# SAFEGUARDING POLICY

## SEPTEMBER 2026

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|---|---|
| **Safeguarding Governor:** | Faye Carter<br>Sarah Creedy |
| **Designated Safeguarding Lead:** | Nick Gough (RGS)<br>Toby Freeman-Day (RGS Prep) |
| **Applicable to:** | RGS Guildford<br>RGS Prep, including EYFS |
| **Author(s):** | Assistant Head Pastoral |
| **Executive owner:** | Senior Deputy Head<br>Head (RGS Prep) |
| **Last reviewed:** | August 2026 |
| **Date of next review:** | August 2027 |



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**Introduction and Policy Aims**

The Royal Grammar School, Guildford and RGS Prep (together, "the School") are committed to providing the highest standard of education and pastoral care. This policy reflects the School's values, ensuring clarity and consistency for pupils, staff and parents.

Throughout this policy, the terms 'child', 'pupil' or student' are used to refer to all those attending the School. At the time of publication, the school is a boys' school but is preparing to become co-educational. Nursery, Reception (Shell) and Year 3 at RGS Prep, and Year 12 (Lower Sixth) at RGS Senior will become co-educational from September 2027. Year 7 (1st Form) at RGS Senior will become co-educational from September 2028.

This policy relates to both The Royal Grammar School, Guildford and RGS Prep. When referring to both sites, the policy uses 'the RGS'. Any site-specific differences will then individually discuss RGS senior or RGS Prep.

**The Royal Grammar School, Guildford** has a duty to keep children safe. This includes how we protect children from experiencing harm and how we should respond when we suspect or confirm that a child is being harmed.

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

The purpose of this policy is to provide staff, volunteers and governors with the framework they need in order to keep children safe and secure in our school. The policy also informs parents and carers how we will safeguard their children whilst they are in our care.

We aim to make sure that:

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



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**Definitions**

**Keeping Children Safe in Education 2026 (KCSIE) defines Safeguarding** as the process for protecting children from harm and abuse, whether that is within or outside the home, as well as online. This includes:

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

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

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

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

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

**DSL** where appropriate also refers to Deputy Designated Safeguarding Lead (DDSL) when DDSL is acting on behalf of the DSL where delegated and appropriate.

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

**The local safeguarding partnership** has three partners:

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

**MAP** refers to the Surrey Multi-Agency Partnership.

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

**School** Unless otherwise specified, 'school' means the RGS, RGS Prep and RGS Pre-prep

**Social Care** refers to Children's Services in the area in which the child is resident, unless a child is a Child Looked After then this will be the Children's Services in their home authority.

**Staff** refers to all those working for or on behalf of the school, full or part time, temporary or permanent, in either a paid or voluntary capacity. This includes, but is not limited to, employed staff, contractors, volunteers, governors/trustees, supply staff and self-employed staff.



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

**The Royal Grammar School** will publish our safeguarding policy on our website and hard copies will be available on request from the school office.



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**Key Personnel:**

**RGS Guildford**

The Designated Safeguarding Lead (DSL) at RGS Guildford is: Mr Nick Gough
Contact details: email: nwg@rgsg.co.uk or dsl@rgsg.co.uk Telephone: 01483 880600

The Deputy DSL(s) at RGS Guildford are:

Mr Adrian Woodman auw@rgsg.co.uk
Mrs Jill Thorpe jsrt@rgsg.co.uk
Mrs Shelley Kidgell ski@rgsg.co.uk
Mr Jamie Lythgoe jdnl@rgsg.co.uk
Miss Gemma Spencer ges@rgsg.co.uk
Mr James Witts jcw@rgsg.co.uk
Mr Matthew Baggs mfb@rgsg.co.uk
Mr William Spouge whns@rgsg.co.uk
Mr Alan Dodd acd@rgsg.co.uk
Mr Matthew Bailey mba@rgsg.co.uk
Mr Ian Wilkes iw@rgsg.co.uk
Miss Jennifer McAllister jlm@rgsg.co.uk
Mr Jimmy Pressley jwp@rgsg.co.uk
Miss Ellie Mason ecm@rgsg.co.uk
Mr Craig Scampton cps@rgsg.co.uk
Ms Josie Weaver jaw@rgsg.co.uk
Dr Chloe McGeady ccm@rgsg.co.uk
Mr Karl Rivers jkr@rgsg.co.uk

Telephone: 01483 880600.

The Headmaster at RGS Guildford is: Dr Jon Cox.
Contact details: email: Headmaster@rgsg.co.uk - telephone: 01483 880600.

Head of Learning Support: Ms Nicola Strivens
Contact details: email: ncs@rgsg.co.uk – telephone: 01483 880600

**RGS Prep**

The Designated Safeguarding Lead (DSL) at RGS Prep is: Mr Toby Freeman-Day.
Contact details: email: gls@rgsg.co.uk Telephone: 01483 880652

The deputy DSL(s) are:

Mr Adam Moore
Mr Nick Williams
Mrs Jo Petersen
Mrs Rebecca Self

Contact details: email: prepDSL@rgsg.co.uk
Telephone: 01483 880650

The Head at RGS Prep is: Mr Toby Freeman-Day
Contact details: email via the Head's PA, Mrs Gaby Sutton: gls@rgsg.co.uk - telephone: 01483 880652

**Governors**

The Liaison Governors for Safeguarding at RGS Guildford and RGS Prep are: Mrs Faye Carter and Mrs Sarah Creedy.
Contact details via Miss Sophie Tolley, svt@rgsg.co.uk, Secretary to the Governors - telephone: 01483 887132 or the School Office 01483 880600.

The Chair of Governors is: Mrs Sarah Creedy.
Contact details via Miss Sophie Tolley, svt@rgsg.co.uk, Secretary to the Governors - telephone: 01483 887132 or via the School Office 01483 880 600.



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**Children's Services**

**Children's Single Point of Access (C-SPA)**
Anyone can contact the C-SPA about a child, young person or parent/carer who needs support in Surrey. This could be a concern about how the child is developing, issues that the parent or carer is experiencing, or you suspect a child is being neglected or subjected to physical, sexual, or emotional abuse.
Surrey's Child Protection Consultation Line for advice and support (0300 470 9100 option 3). If a child does not live in Surrey then please use the relevant County Support line equivalent.

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

If it is not an emergency, but there is a concern that a child is at risk, C-SPA should be contacted by phone on 0300 470 9100 or 03311 435554.

Requests for support should be sent securely by email to cspa@surreycc.gov.uk using the Request for Support Form. For children in other local authorities do discuss with a DSL or, in emergencies, call the police

**Emergency Duty Team (EDT)**
Emergency Duty Team (EDT), provides an emergency social care service for urgent situations which are out of normal office hours. If your call is not answered, please do leave a message and your contact details for someone to get back to you.
EDT is available **5pm-9am, Monday – Friday, Weekends 24 hours a day.**
**Phone: 01483 517898**
**Email: edt.ssd@surreycc.gov.uk**

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

Telephone: 0300123 1650 option 3

Online: LADO Referral Form

**The Law (legislation and statutory guidance)**
In addition to Surrey Safeguarding Children Partnership's (SSCP) arrangements, The Royal Grammar School also follows the laws and statutory guidance below:

- Working Together to Safeguard Children 2023 which sets out the multi-agency working arrangements to safeguard and promote the welfare of children and young people and



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protect them from harm; in addition, it sets out the statutory roles and responsibilities of schools.

- 'What to do if you are Worried a Child is Being Abused' 2015 - Advice for Practitioners
- Keeping Children Safe in Education (KCSIE, 2026) is statutory guidance issued by the Department for Education (DfE) which all schools and colleges must have regard to when carrying out their duties to safeguard and promote the welfare of children.
- Early years foundation stage (EYFS) statutory framework is statutory guidance which sets standards that school and childcare providers must meet for the learning, development, and care of children from birth to 5 years in Ofsted registered settings.
- Relationships and sex education (RSE) and health education - GOV.UK This is statutory guidance from the Department for Education issued under Section 80A of the Education Act 2002 and section 403 of the Education Act 1996
- Education Act 2002, section 175/The Education (Independent School Standards) Regulations 2014 places a duty on maintained/independent schools to keep children safe and promote their welfare.
- The Children Act 1989 is the main source of child safety law for England and Wales. The Act gives the basis for most of children's services' duties and responsibilities towards children and their families. It also provides the legal framework for the child protection system. The 2004 amendment is used alongside the Act.
- The Children Act 1989 Care Planning, Placement and Case Review sets out what responsibilities education settings have for children looked after by the local authority.
- The Human Rights Act 1998 sets out the core rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (the Convention) that apply in the UK. Experiencing harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of these rights.
- The Equality Act 2010 states that schools and colleges must not unlawfully discriminate against children because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (called protected characteristics). Therefore, we can take positive action to deal with disadvantages affecting our children with protected characteristics to make sure their needs are met. The Equality Act 2010: advice for schools advises us further.
- Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 and the Childcare Act 2006 set out who is disqualified from working with children.

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

**Roles and responsibilities**

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



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**All School Staff:**

Sign to say they have read and understood Part 1 of statutory guidance KCSIE (2026) annually. Those working directly with children will also read Annex B.

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

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

Ensure children know that there are adults in RGS Guildford and RGS Prep who they can approach if they are worried or have concerns.

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

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

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

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

Treat information with confidentiality but never promising to "keep a secret."

Create a culture where children who have protected characteristics feel safe, can speak out and share concerns.
Will be aware of indicators of abuse, neglect and exploitation understanding that children can be at risk of harm inside and outside of the school, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and exploitation so that staff are able to identify cases of children who may be in need of help or protection.

Teaching, pastoral and support staff should plan opportunities within the curriculum for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe.

Be aware of the process for community-based Family Help Assessments, understanding criteria, levels of need and processes for particular groups of students.

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 like sexual abuse, physical abuse, emotional abuse, stalking and financial exploitation.



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Staff should look out for and be alert to children who are: disabled or have certain health conditions and have specific additional needs, have special educational needs, has a mental health need, is a young carer, is pregnant or a parent themselves, has exhibited early signs of abusive, violent and/or harmful behaviours, is showing signs of being drawn in to anti-social behaviour or criminal behaviour including gang involvement or County Lines, is frequently missing/ goes missing from education, has been repeatedly removed from the classroom, 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, 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 FGM, is a privately fostered child.

Staff should exercise professional curiosity and respectful uncertainty when assessing concerns, maintaining an attitude of "it could happen here" with regards to safeguarding.

Know who the DSL and Deputy DSL are and know how to contact them.

Understand that corporal punishment is unlawful in all schools. RGS Guildford and RGS Prep do not condone or carry out any form of corporal punishment.

**First aid and managing medical conditions**

Staff will be trained appropriately in first aid and will adhere to the safeguarding implications. Section 100 of the Children and Families Act 2014 places a duty on schools to make arrangements for supporting pupils at their school with medical conditions. Individual Health care Plans may need to be drawn up and multi-agency communication will be essential. Staff will be appropriately trained and responsibilities will be carried on in accordance with government guidance 'Supporting pupils at school with medical conditions' Dec 2015 Supporting pupils at school with medical conditions (publishing.service.gov.uk)

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

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

Staff receive safeguarding training that is updated regularly.

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

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

Visitors are appropriately supervised or escorted, where necessary.

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



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They are informed immediately and guide the 'case manager' (the Senior Deputy Head/DSL/ Deputy Head at RGS Prep) when an allegation is raised about a member of staff of a serious nature

At RGS Prep the Head ensures that there are enough staff per child (staff ratios), where relevant and applicable. Each child in the Early Years Foundation Stage is assigned a key person. Appropriate arrangements are put in place for the supervision of staff who have contact with children and families.

**The Designated Safeguarding Lead:**

**Nick Gough** has the lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place) at the RGS.
**Toby Freeman-Day** has the same responsibility for RGS Prep.

The DSL is a senior member of staff from our school's leadership team. The RGS and RGS Prep have deputy DSLs to support the DSL in their role. While the DSL may hand over some activities to a deputy, the DSL will always have the ultimate responsibility for keeping children safe.

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

Reading and following KCSIE.

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

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

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

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

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

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

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



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At the RGS, keeping the Headmaster, Senior Deputy Head and other relevant staff up to date with safeguarding issues. At RGS Prep, the DSL will keep all relevant staff up to date with safeguarding issues.

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

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

Making sure child protection files are up to date and kept as per record keeping section.

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

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

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

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

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

They become the 'case manager' (at the RGS this is alongside the Senior Deputy Head) when an allegation is raised about a member of staff. At the RGS, the Senior Deputy and the DSL make the final decision regarding all low-level concerns and whether anything needs to be escalated to the Headmaster, or if the harm threshold has been made to the LADO. At RGS Prep, the headteacher is the 'case manager', with discussion with the DDSLs, if appropriate.

**The Deputy Designated Safeguarding Lead(s):**
Will be trained to the same standard as the DSL and the role is explicit in their job description.

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

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



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**The Board of Governors:**
All members of The Board of Governors understand and fulfil their responsibilities to ensure that:

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

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

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

Safeguarding is a standing item on the agenda for Governor's meetings

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

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

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

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

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

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

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

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

Children are taught about keeping safe, including when online.

The Board of Governors does all that they reasonably can to limit children's exposure to online risks from the school's online IT systems and assign a member of the senior leadership team to oversee (the DSL).

Appropriate safer recruitment processes and procedures are in place.

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



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There are procedures for reporting and managing safeguarding concerns about adults who work for the school. The chair of governors will manage any allegations against the headteacher.

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

All members of the governing board receive safeguarding training at induction, which is regularly updated.

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

They contribute to the biennial safeguarding audit process and monitor progress against actions annually led by the DSLs of both the RGS and RGS Prep.

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

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

They keep up to date with the SSCP's safeguarding arrangements and guidance.
The SSCP is informed in line with local requirements about the discharge of duties via the Biennial (s 157 s 175) Statutory Audit for Safeguarding Arrangements and Termly Safeguarding Data Collections via PHEW to Surrey County Council.

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

We recognise the significant emotional impact being involved with or aware of safeguarding incidents can have. **Approach our safeguarding team if you need any support during or following a safeguarding incident.** The names of the DSLs and DDSLs are clearly advertised around both school sites.

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



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**Disclosures**

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

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

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

**Handling a disclosure**

- Listen to them carefully and believe in what they are saying. Do not be afraid of silence moments.
- Be careful not to express your own views or feelings and stay calm.
- Do not investigate. Only ask enough questions to work out if you need to share this matter with the DSL or a deputy. Only ask open questions, such as: How? When? Who? Where?, and open statements, such as "Tell me", "Describe" and "Explain". Otherwise, you may invalidate your and the child's evidence in any later court proceedings.
- If there are injuries or marks on the child, do not examine the child intimately or take pictures.
- Reassure them that they have done the right thing by telling you. Do not say to the child that you wish they had told you sooner.
- Do not automatically offer physical touch to comfort the child. Consider what may be comforting for the child, rather than how you prefer to be comforted.
- Tell the child it is not their fault, and you are taking them seriously.
- Explain what you will do next. Tell the child that you cannot keep what they have told you a secret and that you will pass this information onto someone who can help.

**After a child has made a disclosure**

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

**Recording a disclosure or safeguarding concern**

- Record the date, time, place and persons present.
- Use the child's own words, verbatim where possible, and stick to the facts. Avoid making assumptions and do not put your own judgement on it.
- Record any noticeable non-verbal behaviour. Detail any visible marks or injuries and record them on a body map on CPOMS.
- Keep any original notes you have made on file.



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- If staff are using a paper form, ensure you sign and date the write-up.
- Do not ask children to make written statements themselves or sign records.

**Concerns about a child who is not in immediate danger, or is suffering or likely to suffer significant harm**
First, speak to the DSL or a deputy. If in exceptional circumstances, the DSL or a deputy are not available, this will not delay you from taking appropriate action. Instead, you will speak to a member of the Senior Leadership Team or take advice from children's services, if necessary.

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

- Speaking to an adult they trust
- Putting a written or an anonymous disclosure in a worry box (RGS Prep) or worry monster (RGS Pre-Prep)
- Utilising specific apps such as YouHue (at RGS Prep).
- Using the Speak Up Form (at RGS)
- Speak to a senior prefect or senior mentor
- Contacting the pastoral team

Children are made aware of the systems in place and the support on offer via the publishing of safeguarding information throughout the school, assemblies and the curriculum.

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

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

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



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

We are aware any child may benefit from early help. Staff who work directly with children will be particularly alert to the potential need for early help for children listed under Part 1, paragraph 18 of KCSIE.

**Referral to children's services**

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

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

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

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

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

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

If you have not had any feedback from children's services within 72 hours of making the referral, this must be followed up. If after a referral, the referrer is dissatisfied with the response from children's services and/or the child's situation does not appear to be improving, the DSL (or whoever made the referral) should press for re-consideration to ensure their concerns have been addressed and, most importantly, the child's situation improves.



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**If a child has experienced or is at risk of female genital mutilation**
Female genital mutilation (FGM) is illegal in England. It involves removal, part removal or injury to the female genital internal or external organs for non-medical reasons. It is sometimes known as 'cutting' or female 'circumcision'.

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

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

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

Useful links:
Mandatory reporting of female genital mutilation: procedural information

**Concerns about nudes or semi-nudes**
Responding to any incident that comes to your attention:

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

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



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

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

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

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

- The incident involves an adult.
- There is reason to believe that a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs).
- What they know about the images or videos suggests the content depicts sexual acts that are unusual for the young person's developmental stage, or are violent.
- The images involves sexual acts and any child in the images or videos is under 13.
- They have reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example if they are presenting as suicidal or self-harming.
- They become aware of a computer-generated indecent image of a child, commonly called 'deep fakes' and 'deep nudes' i.e. a digitally manipulated or artificial intelligence-generated nude and semi-nude. '
- Generally AI-generated content may present safeguarding risks through manipulation, misinformation, deepfakes, grooming and exploitation

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

The DSL or a deputy will contact children's services if any child or young person involved is already known to them. If, because of the investigation, the DSL or deputy believes there are wider issues



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that meet the threshold for children's services' involvement, they will make a referral in line with this policy and local safeguarding procedures.

**Viewing the imagery**

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

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

**Deletion of images**

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

**Child-on-child abuse, including sexual violence and sexual harassment**

All staff should recognise that children are capable of abusing other children (including online). The RGS has a zero tolerance approach to abuse and it should never be passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys' as this can lead to a culture of unacceptable behaviour, misogyny and an unsafe environment for children. It is recognised that some (but not all) forms of child-on-child abuse it is more likely that girls will be victims and boys' perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously.

The school recognises that child-on-child abuse may be motivated by prejudice or discrimination, including misogyny, misandry, homophobia, biphobia, transphobia, racism, disability discrimination and faith-based prejudice

Child-on-child abuse can take on many different forms such as:

- bullying (including cyber bullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between children (also known as teenage relationship abuse)
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
- 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.
- consensual and non-consensual making or sharing of nudes and semi nudes, including those generated using AI.



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- 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,
- initiation/hazing type violence and rituals.

**Responding to allegations of child-on-child abuse**

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

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

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

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

Where the DSL, children's services or the police decide the concern should be handled by the school internally, the RGS will thoroughly investigate the concern using our behaviour policy and processes. A risk assessment and Safety and Support plan will be completed if a safeguarding risk is identified. The plan will be monitored and a date set for a follow-up evaluation. All children involved in the incident, including the child/ren who displayed the behaviour and the children who experienced it will be supported. The support will be varied depending on need and the voice of the respective child.

**Responding to allegations of sexual harassment and sexual violence**

Using the DSL's or a deputy's professional judgement, the school will make decisions about and address the incident using various tools including Hackett's continuum Understanding sexualised behaviour in children | NSPCC Learning. The School will request the support of other agencies, such as children's services and the police, if necessary.

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



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1. **Hackett's Inappropriate sexualised behaviour:** Manage internally using the behaviour policy and pastoral support.
2. **Hackett's Problematic sexualised behaviour:** Early help response used for non-violent harmful sexual behaviour to prevent escalation.
3. **Hackett's Abusive sexualised behaviour:** Refer to children's services when a child has been harmed, is at risk of harm or in immediate danger.
4. **Hackett's Violent sexualised behaviour:** Report to the police if a crime has been committed, such as rape, assault by penetration or sexual assault, following the When to call the police guidance.

Responding to children who display sexualised behaviour

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

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

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

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

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

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



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

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, our DSL and a deputy will be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately. They will be guided by the CPS: Safeguarding Children as Victims and Witnesses advice.

**Concerns about mental health**

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

Although staff may be well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one, only appropriately trained professionals should attempt to diagnose a mental health illness. Where necessary, the DSL or a deputy will make a referral to C-SPA.

Useful links:
Mindworks Surrey
Surrey Young Suicide Prevention Toolkit
The Surrey Self-Harm Protocol
Install - R;pple Suicide Prevention

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

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

The DSL may decide to discuss their concerns with children's services and will make referrals to the police Prevent team and/or the Channel programme, where necessary. The DSL will need to seek the individual's consent when referring to the Channel programme.
Prevent referral form to refer cases by e-mail to preventreferrals@surrey.pnn.police.uk.
(email address solely for prevent referrals and not general enquires).

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

**Prevent leads**
Claire McDonald, Prevent Supervisor, Surrey Police:
claire.mcdonald@surrey.police.uk - 07795 043842



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Lara Bowden, Project Officer, Surrey County Council:
lara.bowden@surreycc.gov.uk

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

National Prevent referral form (healthysurrey.org.uk)

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

**Confidentiality, Sharing and Withholding Information**

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

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

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

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

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



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**Notifying parents or carers**

At RGS, working alongside and supporting families is a key priority. This involves being open and transparent with parents and carers when we have concerns about their child's welfare, and/or we need to request support from other services to make sure the child's situation improves. If we believe notifying parents or carers could increase the risk to the child or cause further harm, we may seek advice from children's services about how and when parents or carers should be updated. It is legitimate to share concerns without a parent's or carer's consent when there is good reason to do so and that sharing the information would improve the safeguarding of the child in a timely manner.

Useful links:
Information Sharing

**Record Keeping**

Each child has a safeguarding file where all safeguarding concerns and referrals are stored. The designated safeguarding lead is responsible for keeping written records of all concerns, discussions and decisions, including the rationale for those decisions. Records reflect the reason why referrals are or are not made to another agency, such as children's services or the Prevent program. Safeguarding files will be stored securely on CPOMS, and access will be limited to those who need it.

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

If the RGS is the last school that the child attends, their safeguarding file will be securely stored by the school until their 25th birthday is reached, when it will be securely disposed of.

**Concerns or allegations made about adults in our school**

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

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

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children and/or;



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

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

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

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

Report any concerns to the Headmaster/Head immediately.

If an allegation is made against the Headmaster/Head the concerns need to be raised with the Chair of governors as soon as possible. If the Chair of governors is not available, then the LADO should be contacted directly.

There may be situations when the Headmaster/Head, Chair of governors will want to involve the Police immediately if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.

Once an allegation has been received by the Headmaster/Head, Chair of governors they will contact the LADO (as part of their mandatory duty) on 0300123 1650 option 3 LADO or Email: LADO@surreycc.gov.uk immediately and before taking any action or investigation.

Following consultation with the LADO inform the parents/carers of the allegation unless there is a good reason not to.

In liaison with the LADO, the school will determine how to proceed and if necessary, the LADO will refer the matter to Social Care and/or the Police.

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

**Low-level concerns**

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

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



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

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

Low-level concerns should be reported using the online Form found on the SharePoint landing page.

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

Useful links:
Surrey Safeguarding Children Partnership Procedures Manual Allegations Against Staff or Volunteers
Surrey Safeguarding Children Partnership Procedures Manual Non-recent Abuse Policy

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

Whistleblowing regarding the Headmaster/Head should be made to the Chair of Governors whose contact details are available to staff.

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

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

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

**Online safety and the use of smart devices**
This section summarises the RGS's whole school approach to online safety and the use of smart devices (e.g. mobile phones, smart watches, tablets etc). Our detailed approach is covered in our Digital and Data Policy that understands the significant and essential role that we have in making sure children are protected from potentially harmful and inappropriate online material. We consider online safety in every aspect of school life.



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Our aim is to:

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

We fulfil our aims by:

- Ensuring appropriate filtering and monitoring systems are in place on the school's network and devices.
- Educating children to learn how to keep themselves safe when online (using the government's Teaching online safety in schools guidance), what to do if they are harmed or spot a risk and what the consequences are if they break the school rules about online safety.
- Engaging with parents and carers about what online safety looks like.
- Making sure our whole school approach is reflected in all relevant policies.
- Regularly training staff on online safeguarding risks and how to be online safely.
- Making sure children, staff, parents/carers, governors and volunteers sign an understandable acceptable use agreement that covers how they should use the school's IT systems and their mobile and smart technology.
- Making parents, carers, children and staff aware that staff can search an electronic device they have confiscated. See Searching, Screening and Confiscation.

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

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

**The 4Cs**

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

**Content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, extremism misinformation, disinformation (including fake news) and conspiracy theories.

**Contact:** being subjected to harmful online interaction with other users or generative AI applications that stimulate this, for example peer to peer pressure, commercial advertising, and adults posing as children or young adults with the intention to groom or exploit children 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 nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying), including those generated using AI.



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**Commerce:** risks such as online gambling, inappropriate advertising, phishing and/or financial scams. If children or members of staff report any issues, we will report it to the Anti-Phishing Working Group (https://apwg.org/).

**Generative AI**

Guidance to support schools and colleges to understand safety considerations and legal responsibilities if they choose to use Generative AI (either teacher-facing or pupil-facing) can be found at Generative artificial intelligence in education. Generative artificial intelligence (AI) in education - GOV.UK

**Mobile phones and smart technology (including smart watches and smart glasses)**
Many children have unlimited and unrestricted access to the internet via mobile phone networks; therefore children could be harmed or harm others online when at school. This may include sexually harassing, bullying and sharing indecent images (often via large chat groups). To protect children from these risks while they are at our school, our approach to mobile and smart technology is:

Between the hours of 8.40am and 4.00pm the RGS site will be a phone-free site. Exceptions will be made for Sixth Formers in particular areas, specifically: Sixth Form Centre, break-out areas, outside and with the explicit permission of a member of staff.

First to Third Formers will be expected to keep their phones in their lockers and not have them on their person. Fourth and Fifth Form will be able to have phones on their person, but they should not be visible in school between 8.40am and 4.00pm. Smart watches will be considered the same as phones. Sanctions will range from confiscation for the rest of the day, with phones being released at 4.15pm, to normal school sanctions and the School requesting that a student does not bring their phone into school. At RGS Prep, Smart watches are not to be worn at any time.

Smart glasses are not allowed on the school site at any time. This includes: students, staff, parents and visitors.

At RGS Prep, pupils are only allowed to bring personal mobile phones onto the premises with permission from the Head. Any phone brought onto the site is then given to the front office to be kept in a locked drawer.

**Staff use of Mobile Phones and Cameras Mobile Telephones:**

- Staff may only access their mobile phones during working hours, when students are not present and staff are not engaged in the process of teaching.
- The Headmaster of RGS and the Head of RGS Prep can give permission for staff to access their mobile phones during teaching time, for example if family emergencies so dictate.
- Staff working within the EYFS must store their mobile phones out of the classroom areas during working hours.



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**Use of Cameras**

Photographs taken for the purpose of recording a pupil or group of pupils participating in activities or celebrating their achievements is an effective form of recording their progress. However, it is essential that photographs are taken and stored appropriately in order to safeguard the pupils in our care.

- Cameras on personal mobile phones should not be used at RGS Prep and only designated school cameras should be used to take images of pupils within the School setting or on outings. Exceptions can only be made with prior agreement with the Head of RGS Prep. Sometimes outside providers may be appointed by the School to take photographs of pupils for media purposes, for the website, for marketing or for personal use. All parents must sign consent for this.
- The Headmaster of RGS and the Head of RGS Prep are responsible for checking the list of pupils where consent is withheld. Alongside the marketing team, they need to ensure that images of these pupils do not appear on the School's website or in the media. Images taken on these cameras must be deemed suitable without putting the pupil/pupils in any compromising positions that could cause embarrassment or distress.
- Images taken and stored on the school camera must be downloaded by designated staff as soon as possible.
- At RGS any photographs taken on a mobile phone should be downloaded to the school system and deleted from the phone as soon as possible.
- Photographs may be distributed to other members of the staff in order to update pupil achievements, or for recording purposes.
- At RGS Prep cameras may only be taken into a bathroom if photographic evidence of children washing their hands needs to be recorded, as is sometimes required by EYFS. This activity must be properly supervised by appropriate staff.

**Photography and images**

The vast majority of people who take or view photographs or videos of children do so for entirely innocent and acceptable reasons. Sadly, some people abuse children through taking or using images, so staff have the following safeguards in place.

To protect pupils, staff will:

- seek their consent for photographs to be taken or published (for example, on our website or in newspapers or publications)
- seek parental consent
- not use pupils full name with an image
- ensure pupils are appropriately dressed
- ensure that personal data is not shared.
- store images appropriately, securely and for no longer than necessary.
- only use school equipment, i.e. not personal devices (at RGS Prep).
- encourage pupils to tell us if they are worried about any photographs that are taken of them



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**Parents and carers**

At the RGS, parents, carers and spectators are permitted to take photos at school events but are advised to be careful with their usage. Photos that include other students or staff should not be publicly shared or posted online, including social media platforms, without
the expressed permission of those people in the photo. RGS staff reserve the right to ask anyone at school events to stop taking photos if they feel there is a concern over the actions of the photographer. All should be aware of the safeguarding sensitivities around taking photographs of young people.

**Filtering and monitoring**

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

- Specific staff have assigned roles and responsibilities to manage systems.
- Staff know about the systems in place and how to escalate concerns.
- There are annual reviews of the systems, or more frequently if there is a significant change or issue. Reviews are shared with the Board of Governors.
- The systems are effective for the age range of children
- When we block online content, it does not impact teaching and learning.
- Filtering works across all devices including mobile devices and smart technology

**Remote education**

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

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

**Information security and access systems**

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

Children are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated.

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



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

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

Useful links:
Childnet International
Safer Internet Centre webpages
Generative AI: product safety expectations

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

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

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

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

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



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

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

**Children with special educational needs, disabilities and health issues**
Our Special Educational Needs Co-ordinator (SENCO) and DSL work closely together to safeguard and support children who have special educational needs and disabilities (SEND), in particular when there are any reports of abuse. Our safeguarding curriculum, i.e. the ways we teach children to keep themselves and others safe, is adapted to meet the needs of children with SEND. An example of this are pupil profiles that are issued to teaching staff for students with SEND.

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

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.
- These children being more prone to peer group isolation or bullying (including prejudice-based bullying), than other children.
- The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs, and the communication barriers and difficulties in managing or reporting these challenges.
- 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.
- At RGS Prep, the SENCO is also a DSL and will lead regular training to staff on particular risks faced by this group of pupils.

Useful links:
Surrey Safeguarding Children Partnership Procedures Manual Children with Disabilities/Complex Needs

**Identified areas of risk contextual to the RGS**
The RGS is a school that, due to its circumstances, possesses some contextual risks.

These include:

- Being a school in the centre of town (Guildford)
- Many students getting public transport to and from school



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- County Lines, gangs and general antisocial behaviour
- Sports facilities being off-site
- The main school site being split across Guildford High Street
- The Prep site being split by a residential road

The RGS uses a number of strategies to try and mitigate these risks, including:

- Students are educated on risks in assemblies, the curriculum and briefings. This includes what to look out for, how to escalate concerns and what to do if you find yourself in a difficult situation.
- Staff are educated and briefed on risks and how to mitigate
- Staff have a duty rota which includes duties on the High Street and around the school site
- Parents are communicated with about risks both proactively and if something arises that needs to be communicated as a matter of urgency
- Senior staff share community partnership intelligence using the community partnership intelligence form Partner services | Surrey Police
- The DSL attends the triannual Police and Education Intelligence Briefings
- Staff wear high-vis when crossing children between the Prep and Pre-Prep buildings
- Staff are taught the correct procedures on crossing children between Prep and Pre-Prep buildings

Useful links:
Youth and school engagement | Surrey Police
Safer Communities Programme | Healthy Surrey
Surrey Healthy Schools | Healthy SurreyPartner services | Surrey Police

**Lettings and off-site arrangements**

The School lettings policy can be found on the school website Venue Hire | Independent School Surrey | RGS Guildford

When services or activities are provided by the Board of Governors, under the direct supervision or management of our school staff, the safeguarding procedures listed in this policy will apply. This may not be the case when we hire or rent out our school to other organisations or individuals, such as community groups, sport associations and extra-curricular activities providers. The school will make sure there are arrangements in place to keep children safe, regardless of whether they are children at our school. This is done via procedures put in place in the hiring process and also a phone call from the DSL or DDSL to those organisations hiring to seek appropriate safeguarding assurances. Such assurances may include confirmation of the organisation's safeguarding and child protection arrangements, safer recruitment procedures, staff suitability checks, designated safeguarding lead arrangements and staff safeguarding training.

Prior to the commencement of an arrangement, the school will satisfy itself, so far as is reasonably practicable, that appropriate safeguarding measures are in place and that responsibilities for safeguarding and supervision are clearly understood by all parties. Where safeguarding assurances are not considered satisfactory, the school reserves the right to decline or terminate use of its premises.



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

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

When our children attend an alternative provision provider, we continue to be responsible for their safety and wellbeing. We will satisfy ourselves that the placement can meet the child's needs and obtain written confirmation that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. checks that we would otherwise perform on our own staff. This includes written confirmation that the alternative provider will inform us of any arrangements that may put the child at risk (i.e. staff changes), so that we can ensure ourselves that appropriate safeguarding checks have been carried out on new staff. We will always know where a child is based during school hours. This includes having a record of the address of the alternative provider and any subcontracted provision or satellite sites the child may attend. We will regularly review the alternative provision placements we make. Reviews will be at least half termly to provide assurance that the child is regularly attending, and the placement continues to be safe and meets the child's needs. Where safeguarding concerns arise, the placement will be immediately reviewed, and terminated, if necessary, unless or until those concerns have been satisfactorily addressed. We follow the statutory guidance for alternative provision.

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

Useful links:
Education provision for SEND - Surrey County Council
Alternative Provision: Alternative Curriculum Pathways and Reintegration Support - Surrey County Council

**Safeguarding Responsibilities for the Cathedral Choristers**

**At RGS Prep:**

The Cathedral Choristers are a vital part of RGS Prep Community. When the cathedral staff are responsible for the choristers on School premises, they follow RGS Prep safeguarding procedures. All of the Cathedral Music staff have completed RGS Prep Safeguarding training (or an agreed upon



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equivalent alternative). When the Choristers leave RGS Prep premises, they transfer to the Cathedral Safeguarding procedures.

Those Choristers who are not pupils at RGS Prep remain the sole responsibility of the Cathedral (safeguarding and practical) at all times.

The DSL from RGS Prep meets annually with the Cathedral's DSL to ensure that safeguarding concerns and arrangements are discussed and that there is no conflict or gap between the two procedures. A fortnightly pastoral meeting takes place between the Music staff at the Cathedral and the Head of RGS Prep to ensure that all arrangements are considered to ensure the safety of the pupils. Outside of RGS Prep term, the Chapter is wholly responsible for the insurance and supervision of the choristers.

During RGS Prep term, the following division of responsibilities applies.

**a) Morning Practice**

In the mornings (usually held on Monday, Tuesday, Thursday and Friday), all the cathedral choristers are delivered to Markham House at RGS Prep by their parents, and they become the responsibility of the Cathedral as soon as they enter the building and have been checked-in by a member of the Cathedral music staff who will be staffing the front door.

At the end of the morning practice, the RGS Prep choristers are released to go to their classes directly. The Cathedral music staff deliver the register that has been taken to the Front Office and RGS Prep registers are amended accordingly. At that moment the insurance and supervision of the RGS Prep choristers passes from the Cathedral to RGS Prep.

The choristers who attend RGS senior school are accompanied by the Cathedral music staff to the Markham House doors and escorted into the taxi which is organised by the RGS (if this is delayed, RGS Prep Office staff take responsibility). At that moment the insurance and supervision of the RGS choristers passes from the Cathedral to the RGS. One of the Cathedral music staff phones the Front Office of the RGS when the taxi has left confirming that it is on its way and confirming the attendance of the choristers. Before leaving RGS Prep, pupils and/or staff will confirm the destination of the taxi. The RGS choristers then confirm their arrival at the Front Office and proceed to class. For pupils who neither attend RGS Prep or the RGS senior school, responsibility for the chorister stays with the Cathedral music staff until picked up by an appropriate adult.

In the afternoons, the Cathedral choristers remain under RGS Prep's care and supervision until 4.00 pm or the time the RGS Prep choristers embark the bus to the Cathedral (whichever is earlier). At the end of lessons, the RGS Prep choristers are dismissed and meet at the Sports Hall door. A member of the Cathedral music staff arrives with the bus, checks in with RGS Prep Office to see if any pupils have gone home unexpectedly during the day and then escorts the choristers onto the bus. As the choristers leave the school site, responsibility for their insurance and supervision passes from RGS Prep School to the Cathedral for the rest of the day, until the pupils are returned to their parents. The RGS choristers become the responsibility of the Cathedral when they are on the bus.



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**b) Saturday & Sunday**

As RGS Prep is closed over the weekend, the Cathedral is wholly responsible for the insurance and supervision of the cathedral choristers on both Saturdays and Sundays.

**Off-site activities**

The choristers' annual day-out, concerts, tours and other choir engagements that take the choristers away from the cathedral are insured by (and are the responsibility of) the Cathedral, and they are organised and supervised by the Cathedral music staff in accordance with the Chapter's current safeguarding protocols.

In the light of advice from the Choirs Schools' Association, which recommends that the Cathedral and the Governors should harmonise their safeguarding procedures, members of the Cathedral music department complete RGS Prep safeguarding training sessions alongside all Cathedral sessions. The Head of RGS Prep (DSL) meets annually with the Cathedral DSL to discuss Safeguarding issues and review policy and practice.

**At RGS GUILDFORD:**

Every Monday, Tuesday, Thursday and Friday morning during term time, the Choristers leave the RGS Prep School premises to be transported to RGS Guildford after choir practice.

The RGS choristers are accompanied by the Cathedral music staff to the front door of RGS Prep School and are escorted into the taxi which is organised by RGS Prep (outlined above).

The RGS choristers confirm their arrival at the Front Office and proceed to class.

A termly pastoral meeting or correspondence takes place between the music staff at the Cathedral and the Head of Lower School (Deputy DSL) to ensure that all arrangements are considered to ensure the safety of the students. Outside of RGS School term, the Cathedral is wholly responsible for the supervision of the cathedral choristers.

Every Tuesday and Thursday afternoon, during term time, the Choristers leave RGS Guildford to attend choir practice at the Cathedral.

The Cathedral choristers remain under RGS Guildford's care and supervision until 4.00 pm. The RGS choristers become the responsibility of the Cathedral when they board the bus, until the pupils are returned to their parents.

As the RGS is closed over the weekend, the Chapter is wholly responsible for the supervision of the Cathedral choristers on both Saturdays and Sundays.



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**Training**

**Designated safeguarding lead**

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

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

**Governors**

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

- The **Board of Governors** will make sure the designated safeguarding lead has the time and resources to attend training.
- The **Chair of Governors** will receive training about managing allegations against the headteacher to assist them in the eventuality that an allegation is made.
- The **Board of Governors** will make sure that online safety is a theme in all staff training.
- Senior members of the board will make sure that those involved with the recruitment and employment of staff to work with children have received appropriate safer recruitment training.
- The safeguarding **governor** will make sure that staff and **governors** attend safeguarding training at induction and regularly after that. The link safeguarding **governor** will attend regular training and receive e-bulletins or equivalent to stay up to date with the latest statutory guidance.
- The **Board of Governors** will make sure at least one member of every recruitment panel has completed safer recruitment training within the last five years. The RGS has a separate safer recruitment policy that explains what safeguarding checks are completed before employment to make sure those who work with children are suitable.

Safer recruitment is covered in the 'Staff Recruitment and Selection Policy' School Policies | Prep School Surrey | RGS Guildford



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

Our training ensures that staff:

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

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

The RGS uses Educare training modules every year to train staff, as well as specific safeguarding training on Development Days and notices in staff briefings.

Governors also complete Educare training and receive training and updates from the DSL at meetings.

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

**The designated teacher for children who are looked after (CLA)**
The school follows the Role and responsibilities of the designated teacher's statutory government guidance. The designated teacher will have training to make sure they understand the needs of children looked after/previously looked after and how they can best be supported to have the same



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opportunities as their peers. They will work closely with Surrey Virtual School accessing their training and forums to stay up to date. The designated teacher is the DSL.

**Teaching and learning**

At the RGS, we aim to prevent our children from coming to any harm. We recognise how important it is that we teach and role-model to children how to keep themselves and others safe. Our curriculum meets the needs of all children, including those with SEND and/or have been abused. There are different areas of the curriculum that address various safeguarding issues and challenges including:

- Assemblies and tutor/Form time
- PSHCE/PSHE and General RE
- Workshops and Field Days
- Off timetable activities, talks and workshops
- Ambassador schemes (e.g. show racism the red card)

If specific safeguarding issues arise during the school year, the DSL and the Heads of Section will make sure the curriculum is adapted to cover current issues.

If there is a disclosure in an RSE or PSHME lesson, this would be dealt with sensitively, discreetly and in line with procedures outlined earlier in this policy. The member of staff would pass on the information to the relevant members of the pastoral team.

Useful links:
Relationships Education, Relationships and Sex Education and Health Education guidance
Promoting children and young people's mental health and wellbeing - GOV.UK
Promoting Fundamental British Values as part of SMSC in schools (guidance for maintained schools on promoting basic important British values as part of pupils' spiritual, moral, social and cultural (SMSC))
SMSC requirements for independent schools (guidance for independent schools on how they should support pupils' spiritual, moral, social and cultural development)
PSHE: Relationships & Sex Education an Health Education Guidance
PSHE Drug Education Teaching and Learning Resource EYFS-KS5
Surrey Young People's Substance Misuse | Catch22



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**Linked policies**

This policy is one of a range of documents that set out what our responsibilities are and how we should carry them out. This policy should be read in conjunction with the following policies:

| **Prep:** | |
|---|---|
| • Anti-Bullying Policy<br>• Behaviour, Rewards, Discipline, and Exclusions | • RSE & PSHE Policy |
| **Senior:** | |
| • Anti-bullying Policy<br>• Behaviour (Rewards and Sanctions)<br>• Health Education Policy<br>• IT Student Acceptable Use Policy<br>• Procedure for supporting Vulnerable Students | • PSHE Policy<br>• Relationships & Sex Education Policy<br>• SMSC Policy<br>• Student Absence Policy<br>• Student Safety on Journeys<br>• Substance Use and Misuse Policy |
| **Whole School:** | |
| • Attendance policy and procedure<br>• Complaints procedure<br>• Health & safety Statement<br>• Policy on Use of Force to control or restrain students | • Risk Assessment Policy<br>• SEND Policy<br>• Staff Code of Conduct<br>• Staff Whistleblowing Policy |

**Low level concerns**

Please use this form to share any concern – no matter how small, and even if no more than a 'nagging doubt' – that an adult may have acted in a manner which:

- is not consistent with RGS Guildford or RGS Prep's Staff Code of Conduct, and/or;
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

Where possible please speak with the DSL as soon as possible. You will be asked to go to the RGS SharePoint Landing page and fill out the Low Level Concerns Form in the quick links.

If the concern is about the DSL please go to the Senior Deputy or Head Teacher. If the concern is about the Head Teacher please pass it onto the Chair of Governors (Contact details via Miss. S Tolley, Secretary to the Governors - telephone: 01483 880600)

All low-level concerns are recorded in writing and retained securely in accordance with the school's safeguarding procedures. Records will include the nature of the concern, actions taken, rationale for decisions reached and any follow-up measures implemented.

The DSL and Senior Deputy review all low-level concerns in order to identify patterns, trends or recurring themes that may indicate a wider safeguarding issue. Where appropriate, concerns will be re-evaluated in the light of additional information and escalated in accordance with Part Four of KCSIE.



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The school recognises that a series of concerns, which when viewed in isolation may appear minor, may collectively indicate an emerging safeguarding risk. Professional curiosity will therefore be exercised when reviewing all low-level concerns.

**Allegation**

Behaviour which indicates that an adult who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

**Low-Level Concern**

Any concern – no matter how small, even if no more than a 'nagging doubt' – that an adult may have acted in a manner which:

- is not consistent with an organisation's Code of Conduct, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

**Appropriate Conduct**

Behaviour which is entirely consistent with the organisation's Code of Conduct, and the law.



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**Appendix 1: Types of abuse and specific safeguarding concerns**
These appendices are based on the Department for Education's KCSIE guidance.

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

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

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

**Sexual abuse**: involves forcing, causing or inciting 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. Children are more likely to know their abuser than not. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it. Children under the age of 13 can never legally consent to sexual activity.

**Neglect**: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may



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involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

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

Abuse & Neglect - Surrey Safeguarding Children Partnership
Graded Care Profile 2
Surrey Neglect Screening Tool
Surrey Safeguarding Children Partnership Procedures Manual Recognising Abuse and Neglect
Handling Cases of Affluent Neglect in Schools

**Indicators of abuse**
The following list, provided by the NSPCC, covers some common indicators of abuse and neglect.

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

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

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

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

Attendance is closely monitored at the RGS to support us in identifying abuse and acting early. Our staff will be aware of our school's unauthorised absence and children missing education procedures. We notify children's services if a child who has a social worker is absent from school



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without a suitable explanation. To support the school's procedure for addressing children missing or absent from education, we make sure we have more than one emergency contact number for each child. We work in partnership with Surrey County Council Inclusion Service when patterns of absence give rise to concern, including notifying them when a child leaves our school without a new school being named.

Our attendance policy and procedures are set out in a separate document, which can be found on the school website: School Policies | Prep School Surrey | RGS Guildford The school follows the government's Working together to improve school attendance statutory guidance which sets out how schools must work with the local authority children's services where school absence indicates safeguarding concerns.

Useful links:
The Inclusion Service Resources Area (Surrey Education Services)
Inclusion Service - Pupils missing out on education (PMOOE) (Surrey Education Services)
Children Missing Education statutory government guidance
Surrey Safeguarding Children Partnership Procedures Manual Children Missing Education

**Anti-Bullying**
Our setting's policy on anti-bullying is set out in School Policies | Prep School Surrey | RGS Guildford which includes measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying). The RGS promoted an inclusive, respectful and anti-discriminatory culture where all members of the community are valued and protected from discrimination, prejudice, racism, faith-targeted abuse and harassment. This forms part of the school's safeguarding responsibilities.

We keep a record of known bullying incidents which is shared with and analysed by the Board of Governors. All staff are aware that children with SEND and/or children who identify as Lesbian, Gay, Bisexual, Transgender, Queer or Questioning (LGBTQ+), those from minority ethnic backgrounds, children open to children's services and children from low-income families are more susceptible to being bullied/victims of child abuse.

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

Useful links:
Surrey Safeguarding Children Partnership Procedures Manual Bullying
Behaviour in schools (advice for schools, including advice for appropriate behaviour between pupils)
Relationships Education, Relationships and Sex Education and Health Education guidance
Preventing bullying - GOV.UK
Guidance for schools on colleges on gender questioning children (currently in draft, to be finalised



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**'Reasonable Force'**

There are limited circumstances when it is appropriate for staff in schools 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. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a child needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is necessary for the least amount of time', the application of which will depend on the circumstances.
We acknowledge that staff must only ever use physical intervention as a last resort, when a child is at immediate risk of harming themselves or others, and that at all times it must be the minimal force necessary to prevent injury to another person. Such events should be fully recorded and signed by a witness.

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

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

Use of reasonable force and other restrictive interventions guidance

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

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

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

Useful links:
Tackling Child Exploitation multi-agency Practice Principles
Contextual Safeguarding Network webpages

**Child sexual exploitation (CSE) and child criminal exploitation (CCE)**
We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines)



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and sexual exploitation. In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Both can occur online. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation. Where this is the case, it is important that the child perpetrator is also recognised as a victim. Our staff will be aware of a range of factors that could make a child more vulnerable to exploitation. We will provide additional support to children who have been exploited to help keep them in education.

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

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

**Child sexual exploitation (CSE)**

CSE is a form of child sexual abuse which can affect any child. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse, including via the internet.

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

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

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

See the Sharing nudes and semi-nudes section below for details about 'sextortion'.



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**Child criminal exploitation (CCE)**

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

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

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

Useful links:
Surrey Safeguarding Children Partnership Procedures Manual Child Sexual Exploitation
Surrey Safeguarding Children Partnership Procedures Manual Child Sexual Abuse in the Family Environment
Surrey Safeguarding Children Partnership Procedures Manual Child Criminal Exploitation
Crime - Surrey Safeguarding Children Partnership
Child sexual exploitation - Surrey County Council
Child sexual exploitation | Surrey Police
CEOP Safety Centre
Home | CSA Centre
Centre of expertise on child sexual abuse
Preventing Child Sexual Exploitation
Lucy Faithfull Foundation webpages
Child sexual exploitation: definition and guide for practitioners

**Serious violence**
Staff at the RGS will be aware of the indicators, which may signal children are at risk from, or are involved with, serious violent crime.

These may include:

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



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

- being male.
- having been frequently absent or permanently excluded from school.
- having experienced child maltreatment.
- having been involved in offending, such as theft or robbery.

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

Useful links:
Homepage - Surrey Safeguarding Children Partnership
Crime - Surrey Safeguarding Children Partnership
Preventing youth violence and gang involvement government guidance
Criminal exploitation of children and vulnerable adults: county lines government guidance
Child exploitation | Catch22
Keeping kids safe - Children's Commissioner for England | Children's Commissioner for England

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

Useful links:
Multi agency risk assessment conferences | Healthy Surrey

**Mental health**
With mental health problems, a child might find the ways they are frequently thinking, feeling or reacting becoming difficult, or even impossible, to cope with. Mental health problems affect around 1 in 6 children. The RGS recognises that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be trained to recognise the signs of a child who may be experiencing a mental health problem. The RGS aims to promote positive mental health for all staff and children. To do so, we take into account the government's Mental health and behaviour in schools guidance.

RGS has two school counsellors who provide specific mental health support for students. Josie Weaver is the lead school counsellor, who reports back to the pastoral team and wider staff body around trends and training for mental health. Referrals to the counsellor can be made by students, staff or parents. Ellie Mason is the School Wellbeing practicioner and also offers more practical support for students who are struggling with their mental health. Many other staff also have varying mental health qualifications.



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Mental health is a focus of the curriculum throughout the RGS age groups via PSHE and assemblies as well as some workshops.

At RGS Prep, we make use of worry boxes and worry monsters to share concerns and have specific focuses on mental health throughout the curriculum via PSHCE, assemblies, workshops and following nationally-recognised events such as Mental Health Week or Children's Mental Health Day. At RGS Prep we have ELSA-trained staff and also have non-therapeutic sessions such as Lego clubs and Drawing and Talking.

Useful Links:
Mind
NSPCC: Child mental health
Homepage - Surrey Safeguarding Children Partnership
Mental health and behaviour in schools - GOV.UK
Promoting Children and Young People's Emotional Health and Wellbeing GOV.UK
Better Health Every Mind Matters | Campaigns | Campaign Resource Centre

**Young carers**

The RGS recognises that children who are young carers may be at greater risk of experiencing barriers to their education, wellbeing and safeguarding. We seek to identify young carers at the earliest opportunity and provide appropriate support, which may include pastoral support, flexible arrangements, attendance support, liaison with families and referrals to relevant external agencies where appropriate. Nick Gough is the Young Carers lead at RGS and Rebecca Self is the Young Carers lead at RGS Prep.

**Domestic Abuse**
Domestic abuse can include a wide range of behaviours and may be a single or pattern of incidents. This form of abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional, and includes coercive or controlling behaviour. It can take place inside and outside the home. The Domestic Abuse Act 2021 states that children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse).

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

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



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Useful links:
Surrey Safeguarding Children Partnership Procedures Manual - Domestic Abuse
Homepage - Surrey Safeguarding Children Partnership
Surrey Against Domestic Abuse Strategy 2024-2029 | Healthy Surrey
Multi agency risk assessment conferences | Healthy Surrey
Request information under Clare's Law: Make a Domestic Violence Disclosure Scheme (DVDS) application | Metropolitan Police
NSPCC-UK domestic abuse Signs Symptoms Effects
Refuge what is domestic abuse/effects of domestic abuse on children
Safe Young Lives | Young people & domestic abuse - SafeLives
Domestic abuse: specialist sources of support - GOV.UK (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)

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

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

Useful links:
Homelessness Reduction Act Factsheets - GOV.UK

**Children who are Questioning their Gender**

The RGS recognises that children who are questioning their gender may be vulnerable and may experience a range of emotional, mental health, social or safeguarding needs. Staff will seek to understand the child's individual circumstances with sensitivity, professional curiosity and appropriate pastoral support, whilst remaining alert to factors that may impact their welfare, including bullying, discrimination, family relationships, peer relationships or wider wellbeing concerns. The Designated Safeguarding Lead will be involved where there are safeguarding concerns or where support relating to social transition is being considered.

The RGS will consider each case individually, placing the welfare and best interests of the child at the centre of decision-making whilst taking account of the impact on other children. The school will work in partnership with parents/carers as a matter of priority, except where doing so may place a child at greater risk of harm or be inconsistent with safeguarding requirements. The school is committed to providing an environment that is respectful, inclusive and free from discrimination and will seek to avoid unnecessary gender stereotyping across school life.

Further guidance regarding requests for support with social transition, including the use of single-sex spaces and participation in sport, will be considered in accordance with KCSIE 2026.



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**Child-on-child abuse**

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

- bullying (including online bullying, prejudice-based and discriminatory bullying).
- abuse between children in an intimate relationship.
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (including when a child encourages or threatens physical abuse online).
- sexual violence, such as rape and sexual assault (including when a child encourages or threatens this online).
- sexual harassment, such as sexual comments, jokes and online sexual harrassment.
- consensual and non-consensual sharing of nude and semi-nude images and/or videos.
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- upskirting and initiation/hazing type violence and rituals.

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

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

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

- Our staff read this policy.
- Our staff are trained to spot the signs that a child is, or may be experiencing, child-on-child abuse and how to report it. They maintain an attitude that 'it could happen here'.
- Our staff challenge any inappropriate behaviour between children, including the use of derogatory language.
- The behaviour policy, which includes our whole school response to abuse, makes sure everyone knows how to behave and how to respond consistently when children show unacceptable or abusive behaviour.
- In all areas of school life, such as lessons, assemblies and in the playground, we teach children how to act and to treat other people, including when they are online.
- We have effective systems in place for children to report child-on-child incidents.
- The RGS has a 'Speak Up' Form where children can report their concerns for themselves or another student.
- RGS Prep makes use of the YouHue app which allows children to share their feelings and any concerns. In Pre-Prep there are worry monsters where pupils can share concerns anonymously and daily emotional check-ins.



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**Child-on-child sexual violence and sexual harassment**

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

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

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

- children with SEND.
- children who are LGBT+ or who are perceived to be LGBT+ by their peers.

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

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

**Harmful Sexual Behaviour (HSB)**

The umbrella term 'harmful sexual behaviour' (HSB) is widely used in child protection and applies to behaviour occurring online, face-to-face, or both. HSB should always be considered within a child protection context.

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

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



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particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

Our DSL and deputy will:

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

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

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

Useful links:

Surrey Safeguarding Children Partnership Procedures Manual- Harmful Sexual Behaviour
NSPCC Harmful Sexual Behaviours
Responding to children who display sexualised behaviour
Stop it Now
Shore Space

**Upskirting**

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

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

**Sharing nudes and semi-nudes**

This is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18 (UKCIS, 2024). It is a form of child sexual abuse. All incidents will be dealt with as safeguarding concerns 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. The primary concern at all times will be the welfare and protection of the children involved. While sharing nudes and semi-nudes of themselves or their peers breaks the law, we know it is important to avoid criminalising young people unnecessarily.



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

We are aware of the alert guidance and support provided by the National Crime Agency and CEOP, and will use it to respond to incidents.

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

So-called 'honour'-based abuse (HBA) means incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage and practices such as breast ironing. We are aware this abuse often involves a wider network of family or community pressure and can include multiple perpetrators. Therefore, we will consult with children's services before taking any form of action to reduce the dynamic and additional risk factors that might be present as a result.

**Female genital mutilation (FGM)**

Female genital mutilation (FGM) means all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. The DSL will make sure that staff have appropriate training to prepare them for spotting signs that a child has been affected by FGM or is at risk of FGM.

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

Signs that FGM might happen:

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

Signs FGM might have taken place:

- having difficulty walking, standing or sitting.
- spending longer in the bathroom or toilet.
- appearing quiet, anxious or depressed.
- acting differently after an absence from school or college.



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- reluctance to go to the doctors or have routine medical examinations.
- asking for help – though they might not be explicit about the problem because they're scared or embarrassed (NSPCC).

Useful information:
Female Genital Mutilation Statutory Guidance
Surrey Safeguarding Children Partnership Procedures Manual Female Genital Mutilation

**Forced marriage**

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

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

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

Useful information:
Freedom charity
Handling cases of forced marriage guidance
National FGM Centre
Forced marriage
Karma Nirvana

**One Chance Rule**

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

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

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

Common places modern slavery occurs includes:
- The sex industry, including brothels.
- Retail: nail bars, hand car washes.



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

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

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

Useful links:
Crime - Surrey Safeguarding Children Partnership
Modern slavery - GOV.UK
Modern slavery: how to identify and support victims
Behind the Behaviour: Identifying the criminal exploitation of migrant children | ECPAT UK
Protecting children from trafficking and modern slavery | NSPCC Learning
Surrey Safeguarding Children Partnership Procedures Manual Children from Abroad, including Victims of Modern Slavery, Trafficking and Exploitation

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

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

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

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

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

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

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



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The RGS is aware that, by law, a parent or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. We have a duty to inform children's services of this arrangement if they have not been notified, but we will encourage parents and private foster carers to do so in the first instance. Where a member of staff becomes aware that a child may be in a private fostering arrangement, they will raise this with the DSL and the DSL will notify the C-SPA immediately.

Useful links:
Surrey Children's Services Procedure Manual Private Fostering
A5-Private-Fostering-leaflet.pdf

**Preventing radicalisation and extremism**
While some children are more susceptible, any child can be radicalised into terrorism. We take our statutory duty to prevent children from becoming terrorists or supporting terrorism seriously.

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

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

**Terrorism** is an action that:

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

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

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

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

The Educate against hate government website lists signs that could indicate that a child is being radicalised:

- becoming increasingly argumentative
- refusing to listen to different points of view



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- unwilling to engage with children who are different
- becoming abusive to children who are different
- embracing conspiracy theories
- feeling persecuted
- changing friends and appearance
- distancing themselves from old friends
- no longer doing things they used to enjoy
- converting to a new religion
- being secretive and reluctant to discuss their whereabouts
- changing online identity
- having more than one online identity
- spending a lot of time online or on the phone
- accessing extremist online content
- joining or trying to join an extremist organisation

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

Useful links:
Crime - Surrey Safeguarding Children Partnership
Prevent | Healthy Surrey
For Professionals - Prevent and Channel | Healthy Surrey
Protecting children from radicalisation: the prevent duty
Advice For Families | Counter Terrorism Policing

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

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

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

Useful links:
Child abuse linked to faith or belief | Surrey Police
Short Youtube introduction video



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**Fabricated or induced illnesses**

Staff at the RGS are alert to the issues surrounding fabricated or induced illnesses.
Fabricated or induced illness (FII) is a rare form of child abuse. It happens when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child. Our supporting children with medical needs policy details our procedure for ensuring reported medical needs are evidenced by medical professionals.

Useful link:
The Royal College of Paediatrics and Child Health (RCPCH) guidance



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