic abuse - SafeLives - for young people who experience domestic abuse in intimate partner relationships
Drug taking and/or alcohol misuse	**Resources & Signposting**	Honest information about drugs – Talk to Frank website Sutton, Here4YOUth | Cranstoun - Sutton youth support
	Actions	Sutton School Vaping Protocol_Flow Chart - Google Slides - follow vaping protocol
Fabricated or Induced Illness	**Definition & signs**	Overview - Fabricated or induced illness - NHS Fabricated or induced illness (FII) is a rare form of child abuse. It happens when a parent or carer exaggerates or deliberately causes symptoms of illness in the child.
	Actions	• Inform the DSL • Do not speak to parents/carers about your concerns
Financially Motivated Sexual Extortion (FMSE)		Being forced into paying money or meeting another financial demand (such as purchasing a pre-paid gift card) after an offender has threatened to release sexual/indecent images of them. This is called 'Financially Motivated Sexual Extortion', a type of online blackmail often referred to as 'sextortion'.

		Victims of any age are potential targets, however **teenage males aged 14-17** and male adults aged 18-30 are particularly at risk. This crime is usually carried out by organised criminal gangs, often based overseas, who are typically motivated by financial gain. Victims may be: • contacted by an online account they don't know, or a hacked account of someone they do know where the communication feels unfamiliar • quickly engaged in sexually explicit communications, which may include the offender sharing an image first • moved from a chat on social media, an online platform or game to a private platform such as an end-to-end encrypted messaging app. • manipulated or pressured into taking nude or semi-nude photos or videos • told they have been hacked and the offender has access to their images, personal information and contacts (whether this is true or not) • blackmailed into sending money or meeting another financial demand (such as purchasing a pre-paid gift card) after sharing an image, or the offender sharing hacked or digitally manipulated/AI-generated images of them to make the threat of sharing them wider Sextortion - National Crime Agency
	Actions	• Report to DSL • DSL to report the incident to the police by calling 101 or 999 if you feel you are at immediate risk of harm. • Report it to the social media platform the child has been contacted on. You can also use Stop NCII (Non-Consensual Intimate Image Abuse), a free tool to help detect and remove images from being shared online. • Support the child to use Report Remove, a tool from Childline and the Internet Watch Foundation, to remove images that have been shared or might be shared.

		• Use Take It Down, a tool from the National Center for Missing and Exploited Children, to remove or stop the online sharing of images or videos.
	Signposting	Sextortion - National Crime Agency
Homelessness		Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets. The new duties shift the focus to early intervention and encourages those at risk to seek support as soon as possible, before they are facing a homelessness crisis. In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16- and 17-year-olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Local authority children's social care will be the lead agency for these children, and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16- and 17-year-olds who may be homeless and/or require accommodation: here.
	Actions for the DSL	The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority

		so they can raise/progress concerns at the earliest opportunity. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, **this does not, and should not, replace a referral into local authority children's social care where a child has been harmed or is at risk of harm.**
	Signposting	Sutton Information Hub | Sutton Information Hub
Honour or Faith-based Abuse (including FGM and Forced Marriage)	**Definition**	**Honour or faith-based abuse (HBA)** encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including: • female genital mutilation (FGM) • forced marriage • and practices such as breast ironing. Abuse committed in the context of preserving honour often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA. **FGM** comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. **Forced Marriage:** Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning

		disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (chapter 8 provides guidance on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at: The right to choose: government guidance on forced marriage - GOV.UK It is also a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.
	Actions	If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or a deputy). As appropriate, the designated safeguarding lead (or a deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority children's social care. **FGM:** staff must personally report FGM to the police Mandatory reporting of female genital mutilation: procedural information - GOV.UK **Forced Marriage:** School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fcdo.gov.uk.
	Actions for the DSL	Sutton Local Safeguarding Children Partnership - Female Genital Mutilation (FGM)
Mental Health	**Resources & Signposting**	Mental health and behaviour in schools – DfE advice See Mental Health section of Safeguarding Commonly Asked Questions – Cognus for Sutton support Mental Health Support Network provided by Chasing the Stigma | Hub of hope

Modern Slavery and the National Referral Mechanism	**Definition and Signs**	Modern slavery encompasses exploitation, including sexual exploitation, criminal financial exploitation, human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including forced labour, slavery, servitude, forced criminality and the removal of organs. Further information and training for professionals on exploitation and modern slavery is available: Modern slavery training: resource page - GOV.UK
	Actions for the DSL	In discussion with CFCS: The National Referral Mechanism is the system used within the UK to support potential victims of exploitation and modern slavery. Further information on the signs that someone may be a victim of exploitation and modern slavery, the support available to victims and **how to refer them to the NRM** is available in statutory guidance Modern slavery: how to identify and support victims - GOV.UK
Preventing Radicalisation	**Definition & Signs**	Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools or colleges safeguarding approach. • **Extremism** is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs • **Radicalisation** is the process of a person legitimising support for, or use of, terrorist violence. • **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 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. Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern, including:

		• accessing extremist or terrorist websites, forums and publications • expressing an interest to travel to a conflict zone • being in contact with a group or individuals known to support a violent extremist ideology, either online or in real life • demonstrating a fixation with weaponry or explosives (this may include posing in concerning photographs or videos with weaponry), without an otherwise reasonable explanation • being obsessed with massacre, or extreme or mass violence, without targeting a particular group (for example, high school shootings) A full list of risk indicators can be found at: Managing risk of radicalisation in your education setting - GOV.UK **Prevent Duty:** All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015, in the exercise of their functions, to have "due regard to the need to prevent people from becoming terrorists or supporting terrorism". This duty is known as the **Prevent duty.** **Channel** is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals are assessed and may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required. **A representative from the school or college may be asked to attend the Channel panel to help with this assessment.** An individual will be required to provide their consent before any support delivered through the programme is provided. Channel and Prevent Multi-Agency Panel (PMAP) guidance - GOV.UK
	Actions	It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being drawn into terrorism. 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.
	Actions for DSL	**Referral:** Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or a deputy) making a Prevent referral **The Prevent duty** should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads (and deputies) and other senior leaders in education settings should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 141-210, which are specifically concerned with education (and also covers childcare). The guidance is set out in terms of three general themes: leadership and partnership, capabilities and reducing permissive environments. **If a child is leaving the school:** The designated safeguarding lead (or a deputy) should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse, incidents that may indicate concerns about serious violence or harmful behaviours and/or details of those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives. Prevent Lead, Sutton: Ammar Bhatty ammar.bhatty@sutton.gov.uk
	Resources	The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK Educate Against Hate - Prevent Radicalisation & Extremism Managing risk of radicalisation in your education setting – DfE advice
	Staff Training	The Home Office has developed three e-learning modules: • Prevent awareness e-learning offers an introduction to the Prevent duty. • Prevent referrals e-learning supports staff to make Prevent referrals that are robust, informed and with good intention.

		• Channel awareness e-learning is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel. Regional CONTEST co-ordinators - GOV.UK DfE London Prevent Links | Linktree
Serious Violence	**Definition & Signs**	There are a number of indicators, which may signal children are at risk from, or are involved in serious violence. These may include: • increased absence from school or college • a change in friendships or relationships with older individuals or groups • a significant decline in educational performance • signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries, and • 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. The likelihood of involvement in serious violence may be increased by factors such as: • being male • having been suspended, spent time in Alternative Provision or permanently excluded from school, and • having experienced child maltreatment and having been involved in offending, such as theft or robbery. A fuller list of risk factors can be found in the Home Office's Serious Violence Strategy. Professionals should also be aware that violence can often peak in the hours just before or just after school, when pupils are travelling to and from school and can concentrate in particular places. These times can be particularly risky for young people involved in serious violence. It is important that schools and colleges try to understand where these places are, with a view to working with partners to promote safety for children. Listening to children and consulting with staff can help establish when and where they feel unsafe. Working with wider partners can also help build understanding of the local context beyond the school or college and help co-ordinate a collective safeguarding response around the school day.

		Advice for schools and colleges is provided in the Home Office's Criminal exploitation of children and vulnerable adults: county lines guidance. The Youth Endowment Fund (YEF) (the "what works" centre for preventing violence) has produced practical guidance for schools and colleges and an accompanying self-assessment tool to help introduce evidenced practice for preventing children becoming involved in violence.
	Actions for DSL	Bladed or offensive weapon - Guidance from Sutton
Sexual Violence	**Definitions**	Sexual violence refers to specific sexual offences under the Sexual Offences Act 2003145 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 - Schools and colleges 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 consent is:** 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, and • sexual intercourse without consent is rape. For further guidance refer to Rape Crisis England & Wales - Sexual consent
	Resources	• National Crime Agency's CEOP Safety Centre offers support and reporting mechanisms for online sexual abuse. • NSPCC helpline provides expert advice for professionals via 0808 800 5000 or help@nspcc.org.uk. • Rape Crisis and The Survivors Trust provide specialist support for victims of sexual violence. • The Anti-Bullying Alliance provides guidance for schools on Sexual and sexist bullying. Online incidents of HSB, sexual harassment and sexual violence can be complex, often involving widespread abuse or harm on multiple social media platforms and repeated victimisation. Support is available from: • UK Safer Internet Centre provides an online safety helpline for professionals at 0344 381 4772 or helpline@saferinternet.org.uk. • Childline/IWF provides a free tool, Report Remove, for children to report nude or sexual images and/or videos of themselves that they think might have been shared online. • UKCIS provides : Advice for education settings working with children and young

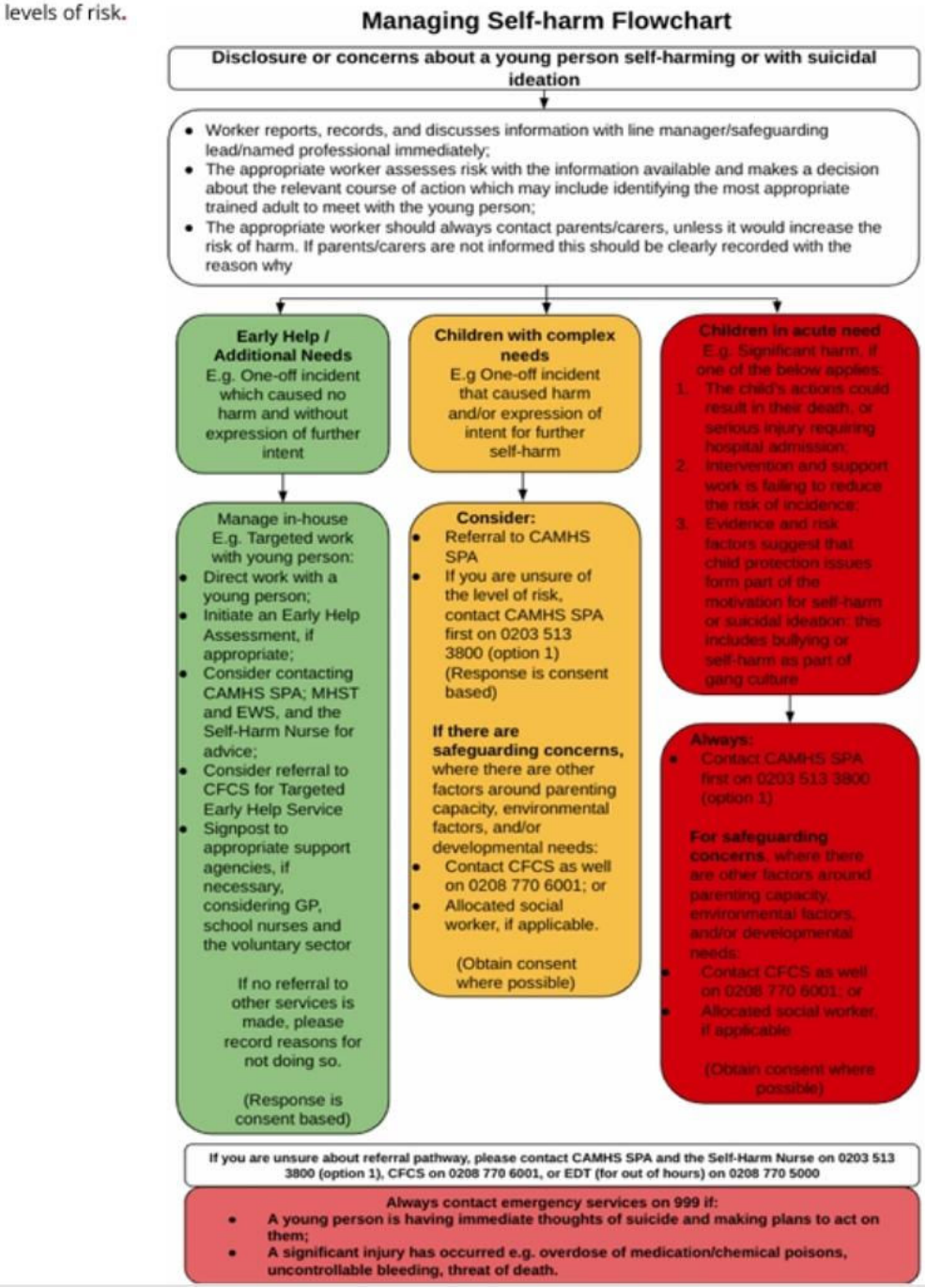
		people on handling reports of children sharing nudes and semi-nudes • National Crime Agency's CEOP Education Programme provides resources for professional's and parents and carers on protecting children and young people from online child sexual abuse. • LGfL provide education materials via 'Undressed' on how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders.
Suicide	**Resources**	Follow Sutton LSCP Management of Self-Harm and Suicidal Ideation Protocol • 2025 Sutton Suicide Cluster Response Plan • Sutton suicide-prevention-strategy-20242027.pdf
Teenage Relationship Abuse	**Definition**	Children and young people can experience domestic abuse in their own intimate relationships (teenage relationship abuse - including physical, sexual, emotional abuse, and stalking) para. 45 of KCSIE 2026. It is a form of child-on-child abuse: abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse') para. 37 of KCSIE 2026.
	Resources & Signposting	Safe Young Lives | Young people & domestic abuse - SafeLives Teenage Relationship Abuse | The Children's Society
Young Carers	**Resources**	Sutton Young Carers | Sutton Information Hub

APPENDIX C: Managing Self-Harm and Suicidal Ideation Flowchart

Refer to *Sutton LSCP Management of Young People Who Self Harm or Have Suicidal Ideation* protocol. https://www.suttonlscp.org.uk/lscp-protocols

3. MANAGING SELF-HARM AND SUICIDAL IDEATION FLOWCHART

Please refer to the case studies in Appendix A for examples of children and young people at different levels of risk.



APPENDIX D: Links to Other Guidance and other policies

Although this list is not exhaustive, this policy and procedure is also in accords with:

- Keeping Children Safe in Education 2026
- Working together to safeguard children - GOV.UK (www.gov.uk)
- Early years foundation stage (EYFS) statutory framework - GOV.UK (www.gov.uk)
- Children Missing Education: statutory guidance for local authorities and schools GOV.UK
- Education inspection framework (EIF) - GOV.UK (www.gov.uk)
- Inspecting schools: guide for maintained and academy schools - GOV.UK (www.gov.uk)
- Inspecting further education and skills: guide for providers - GOV.UK (www.gov.uk)
- Early years inspection handbook - GOV.UK (www.gov.uk)
- The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK (www.gov.uk)
- Prevent duty guidance: England and Wales (2023) - GOV.UK (www.gov.uk)
- Disqualification under the Childcare Act 2006 - GOV.UK (www.gov.uk)
- Information sharing advice for safeguarding practitioners - GOV.UK (www.gov.uk)
- What to do if you think a child is being abused (DfE March 2015)
- Section 5B of the Female Genital Mutilation Act (2003) Section 74 of the Serious Crime Act 2015
- Female Genital Mutilation: Resource Pack (Updated February 2023)
- Regulated Activity with Children
- Teacher Status Checks
- Child sexual exploitation: definition and guide for practitioners - GOV.UK (www.gov.uk)
- Understanding sexualised behaviour in children | NSPCC Learning
- Searching, Screening and Confiscation (publishing.service.gov.uk)
- The designated teacher for looked-after and previously looked-after children (publishing.service.gov.uk)
- Promoting the education of looked-after children and previously looked-after children (publishing.service.gov.uk)
- Criminal exploitation of children and vulnerable adults: county lines (accessible version) - GOV.UK (www.gov.uk)
- Data protection in schools - Guidance - GOV.UK (www.gov.uk)
- Mental health and behaviour in schools (publishing.service.gov.uk)
- young-people-who-self-harm-a-guide-for-school-staff.pdf (rcpsych.ac.uk)

- Safeguarding children and protecting professionals in early years settings: online safety considerations for managers - GOV.UK (www.gov.uk)
- Maintained schools governance guide - Guidance - GOV.UK (www.gov.uk)
- Academy trust governance guide - Guidance - GOV.UK (www.gov.uk)
- Teaching online safety in schools - GOV.UK (www.gov.uk)
- Education for a Connected World (publishing.service.gov.uk)
- Reducing the need for restraint and restrictive intervention - GOV.UK (www.gov.uk)
- Relationships and sex education (RSE) and health education - GOV.UK (www.gov.uk)
- Positive environments where children can flourish - GOV.UK (www.gov.uk)
- Safeguarding and remote education - GOV.UK (www.gov.uk)
- When-to-call-police-guidance-for-schools-and-colleges.pdf (governmentevents.co.uk)
- Sharing nudes and semi-nudes: how to respond to an incident (overview) (updated March 2024) - GOV.UK (www.gov.uk)
- After-school clubs, community activities and tuition: safeguarding guidance for providers - GOV.UK (www.gov.uk)

- Meeting digital and technology standards in schools and colleges - Guidance - GOV.UK (www.gov.uk)
- Marriage and Civil Partnership (Minimum Age) Act 2022
- Working together to improve school attendance - GOV.UK (www.gov.uk)
- School suspensions and permanent exclusions - GOV.UK (www.gov.uk)
- Improving behaviour in schools - GOV.UK (www.gov.uk)
- Gender Questioning Children - non-statutory guidance (education.gov.uk)
- Mobile Phones in Schools Guidance
- Alternative Provision - GOV.UK
- Artificial Intelligence - DfE Guidance
- https://www.gov.uk/government/publications/unregistered-independent-schools-and-out-of-school-settings
- Whistleblowing Policy DfE
- Out-of-school settings: safeguarding guidance for providers - GOV.UK
- Use of reasonable force in schools - GOV.UK
- Children's Wellbeing and Schools Act

This policy also links to the following policies relevant to the welfare and safety of our pupils:

- Anti-Bullying
- Attendance
- Behaviour, Rewards and Sanctions
- Drug and Substance Misuse
- Designated Teacher Policy
- Health and Safety
- Online Safety
- Acceptable Use
- Pupil Premium Statement
- Equality Statement
- RSE
- Supporting Children with Medical Conditions
- Allergy Safety Policy
- Safer Recruitment
- Staff Code of Conduct
- SEND
- Trips
- Use of Restrictive Interventions
- Whistleblowing

APPENDIX E: The Role of the Responsible Adult – Strip Searches in Educational Settings

A strip search is a search involving the removal of more than outer clothing. Strip searches IN Educational settings can only be carried out by police officers under **the Police and Criminal Evidence Act 1984 (PACE) Code A and in accordance with the Police and Criminal Evidence Act 1984 (PACE) Code C.**

While the decision to undertake the strip search itself and its conduct are police matters, staff retain a duty of care to the pupil(s) involved and should always advocate for pupil wellbeing.

A strip search is a search involving the removal of more than outer clothing. Outer clothing includes shoes and socks.

Strip searching can be highly distressing for the pupil involved, as well as for staff and other pupils affected. PACE Code C states that a strip search may take place only if it is considered necessary to remove an item related to a criminal offence, and the officer reasonably considers the pupil might have concealed such an item. Strip searches should not be routinely carried out if there is no reason to consider that such items are concealed.

Except in cases of urgency where there is risk of serious harm to the pupil or others, whenever a strip search involves exposure of intimate body parts there must be at least two people present other than the pupil, one of which must be the appropriate adult.

The role of the appropriate adult is to safeguard the rights, entitlements and welfare of children and vulnerable adults in police custody. This adult must not be a police officer or otherwise associated with the police. **Examples of an appropriate adult include, but are not limited to:**

- the parent, guardian or, if the juvenile is in the care of a local authority or voluntary organisation, a person representing that authority or organisation.
- a social worker of a local authority
- failing these, some other responsible adult aged 18 or over who is not:
- a police officer;
- employed by the police;
- under the direction or control of the chief officer of a police force; or
- a person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions

Note that an appropriate adult is not required when a pupil is eighteen or above.

It is important that the Designated Safeguarding Lead liaise with the School Police Teams when a pupil is believed to be in possession of drugs or prohibited articles. Be aware of your obligation to the young person and do not be afraid to challenge the police if you believe things are not being done correctly or in the best interests of the child.

The Designated Safeguarding Lead (and deputy) are aware of the requirement for children to have an appropriate adult when in contact with police officers who suspect them of an offence.

PACE states that anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child for the purposes of this Code and any other Code.

PACE also states that if at any time an officer has any reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an appropriate adult at any point.

The Designated Safeguarding (or deputy) will communicate any vulnerabilities known to any police officer who wishes to speak to a pupil about an offence they may suspect. This communication will be recorded on CPOMS.

If having been informed of the vulnerabilities, the designated safeguarding lead (or deputy) does not feel that the officer is acting in accordance with PACE, they should ask to speak with a supervisor or contact 101 to escalate their concerns.

A person whom there are grounds to suspect of an offence must be cautioned before questioned about an offence, or asked further questions if the answers they provide the grounds for suspicion, or when put to them the suspect's answers or silence, (i.e., failure or refusal to answer or answer satisfactorily) may be given in evidence to a court in a prosecution.

A Police Officer must not caution a juvenile or a vulnerable person unless the appropriate adult is present. If a child or a vulnerable person is cautioned in the absence of the appropriate adult, the caution must be repeated in the appropriate adult's presence.

Further information can be found in the Statutory guidance - PACE Code C 2019.

https://www.gov.uk/government/publications/pace-code-c-2019/pace-code-c-2019-accessible

APPENDIX E: Safeguarding and Child Protection: Visitor Guidance

Safeguarding Children and Child Protection: Guidance for Visitors

Sutton Grammar School is committed to safeguarding and promoting the welfare of children and young people and expects all members of the school community (including staff, parents, members of the Trust, contractors, visitors and volunteers) to share this commitment and maintain a vigilant and safe environment.

A copy of the school's Safeguarding Policy is available in reception.

Please sign in on your arrival and collect a visitor's badge and lanyard. This must be worn at all times. Remain with your host at all times unless we confirm we have prior DBS clearance for you. If you have a red lanyard you must be accompanied by a member of staff when on the school site. On your departure please sign out and return your badge and lanyard.

This guidance contains important information about our safeguarding and child protection procedures that all adults working with and around children and young people at the school must observe.

Please see below the Safeguarding Team at Sutton Grammar School:

The Designated Safeguarding Lead (DSL) is: Kate Ross – Deputy Headteacher

The Deputy Designated Leads (DDSL) are:

Mr Alex Marsh – Head of Upper School

Mr Chris Robson – Assistant Head

Mrs Kerry Lapsley – Student Support Officer

The DSL or DDSLs can be contacted via the school office

What should you do if you are worried about a child or young person?
Safeguarding is everybody's responsibility. If you have any concerns about the welfare of a child at the school, you should share this information immediately with the DSL or a DDSL. Please do not leave the school without having shared your concerns, even if you feel you are reporting a small matter. In some cases, small pieces of information, when placed alongside information from other colleagues can add up to a serious cause for concern. It is vital therefore that all information is shared with the Safeguarding Team.

Child Protection Procedures
Everybody who works with children has a responsibility for keeping them safe and protecting them from abuse. Please be aware that a child may disclose abuse to you; they may do this by telling you what happened or indirectly telling friends, or by asking for advice about a situation, say involving another person. In school you may observe physical signs, notice changes in the child's behaviour or presentation, application to study, friendships, or pick up signs of emotional distress.

We ask that you report anything that might worry you to the DSL or a DDSL immediately.