Safeguarding and Child Protection Policy

Dorchester Primary School | 2026–27

This policy sets out how staff and governors recognise and respond to safeguarding concerns, protect children and maintain safe school practice. All staff must know the immediate reporting procedure and how to contact the safeguarding team.

Staff member with Responsibility:	Gemma Hall
Governor:	Jane Templeman
Reviewed By:	Gemma Hall
Next Review Date:	August 2027, or sooner if required

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Introduction

Policy Statement

Safeguarding and promoting children's welfare is everyone's responsibility. This policy applies to all staff and governors, who must put children's best interests first, identify concerns, share information and act promptly. No practitioner has a complete picture of a child's circumstances; we work with families and partner agencies within the safeguarding system described in Working Together to Safeguard Children.

Safeguarding and promoting children's welfare means:

Guidance: Working Together to Safeguard Children

- 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 including Preventative Education

Safeguarding underpins every aspect of school life. We listen to pupils, build trusted relationships and maintain a safe, inclusive and nurturing environment where every child is known, valued and able to succeed. Our values help children care for themselves, others and the world, learn from mistakes and make fresh starts.

Our inclusive, age-appropriate PSHE, relationships and health education, online safety teaching, assemblies and workshops teach children to recognise harm and keep themselves and others safe. Sexism, racism, misogyny, misandry, homophobia, biphobia, sexual harassment, sexual violence, derogatory behaviour and physical violence are challenged. The preventative education section explains our curriculum and approach.

Role	Name	Contact
Designated Safeguarding Lead	**Gemma Hall**	dsl@dorchesterprimary.com
Deputy DSL	**Cathy Bell** **Julie Enright** **Michaela Cucharo** **Suzanne Rankin**	dsl@dorchesterprimary.com
Chair of Governors and Safeguarding Governor	**Jane Templeman**	Request confidential direct contact through the school office or GovernorHub. Do not use the DSL mailbox for concerns about the Headteacher.
Deputy Chair of Governors	**Carol Archer**	Request confidential direct contact through the school office or GovernorHub. If a governor is implicated, contact an unconflicted governor or LADO.
Online Safety Lead	**Gemma Hall / Chloe Marwood**	dsl@dorchesterprimary.com
Filtering and Monitoring Lead	**Gemma Hall / Chloe Marwood**	dsl@dorchesterprimary.com
Children Looked After Lead	**Gemma Hall**	dsl@dorchesterprimary.com
Young Carer Lead	**Gemma Hall**	dsl@dorchesterprimary.com

Key External Contacts	
Organisation	**Contact**
Children's First Contact Service (CFCS)	**Tel:** 020 8770 6001 (9am-5pm) or 020 8770 5000 (out of hours Emergency Duty Team) **Email:** childrensfirstcontactservice@sutton.gov.uk
Local Authority Designated Officer (LADO)	**Tel:** 0208 770 4776 **Email:** lado@sutton.gov.uk
NSPCC Whistleblowing Helpline	**Tel:** 0800 028 0285 (8am-8pm Monday to Friday) **Email:** help@nspcc.org.uk
CAMHS Spa - Sutton	0203 513 3800 (Mon-Fri, 9am-5pm) Sutton CAMHS SPA: 020 3513 3800 (option 1). Urgent mental health support: NHS 111, mental health option (24 hours). Emergency: 999.
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 1: 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
- Section 3 of Early years foundation stage (EYFS) statutory framework (for children aged 0 to 5 in school-based nurseries and reception).
- Safeguarding and Child Protection Policy including procedures to deal with child-on-child abuse
- Behaviour Policy including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying
- Staff Handbook (Code of Conduct) including how to recognise and report low-level concerns, allegations against staff and whistleblowing
- our school's policy and response to children who are absent from education, particularly on repeat occasions and/or prolonged periods – this is contained in our Attendance Policy
- Mobile Phone Policy
- Inclusion Policy

Copies of these policies and Part One of Keeping Children Safe in Education 2026 will be provided to all staff on induction.

All staff must ensure they know:

- Who the Designated Safeguarding Lead and Deputies are and what their roles are
- How to follow our school'sreporting 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

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 may be being threatened. This could be due to their vulnerability, disability, 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. 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

Act immediately on any concern about a child's welfare. Maintain an 'it could happen here' mindset and put the child's best interests first. Follow the safeguarding concern response below; recording, DSL availability and uncertainty about thresholds must never delay protective action.

It is important to remember that students may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report, or a member of school staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. **If staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told directly.**

The DSL team decides whether to provide internal pastoral support, involve parents or carers, arrange a Family Help assessment or refer to statutory services. Internal support is appropriate only where it does not expose the child to further risk. The DSL may consult CFCS for referral advice.

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, sect.118)

Do not assume a colleague or another professional has acted. Share relevant information promptly, whether concerns are new or the child already has a child-in-need or protection plan. See Record keeping and information sharing for the applicable duties, safeguards and guidance.

Guidance: Information sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers

Safeguarding concern response

For any member of staff who sees, hears or is told something that raises concern about a child.

1 Protect the child immediately

Check for immediate danger or urgent medical need first. Call 999 where necessary, arrange appropriate supervision and seek help. Do not delay for recording, advice or a DSL response.

2 Listen and reassure

Listen calmly. Use open prompts only to clarify: “Tell me”, “Explain”, “Describe”. Do not investigate, suggest answers or promise confidentiality. Explain that information will be shared only with those who need to help.

3 Tell the DSL or a deputy now

Find and speak to a safeguarding lead immediately. If none is available, act yourself: seek senior advice and contact children’s social care and/or police as necessary. Do not wait until the end of the day or assume an electronic alert has been read.

4 Record promptly and factually

Use CPOMS as soon as possible without delaying protection or referral. Record the date, time, location, people present, the child’s own words, observations, action taken and who was informed. If CPOMS is unavailable, keep secure written notes for transfer.

5 Assess and refer

The DSL considers the full context and the child’s wishes and feelings, assesses risk and decides on immediate referral, Family Help or school support. Seek children’s social care advice if uncertain. Inform parents unless this could increase risk or prejudice an investigation; seek agency advice where needed.

Sutton CFCS: 020 8770 6001 during office hours; 020 8770 5000 out of hours. Email: cfcs@sutton.gov.uk. For children living elsewhere, use the home authority’s referral route. Police: 999 in an emergency; 101 for non-emergency contact.

6 Follow up and review

Record decisions, reasons, referrals, outcomes and review dates on CPOMS. Follow up if children’s social care has not acknowledged the referral and indicated next steps within one working day. Keep the child’s circumstances under review; re-refer or use local escalation procedures if concerns persist or increase. Share feedback with the reporting member of staff on a need-to-know basis.

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. 17, Keeping Children Safe in Education 2026)

Universal Support Services and Community-Based Early Help

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 Family 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 we will ensure that we provide 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.

The referrer should follow up if children's social care has not acknowledged the referral and indicated the next steps within one working day. Urgent concerns must be followed up immediately. Staff will support any statutory assessment, with support from the DSL or a deputy.

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

Staff must recognise indicators of abuse, neglect, exploitation and modern slavery, remain professionally curious and act early. Harm can occur at home, school, elsewhere or online. Safeguarding issues commonly overlap; do not rely on a single definition or label.

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):

Extra-familial harms include 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

Online and offline harm often occur together. Technology can facilitate abuse and children can abuse their peers online, including through:

Online child-on-child abuse includes 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 maltreatment through inflicting harm or failing to prevent it. Harm includes non-physical ill-treatment and seeing, hearing or experiencing the effects of abuse against others, including domestic abuse. It can involve adults or children, occur within families, institutions or communities, and take place online or be facilitated by technology. Children can also abuse parents or caregivers. The main categories below follow KCSIE 2026 Part 1; Appendix B covers additional safeguarding issues.

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 **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:

Possible signs include 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.
- 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 staff must understand the Signs and indicators of child sexual abuse | CSA Centre and be familiar with the signs of child sexual abuse, which is covered in the annual Safeguarding update training.

Emotional and behavioural signs may include:

Possible signs 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 drop; Alcohol or drug misuse; Self-harm; Physical signs may include.

- Bruises

Physical signs include Bleeding, discharge, pains or soreness in their genital or anal area; Sexually transmitted infections; Pregnancy.

Signs of online sexual abuse may include:

Online indicators 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 understand Communicating with children | CSA Centre – this is covered in annual Safeguarding update training.

- 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:

Neglect may involve 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:

Staff should notice 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 Annexe A of Keeping Children Safe in Education 2026 and Appendix B of this policy.

Artificial Intelligence (AI) safeguarding risks

We follow the guidance from the National Crime Agency (NCA) Child Sexual Abuse Material Generated by Artificial Intelligence

AI-Child Sexual Abuse Material (AI-CSAM)

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)

Children can abuse other children at school, elsewhere or online. All staff must prevent, identify, challenge and respond to abusive behaviour. No reported cases does not mean that abuse is absent. Timely, evidence-based support can prevent further harm.

We take a zero-tolerance approach: abuse is never dismissed as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys'. All incidents are taken seriously, recorded and addressed promptly. Both the victim and alleged perpetrator may have safeguarding needs. In some forms of abuse, girls are more likely to be victims and boys perpetrators; every child's concern requires a response. See Part 5 for the detailed response to harmful sexual behaviour, sexual harassment and sexual violence (KCSIE 2026, paragraphs 30–35).

Procedures to minimise the risk of child-on-child abuse:

Preventative Education & Whole-School Curriculum

Our school values, curriculum and discussions about current affairs help prevent abuse and teach safe, respectful relationships.

- **Kapow PSHE Curriculum:** We deliver structured, age-appropriate lessons through the *Kapow Primary PSHE & RSE* framework. This directly addresses healthy relationships, body autonomy, personal boundaries, digital safety, and consent. It explicitly teaches pupils how to identify abusive behaviours, recognise peer pressure, and understand the difference between respectful humour and harmful actions.

School values: Staff link respect, empathy, inclusion and kindness to everyday behaviour. Pupils learn why put-downs, harassment and discriminatory language breach our values.

- **Behaviour Curriculum and Therapeutic Thinking:** Our bespoke Behaviour Curriculum aligns with the principles of Therapeutic Thinking. We explicitly teach, model and practise prosocial behaviour, emotional regulation, active listening and respectful conflict resolution. Staff seek to understand the feelings, experiences and unmet needs that may contribute to behaviour, while maintaining clear boundaries and acting promptly to protect children from harm. Protective consequences help keep everyone safe, while educational consequences help children understand the impact of their actions and develop the skills to behave differently. Harmful or discriminatory behaviour is challenged calmly and consistently, with support for those affected. This approach does not lessen our safeguarding responsibilities: concerns are recorded, reported and referred in accordance with this policy.

Picture News and assemblies: Current affairs and human rights provide opportunities to discuss gender equality, online behaviour, prejudice and respectful dialogue. Pupils explore the impact of language within school and in the wider world.

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 and Health Education following statutory guidance.

Our curriculum plays a crucial role in preventative education. A planned programme of evidence based RHE 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:

Curriculum coverage includes: 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 PSHE/RHE Policy)

Children can report concerns through the accessible routes set out under Reporting systems in Part 5. Staff promote these routes and respond to concerns raised directly or indirectly.

Dealing with allegations of child-on-child abuse:

Report child-on-child concerns to the DSL or a deputy immediately and record a factual account on CPOMS using the relevant safeguarding category. Include the child's words, observations, actions and decisions. Recording and electronic alerts do not replace direct contact for urgent concerns. Complete the record as soon as it is safe, normally before leaving; arrange a clear handover if this is not possible. The DSL reviews the concern, assesses risk and decides the response.

Staff must be aware of the signs and indicators so that they can recognise behaviours and risks early. A full list can be found in KCSIE 2026

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- physical assault and harm, or the threat of harm with a weapon
- harmful sexual behaviour, sexual violence and sexual harassment – which may include misogyny/misandry. ***Part Five of this guidance sets out how we 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. 35 and 191 of Keeping Children Safe in Education 2026)

Actions: Follow our school's reporting procedures immediately.

We 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

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

Following instances of harmful sexual behaviour, we 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. We 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)

CCE and CSE involve an individual or group exploiting a power imbalance to coerce, manipulate or deceive a child into criminal or sexual activity. This may involve exchanging something the child needs or wants, financial gain or status for the exploiter, violence or threats. Networks and gangs may be involved; children may identify with the group. Any child can be affected, including through trafficking and modern slavery.

Children cannot consent to exploitation, abuse or trafficking. Recognise their vulnerabilities and treat them as victims, including older children whose exploitation may be overlooked. Appendix B gives further indicators, local protocols and resources.

Staff training uses Brook's Spotting the Signs Tool and Training (2023) to support conversations and identify potential abuse or exploitation.

Guidance: Modern Slavery statutory guidance;Spotting the Signs Tool & Training - Brook.

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:

Examples 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.

Threats against children or families, manufactured debts and violence can trap victims. Children may carry weapons under coercion or for perceived protection and may not recognise their exploitation. Girls' experiences and indicators may differ from boys'; both may also face increased risk of sexual exploitation.

Child Sexual Exploitation (CSE)

CSE is sexual abuse that may be a single incident or ongoing, including images shared without the child's knowledge. It can affect 16- and 17-year-olds, involve an individual or network and often involves someone known to the child. Grooming may be mistaken for a romantic relationship. Victims may not recognise the abuse and may be criminalised for actions under coercion.

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:

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

(Para. 43 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:

Physical abuse 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:

Examples of coercive control include 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:

Examples of verbal abuse 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:

Technology-facilitated abuse includes '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.

We follow 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:

Notifications cover 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.162, 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.171 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

Mental health problems may indicate abuse, neglect or exploitation, or become safeguarding concerns themselves. Staff should notice changes, including self-harm, eating disorders, suicidal thoughts or plans, and report concerns promptly. Only appropriately trained professionals diagnose mental health problems.

These could include:

Possible signs 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.

These signs do not establish a diagnosis or mean a child is suicidal. They prompt sensitive enquiry, early support and safeguarding action where needed. Interventions must be evidenced as safe, effective and appropriate to the child's needs and phase of education.

If a child's mental health raises a safeguarding concern, speak to the DSL or a deputy immediately and follow the reporting procedure. Call 999 for immediate danger or urgent medical need; keep the child appropriately supervised and follow emergency-service advice. For urgent mental health support that is not an emergency, call NHS 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 Relationships and Health Education curriculum, we address wellbeing and help-seeking in an age-appropriate way. Children learn to recognise and talk about emotions, care for their own and others' wellbeing, manage worries and friendships, and seek support from a trusted adult. Teaching includes isolation, loneliness and bullying, and coping when things go wrong. Refer to the school's PSHE and Relationships and Health Education Policy.

Staff training: Staff receive suicide prevention training as part of the annual safeguarding CPD offer

- Free e-learning course | Internet, Suicide and Self-harm

Self-harm is intentional injury or harm to oneself and may indicate distress or unmet needs. Reasons vary and must not be assumed. Any concern requires a compassionate response, assessment of immediate safety and prompt safeguarding action. Self-harm and suicide risk can overlap; staff must not assume that the absence of stated suicidal intent means the child is safe.

Suicidal thoughts may range from wishing not to be alive to thinking about ending one's life. Staff must take all such concerns seriously, inform the DSL or a deputy immediately and seek appropriate professional advice. Do not use a definition or checklist to rule out risk.

Where a child has acted to end their life, has an immediate plan or intent, or cannot be kept safe, call 999 and obtain urgent medical help. Keep the child with a suitable adult and follow emergency-service advice. Inform the DSL or a deputy without delaying help.

Actions:
In an emergency, call 999 and follow emergency-service advice. Keep the child appropriately supervised.
For urgent mental health support that is not an emergency, call NHS 111 and select the mental health option, available 24 hours a day. Sutton CAMHS SPA: 020 3513 3800 (option 1) for referral advice during service hours.
Follow the current NHS urgent-help guidance: https://swlstg.nhs.uk/urgent-help

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 our school'ssafeguarding 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 |

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 our 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). our 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. Schools play 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. 150 Keeping Children Safe in Education 2026).

Further information on indicators, risk factors, and protective actions relating to serious violence is provided in Appendix B of this policy.

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

Record all concerns, discussions, actions, decisions and reasons on CPOMS. Keep information confidential and secure. Records must give a clear summary, follow-up, resolution and outcome. Ask the DSL or a deputy if uncertain about recording requirements.

Share information early enough to identify, assess and respond to risk. It must be relevant to safeguarding, necessary for the recipient, clearly presented and properly contextualised. Data protection law does not prevent appropriate safeguarding information sharing. Consult the DSL if unsure; fear of sharing must not prevent protective action (KCSIE 2026, paragraph 61).

The school follows the statutory Information Sharing Duty guidance under section 16LA of the Children Act 2004, in force from 30 September 2026. Staff must share relevant information with another person within the duty's scope where the statutory conditions are met, including in response to a request. The duty does not apply where sharing would be more detrimental to the child than not sharing. Staff must apply the safeguards and exceptions in that guidance, share proportionately and securely, and record the reasons for sharing or withholding information. Seek DSL and data protection advice where needed without delaying urgent protective action. Guidance: https://www.gov.uk/government/publications/information-sharing-to-safeguard-children-and-young-people

Transfer of child protection files

When a child leaves, the DSL or a deputy will transfer the child protection file securely to the new school or college as soon as possible: within five days for an in-year transfer, or within the first five days of the start of a new term. The file is transferred separately from the main pupil file. The DSL will confirm and record receipt, keep a record of the transfer and ensure that access is restricted to those who need the information. Where necessary, relevant safeguarding information will be shared before the child starts so support and safety arrangements are ready on arrival. If a destination is unknown, the school will follow children-missing-education procedures and seek local authority advice.

Information sharing advice for safeguarding practitioners - GOV.UK

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 Surrey: https://www.surreycc.gov.uk/children/contact-childrens-services

For children living in Kingston: https://afc-self.achieveservice.com/service/SPA_Online_Referral

Part 2: The Management of Safeguarding

Role of the Designated Safeguarding Lead and Cover Arrangements

The DSL has the status, authority, skills, experience, time, funding, training, resources and support to fulfil the role. KCSIE 2026 Part 2 sets out the responsibilities of leaders and governors and the DSL's duties.

The names and contact details of the safeguarding team are listed under Key School Contacts near the beginning of this policy.

Availability

The DSL or a deputy is available throughout school hours in term time. The team also endeavours to be available outside school hours and during holidays; the specific cover arrangements below apply to school-run provision.

Cover arrangements

If the DSL is not in school, contact a deputy immediately. For urgent concerns use direct verbal contact; the shared mailbox is not an emergency service. If no safeguarding lead can be reached, follow the direct-referral procedure in Part 1.

The safeguarding team consists of the DSL and four deputies with access to a shared safeguarding mailbox. Cover will be arranged for absence, school-run breakfast and after-school provision, and holiday activities. The school operates an on-call system for its holiday club; staff running provision must know which safeguarding lead is on call and how to reach them. A mailbox or electronic alert must not be relied on as the sole route for an urgent concern.

Managing referrals

The designated safeguarding lead will refer cases:

The DSL makes or supports referrals 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

We work within Sutton LSCP arrangements, following its protocols and procedures and Working Together to Safeguard Children. Partners include children's social care, police, health and other services. Our contribution includes coordinated Family Help, inter-agency support and child protection plans. Staff follow the information-sharing requirements in Part 1.

Guidance: Working Together to Safeguard Children;Sutton Local Safeguarding Children's Partnership (LSCP)

Staff Training

All staff receive safeguarding and child protection training at induction, including online safety and their filtering and monitoring roles. Training follows local safeguarding partners' advice and is regularly updated. Staff receive updates as needed and at least annually, in September or at induction for mid-year starters.

There is a weekly Safeguarding reminder in the staff briefing and regular bitesize content included in staff CPD meetings.

The DSL and all deputies will undertake role-specific training updated at least every two years and refresh their knowledge and skills at least annually. All governors will receive appropriate safeguarding and child protection

training, including online safety, at induction, with regular updates. The governing body will review safeguarding effectiveness and this policy at least annually and following relevant changes or learning from incidents; the DSL will ensure that changes are communicated to staff.

Teaching safeguarding and preventative education

The curriculum, its adaptations and the topics taught are set out in Part 1 under Preventative education and whole-school curriculum. This includes our Kapow programme, school values, Therapeutic Thinking and Picture News. See also the PSHE/RHE Policy.

Guidance: statutory guidance.

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. Children are taught explicitly about online safety as part of the PSHE curriculum and computing curriculum. We work with local partners, for example the Education Safeguarding team and Police to deliver workshops about online safety from mobile devices and gaming. Children are protected through the school's filtering and monitoring system and children are monitored through Classroom Cloud software which is linked to every child's log in. Classroom Cloud allows live in the lesson monitoring by teachers and notifies the DSL if key words or phrases are both typed and viewed. We have established mechanisms to identify, intervene in, and escalate any concerns where appropriate. Children are taught how to report concerning content and any concerns are logged on CPOMS and dealt with by the DSL in line with KCSIE, including speaking to parents or involving other services as needed.

our school's Online Safety Policy outlines the school's approach to keeping children, staff and the wider school community safe online. We recognise the four areas of online risk: **Content, Contact, Conduct and Commerce.**

Content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, racism, misogyny, self-harm, suicide, antisemitism, radicalisation, extremism, extreme sexual or physical violence, misinformation, disinformation (including fake news) and conspiracy theories; Contact: being subjected to harmful online interaction with other users or generative AI applications that simulate this; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes; Conduct: online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (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; Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If we feel children or staff are at risk, we will report it to the Anti-Phishing Working Group (https://apwg.org/).

Guidance: **https://apwg.org/**

We recognise that technology, and risks and harms related to it, evolve and change rapidly. We therefore carry out an annual review of our approach to online safety as part of our safeguarding audit review, supported by an annual risk assessment that considers and reflects the risks children face.

Artificial Intelligence (AI)

The school understands the opportunities, safety considerations and legal responsibilities associated with the use of Generative Artificial Intelligence (AI). We use Generative AI appropriately for teacher-facing tasks, for example lesson content creation, personalised learning and accessibility tools, assessment and analytics, ideas for learner engagement and interaction, and administrative tasks.

We follow the Department for Education guidance on Generative artificial intelligence (AI) in education and ensure that the use of AI supports, rather than replaces, professional judgement.

Online safety, including the risks associated with AI, forms part of the school's safeguarding approach and related policies and procedures. We follow the requirements of Keeping children safe in education and consider the risks associated with AI-generated or manipulated content, including inappropriate or harmful content, misinformation, image-based abuse, deepfakes, inappropriate interactions with AI applications and the sharing of personal or sensitive information.

We also refer to the Department for Education's Generative AI product safety expectations and the filtering and monitoring standards to ensure that appropriate systems are in place to manage online safety risks, including those associated with Generative AI.

Training: All staff will complete appropriate training on the safe and responsible use of Generative AI as part of the school's annual safeguarding and professional development programme. This will include consideration of safeguarding, ethics, data protection, intellectual property and the potential risks associated with AI-generated and manipulated content.

The school recognises that photographs and videos of children can be manipulated using AI and may be used inappropriately or maliciously. We therefore take appropriate steps to protect children's images and to respond to concerns involving image-based abuse.

Photographs and videos of children will only be taken and used in accordance with the school's photography, image-consent, data protection and online safety arrangements. Staff must not use personal mobile phones or other personal devices to photograph, video or audio-record children. School photographs and recordings must be made using school-approved equipment and stored and transferred securely.

Where images of children are shared through the school's website, social media or other digital platforms, staff will consider the privacy and safeguarding implications and will only share images in accordance with the school's agreed arrangements and permissions.

All staff will:

- understand the potential risks associated with AI-generated or manipulated images of children;

follow the school's procedures for the safe taking, storage and sharing of photographs and videos; report concerns about inappropriate, manipulated or non-consensually shared images of children immediately to a member of the safeguarding team; follow the school's safeguarding procedures where a child is threatened, blackmailed, coerced or harmed through the use or sharing of images; prioritise the child's safety, dignity and emotional wellbeing when responding to image-based abuse; Any concern involving the creation, manipulation, sharing or threatened sharing of sexual or otherwise harmful images of a child will be treated as a safeguarding concern and managed in accordance with the school's safeguarding procedures and relevant statutory guidance.

Filtering and monitoring

The school adheres to 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: Gemma Hall and Chloe Marwood
- Gemma Hall (DHT) and Chloe Marwood (Computing Lead) 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 Classroom.Cloud and have the following strategies in place for monitoring that meet our school's safeguarding needs:

1. Technological Filtering & Real-Time Monitoring

- Classroom.Cloud supports monitoring of activity on devices and accounts on which it is configured. The DSL and IT provider will identify and document coverage, including any limitations for different devices, accounts, applications and use away from school. Staff supervision remains essential; monitoring software cannot guarantee that all harmful activity will be detected.
- LGfL filtering is used to restrict harmful and inappropriate content. Filtering settings and any additional web or application controls will be checked with the IT provider to confirm that they cover the school's devices and network appropriately without unreasonably restricting teaching and learning.

2. Alerting and CPOMS Recording

- Configured alerts are sent to designated safeguarding staff for prompt review. The DSL and IT provider will document who checks alerts, expected response arrangements, cover for absence and arrangements for school-run provision outside lessons. Staff must report urgent concerns directly rather than rely on automated alerts. Children and families must not assume alerts or online forms are monitored continuously outside provision hours.
- **Logging on CPOMS:** Any confirmed digital safeguarding alerts or concerning online behaviours captured by Classroom.Cloud are logged on CPOMS. This ensures digital concerns are reviewed alongside wider safeguarding histories for complete context.

3. Live Classroom Management & Visual Supervision

- **Real-Time Teacher Visibility:** During lessons, teachers use the Classroom.Cloud visual dashboard to monitor pupil screens live, track active tabs, and ensure pupils remain safely on task.
- **Instant Intervention:** Staff can remotely lock screens, close inappropriate tabs, or message pupils directly to address misbehaviour or online distress instantly.

4. Operational Oversight & System Testing

- **Regular Testing & Updates:** The IT Lead and DSL conduct termly checks of Classroom.Cloud settings to verify that filtering databases and keyword lists are updated in line with emerging online risks.
- **Governor Review:** The Designated Safeguarding Governor periodically reviews Classroom.Cloud reports and monitoring effectiveness to ensure compliance with KCSIE filtering and monitoring requirements.

- We have used the DfE 'plan technology for your school service' to self-assess against the filtering and monitoring standards and received personalised recommendations on how to meet them

Mobile Phones and other communication devices

We follow the DfE guidance on Mobile phones in schools . Our school requires mobile phones belonging to both staff and children to be stored securely away from children during the school day. Strict exceptions to this are granted to staff or children who require their mobile phone for medical monitoring e.g. for diabetes, with prior consent from the headteacher. Pupils do not have access to their mobile phone throughout the school day including during lessons, the time between lessons, breaktimes and lunchtimes. Children are also not permitted to use smart

watches or other personal interactive communication devices. Mobile phones, if brought to school, are handed to the class teacher upon arrival and returned at dismissal.

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. We follow the DfE guidance Use of reasonable force and other restrictive interventions guidance

Please refer to our school's Use of Reasonable Force Policy

Use of school premises for non-school activities

Where services or activities are provided separately by another body, we 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 .

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

Alternative Provisions

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.*

our 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.

We follow 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.

Children Missing Education (CME)

We follow the DfE statutory guidance contained in Children missing education. This includes the 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 we will support 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)

Where a parent or carer proposes elective home education, the school will discuss the child's educational and safeguarding needs without pressuring the family in either direction. We work with the local authority and relevant professionals, and encourage a coordinated discussion before a final decision where possible, particularly where the child has SEND, is vulnerable or has a social worker. The DSL will refer safeguarding concerns promptly. The school will follow current statutory requirements and local procedures concerning notification, any required consent and lawful deletion from the admission register; a request to home educate does not replace safeguarding action.

Elective Home Education – Cognus

Children Requiring Mental Health Support

See Mental health and Self-harm in Part 1 for indicators and urgent action. Our whole-school support includes staff mental health first aiders, pupil Mental Health Ambassadors, explicit teaching of wellbeing strategies, enrichment and sport. We fulfil four roles:

1. **Promoting good mental wellbeing and preventing the onset of mental illness:** We do this through lessons/assemblies/signposting/pastoral system/buddies etc 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/drawing and talking, work with EWS, nurture interventions, learning mentors, Building Stronger Foundations project
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: Gemma Hall

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 use funding to support progress and meet the Personal Education Plan (PEP). The VSH also has non-statutory strategic oversight of attendance, attainment and progress for children with a social worker, working with local authorities on ambitious attendance targets and reporting progress. Sutton Virtual School – Cognus provides local support.

Guidance: Sutton Virtual School – Cognus

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 support care leavers by keeping in touch, assessing needs and appointing a Personal Advisor to develop a pathway plan, including education and training. The DSL holds the advisor's details and liaises about safeguarding or welfare concerns.

Young Carers

A young carer is under 18 and supports a friend or relative who cannot cope without help because of illness, disability, mental ill-health or addiction. Caring can affect attendance, attainment, behaviour and wellbeing. We identify needs early and arrange timely support, including from external partners, local authority or 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.

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 SEND Policy

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).
- We consider extra pastoral support and attention for these children
- We 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.250 Keeping Children Safe in Education 2026*

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

Actions: All staff must follow the school's Supporting Pupils with Medical Conditions Policy, Allergy Policy and individual healthcare plans, together with the relevant intimate care and safeguarding procedures. Current policies are available from the school.

Staff training: All staff will watch training videos provided by school nursing team: https://www.suttonhealthandcare.nhs.uk/complexneeds. These videos are for use solely by school staff. We keepa 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

We will not initiate any action in this area. Where a child or their parent has raised a request relating to social transition, we 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 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**. We 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 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, we 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. We consider everything that could be affecting a child, including whether they have any wider health issues or neurodiversity.

As a Primary school, we will exercise particular caution; support for full social transition will be agreed **very rarely**. This is due to the recommendations and findings in the Cass Review. See sect. 271 of Keeping Children Safe in Education. The school is particularly conscious of safeguarding concerns relating to primary aged children. For example, the Cass Review noted evidence that children who socially transition before puberty – and those who transition prior to receiving clinical advice – are more likely to proceed to a medical pathway than those who do not. We recognise that some children who socially transition before puberty will be "living in stealth" meaning other pupils and/or staff may be unaware of their biological sex.

Living in stealth

Our 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: We 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 School Premises (England) Regulations 2012 and the Education (Independent School Standards) Regulations 2014, We 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.

This policy should be read alongside our school's Gender-Questioning Children policy, which sets out our approach to supporting pupils who are exploring their gender identity.

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.
- We 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 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 only be allowed home with adults with parental responsibility or confirmed permission.
- Children should never be allowed to leave school alone during school hours, and if collected by an adult, must be signed out.
- If a child leaves the premises without permission, staff must alert the office and DSL or senior leader immediately and implement the school's missing-child procedure. Assess immediate risks, including traffic and the child's vulnerability; maintain sight where safe, arrange appropriate supervision of other pupils, and avoid pursuit that could increase danger. Call 999 where there is immediate danger or urgent police assistance is needed. Inform parents and relevant agencies as appropriate, coordinate the search and response, and record actions and subsequent review.
- All visitors are required to sign in at the main school reception where they will be given a visitor's badge. This will be returned to the main school reception on departure.
- Lanyards indicate whether a visitor has a DBS/assurance from their employer (green) or not (Red). Those with Red lanyards will not be left unsupervised or to move around the school unaccompanied.

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

The Terrorism (Protection of Premises) Act 2025 (Martyn's Law) introduces protective security and preparedness requirements for qualifying premises. Education settings within scope are subject to the standard-tier arrangements. The school will review its position against the final commencement arrangements and current statutory guidance. The public protection procedures below form part of our emergency planning and preparation; this policy does not imply that uncommenced statutory duties are already in force.

The school's emergency arrangements are set out in its Emergency Evacuation Policy and Safe Indoors / Lockdown Procedure. Together these cover:

1. Evacuation: moving people away from danger, including on-site assembly and off-site relocation where needed.
2. Safe Indoors / inward movement: bringing people into the nearest safe part of the building when the threat and route make this appropriate.
3. Partial or full lockdown: restricting access and movement, and sheltering safely, according to the nature and location of the threat.
4. Emergency communication: evacuation communication arrangements and use of the school telephone broadcast facility for lockdown alerts. A classroom telephone-tree backup is being introduced because broadcasts may not be heard in noisy rooms; it must be completed, tested and briefed before being relied on.

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

Staff must know the procedures that apply to their role. Fire drills and evacuation reviews follow the Emergency Evacuation Policy. Lockdown alerting, acknowledgements, outdoor and non-classroom coverage, phone-system failure arrangements and the proposed telephone tree will be tested and briefed as part of implementing the revised Safe Indoors / Lockdown Procedure. Arrangements will be reviewed after exercises, incidents or relevant changes.

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. We adopt 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 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; At least one person on every selection panel will have completed appropriate safer recruitment training, in accordance with the requirements applying to maintained schools.

See Safer Recruitment Policy

Regulated Activity

A person will be engaging in regulated activity with children if they work on a frequent basis in a specified establishment, such as a school, or in connection with the purposes of the establishment, where the work gives opportunity for contact with children. A person will also be in regulated activity if, as a result of their work or volunteering, they:

- will be responsible, on a frequent basis in a school or college, for teaching, training instructing, caring for or supervising children, providing advice or guidance on physical, emotional or educational wellbeing, or driving a vehicle only for children, or
- engage in intimate or personal care or healthcare or any overnight activity, **even if this happens only once.**

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

Single Central Record

We maintain 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 348 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. Governors will ensure they have assurance that these checks are regularly being carried out.

Agency and Third-Party Staff (supply staff)

We 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 school (or who will be providing education on our school'sbehalf, 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 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, we follow the statutory requirements outlined in Part 3 of Keeping Children Safe in Education 2026.

We ensure that any contractor, or any employee of the contractor, who is to work at 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, we will either obtain the DBS check, or request to see the certificate if the self-employed person has obtained their own check. We ensure that the DBS check is at the level required.

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

Trainee/Student Teachers

Where applicants for initial teacher training are salaried by the school, we 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. We will obtain written confirmation from the provider that it has carried out all pre appointment checks that 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, we 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).

We 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 our 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.
- We 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, we 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 our school'sreputation 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. 381 of Keeping Children Safe in Education 2026.

Where this applies, we 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, we 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.

Where volunteers provide relevant personal care, even on a one-off basis, the school will obtain an enhanced DBS check with children's barred list information because this is regulated activity.

Existing Volunteers in Regulated Activity

Where we have 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
- We have 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 we 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 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, we 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.

We 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. 406 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.403-407 Keeping Children Safe in Education 2026)

Children Staying with Host Families (Homestay)

We do not participate in Homestay arrangements or trips.

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 our schoolis involved (whether or not directly) in arranging for a child to be fostered privately, we 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

Ongoing safeguarding and employer reporting duties

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. We have a culture of “it could happen here” and staff are encouraged at our annual safeguarding training to be vigilant to low-level concerns and report them. We have regular additional information sharing via our weekly briefing and use scenario-based discussion to highlight specific safeguarding issues.

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 we will need to carry out new checks on existing staff or volunteers. These are when:

- an individual working or volunteering at 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 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 we 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 school). We 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. We 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

Staff must report immediately to the Headteacher any concern that an adult working in or on behalf of the school, including supply teachers, trainees, volunteers or contractors, has:
• harmed a child or may have harmed a child;
• possibly committed a criminal offence against or related to a child;
• behaved towards a child or children in a way indicating that they may pose a risk of harm; or
• behaved, or may have behaved, in a way indicating that they may not be suitable to work with children, including conduct outside school (transferable risk).
Concerns about the Headteacher must go directly to the Chair of Governors, Jane Templeman, without notifying the Headteacher first. If the Chair is unavailable or implicated, contact the vice-chair or another unconflicted governor and/or seek LADO advice directly. Never delay emergency protective action.
The Headteacher, or the Chair acting as case manager for a concern about the Headteacher, will contact the LADO promptly to discuss the nature, content and context of the allegation and agree the next steps. Follow the Sutton LADO protocol; do not undertake an investigation before seeking appropriate LADO advice. Where a child is at immediate risk, contact children's social care and/or police without delay.

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, we 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, we 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 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:

Examples include being over friendly with children; having favourites; taking photographs of children on their mobile phone or personal photography device, 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.

All low-level concerns about adults must be shared promptly with the Headteacher, verbally if necessary and followed by a written record. Concerns about the Headteacher must be shared directly with the Chair of Governors. If the Chair is unavailable or implicated, contact an unconflicted governor or seek LADO advice directly. Staff are encouraged to self-refer if their conduct could be misinterpreted. The Headteacher, or the Chair for concerns about the Headteacher, will assess and record low-level concerns internally. Not every low-level concern requires LADO consultation. If there is doubt about whether a concern meets the harm threshold, the case manager will seek LADO advice. Any concern that meets the threshold, including a pattern of concerns that together reaches it, will be referred promptly in accordance with local procedures.
These will be recorded and dealt with appropriately. This enables the school to:

The Headteacher, or the Chair for concerns about the Headteacher, will keep a confidential record of the concern, its context, the action taken and the reasons for decisions. Records will be held securely with access limited to those who need it, separate from general pupil records. They will be reviewed regularly to identify patterns and any need

to refer to the LADO or strengthen practice. Records will be retained at least until the individual leaves employment, and longer where the school's retention schedule or legal advice requires. Allegations meeting the harm threshold follow the separate KCSIE retention requirements.

- 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.

Whistleblowing

Where a staff member feels unable to raise an issue with the Headteacher or the Chair of Governors, 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 Whistleblowing Policy and Staff Handbook for more details.

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

This part of the policy outlines how we 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 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

The zero-tolerance approach and preventative curriculum in Part 1 apply here. Staff model respectful behaviour, challenge everyday sexism, misogyny, homophobia and stereotypes, and act early to prevent escalation. Challenge harmful ideas without attacking the child expressing them.

Pupils learn to challenge prejudice safely and seek help from a trusted adult as an 'upstander'. A lack of reports does not mean abuse is not happening. Our relationships education develops the skills for respectful relationships, boundaries, kindness and recognising prejudice from early primary school.

Guidance: Relationships Education, Relationships and Sex Education and Health Education guidance,;Relationships Education, Relationships and Sex Education and Health Education guidance

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

We have clear, well-promoted and accessible systems that enable children to confidently report abuse, bullying, online safety concerns or anything that is worrying them. We make it clear that children's concerns will be listened to, taken seriously and acted upon.

Children can report a concern in a number of ways:

- **Talk to a trusted adult:** Children can speak to their class teacher, teaching assistant, DSL or any member of staff they feel comfortable approaching.
- **Speak directly to the safeguarding team:** Children can approach the Designated Safeguarding Lead or Deputy Designated Safeguarding Leads during the school day.
- Classroom worry boxes/worry monsters: Each class has a worry box or worry monster where children can leave a written note or drawing. These are checked daily by staff.
- **Zones of Regulation check-ins:** Children can use check-ins to communicate when they are not feeling in the "green zone", prompting an adult to follow up with them.
- **"Tell an Adult" online reporting form:** Children can use the school's online reporting form to raise a concern, which is sent directly to the safeguarding team.
- Online safety reporting: Children can access appropriate online reporting tools, including the CEOP Safety Centre reporting tool, through Google Classroom.
- **Classroom Cloud:** The school uses filtering and monitoring systems to identify potential online safety concerns and alert relevant staff.
- **Trusted adults and additional support:** Children who are particularly vulnerable are identified and supported to have trusted adults they know they can approach.

Child-friendly safeguarding and reporting posters are displayed in classrooms and other appropriate areas. These provide information about how children can seek help and, where appropriate, how to access external organisations such as Childline, the NSPCC and ThinkUKnow.

Children are taught that they should **keep telling an adult if they feel they have not been listened to or if something continues to worry them**. Staff actively promote a culture in which speaking out is encouraged, and children are reassured that they will be listened to, taken seriously and supported.

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 at the point of induction and as part of the annual safeguarding training.

When assessing HSB, We 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. **We 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 receives HSB training and intervenes early. Safety planning follows the CSA Centre approach in Appendix A: involve children and families, assess risks and responses, and implement a plan that supports and protects every child involved.

Guidance: The Centre of Expertise on CSA Safety Planning in Education

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 - We 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

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

In para. 540 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:

Sexual offences include Rape; Assault by penetration; Sexual assault; Causing someone to engage in sexual activity without consent.

Consent requires freedom and capacity to choose and may be conditional or withdrawn at any time. The age of consent is 16; children under 13 can never consent to sexual activity. Sexual intercourse without consent is rape. Appendix B gives the full definitions and consent guidance.

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

Follow the safeguarding concern response in Part 1 and the sexual abuse disclosure procedure in Appendix A. Children may disclose indirectly through a friend, conversation or behaviour, and may face barriers linked to disability, sex, ethnicity or sexual orientation. Act on signs without waiting for a direct disclosure. The child may choose any trusted adult; respond sensitively to that trust.

Where possible, two staff should manage the report, preferably including the DSL or a deputy. Do not delay listening or protective action to arrange this. Give the child your attention; if notes are taken during the conversation, remain engaged. Appendix A sets out reassurance, open questions, recording and immediate reporting requirements. Tell the child what happens next and who needs the information (KCSIE 2026, paragraph 554).

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 our school'sresponse 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, we 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 we can offer support and act appropriately.

As part of good safeguarding practice, we 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. We will also consider the potential impact of social media, which can spread rumours and compromise victims' identities, referring to the guidance outlined in paragraph 551 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 assessment considers 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, reviewed regularly and used to inform ongoing safeguarding decisions. At all times, we 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. our school's risk assessment is not intended to replace the detailed assessments of expert professionals. Professional assessments will be used to inform our school'sapproach 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. 568 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

We 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, we consider the four common scenarios outlined in para. 571 of Keeping Children Safe in Education. Below is a summary of the four scenarios – see para.571 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, we 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 on CPOMS.

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 our schoolis a safe space for them
- We 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
- We consider the proportionality of the response. Support will be tailored on a case by-case basis.
- We recognise 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, we 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. We 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.
- We 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, we 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.
- We 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 from doing 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, we 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.149 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), We 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 consider the age and the developmental stage of the alleged perpetrator(s), the nature of the allegations and frequency of allegations.

- We 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.
- We recognise that HSB in young children may be (and often is) a symptom of either their own abuse or exposure to abusive practices and or materials. 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.

We 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. We 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.

We 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.

We recognise 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 we will signpost parents and carers to this support.

Safeguarding other children

We recognise 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". We 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, 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

We follow 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 follow the guidance in 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 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:

Listen calmly, without shock or judgement. Reassure the child that they are taken seriously, are not to blame and will be supported and kept safe, however long it has taken to tell someone. Online and off-site abuse receive equal seriousness. Never suggest that reporting causes a problem. Explain sensitively that the law protects children rather than criminalising them.

Do not promise secrecy. Explain that information will be shared only with people needed to protect children and progress the concern. Do not investigate, interrogate, decide whether the account is true, confront the alleged abuser or ask the child to repeat the account to another adult.

Use open questions only to clarify: for example, 'Is there anything else you would like to tell me?' You may ask whether the child has been harmed and about the nature of that harm. Report immediately to the DSL or a deputy, following the safeguarding concern response.

Make factual notes in pen and write them up promptly on CPOMS. Record the date, time, place and the child's exact words, including slang or swear words. Separate observed facts from interpretation. Sign and retain original notes, which may be needed in court. Recording must not delay protective action.

Reporting child sexual abuse: Make safeguarding referrals promptly under the procedures in Parts 1 and 5. The Crime and Policing Act 2026 establishes a statutory reporting duty, subject to commencement and the applicable statutory requirements. The DSL will keep procedures and staff training aligned with commencement regulations and guidance. This does not alter the requirement in this policy to act immediately on concerns, refer where required and call 999 in an emergency; staff must not wait for the new duty to commence or use a statutory reporting period to delay protective action.

Guidance: Crime and Policing Act 2026

Child sexual abuse images have been discovered

We 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 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 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 relationships 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.

We 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, We ensurechildren are supported in their education by maintaining their engagement in learning and guaranteeing their safety from harm by peers within school environment, following recommendations from: https://csapathway.uk/education.pdf

The DSL uses the CSA Centre's Safety Planning in Education guidance: speak with the children and families, assess risks and possible responses, and draw up, share and implement a safety plan addressing all children involved. This is also the safety-planning approach described in Part 5.

Guidance: The Centre of Expertise on CSA Safety Planning in Education

4	**Supporting the child's education**	To 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. • keeping the child engaged in their learning • helping them to manage their emotions • supporting them with their friendships and wider relationships.

Supporting the child's emotional health and wellbeing

In line with Priority 5 of Sutton's strategy and Safety Planning in Education (page 36), agree support with the child. This may include a separate safe space for each child, an exit card or code question, calming strategies and an emotional toolkit, or a fidget item, sensory toy or calm box. Agree where the child goes, supervision and how staff follow up time away from learning. Older children may use an appropriate social space, gym or library.

Guidance: action plan;Safety planning in education | CSA Centre

We 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, we 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

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

See Child criminal exploitation and Child sexual exploitation in Part 1 for definitions, examples, coercion and gender differences. Children cannot consent to exploitation and must be recognised as victims.

Guidance: Child Exploitation Awareness - Child Criminal ExploitationSpotting 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

See Sexual abuse and Child sexual exploitation in Part 1. CSE may be a single incident or ongoing, occur without the child's knowledge, affect 16- and 17-year-olds and be disguised as a romantic relationship. Victims may be criminalised for actions under coercion.

Guidance: Child sexual exploitation: guide for practitioners.Spotting the Signs Tool & Training - BrookChild Exploitation Awareness - Child Sexual Exploitation

Actions for DSL

The DSL follows the Sutton LSCP Multi-Agency Protocol for Safeguarding Adolescents and the child protection and modern slavery referral arrangements above.

Guidance: Sutton LSCP Multi-Agency Protocol for Safeguarding AdolescentsModern 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

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

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

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)

Repeated or prolonged absence can indicate abuse, neglect, exploitation, mental health problems, substance misuse, travel to conflict zones, FGM, honour or faith-based abuse or forced marriage. Follow the absence and CME procedures in Part 2 and intervene early. A child missing education is of compulsory school age, not registered at a school and not receiving suitable education elsewhere.

Actions for the DSL

DSL to follow Sutton LSCP Children Missing Education Policy and
Children Missing Education – Cognus

Cyber Crime

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

Under the Domestic Abuse Act 2021, children are victims in their own right if they see, hear or experience the effects of domestic abuse. The statutory definition covers personally connected people aged 16 or over, including partners, ex-partners and family. It includes physical, emotional and economic abuse and coercive control. Abuse can affect anyone and occur inside or outside the home. See Domestic abuse in Part 1 for behaviours and Operation Encompass.

Guidance: 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

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.

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)

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

Follow the FGM reporting duty and actions in Part 1: the personal statutory reporting duty applies to teachers who discover that FGM has been carried out on a girl under 18. Other concerns about FGM or honour-based abuse must also be reported immediately to the DSL and referred through safeguarding procedures.

Guidance: Mandatory reporting of female genital mutilation: procedural information - 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

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 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

Follow the Prevent procedures in Part 1, including immediate reporting to the DSL and emergency action where required.

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

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 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
- Papyrus: charity for prevention of young suicide: Papyrus | Young Suicide Prevention

Teenage Relationship Abuse

Teenage relationship abuse is domestic abuse within a young person's intimate relationship and a form of child-on-child abuse. It may include physical, sexual or emotional abuse and stalking. See the domestic abuse and child-on-child procedures in Parts 1 and 5.

Resources & Signposting

Safe Young Lives | Young people & domestic abuse - SafeLives
Teenage Relationship Abuse | The Children's Society

Young Carers

Resources

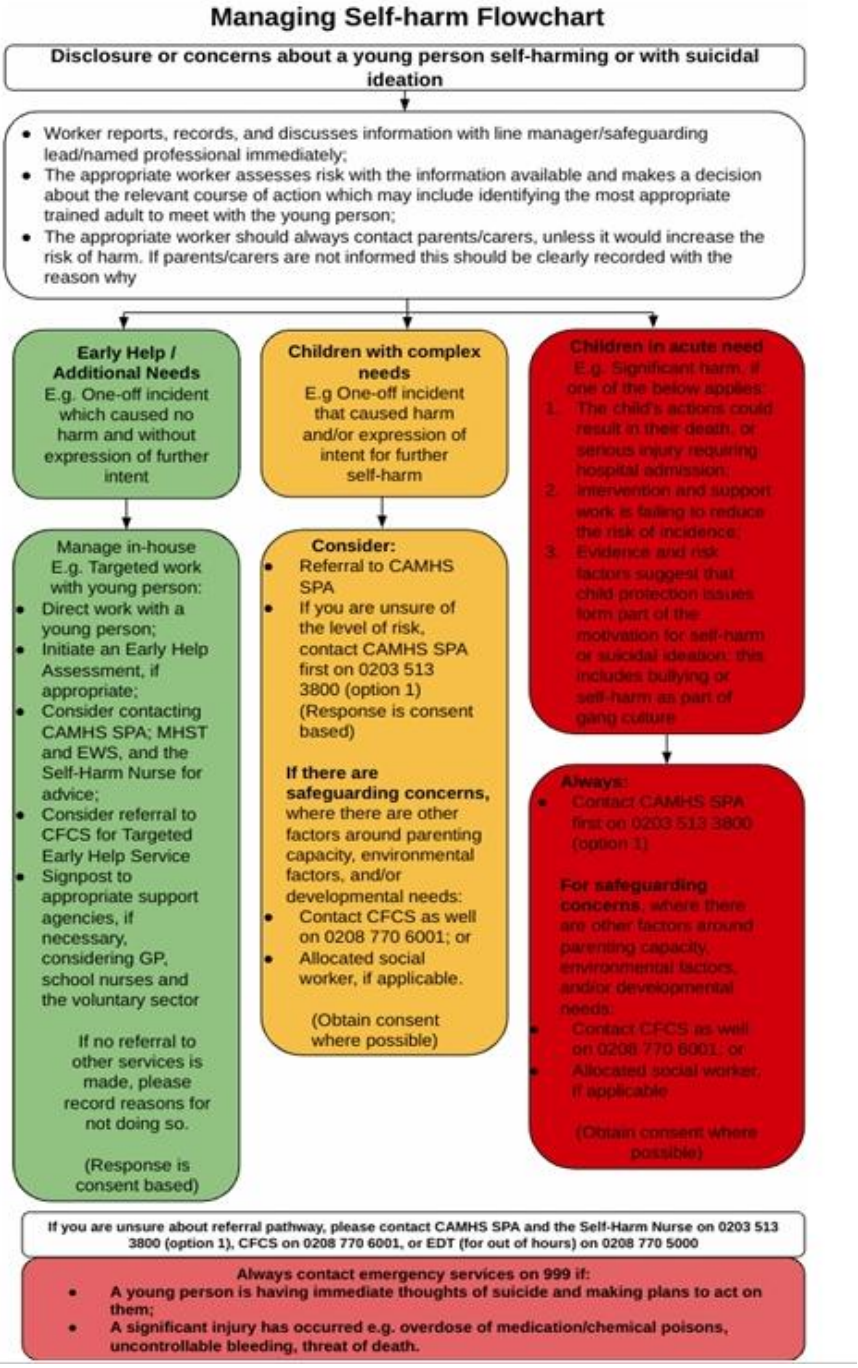
Sutton Young Carers | Sutton Information Hub

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, available here: Sutton Local Safeguarding Children Partnership - 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 Staff Training

Training for All Staff on Induction	
Keeping Children Safe in Education 2026	Andrew Hall: what has changed in KCSIE this year? https://www.safeguardinginschools.co.uk/kcsie2026videob All staff 2/9/26
Sutton LSCP Child Safeguarding Toolkit	Child Safeguarding Toolkit - Incident E-Learning
Sutton LSCP Fire Prevention & Safeguarding Toolkit	Free Fire Prevention and Safeguarding Training Course | Virtual College
Child Sexual Abuse	Free e-learning module from the Centre of Expertise on Child Sexual Abuse: eLearning | CSA Centre **In addition to the training, all staff must read the following documents from the Centre of Expertise on CSA:** • **Communicating With Children Guide** – download here • **Signs and Indicators Template** – download here
The role of the LADO	Level 1 – An introductory video to the role of the Local Authority Designated Officer (LADO) in Sutton. Sutton Local Safeguarding Children Partnership - Induction Modules
Prevent (every 2 years)	Prevent duty training: Learn how to support people susceptible to radicalisation | Prevent duty training
Online Safety	Training at induction and through regular updates covers online risks, filtering and monitoring responsibilities and limitations, safe use of devices, and prompt reporting. The DSL maintains training records and arranges updates when risks or systems change. Children's reporting arrangements are set out in Part 5.
Artificial Intelligence (AI)	Using AI in education settings: support materials - GOV.UK - Materials for all school and college staff. **4 modules:** Understanding AI in education: module 1 - GOV.UK Interacting with generative AI in education: module 2 - GOV.UK Safe use of generative AI in education: module 3 - GOV.UK - all staff regardless of level Use cases of generative AI in education: module 4 - GOV.UK

Appendix E Links to Other Policies and Guidance

Document / guidance		
Keeping Children Safe in Education 2026	DfE	**Statutory**
Working Together to Safeguard Children 2026	DfE	**Statutory**
Sutton LSCP Threshold Guidance	Sutton LSCP	**Local guidance**
Sutton LSCP Protocols	Sutton LSCP	**Local procedures**
London Safeguarding Children Procedures	London SCP	**Local/regional procedures**
Sharing nudes and semi-nudes	UKCIS/DfE	**Non-statutory guidance**
Prevent Duty Guidance	Home Office	**Statutory**
Generative AI in Education	DfE	**Guidance**
Filtering and Monitoring Core Standard	DfE	**DfE standard**
CSA Centre – Communicating with Children	CSA Centre	**Practice guidance**
CSA Centre – Signs and Indicators	CSA Centre	**Practice resource**
CSA Centre – Safety Planning in Education	CSA Centre	**Practice guidance**
Restrictive interventions / reasonable force	DfE	**Guidance**
Searching, Screening and Confiscation	DfE	**Guidance**
Working Together to Improve School Attendance	DfE	**Statutory**
Mental Health and Behaviour in Schools	DfE	**Guidance**
PACE Code C	Home Office	**Statutory code**

Information Sharing Duty statutory guidance (DfE, September 2026):
https://www.gov.uk/government/publications/information-sharing-to-safeguard-children-and-young-people

Internal policy documents (available from school):

- Behaviour Policy
- Anti-Bullying Policy
- Online Safety Policy
- Attendance Policy
- Safer Recruitment Policy
- Use of Reasonable Force / Restrictive Intervention Policy
- Medical Policy
- Allergies Policy
- Staff Code of Conduct / Staff Handbook
- Whistleblowing Policy
- Complaints Policy
- SEND/Inclusion Policy
- Educational Visits Policy
- Mobile Phone Policy
- AI Policy

Appendix F – The Role of the Appropriate Adult – Strip Searches in Educational Settings

A strip search removes more than outer clothing (which includes shoes and socks). In educational settings, only police officers may conduct it, under PACE Code A and in accordance with PACE Code C. Staff retain their duty of care and must advocate for the pupil's wellbeing.

Strip searching can distress the pupil, staff and others. PACE Code C permits it only where necessary to remove an item connected with a criminal offence and the officer reasonably believes the pupil has concealed it. It must not be routine.

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.

The DSL liaises with the local schools police team where a pupil may possess drugs or prohibited items. Staff must protect the pupil's welfare and challenge police practice they believe is incorrect or contrary to the child's best interests.

The DSL and deputies ensure children have an appropriate adult when required during police contact about a suspected 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 suspected of an offence must be cautioned before questioning, including further questions once answers give grounds for suspicion, or where their answers or silence may be used in evidence.

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