



# Child and Adult Protection and Safeguarding Procedure

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## INTRODUCTION

### **‘Safeguarding is everyone’s business and responsibility’**

All people have the potential to abuse others and it occurs in all races, cultures and social classes. It is important to consider that someone who abuses a child or adult at risk could be a member of their immediate or extended family, a friend, a neighbour or stranger to them, a member of staff or a peer. It is therefore essential to remain alert to the possibility that **‘abuse can happen here’**, and consequently staff are required to adopt an approach that is professional, open-minded and that respectfully challenges others to facilitate this.

We believe the safety and wellbeing of our students is of the utmost importance and that they have a fundamental and equal right to be protected from harm regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation.

We recognise that the students supported by St Piers/Young Epilepsy are particularly vulnerable to abuse, harm, exploitation and neglect due to their disability and the support needs that they have.

It can also be more challenging for staff to recognise the signs and indicators of abuse for students at St Piers. This is partly due to the limited communication that some students have, and because possible indicators of abuse such as a student’s mood, behaviour or injury might be assumed to relate to their impairment or learning disability, rather than recognising that it may be a cause for concern.

Where any particular risk factors are identified, suitable care planning and risk assessments will be developed with all relevant internal and external agencies to help to keep the student safe.

We will make every effort to provide an environment in which our students and those using our services feel safe, secure, valued and respected, and feel confident to talk if they are worried, believing they will be listened to effectively.

We fully acknowledge that national guidance for those working with children or adults at risk is very clear, that everyone has a duty to help protect children and adults at risk and therefore reporting concerns is mandatory.

All staff must understand that failure to report a concern will be treated as a disciplinary matter. In the absence of the Lead DSL or their Deputies, staff must be prepared to refer directly to C-SPA or MASH (and the Police if appropriate) if there is the potential for immediate significant harm.

All governors, trustees and staff, including interim, temporary, casual, agency and volunteers must ensure that they are aware of these procedures. Parents, carers, and students are welcome to read the documents and a copy is available on the St Piers School and College website.

*This document has been set out in separate sections partly due to the different, but related, issues in dealing with concerns about children (who are under 18 years old) and those who are above that age, reflecting the different legislation in force for these two groups.*

**It is important to remember that not all students over 18 years are in college or in an Adult House.**



## Terminology

**Child** includes everyone under the age of 18 years.

**Staff** refers to all those working for or on behalf of Young Epilepsy/St Piers School and College, full or part time, temporary or permanent, in either a paid or voluntary capacity, including governors and trustees.

**Student** refers to any child, young person or adult at risk accessing St Piers School and College.

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

**Safeguarding and promoting the welfare of children** is defined as:

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

**Adult at Risk** refers to someone who is 18 years and over and:

- Who has needs for care and support (whether or not the local authority is meeting any of those needs)
- Is experiencing, or at risk of abuse or neglect
- Who as a result of those care and support needs is unable to protect themselves from either the risk of or the experience of abuse or neglect.

**Child/Adult Protection** is an aspect of safeguarding but is focused on how we respond to prevent children or adults at risk suffering, or being likely to suffer, significant harm.

**Early years foundation stage (EYFS)** sets standards for the learning, development and care of children from birth to 5 years old

**MASH** – Multi-Agency Safeguarding Hub

**C-SPA** refers to the Children's Single Point of Access and the Child Protection Consultation Line.

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

**Early Help** means providing support as soon as any needs emerge or are identified at any point in a child's life.

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



## Key Contacts

Role	Name	Contact
Chair of Trust Board	Simon Neville	sneville@youngepilepsy.org.uk
Chair – EGB ducation Governing Body	Tamsin Jones	<a href="mailto:tjones@youngepilepsy.org.uk">tjones@youngepilepsy.org.uk</a>
Lead Trustee for Safeguarding	Paola Morris	pmorris@youngepilepsy.org.uk
Lead Governor for Safeguarding	Maria Rodrigues	mrodrigues@youngepilepsy.org.uk
Executive Principal & Lead Executive for Safeguarding	Simone Hopkins	01342 832243 Ext 272 07825188814
Head of Safeguarding and Quality Practice – <b>Lead DSL</b>	Gill Walters	01342 832243 Ext 409 07825 1888 20
Designated Teacher for Children Looked After	Danny Hulme	01342 832243 Ext 262
<b>Deputy DSLs</b>	<p><b>Residential:</b></p> <ul style="list-style-type: none"> <li>• Senior House Managers</li> <li>• House Managers</li> <li>• Care Coordinators</li> <li>• Duty Managers/Night Coordinators</li> </ul> <p><b>School</b></p> <ul style="list-style-type: none"> <li>• Danny Hulme</li> <li>• Clare Lewis</li> <li>• Katie Scanlon</li> </ul> <p><b>College</b></p> <ul style="list-style-type: none"> <li>• Lisa Bush</li> </ul> <p><b>Health</b></p> <p>Kirsten McHale</p>	Check posters in your respective areas for contact person and relevant telephone number

*\*For Young Epilepsy contacts please refer to the website and off campus safeguarding procedure*



## How the Safeguarding Team Works

There is a designated member of the Executive Team (currently the Executive Principal) with responsibility for safeguarding at St Piers School and College and Young Epilepsy. The Executive for Safeguarding maintains the strategic overview of safeguarding within both the charity and on campus, which includes overseeing the work of the Safeguarding Team.

The Safeguarding Team comprises a Lead DSL (Designated Safeguarding Lead), and a number of Deputy DSLs (DDSL) across health, residential and education services who are available for people to report their concerns to. There is a DSL available to speak to 24hrs a day during the term time. The staff, inclusive of the Lead DSL, who actively assume the DSL role on a daily basis are:

- Senior House Managers
- All House Managers
- All Care Coordinators
- Night Duty Co-Ordinators
- Allocated DSL(s) – Leadership team - Education
- Nurse Consultant

All DSLs have undertaken Surrey 'Designated Safeguarding Lead New to Role' and attend refresher training at 2 yearly intervals, alongside annual updates. DSLs fulfil this function in addition to their main role at St Piers School and College. They have also completed Surrey Safeguarding Children's Board (SSCB) Advanced Certificate (formerly Foundations 1 and 2 training). The Lead DSL and the Senior Leadership team in school have completed Early Years DSL training.

Information about the DSLs across St Piers School and College is available on the St Piers School and College Intranet.

The Lead DSL, Gill Walters, Head of Safeguarding and Quality Practice, has attended further training provided by Surrey County Council and Surrey Safeguarding Adults.

The Lead DSL will take the lead on all instances where an allegation has been made against a member of staff and will liaise with the relevant senior manager when doing so. The Lead DSL is also responsible for attending case conferences, strategy meetings, core groups and multi-agency planning meetings as required with the relevant manager/DDSL.

The Executive Principal and Senior Managers within education and residential services have also completed the training outlined above although it is acknowledged that they are generally not the first point of call for people to report concerns to (although this is possible).

We believe that by having senior managers trained as DSLs, this creates a stronger culture and understanding about safeguarding students.



## Contact points for safeguarding in Surrey County Council

Children (under 18 years)	Contact
<p><b>Allegation against staff/professional</b></p> <p>Every local authority has a statutory responsibility to have a local authority designated officer (LADO), who is responsible for coordinating the response to concerns that an adult who works with children may have caused them harm.</p>	<p>To contact the Duty LADO: Tel: 0300 123 1650 (option 3)</p>
<p><b>Significant harm to child at St Piers School and College or at home.</b></p> <p>(Note: if the harm happened outside of Surrey, you will be re-directed to the child's home local Children's Services Team)</p>	<p>Surrey Children's Single Point of Access (C-SPA) Tel: 0300 470 9100 (Monday – Friday 9am – 5pm - Option 1) Email: <a href="mailto:cspa@surreycc.gov.uk">cspa@surreycc.gov.uk</a></p>
Adult at risk (18 years and over)	Contact
<p><b>Allegation against staff</b></p>	<p>Multi Agency Safeguarding Hub: Tel: 0300 470 9100 (Monday – Friday 9am – 5pm - Option 2) Email: <a href="mailto:ascmash@surreycc.gov.uk">ascmash@surreycc.gov.uk</a></p>
<p><b>Serious harm to adult at risk</b></p> <p>(Note: as above if the harm happened at home, you will be re-directed to the local Adult's Services Team)</p>	<p>As above – use same contact details</p>

### Outside of office hours and at weekends and public holidays:

Telephone the Surrey Emergency Duty Team on 01483 517898. However, if you are seriously concerned about a child or an adult's immediate safety dial 999 for emergency services.



## Regulators' Details

Regulator	Contact
<a href="#">Care Quality Commission</a> - regulates adult residential care and health services in St Piers	St Nicholas Building St Nicholas Street Newcastle upon Tyne NE1 1NB Tel: 03000 616161 <ul style="list-style-type: none"><li>• Provider ID – 1-101610290</li><li>• Location ID – 1-137790641</li></ul>
<a href="#">Ofsted</a> - regulates St Piers School and the residential special school houses and St Piers College,	Royal Exchange Buildings St Ann's Square Manchester M2 7LA Tel Whistleblowing Hotline: 08456 404046 <a href="http://www.ofsted.gov.uk">www.ofsted.gov.uk</a> Reference No: SC394025

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](#)

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

***Please also refer to the Whistleblowing and Confidential Disclosures Procedure.***





## 1. SAFEGUARDING FOUNDATION/GENERAL INFORMATION

### 1.1 St Piers School and College and Young Epilepsy Safeguarding Statement

#### 'It could happen here'

We are committed to safeguarding and promoting the welfare of children and adults at risk and expects all staff and volunteers to share this commitment. We believe that the welfare of each student is paramount and that it is better for harm to be prevented than reacted to.

Decisions by staff whether to report a concern, suspicion, nagging doubt or allegation of abuse or mistreatment are not a matter of individual conscience but are considered a professional duty.

All students must have these fundamental rights accorded to them whilst they are in our care:

- **To be treated as an individual**
- **To be treated with dignity and respect**
- **To be safe.**

### 1.2 Roles and Responsibilities

#### All Staff will:

- Maintain an attitude of "It could happen here" with regards to safeguarding.
- Understand that safeguarding is 'everyone's responsibility.'
- Maintain a 'zero-tolerance' approach to abuse inclusive of inappropriate sexualised behaviour, sexual violence and sexual harassment.

All members of staff have an equal personal responsibility to follow these procedures if they are worried a student is being harmed or abused. **All** staff have a duty to intervene to stop harm and to report concerns about the safety of a student.

Staff have a key role to play in identifying concerns early and in providing help for our students. To achieve this, they will:

- Read the Child and Adult Protection and Safeguarding policy and procedures. Each time the documents are updated staff will be informed and will be required to read the amendments.
- Understand that they have a pivotal role to play in multi-agency safeguarding arrangements.
- Establish, provide and maintain a safe environment in which students can learn and feel secure and in which they are encouraged to talk and are listened to.
- Ensure students know that there are staff who they can approach if they are worried or have concerns.
- Plan opportunities within the 24-hour curriculum for students to develop the skills they need to assess and manage risk appropriately and keep themselves safe.
- If the DSL is not available be prepared to refer directly to C-SPA, MASH or LADO and the police if appropriate.
- Report low-level concerns about any member of staff/agency staff or contractor to the Lead DSL or Deputy DSLs.



- Understand Early Help and be prepared to identify and support children who may benefit from Early Help.

Staff in regular contact with students are well placed to notice signs of physical, sexual or emotional abuse, neglect, behavioural change or failure to develop as expected. These signs and indicators are crucial in identifying when a student is suffering /has suffered from abuse.

All staff should be aware that mental health problems can, in some cases, be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals will attempt to make a diagnosis of a mental health problem.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood.

### **Trust Board Responsibilities**

Trustees are ultimately responsible for ensuring that those benefiting from or taking part in the charity's activities are not harmed in any way. This includes:

- Ensuring they take all reasonable steps to prevent any harm to children and adults at risk.
- Managing risk and to protect the reputation and assets of the charity.
- Assessing the risks that arise from the charity's activities and operations.
- Supporting and ensuring that there are appropriate safeguarding policies and procedures in place.
- Monitoring and scrutiny to ensure that these safeguards are being effectively implemented in practice.
- Making sure that the charity has robust systems in place to handle allegations and that they are dealt with responsibly and appropriately.
- Ensuring a robust safe recruitment procedure is in place within the charity and monitor and review this (Recruitment Policy and Procedure and the Vetting Procedure).

The trust board may set up committees to scrutinise the safeguarding policies, procedures and processes to ensure that these remain up to date and effective.

### **Lead Trustee for Safeguarding**

The Lead Trustee should champion safeguarding within the Trust Board and meet regularly with the Lead Governor for Safeguarding and relevant Directors to:

- Oversee high level planning of safeguarding across the charity.
- Provide scrutiny that the charity functions within the legal and regulatory framework for safeguarding practice and in line with the charity's governing document.
- Be involved in any required safeguarding policy review.
- Provide scrutiny that appropriate systems for the charity's safeguarding performance are in place, continually striving for best practice in safeguarding governance.
- Provide scrutiny that the fundamental values and guiding principles of the charity in relation to safeguarding children and adults at risk are articulated and reflected throughout the charity.



- Make visits to services as part of a planned programme and report back to the Trust Board about his/her activities to inform them of what they have observed about how the charity is meeting its safeguarding duties.
- Scrutinise that there are mechanisms for beneficiaries, employees, volunteers, other individuals, groups or organisations to bring to the attention of the Trustees should it be necessary, any safeguarding concerns in relation to children and adults at risk that threaten the probity of the charity.
- Scrutinise that safe recruitment processes are in place.
- Scrutinise that the training programme for staff regarding safeguarding meets the needs of the charity and regulatory requirements.
- Scrutinise that there is a system in place for recording information and that these records are kept secure.

### **Governor responsibilities**

The Governing body takes seriously its responsibility under section 175/157 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure there are robust arrangements within our school to identify, assess, and support those children who are suffering harm or at risk of suffering harm.

Key responsibilities for the governing body in relation to safeguarding in the education services include:

- Ensure there are effective safeguarding policies and procedures in place together with a staff behaviour policy/code of conduct (Code of Conduct) which all staff receive during their induction, a behaviour policy and a response to children who go missing from education and that they are available on the website.
- Ensuring the safeguarding policy is updated annually and made publicly available.
- Consider how students may be taught about safeguarding as part of a broad and balanced curriculum within the school environment.
- Assess the effectiveness of the safeguarding arrangements in place.
- Requirements for safe recruitment are met and that S 128 checks occur as set out in KCSIE 2024 and that the Single Central Register is maintained effectively.
- Ensure appropriate online filters and appropriate monitoring systems are in place.
- Ensure appropriate and effective procedures are in place to manage allegations and low level concerns against staff/volunteers/contractors.
- Ensure the student's wishes and feelings are considered when determining what action to take and what services to provide.
- Ensure that staff have the skills, knowledge and understanding necessary to keep looked after children safe.
- Have due regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all children.
- Policies and processes are in place to deal with concerns (including allegations) which do not meet the harm threshold or low-level concerns as defined in KCSIE 2024.



- Students are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through PSHE and RSE.
- The setting will comply with DfE and the Surrey County Council Policy Guidance for Safeguarding Children Missing Education and Education Other Than At School.
- Clear systems and processes are in place for identifying possible mental health concerns, including routes to escalate and clear referral and accountability systems.

### **Lead Governor for Safeguarding**

Within the Education Governing Body, there is a lead governor for safeguarding (see contacts section) who will work closely with the EGB Chair, Lead Executive for Safeguarding, Lead DSL and the Executive Principal to ensure that the governing body meet their responsibilities as set out in Keeping Children Safe in Education (2024).

- Fully understand the requirements of all statutory safeguarding legislation and advisory guidance and, that St Piers is compliant.
- Ensure there are effective systems in place to keep vulnerable students safe.
- Determine if there is a consistency in safeguarding across the whole organisation.
- Demonstrate confidence and support governance in their challenge to senior leaders on strategies for monitoring and improving the behaviour and safety of students.
- Ensure measures are in place to support the work of the DSL (Designated Safeguarding Leads) and Deputy DSLs.
- Report back, at least annually, to governance about the effectiveness of the organisation's safeguarding arrangements.

### **Executive Principal responsibilities (Lead Executive for Safeguarding)**

The Executive Principal should work in close liaison with the Lead Executive for Safeguarding about all matters pertaining to safeguarding to ensure joint understanding and overview.

In addition to the role and responsibilities of all staff, the Executive Principal will ensure:

- That this procedure is implemented and followed by all staff within school and college and its residential provision.
- St Piers School fully contributes to inter-agency working in line with Working Together to Safeguard Children 2023 guidance.
- Adequate and appropriate DSL cover arrangements are in place across school, college and residential services.
- That opportunities are provided for a co-ordinated offer of early help when additional needs of children or young people are identified.
- Student-centred systems and processes are in place for children and young people to express their views and give feedback.
- All staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle-blowing procedures.
- Students are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.
- Delegate liaison with the LADO to the Lead DSL or designated other Deputy DSL as appropriate.



- Ensure that safeguarding is incorporated across the curriculum, including PSHE, opportunities which equip children and young people with the skills they need to stay safe from harm and to know to whom they should turn for help.
- That St Piers School, College and residential provision have appropriate policies in place that make it clear that sexual harassment, online sexual abuse and sexual violence (including sexualised language) is unacceptable, with appropriate consequences and support in place.
- That all students are supported to report concerns about harmful sexual behaviour freely and that concerns are taken seriously and dealt with swiftly and appropriately. Students should be confident that this will be the case and assured that comprehensive records of all allegations are kept.
- In consultation with the Lead DSL to ensure that statutory requirements are met to make a referral to the Disclosure and Barring Service and additionally in the case of teaching staff the Teacher Regulation Agency where they think an individual has engaged in conduct that harmed (or is likely to harm) a student; or if the person otherwise poses a risk of harm to a student.
- That the Chair of the EGB is kept briefed of any serious safeguarding allegations and/or incidents occurring within the educational and residential settings, within the agreed time frame.
- Be the Prevent Lead in conjunction with the Lead DSL
- Ensure the Lead DSL has appropriate support, autonomy and resources to fulfil their role.

### **The Designated Safeguarding Lead (as outlined in KCSIE 2024 - Annex C):**

- Acts as a source of support and expertise in carrying out safeguarding duties for the charity.
- Encourages a culture of listening to students and taking account of their wishes and feelings.
- Will refer a child or adult at risk if there are concerns about possible abuse, to the SPA/MASH and act as a focal point for staff to discuss concerns.
- Will refer cases where a crime may have been committed to the police as required.
- Will liaise with Surrey LADO regarding concerns about those in school or college who work with children and to keep the Executive Principal apprised of these.
- Will keep detailed, accurate records of all concerns about a student even if there is no need to make an immediate referral.
- Will keep up to date, detailed, accurate records (either written or using appropriate secure online software), that include all concerns about a student even if there is no need to make an immediate referral and record the rationale for decisions made and action taken.
- Will ensure that when a student leaves St Piers School or College, child/adult protection information is shared with appropriate and relevant agencies (such as new school/college).
- Will ensure that a copy of the CP/AP file is retained until such a time that the new school acknowledges receipt of the original file. The copy should then be securely destroyed on receipt of confirmation.



- Will liaise with the Local Authority and work with other agencies and professionals in line with Working Together to Safeguard Children.
- Has a working knowledge of Surrey Safeguarding partnership arrangements.
- Will ensure that either they, or another suitable staff member, attend case conferences, core groups, or other multi-agency planning meetings, contribute to assessments, and provide a report where required which has been shared with the parents.
- Will ensure that the case holding Social Worker is informed of any child currently with a child protection plan who is absent without explanation.
- Will ensure that the leadership teams in school, college and residential services ensure all staff sign to say they have read, understood and agree to work within the charity's Child and Adult Protection and Safeguarding policy and procedure, staff behaviour policy (code of conduct) and Keeping Children Safe in Education Part 1 and ensure that the policies are used appropriately.
- Understand the risks associated with online activity and be confident that they have the up-to-date knowledge and capability to keep children safe whilst they are online at school/college; in particular understand the additional risks that children with SEND face online and the associated and appropriate support they require.
- Will organise safeguarding induction, regularly update training and ensure a minimum of annual updates for all student facing staff.
- Understands locally agreed processes for providing early help and intervention and will support members of staff where Early Help is appropriate.
- Will ensure that the name of the designated members of staff for safeguarding are clearly advertised in all services.
- Feedback to the Executive Team and Trustees and Governors as required, about safeguarding practice within the charity.
- Review relevant policies when required to do so.
- Liaise with school staff (especially pastoral support, behaviour leads, school health colleagues) on matters of safety and safeguarding and consult the SSCP Levels of Need document to inform decision making and liaison with relevant agencies.
- Contribute to the biennial (s157 s175) Statutory Audit for Safeguarding Arrangements and Termly Safeguarding Data Collections via The Virtual College – ENABLE to Surrey County Council.
- When there has been a report of sexual violence, make an immediate risk and needs assessment. Additionally, where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis and will be put in place as required.
- Be the Prevent Lead in conjunction with the Executive Principal

### **Deputy DSL responsibilities**

- Be trained to the same standard as the Lead DSL. The role is explicit in their job description.
- Provide support and capacity to the Lead DSL in carrying out delegated activities of the DSL; however, the lead responsibility of the Lead DSL cannot be delegated.
- In the absence of the Lead DSL, carries out the activities necessary to ensure the ongoing safety and protection of children and young people. In the event of the long-term absence of the Lead DSL the deputy will assume all the functions above.





- Discuss referrals made at the Safeguarding Team meetings held in term time.
- Be available to provide support to students as needed regarding concerns.
- Liaise with parents and families and offer support relating to concerns raised or being acted upon.
- Liaise with Children's or Adult Services in accordance with Surrey County Council procedures concerning children or adults at risk.
- Keep records of any concerns/suspected cases of abuse/referrals on the electronic Incident Reporting System, separate to the child or young person's main file, and ensure their confidentiality.
- Support and deliver the training programme, when required, for all St Piers School and College staff to ensure that the staff who work with children and adults at risk are equipped to carry out their safeguarding responsibilities.
- Challenge cultures, practices and attitudes where there is a concern that they are impacting negatively on the wellbeing of students and/or staff.
- Attend monthly DSL meetings as arranged by the Lead DSL.
- Attend termly DSL network meetings arranged by Surrey Safeguarding Education team.

### 1.3 Training

Training regarding safeguarding is mandatory for all staff. Please see the 'Learning and Development Requirements per Staff Group' for more information.

#### Core Induction

**All staff** (contact staff, non-contact staff, Trustees, Governors, Executive Team, volunteers etc.) are required to complete the Safeguarding Induction training before commencing employment. This induction training includes the introduction to 'Working Together to Safeguard Children' and 'Keeping Children Safe in Education' as well as the Care Act. This includes such issues as the definitions of abuse; raising awareness of the signs and symptoms of abuse; how to respond to a student who discloses abuse/harm; recognition of how values affect judgement; who to report concerns to and how to do this.

All staff who work in school/children's residential inclusive of all night staff across Adults and Childrens, admissions team, therapy and nursing department are required to read Part 1 'Keeping Children Safe in Education' (2024). Managers also facilitate 'spotlight' training with support staff to consolidate learning.

In addition to the Safeguarding Induction, staff working directly with children and adults at risk are also required to complete Online Safety, Relationships and Sexual Wellbeing and courses within the first few months of employment.

#### Refresher Training

All staff working in non-student facing roles must complete the Safeguarding eLearning module annually. Staff working in contact roles with students must attend an annual face-to-face safeguarding refresher training session.

#### Designated Safeguarding Lead Training

All staff within the Safeguarding Team complete Surrey's 'Designated Safeguarding Lead New to Role' training upon commencing their role and biannually thereafter. The DSLs will also attend the termly DSL network meeting. The Safeguarding Team will attend Surrey provided



workshops and sessions on an ad hoc basis where necessary and such information will also be passed on to the wider staff team in workshops concerning specific issues.

### **Training for governors and trustees**

Safeguarding training for all governors and trustees occurs on an annual basis online and is provided by an external company. This training meets the requirements set out in Keeping Children Safe in Education (2024). All governors are expected to read KCSIE in its entirety.

### **Agency, Casual and Bank staff**

All staff working at St Piers School and College have a duty to follow our Policies and Procedures. Fixed Term Agency Staff and casual staff are expected to complete Safeguarding induction training (face to face), and any ad-hoc agency staff must complete a mini-induction before their first shift which includes information about safeguarding; this is the responsibility of the booking manager.

### **Safeguarding updates (Briefings and Spotlight Training)**

The Lead DSL disseminates additional information and learning to staff in the charity via regular staff briefings with updates and information about safeguarding practice. Staff are expected to read these, and this is overseen by managers. All information pertaining to safeguarding, can also be found on St Piers School and College intranet in the Safeguarding Team site. Further to this bitesize training spotlights occur bi-termly, these are written by the Lead DSL and facilitated by DSLs during staff meetings.

## **1.4 National and Local Guidance**

### **Children**

Based on the Department for Education's (DfE's) statutory guidance [Keeping Children Safe in Education \(2024\)](#) and [Working Together to Safeguard Children \(2023\)](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners (Surrey County Council, Surrey Police, and NHS Surrey Heartlands Integrated Care Board).

- [The Children Act 1989](#) and [The Children Act 2004](#)
- [What to do if you're worried a child is being abused – \(DfE, 2015\)](#)
- [Children and Families Act 2014](#)
- [Surrey Safeguarding Children Partnership \(SSCP\) Protocols, Guidance and Procedures](#)
- [Safeguarding Disabled Children & Young People; Practice Guidance for all Agencies – \(DfE, 2009\)](#)
- [Statutory guidance on FGM](#)
- [statutory framework for the Early Years Foundation Stage](#)

### **Adults**

- [Care Act \(2014\)](#)
- [Surrey Safeguarding Adults Board \(SSAB\)](#)
- [Surrey Safeguarding Adults Safeguarding Policy and Procedures](#)

### **Other Key Legislation**

- [Human Rights Act 1998](#)



- [Education Act 2002](#)
- [Adoption and Children Act 2002](#)
- [Mental Capacity Act and Code of Practice 2005](#)
- [Sexual Offences Act 2003](#)
- [Sexual Violence and Sexual Harassment between Children in Schools and Colleges guidance \(DfE 2021\)](#)
- [Safeguarding Vulnerable Groups Act 2006](#)
- [Children and Adoption Act 2006](#)
- [Health and Social Care Act 2008](#)
- [Children and Young Person's Act 2008](#)
- [Equality Act 2010](#)
- [Education Act 2011](#)
- [Protection of Freedoms Act 2012](#)
- [Teacher Standards 2011](#)
- [Information Sharing Advice for Practitioners guidance 2018](#)
- [The Public Sector Equality Duty \(PSED\)](#)

### **1.5 Working with parents, guardians and carers**

It is good practice regarding general care, education and health issues, for all staff to work in close partnership with the parents/carers of all students. We recognise that parents and carers are a vital partner in providing high quality services to their son or daughter.

However, in certain situations, safeguarding concerns cannot be discussed with parents without advice from the LADO or Surrey SPA or Adult MASH team to ensure that doing so does not put a student at greater risk (such as cases of so-called, 'honour' based abuse or forced marriage). Staff in doubt about this must refer to the Lead DSL to discuss.

At St Piers school and college, we always aim to be as open and honest as possible with parents/carers about any concerns. However, Surrey Safeguarding partnership advise that we do not discuss concerns with parent/s/carer/s in the following circumstances (if related to the family) pending further advice and/or consultation:

- Where sexual abuse or exploitation is suspected.
- Where organised or multiple abuse is suspected.
- Where fabricated or induced illness is suspected.
- Where female genital mutilation is a concern.
- In cases of forced marriage.
- Where contacting parents/carers could place a child or young person or others at immediate risk of harm.

Information sharing with parents and carers is also impacted upon by the requests and views of the young person or adult at risk. Where a young person or adult at risk has the capacity to decide that they do not want their parents/carers informed about a concern, then St Piers School and College will respect this choice, unless there are very clear reasons why this cannot be upheld. This however does not negate our responsibilities to inform other statutory agencies of any concerns of abuse.



Where a child is subject to a Care Order there may be restrictions in place on what information is shared with a parent/s. It is crucial that all staff members working with the child know what they can and cannot share with parents and that this is recorded in the child's file and on all electronic information management systems (e.g., Databridge). Staff will need to work closely with the child's Social Worker and to report to them any safeguarding concerns.

## **1.6 Confidentiality, Sharing and Withholding Information**

All matters relating to child and adult protection will be treated as confidential and only shared as per the 'Information Sharing Advice for Practitioners' (DfE 2018) guidance.

Information will be shared with staff who 'need to know'. Relevant staff should have due regard to Data Protection principles which allow them to share (and withhold) information.

Sensitive information about a student sometimes needs to be shared both inside and outside the organisation to safeguard the student and promote their welfare and safety. This may include a student's social worker or funding authority. The purpose of this will always be to safeguard the individual from harm and to meet statutory requirements.

Students have a general right to independence, choice and self-determination including control over information about themselves. In the context of safeguarding, these rights can be overridden in certain circumstances.

- Emergency or life-threatening situations may warrant the sharing of relevant information with the relevant emergency services without consent.
- The law does not prevent the sharing of sensitive, personal information within organisations. If the information is confidential, but there is a safeguarding concern, sharing it may be justified.
- The law does not prevent the sharing of sensitive, personal information between organisations where the public interest served outweighs the public interest served by protecting confidentiality – for example, where a serious crime may be prevented.
- The Data Protection Act enables the lawful sharing of information.

The DSL should always be consulted before any information sharing about a safeguarding concern. As necessary the team will refer to the Information Governance Manager/Caldicott Lead to ensure that information sharing is legitimate and in accordance with relevant legislation and information sharing protocols.

## **1.7 Consent to Sharing Information**

Usually personal information (including details of safeguarding concerns) regarding students, their families or their carers (i.e., staff at St Piers School and College is only disclosed with consent. Where possible, St Piers School and College will seek consent from both the student (dependent on their capacity level) and parents/carers (where appropriate to the situation and age and capacity of the student) when sharing any information externally regarding safeguarding concerns.

However, there are some circumstances where seeking consent may not be appropriate or safe. We have a legal duty to share information where there are child or adult protection concerns. Therefore, in some cases, personal information will be shared with other agencies without consent if this is deemed to be in the best interests of the student and the decision making around this will be clearly documented. For example, if the DSL felt that a student was at risk of harm or had been harmed then the DSL would have a duty to pass over personal pertinent information about the student to the relevant children's/adults' services. Equally if the student is believed to lack capacity to make a decision about whether they give consent



to share their information, then a best interests decision may be made about whether to do so.

UK Law assumes that all people over the age of 16 have the ability to make their own decisions, unless it has been proved that they cannot. It also gives us the right to make any decision that we need to make and gives us the right to make our own decisions even if others consider them to be unwise.

We make so many decisions that it is easy to take this ability for granted. The Law says that to make a decision we need to:

- Understand information
- Remember it for long enough
- Think about the information
- Communicate our decision.

A person's ability to do this may be affected by things such as learning disability, dementia, mental health needs, acquired brain injury and physical ill health.

Mental capacity refers to the ability to make a decision at the time that decision is needed. A person's mental capacity can change. If it is safe/possible to wait until they are able to be involved in decision making or to make the decision themselves.

For example:

- A person with epilepsy may not be able to make a decision following a seizure.
- Someone who is anxious may not be able to make a decision at that point.
- A person may not be able to respond as quickly if they have just taken some medication that causes fatigue.

Adults have a legal right to make decisions about their own lives. Adults who may be at risk of, or who are, experiencing abuse and neglect, may often feel disempowered by the abuse, and acting without involving them or seeking their consent will often disempower them further.

Wherever possible, there should be a conversation with the adult at the earliest opportunity to establish their views including:

- Whether they see the issue as a cause for concern or not.
- What they want to happen, if anything, including any actions they might want taken or may want to take themselves or not take; if the adult agrees that a safeguarding concern should be raised, what they want to be achieved from this and if they do not agree, the reasons for this.

Where a young person/adult with capacity to make an informed decision about their own safety, does not want any action taken, this does not override our responsibility to raise a safeguarding concern and to share key information with relevant professionals in the circumstances outlined above.

If a refusal to give this permission does not appear to be in the student's best interests, the information may be shared without the student's consent. In such circumstances, a best interests decision will be made by the relevant manager (as long as they are not implicated in the concern), the Lead DSL and where appropriate, the student's parents. For adults at risk who lack capacity to understand the issue in hand, a decision will need to be made by the appropriate manager and parents or whoever has deputyship for the individual, about their



best interests in the situation. All such decision making needs to be recorded as per guidance from Information Governance Manager.

*Please see the [Mental Capacity SharePoint site for more information.](#)*

## 1.8 Inter-Agency Partnership

As an education, residential and healthcare provider, we work in partnership with Children's and Adults' services, regulators and police forces in both our locality (Surrey) and the student's home area.

The first point of contact for any child or adult protection concern, is the [Surrey Single Point of Access \(SPA\)](#) for Children and the [Multi Agency Safeguarding Hub \(MASH\)](#) for adults. The telephone number is the same and you will have an option to choose whom you need to speak.

Where there is an allegation made about a member of staff or volunteer against a child (under the age of 18 years), the [Surrey Local Authority Designated Officer \(LADO\)](#) will also be contacted.

Some concerns about students will also need to be passed to our regulators through a notification ([Ofsted](#) or [CQC](#)). Where this is required, the Lead DSL will liaise with the relevant person to complete the necessary notification.

Where necessary (as laid out in statutory guidance) the Lead DSL will, with support from the Human Resources Department, make referrals to the Disclosure and Barring Service as well as any other professional bodies.

This inter-agency approach enhances the effectiveness of identifying and dealing with safeguarding and child and adult protection issues that may arise as swiftly as possible, for the best interests of the child or adult.

## 1.9 Escalation process

### Internal

- Where there is an allegation or concern about a senior staff member or manager at St Piers staff should speak directly to the Lead DSL or a member of the Executive Team. If the Executive Team are contacted initially by the staff member the Head of Safeguarding/Lead DSL will require to be informed to ensure that the processes around managing allegations against staff are followed and recorded.
- Where there is an allegation or concern about a member of the Executive Team staff should inform the Chief Executive/Head of Safeguarding/Lead DSL. The Chief Executive will inform the Chair of Trustees and/or the Lead Trustee for Safeguarding.
- If there is an allegation or concern about the CEO then the Chair of Trustees should be contacted directly.
- If the concern or allegation relates to the Executive Principal (who is also the Lead Executive for Safeguarding) then the Chair of the Education Governing Body must also be informed. The Chief Executive will decide who will do this.
- Where there is an allegation or concern about a DDSL, staff must contact the Head of Safeguarding/Lead DSL or a member of the Executive Team.
- Where there is concern about the Head of Safeguarding/Lead DSL staff must contact the Executive Principal or another member of the Executive Team who should make



the Chair of Trustees and the Lead Governor/Trustee for Safeguarding aware. *The contact details for these individuals can be found at the start of this procedure.*

The Chair of the Governors will be informed of any significant concern\* or complaint or police investigation by the Executive Principal **within 48 hours** of the alleged incident.

A significant concern comprises of the one or more of the following:

- Police involvement – where they decide the matters warrants their follow up after being reported, and/or if a police investigation occurs.
- Pattern of concerning events in one area (house/class/service).
- Reputational risk as a result of safeguarding concern(s).
- Significant harm to a student or to a staff member.
- Dismissal and referral to DBS as a result of professional conduct/potential for harm to children and young people.
- Fixed Term/Full exclusions (Also see Exclusion/End of placement procedures)
- Any other concern/complaint at the discretion of the Executive Principal.
- Death of a student.

A flowchart depicting St Piers escalation process can be found in Appendix 1.

## External

If St Piers School and College disagrees with a decision or any in/action taken by Surrey Children or Adult's Services relating to a safeguarding concern, the Head of Safeguarding/Lead DSL will follow the escalation process as highlighted on Surrey's Safeguarding Partnership website. <https://surreyscb.procedures.org.uk/skyqox/complaints-and-disagreements/inter-agency-escalation-policy-and-procedure>

### 1.9 Duty of Candour

The Duty of Candour requires all health and adult social care providers registered with the [Care Quality Commission \(CQC\)](#) to be open with people when things go wrong. The regulations impose a specific and detailed duty on all providers where any harm to a service user from their care or treatment is above a certain harm threshold. This applies to St Piers health and adult residential services, although the principle of Duty of Candour is appropriate to all of our services.

The Duty of Candour requires providers to offer an apology and state what further action the provider intends to take in this situation. In practice, this means that care providers are open and honest with patients when things go wrong with their care and treatment.

## 2 SIGNS AND INDICATORS

### 2.1 Safeguarding Children

In the Children Act 1989, a child is defined as someone under the age of 18 years.

#### Definition of Significant Harm – The Children Act 1989

The Children Act 1989 introduced the concept of Significant Harm as the threshold that justifies compulsory intervention in family life in the best interests of children.

There are no absolute criteria on which to rely when judging what constitutes Significant Harm, but consideration should be given to the following:



- The severity of ill-treatment which may include the degree and extent of physical harm including, for example, impairment suffered from seeing or hearing the ill-treatment of another.
- The duration and frequency of abuse and neglect.
- The extent of premeditation.

Working Together to Safeguard Children (2023) sets out definitions and examples of the categories of abuse. St Piers School has a duty to raise any concerns that a child is suffering, has suffered or is likely to suffer significant harm, to Surrey Children's Services. This may result in a Section 47 enquiry being completed by Children's Services and/or the police.

## **2.2 Safeguarding Adults at Risk**

### **Definition of an Adult at Risk**

This term refers to someone who is 18 years and over with care and support needs.

The aims of Adult Safeguarding are to:

- Stop abuse or neglect wherever possible.
- Prevent harm and reduce the risk of abuse or neglect to adults with care and support needs.
- Safeguard adults in a way that supports them in making choices and having control about how they want to live.
- Promote an approach that concentrates on improving life for the adults concerned.
- Raise public awareness so that communities as a whole, alongside professionals, play their part in preventing, identifying and responding to abuse and neglect.
- Provide information and support in accessible ways to help adults understand the different types of abuse, how to stay safe and what to do to raise a concern about the safety or wellbeing of an adult.
- Address what has caused the abuse.

Making safeguarding personal means that safeguarding processes should be person-led and outcome-focused. It means engaging the adult involved in a conversation about how best to respond to their safeguarding situation in a way that enhances involvement, choice and control, as well as improving quality of life, wellbeing and safety.

Personalised care and support are for everyone, but some people will need more support than others to make choices and manage risks. Making risks clear and understood is crucial to empowering and safeguarding adults and in recognising people as 'experts in their own lives'.



There are six key principles that underpin the safeguarding of adults at risk:

Principles	Description	Outcomes for the adult
<b>Empowerment</b>	Presumption of person led decisions and informed consent.	<i>I am asked what I want as the outcomes from the safeguarding process and these directly inform what happens."</i>
<b>Prevention</b>	It is better to take action before harm occurs.	<i>"I receive clear and simple information about what abuse is, how to recognise the signs and what I can do to seek help."</i>
<b>Proportionality</b>	Proportionate and least intrusive responses appropriate to the risk presented.	<i>"I am sure that the professionals will work for my best interests, as I see them and will only get involved as much as needed." "I understand the role of everyone involved in my life."</i>
<b>Protection</b>	Support and representation for those in greatest need.	<i>"I get help and support to report abuse. I get help to take part in the safeguarding process to the extent to which I want and to which I am able"</i>
<b>Partnerships</b>	Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse.	<i>"I know that staff will treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. I am confident that professionals will work together to get the best result for me."</i>
<b>Accountability</b>	Accountability and transparency in delivering safeguarding.	<i>"I understand the role of everyone involved in my life and so do they."</i>

### 2.3 Types of Abuse

One of the fundamental roles for all staff, is to be aware of the different categories of abuse and harm and to identify and respond to any signs or indicators that such things could be

happening to the students we work with. The definitions of some types of abuse are different depending on whether they relate to child or adult victims. Therefore, where applicable, both definitions are included below. This information can also be found in Working Together to Safeguard Children (2023) and the Care Act (2014).

The Safeguarding Team have also developed '*Signs of Abuse Guidelines*' which go into more detail about the different types of abuse and harm and the indicators associated with these so that staff can be vigilant of these. This document can be found on the staff intranet.

### Physical abuse

Definition of physical abuse relating to children	Definition of physical abuse relating to adults
This may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning or suffocating, or otherwise 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. It may also include, kicking, misuse of medication, restraint or inappropriate sanctions.	The use of force, or any action, or inaction which results in pain or injury or a change in the person's natural physical state or the non-accidental infliction of physical force that results in bodily injury, pain or impairment. Examples may include restraint and/or misadministration of medication.

If you spot any indicators or signs that a student is being physically abused, you must speak to the Safeguarding Team immediately.

### Emotional/Psychological abuse

Definition of emotional abuse relating to children	Definition of emotional/psychological abuse relating to adults
<p><b>Emotional abuse</b> is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.</p> <p>Emotional abuse may involve:</p> <ul style="list-style-type: none"> <li>› Conveying to a child that they are worthless or unloved, inadequate, or valued only as far as they meet the needs of another person.</li> <li>› Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.</li> </ul>	This can include, emotional abuse, threats of harm or abandonment, deprivation of contact with others, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber-bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.



<ul style="list-style-type: none"> <li>› 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 participating in normal social interaction.</li> <li>› Seeing or hearing the ill-treatment of another.</li> <li>› Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.</li> </ul>	
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If you spot any indicators or signs that a student is being emotionally abused, you must speak to the Safeguarding Team immediately.

### Sexual abuse

Definition of sexual abuse relating to children	Definition of sexual abuse relating to adults
<p><b>Sexual abuse</b> involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:</p> <ul style="list-style-type: none"> <li>› 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.</li> <li>› 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 (including via the internet)</li> </ul> <p>Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.</p>	<p>This is direct or indirect involvement in sexual activity without valid consent (this can include when an adult has not or cannot consent or was pressured into consenting).</p> <p>This includes, rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts.</p>

If you spot any indicators or signs that a student is being sexually abused, you must speak to the Safeguarding Team immediately.



The Sexual Offences Act 2003 defines 'consent' as '*if he/she agrees by choice and has the capacity to make that choice*'. The Act, removes the element of consent for many sexual offences for:

- Children/young people under 16 (including under 13).
- Children/ young people under 18 years having sexual relations with a person of trust (for example: teachers, youth workers, foster carers, police officers).
- Children / young people under 18 years involved with family members over 18 years.
- Persons with a mental disorder impeding choice or who are induced, threatened or deceived.
- Persons with a mental disorder who have sexual relations with care workers.

In relation to young people under the age of 13, consent is irrelevant. The law says, 'a child under the age of 13 does not, under any circumstances, have the legal capacity to consent to any form of sexual activity'.

**The Police must be informed immediately of any sexual activity involving a child under 13 years.**

- **Child Sexual exploitation (CSE)**

The sexual exploitation of children is a form of sexual abuse.

The sexual exploitation of children is described in government guidance (Child sexual exploitation: definition and guide for practitioners, 2017) as 'involving exploitative situations, contexts and relationships where children (or a third person or persons) receive 'something' (e.g., food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of their performing, and/or another or others performing on them, sexual activities'.

It can occur through the use of technology without the child's immediate recognition, for example, being persuaded to post sexual images on the internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources.

Violence, coercion and intimidation are common, with involvement in exploitative relationships being characterised in the main by the child's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

What marks out sexual exploitation is an imbalance of power within the relationship. The perpetrator always holds some kind of power over the victim, increasing the dependence of the victim as the exploitative relationship develops.

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

St Piers School and College is aware there is a clear link between regular non-attendance at school and CSE. In the case of regular non-attendance at school, staff may need to consider if a child is at potential risk of CSE and make reasonable enquiries with the child and parents to assess this risk.



If you spot any indicators or signs that a child or young person is being sexually exploited, you must speak to the Safeguarding Team immediately.

- **Sharing Nudes/Semi- Nudes images (Sexting)**

The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has now become commonplace. However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. **Such imagery involving anyone under the age of 18 years is unlawful.**

Sharing Nudes/Semi-Nudes refers to both images and videos where:

- A person under the age of 18 years creates and shares sexual imagery of themselves with a peer under the age of 18 years.
- A person under the age of 18 years shares sexual imagery created by another person under the age of 18 years with a peer under the age of 18 years or an adult.
- A person under the age of 18 years is in possession of sexual imagery created by another person under the age of 18 years.

Cases where sexual imagery of people under 18 years has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child is child sexual abuse and should be responded to under our safeguarding procedures.

The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff must not view, copy, or print the images.

Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the child at risk of harm. At any point in the process if there is concern a child has been harmed or is at risk of harm a request for support should be made to the C-SPA and/or the Police as appropriate.

If any of the below issues are noted, then immediate support from the police and/or social care will be required:

- If the incident involves an adult.
- There is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent.
- What you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent.
- The imagery involves sexual acts.
- The imagery involves anyone aged 12 or under.
- There is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery.

***Please refer to the Online Safety Procedures.***

## Neglect and acts of omission

Definition of neglect abuse relating to children	Definition of neglect abuse relating to adults
<p><b>Neglect</b> is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.</p> <p>Once a child is born, neglect may involve a parent or carer failing to:</p> <ul style="list-style-type: none"> <li>› Provide adequate food, clothing and shelter (including exclusion from home or abandonment)</li> <li>› Protect a child from physical and emotional harm or danger</li> <li>› Ensure adequate supervision (including the use of inadequate care-givers)</li> <li>› Ensure access to appropriate medical care or treatment</li> <li>› It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.</li> </ul>	<p>Can take several forms and can be the result of an intentional or unintentional act(s) or omission(s).</p> <p>Neglect includes, ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.</p>

If you spot any indicators or signs that a student is being neglected, you must speak to the Safeguarding Team immediately.

The [Neglect Risk Assessment Tool](#) is available from Surrey to provide a more detailed information regarding the assessment of neglect.

The Lead DSL is trained to use the Graded Care Profile 2 tool to support better identification and intervention in the cases of neglect.

- **Self-Neglect**

Is ‘the inability (intentional or non-intentional) to maintain a socially and culturally accepted standard of self-care with the potential for serious consequences to the health and wellbeing of people who self-neglect and perhaps even to their community’ (Gibbons, 2006). An individual may be considered as self-neglecting and therefore at risk of harm where they are:

- either unable or unwilling to provide adequate care for themselves
- unable or unwilling to obtain necessary care to meet their needs
- and/or
- declining essential support without which their health and safety needs cannot be met.

Examples may include hoarding and/or failure to self-medicate.



We understand that sometimes self-injurious or self-harming behaviour is typical for a particular student due to their sensory, communication, behaviour or learning difficulties. Where this is recognised, a robust support plan and risk assessment will be put in place alongside input from our therapy and psychology teams to ensure risk of harm is minimised. Where self-neglecting behaviours are not recognised as 'typical presentation' for a student, these will be treated as safeguarding concerns in the same way as other types of abuse or harm.

### **Child on child abuse**

While a clear focus of child on child abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from children to children can also be abusive. These are equally not tolerated and if it is believed that a crime has been committed, will be reported to the police.

The principles from our anti-bullying procedure will be applied in these cases, recognising that any police investigation will need to take priority.

We are clear that harmful sexual behaviour, sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.

***Please also refer to the Relationships and Sexual Education and Wellbeing Guidelines and Responding to Harmful Sexual Behaviour, Sexual Harassment and Violence Procedure.***

### **Abuse by another adult with Care and Support Needs**

Abuse by another adult with care and support needs, irrespective of the capacity of either, within St Piers requires to be addressed as a Safeguarding Adults issue. Surrey MASH and Adult Social Care are clear that it is not acceptable for us to respond internally to incidents due to the risk of organisations' becoming accustomed to their nature and / or frequency. The safety of the adult who may have been abused is paramount. The Lead DSL and safeguarding team are required to use their professional judgement as to whether the concern raised constitutes a referral to MASH or to the Quality Assurance Team.

### **Online abuse**

Unfortunately, some adults and other children use technologies to harm others. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing people to engage in extremist or sexual behaviour such as webcam photography or face-to-face meetings. Students may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders. Online abuse can happen through social networks, accessing emails, playing online games or using mobile phones. Students may experience the following online; cyberbullying, grooming, sexual abuse, sexual exploitation, trolling, financial abuse or exploitation or emotional abuse.

Students can be at risk of online abuse from people they know, as well as from strangers. Online abuse may be part of abuse that is taking place in the real world (for example bullying or grooming). Or it may be that the abuse only happens online (for example persuading children to take part in sexual activity online).

If you spot any indicators or signs that a student is being groomed or abused online, you must speak to the Safeguarding Team immediately.

***Please refer to the Online Safety Procedure.***



## **Financial / material abuse**

Financial abuse is the use of a person's property, assets, income, funds or any resources without their informed consent or authorisation. This involves exploitation and pressure in connection to allowances, pocket money, monetary gifts, wills, property, inheritance or financial transactions.

If you spot any indicators or signs that a student is being financially abused, you must speak to the Safeguarding Team immediately.

## **Discriminatory abuse**

This exists when values, beliefs or culture result in a misuse of power that denies mainstream opportunities to some groups or individuals. It is the exploitation of a person's characteristics, which excludes them from opportunities in society, for example, education, health, justice, civic status and protection. It includes discrimination on the basis of age, disability, gender reassignment, marriage, civil partnership, pregnancy, maternity, race, religion or belief, sex or sexual orientation and includes hate crime incidents. Discriminatory abuse includes forms of harassment and slurs or similar treatment because of race, gender and gender identity, age, disability, sexual orientation or religion.

If you spot any indicators or signs that a student is being discriminated against, you must speak to the Safeguarding Team immediately.

## **Professional abuse**

Professional abuse is the misuse of therapeutic power and abuse of trust by professionals, the failure of professionals to act on suspected abuse/crimes, poor care practice or neglect in services, resource shortfalls or service pressures that lead to service failure and culpability as a result of poor management systems/structures.

If you spot any indicators or signs of professional abuse you must speak to the Safeguarding Team immediately.

## **Institutional/organisational abuse**

Institutional/Organisational abuse occurs when an organisation's systems and processes, and/or management of these, fails to safeguard a number of adults leaving them at risk of, or causing them, harm. Organisational abuse can also occur when the routines, systems and norms of an organisation override the needs of those it is there to support or fail to be the product of both ineffective and/or punitive management styles, creating an environment within which abuse can take place, intentional or otherwise. Organisational abuse includes, neglect and poor care practice within an institution or specific care setting such as a hospital or care home, or in relation to care provided in a person's own home. This may range from one-off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

If you spot any indicators or signs that a student is being institutionally abused, you must speak to the Safeguarding Team immediately.

## **Female Genital Mutilation**

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

Any teacher that discovers that an act of FGM appears to have been carried out on a student under 18 MUST immediately report this to the police, personally. This is a statutory duty under





the Serious Crime Act 2015. Teachers will face disciplinary sanctions if they fail to meet this duty. The above duty does not apply where a student is at risk of FGM or FGM is suspected but not known to have been carried out. Staff should not examine students.

***Please refer to Awareness of FGM Guidelines***

### **Anti-Bullying/Cyberbullying Procedures**

Where there is a concern that bullying is an issue, all parties involved will be supported to understand the nature of the issues and to agree a positive way forward. These issues are often due to difficulties in individual relationships. Where it is concluded that further action is required to address the behaviour of an individual, this will be done in line with the Positive Behaviour Support Strategy). PSHE education regularly provides opportunities for children to understand bullying is wrong, its impact and how to deal with it.

We keep a record of known bullying incidents which is shared with and analysed by the governing body. All staff are aware that children and adults who have a disability and those who identify as Lesbian, Gay, Bisexual, Transgender or Queer/Questioning (LGBTQ+) are more susceptible to being bullied/victims of child abuse.

When families/carers are making decisions about support for gender questioning students, they should be encouraged to seek clinical help and advice. This should be done as early as possible when supporting pre-pubertal students.

When supporting a gender questioning student, we will take a cautious approach as there are still unknowns around the impact of social transition, and a student may have wider vulnerability, such as complex mental health and psychosocial needs, and in some cases, autism spectrum disorder (ASD) and/or attention deficit hyperactivity disorder (ADHD).

We will also consider the broad range of their individual needs, in partnership with their parents/carers (other than in rare circumstances where involving parents/carers would constitute a significant risk of harm to the pupil). We will also include any clinical advice that is available and consider how to address wider vulnerabilities such as the risk of bullying.

Risks can be compounded where students lack trusted adults with whom they can be open. We therefore aim to reduce the additional barriers faced and create a culture where students can speak out or share their concerns with members of staff.

### **Mate Crime**

This happens when someone fakes a friendship to take advantage of a vulnerable person. This crime is committed by someone who is known to the victim or someone perceived by the victim at some point as a 'friend'.

If you spot any indicators or signs that a person is suffering from or at risk of mate crime, you must speak to the Safeguarding Team immediately.

***St Piers School and College's policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child and adult protection procedures.***

### **Online Safety/Cybercrime**

Children and young adults increasingly use electronic equipment daily to access the internet, share and view content and images via social media sites such as Facebook, X (formally twitter), Instagram, snapchat and voodoo and for online gaming.

We have an Online Safety Procedure and Policy which explains, in greater detail, how we try to keep students safe and how we respond to online safety incidents.



The Head of IT and the Head of Safeguarding will ensure application filters and monitoring systems are in place to safeguard children and adults at risk online.

***St Piers School and College's policy on online safety is set out in a separate document.***

### **Absent or missing student**

A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

We will follow our procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, to help identify the risk of abuse, exploitation and neglect, including sexual exploitation, and to help prevent the risks of going missing in future.

This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being absent, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Where a student is persistently absent or missing from education, the Head of School/College or School/College Leadership Team will liaise with the funding authority.

***Please also see the Attendance Procedures***

### **Domestic Abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. It is actual or threatened physical, emotional, psychological or sexual abuse. It involves the use of power and coercive control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, mental or physical ability. Domestic abuse can also involve other types of abuse.

- psychological
- physical
- sexual
- financial
- emotional

Living in a home where domestic abuse takes place is harmful to children and can have a serious impact on their behaviour, wellbeing and understanding of healthy, positive relationships. Children who witness domestic abuse are at risk of significant harm and staff need to be alert to the signs and symptoms of a child suffering or witnessing domestic abuse.

St Piers School is enrolled onto the Operation Encompass scheme, a joint project between Surrey and Sussex Police, Surrey Domestic Abuse Service and Surrey school/colleges; where





every school/college day our DSL is notified of all domestic abuse incidents that have occurred and been reported to Police in the previous 24 hours which involved a child at this school/college (72 hours on a Monday morning). This provides an opportunity for us to ensure the right support is in place at the right time for children who are experiencing domestic abuse.

If you spot any indicators or signs that a student is at risk of or suffering from domestic abuse, you must speak to the Safeguarding Team immediately.

East Surrey has a Domestic Abuse Outreach Service which can also be contacted where there are concerns about such abuse- 01737 771350.

### **Forced Marriage**

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

Forced marriage is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014. In addition, effective as of February 2023 it is a crime to carry out any conduct whose purpose is to cause a child to marry before their 18<sup>th</sup> birthday.

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

Staff are aware of the 'one chance' rule that we may only have one chance to speak to the potential victim and only chance to save them.

### **So-called 'Honour'-based Abuse**

Honour based abuse (HBA) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code. It is considered a violation of human rights and may be a form of domestic and/or sexual abuse.

Honour based abuse might be committed against people who:

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

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



## Radicalisation, Extremism & Terrorism

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

Extremism is defined as 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs'. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

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

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

There is no such thing as a 'typical extremist'. Those who become involved in extremist actions can come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

Children may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that our staff are able to recognise those vulnerabilities and potential indicators may include:

- **Identity Crisis** – the student is distanced from their cultural/religious heritage and experiences discomfort about their place in society.
- **Personal Crisis** – the student may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging.
- **Personal Circumstances** – migration; local community tensions; and events affecting the students' country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- **Unmet Aspirations** – the student may have perceptions of injustice or a feeling of failure.
- **Experiences of Criminality** – which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration.
- **Special Educational Needs and Disability (SEND)** – they may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

St Piers School and College and follows the Department for Education guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism.

St Piers School and College seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to



Far Right/Neo Nazi/White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

Staff receive training to help identify early signs of radicalisation, extremism and terrorism and are clear that the exploitation of vulnerable children/young people and radicalisation should be viewed as a safeguarding concern.

Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and the school follows the DfE advice Promoting Fundamental British Values as part of SMSC (spiritual, moral, social and cultural education) in Schools (2014).

When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL in the first instance.

They should then follow the safeguarding procedures and refer cases by e-mail to [preventreferrals@surrey.pnn.police.uk](mailto:preventreferrals@surrey.pnn.police.uk) following the Prevent referral process and use the Prevent referral form. If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101 or 01483 632982 and ask to speak to the Prevent Supervisor for Surrey.

The Department for Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).

### **Modern Slavery**

Modern slavery is the illegal exploitation of people for personal or commercial gain. It covers a wide range of abuse and exploitation including human trafficking, sexual exploitation, domestic servitude, forced labour, criminal exploitation and organ harvesting.

If you spot any indicators or signs that a student is at risk of modern slavery, you must speak to a DSL immediately.

### **III Treatment or Wilful Neglect**

The Mental Capacity Act 2005 introduced a new criminal offence of ill-treatment or wilful neglect of a person who lacks capacity, intended to deter people from abusing people who lack capacity. If a person is convicted of this offence, they can be imprisoned or fined. The offence could cover the restraint of a person unreasonably against their will, failure to provide adequate care as well as the more commonly understood forms of abuse.

Sections 20 and 21 of the Criminal Justice and Courts Act 2015 also made it an offence for Care Workers and Providers to wilfully neglect or ill-treat an individual with full capacity.

### **Faith and Spiritual Abuse**

Where parents, families and the child themselves believe that an evil force has entered a child and is controlling them, the belief includes the child being able to use the evil force to harm others. This evil is variously known as black magic, kindoki, ndoki, the evil eye, djinns, voodoo, obeah. Children are called witches or sorcerers.

Parents can be initiated into and/or supported in the belief that their child is possessed by an evil spirit by a privately contacted spiritualist / indigenous healer or by a local community faith leader. The task of exorcism or deliverance is often undertaken by a faith leader, or by the parents or other family members.

A child may suffer emotional abuse if they are labelled and treated as being possessed with an evil spirit. In addition, significant harm to a child may occur when an attempt is made to 'exorcise' or 'deliver' the evil spirit from the child.



The forms the abuse can take include:

- Physical abuse: beating, burning, cutting, stabbing, semi-strangulating, tying up the child, or rubbing chilli peppers or other substances on the child's genitals or eyes
- Emotional abuse: in the form of isolation (e.g., not allowing a child to eat or share a room with family members or threatening to abandon them). The child may also be persuaded that they are possessed
- Neglect: failure to ensure appropriate medical care, supervision, school attendance, good hygiene, nourishment, clothing or warmth
- Sexual abuse: within the family or community, children abused in this way may be particularly vulnerable to sexual exploitation.

If you spot any indicators or signs that a student is suffering from or at risk of faith or spiritual, you must speak to the Safeguarding Team immediately.

### **Child Criminal Exploitation**

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

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". Children are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt.

Where there are any concerns about students being criminally exploited or involved in gangs, staff must report their concerns to the DSL without delay. The DSL will then contact the C-SPA and if there is concern about a student's immediate safety, the Police will be contacted on 999.

We are aware there may be a link between regular non-attendance at St Piers School and exploitation. Staff will consider a student to be at potential risk in the case of regular non-attendance at setting and make reasonable enquiries with the child and parents to assess this risk.

### **Serious Violence**

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

- increased absence from school or college
- 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, or signs of assault or unexplained injuries
- Unexplained gifts or new possessions could also indicate that young people have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

## 3. PROCEDURES

### 3.1 Reporting Concerns about a Student

See *Appendix 2*, Safeguarding Procedures Flowchart.

When a safeguarding concern arises, after ensuring that the student is safe from any immediate harm (and intervening when necessary to stop possible further harm), you must speak to a DSL **immediately** to report the concerns. There is always a DSL available to speak to during the day in each service. Outside of normal working hours, during term time, Night Duty Co-ordinators and Duty Managers can be contacted (who are trained as DSLs).

Failure to comply with this, may raise concerns of Professional Abuse and staff may be subject to disciplinary processes where it is felt that there was a deliberate decision not to report concerns that subsequently become known.

The following are concerns which must be reported to a DSL:

- ❖ Allegations against staff/family/peers
- ❖ Abuse by another adult with care and support needs
- ❖ Bullying/cyberbullying
- ❖ Bumps and injuries to head/face – even if explained
- ❖ Child on child abuse (physical, sexual, emotional)
- ❖ Choking incidents (must also be reported to SaLT)
- ❖ Concerns of abuse
- ❖ Death of a student
- ❖ Disclosures of abuse
- ❖ Harm caused to a student by adult action or inaction
- ❖ Inappropriate sexualised behaviour, harmful sexual behaviour, sexual assault and violence
- ❖ Medication administration errors (inclusive of social leave errors if there is a pattern of concern or a notable impact on the student)
- ❖ Missing student
- ❖ Online safety concerns
- ❖ Significant injuries – even if explained
- ❖ Sunburn
- ❖ Unexplained injuries – inclusive of bruises, grazes, cuts etc.

***Safeguarding students is about promoting their welfare and preventing harm, which can be intentional, unintentional or accidental.***

The DSL will advise you about the actions that you need to take, this will usually include writing a report as soon as possible. If you have any queries about the actions that are required, please ask the DSL.

Posters and leaflets are available across the site and in the reception areas of St Piers School and College where most visitors pass through, which describe how you can raise a safeguarding concern.



## Disclosures from students

It is important to remember that even students who use verbal communication, may often not talk about their own abuse for many reasons, and staff need to be vigilant to physical, emotional, sexual, and behavioural signs which may suggest that something is wrong. Staff are taught about the signs and indicators of abuse within their own training.

Many of the students within St Piers School and College are not able to communicate verbally which in turn can make them even more vulnerable to abuse. Therefore, it is the role of staff working with them to keep them safe to act on their behalf in such situations and refer any concerns to the Safeguarding Team.

However, if a student does make a disclosure to you, it is important that the student is given the opportunity to talk and every effort should be made to ensure this takes place in private. The student may not understand that they are being abused and so may not realise the significance of what they are telling you.

### Here are some 'do's and don'ts' with regards to disclosures:

DO:	DON'T:
<ul style="list-style-type: none"><li>• listen very carefully</li><li>• try not to show shock</li><li>• demonstrate empathy</li><li>• use open questions</li><li>• assure the student that you are taking them seriously</li><li>• stay calm and try to get a good picture of what happened, but avoid asking too many questions</li><li>• explain that you have a duty to tell the safeguarding team</li><li>• reassure them that they have done the right thing and that they will be involved in decisions about what will happen</li><li>• explain that you will try to take steps to protect them from further abuse or neglect.</li><li>• provide support and information to meet their specific communication needs</li><li>• record the words of the student.</li></ul>	<ul style="list-style-type: none"><li>• make promises you cannot keep</li><li>• promise to keep secrets</li><li>• ask leading questions</li><li>• confront the person alleged to have caused the harm as this could place you at risk, or provide an opportunity to destroy evidence, or intimidate the person alleged to have been harmed or witnesses</li><li>• be judgemental or jump to conclusions</li><li>• breach confidentiality for example by telling friends, other work colleagues.</li></ul>

The student must tell their own story in their own time. Even what seems to be an unbelievable story must be listened to and acted upon. If you make any notes, you must use the student's own words and they must be kept in their original state (see below on writing safeguarding reports).

If a student discloses anything to you, you must not promise to keep it secret or confidential but explain that you will need to share the information with another person. It is important that you are clear with the student about what happens next, to make them feel safe and less





worried. Reassure them that they did the right thing in telling you and that what happened to them is not their fault.

Support will be provided to a student who has made a disclosure or who has been identified as having suffered from abuse, to ensure that they are protected from further harm and that they are supported with the emotional impact of what has happened to them. Importantly, they will also be supported to express their views and desired outcomes because of the concern.

### 3.2 Writing Safeguarding Reports

The reports that staff write are essential for the DSLs as they form part of our assessment of what to do next or what to recommend preventing further harm. All safeguarding reports need to be fully completed on our reporting system **within 24hrs**, of the concern being reported; **however directly after speaking to the DSL is preferable.**

In the case of allegations against staff, if after an enquiry/investigation either internally or by external agencies, disciplinary action is taken, then the written reports will be made available to the staff member concerned but this will only happen after the allegation has been fully investigated and there are no concerns that releasing such information would create a risk of harm to any witnesses. If there has been involvement from the police and they request that certain information is not divulged to an employee, St Piers School and College may withhold such information.

Be aware that the reports written regarding safeguarding concerns may also be shared with agencies outside St Piers School and College during any external enquiries of safeguarding issues.

The Lead DSL has created *Top Tips to Report Writing*, which is available on the intranet and should be followed by all staff when completing incident reports.

The following indicates what is required for a safeguarding report:

#### Precise and measured information

- Set the scene – date, time, what was happening where, and who else was nearby. Please use the full names of the staff and students involved in the first instance and designation (i.e., parent/social worker/student/tutor). Following this staff can use first names only.
- Details of any disclosure/concern (using the student's words).
- Demeanour/non-verbal disclosures from the student.
- State whether anything is noted anywhere else (e.g., day journals) about the issue you are reporting.
- Note if any medical treatment required.
- Be careful not to make assumptions or presume but focus on the facts to hand.
- Do not use emotive language or personal opinions.

### 3.3 Next Steps

#### Concerns about the safety of a child or adult at risk

After a concern has been passed to the DSL, they will then be responsible for coordinating the next steps that need to be taken. The DSL may need to ask staff for further information possibly through arranging meetings or asking for witness reports. This is a normal and important part of the process and is necessary to collect information and evidence.



- **Using the Surrey Continuum of Support Guidance** for children, the DSL will decide whether or not there are sufficient grounds for suspecting significant harm, in which case a request for support must be made to the C-SPA and the police if it is appropriate.
- Early help is defined as 'support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse.'
- The DSL should be alert to any child who:
  - Has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit
  - Has a parent or carer in custody (previously it was 'family member in prison'), or is affected by parental offending
  - Is frequently missing/goes missing from education, home or care.
- The DSL can request a consultation with Surrey C-SPA to ascertain next steps if this is not immediately clear.
- We will try to discuss any concerns about a child's welfare with the family and where possible seek their agreement before making a referral to the C-SPA. However, this should only be done when it will not place the child at increased risk or could impact a police investigation. The child's views should also be taken into account.
- For adults at risk the DSL will need to consider whether it is a low level quality concern and refer to the Surrey Quality Assurance Team or a safeguarding concern which needs to be referred to the MASH.

Where the concern is about the safety of a child or adult and meets the threshold for intervention as per Surrey's thresholds criteria (see the websites for Surrey's Safeguarding Children's Partnership and Adults' Safeguarding Board), Surrey C-SPA/MASH team will be contacted by the DSL. If it is outside of normal working hours, the Emergency Duty Team will be contacted by the Duty Manager.

**Where there is a concern that a crime has been committed, the police will be contacted and they will decide whether a criminal investigation will take place.**

The Local Authority could decide on the following actions:

- For a concern involving a child, a Section 47 Enquiry may be completed by the police and/or Children's Services.
- For a Section 42 enquiry to be completed by Adult's Social Care, for a concern involving a student aged 18 years or over.
- For a provider led enquiry to be completed by St Piers School and College on behalf of Adult's Services for a concern involving a student aged 18 years or over.
- For the concern about a child or adult to be investigated internally by St Piers School and College.
- No further action - although St Piers School and College may then decide to act internally such as an investigation under the Safeguarding or Disciplinary policies.

St Piers are also required to alert the Department for Education when there are serious safeguarding incidents whereby the entire school/college/charity/any subcontractor is investigated by the police or local authority in relation to safeguarding concerns (as per ESFA (Education and Skills Funding Agency) contracts).





Similarly, serious safeguarding concerns also need to be reported to the charity Commission. Where concerns meet the threshold for such reporting, the Lead DSL will arrange this.

### **Allegations about those who work with children or adults at risk**

All staff should take care not to place themselves in a vulnerable position with a child or adult at risk. It is always advisable for work with individual students or parents to be conducted in view of other staff.

Students may make an allegation against a member of staff or staff may have concerns about another staff member. If any such allegation is made, or information is received which suggests that a person may be unsuitable to work with children or adults at risk, the member of staff receiving the allegation or aware of the information, must immediately inform a DSL. The DSL's initial actions and decision making will be to ensure that no student is at risk of harm or further harm, and so immediate actions may need to be implemented to provide this assurance.

The DSL will discuss the content of the allegation with the LADO and/or C-SPA/MASH at the earliest opportunity and before taking any further action.

If the allegation made to a member of staff concerns a senior manager, the person receiving the allegation will immediately inform the Chair of Governors/Chair of Trust Board/Member of the Executive Team who will consult the LADO as above.

St Piers School and College will follow the Surrey procedures for managing allegations against staff, and procedures set out in Keeping Children Safe in Education and St Piers School and College Managing Allegations procedure.

*Please also see [Managing Allegations Procedure and Disciplinary Procedure for more information](#).*

## **3.4 Code of Conduct**

All staff are given a copy when they commence employment at St Piers School and College and Young Epilepsy. All staff are requested to read and sign this to state they have understood the contents of the agreement and will therefore abide by it. Ad-hoc Agency staff must complete this before they commence work at St Piers School and College and Young Epilepsy.

## **3.4 Recruitment and Human Resources Procedures**

### **Vetting**

There is careful selection and vetting of all staff (including supply and agency staff), volunteers, and monitoring of visitors to prevent students from being exposed to abusers.

Recruitment of all staff and volunteers who work with students is in line with KCSIE 2024 and other statutory guidance and includes checks for suitability with the Disclosure and Barring Service.

Currently these checks are carried out on every member of staff every three years, and a record to verify the authenticity of identity, qualifications, and satisfactory Disclosure and Barring Services check (according to the national requirements for this type of work) is held centrally by the Human Resources Department for each staff member.

### **Staff subject to Section 47 Enquiry external to St Piers School and College**

If a staff member is subject to a section 47 enquiry by social services or the police or have a child who has a child protection plan, they must disclose this to the Human Resources



Department or the Lead DSL at St Piers School and College. In such circumstances, it will be necessary to risk assess the staff member's ability to perform their role, to protect both the staff member, and the students they work with at St Piers School and College. A staff member could be suspended if this action was deemed necessary. Any suspension in this situation would need to be authorised by the appropriate executive. Special care should be taken to ensure that other staff are not told about this.

*Please refer to the Safer Recruitment and Vetting policy*

### **Referral to DBS**

Where there are concerns about a staff member, volunteer, or prospective staff member having caused or been at risk of causing harm to a child or adult at risk then the Lead DSL along with support from Human Resources Department and the employee's line manager will make a referral to the DBS as per national guidelines.

### **Retention of documents relating to safeguarding concerns**

Safeguarding records must be retained, in line with 2019 IRMS guidance. A retention process has been established by the Head of Safeguarding and Quality Practice and the Information Governance Manager.

- Sexual abuse records must be permanently retained by St Piers School and College as mandated by the Independent Inquiry into Child Sexual Abuse.
- Safeguarding records relating to a student who has lived in a children's home should be retained until the student's 75th birthday.
- Safeguarding records relating to a student who lacks capacity when they leave St Piers School and College should be retained until the student's 75th birthday.
- Safeguarding records relating to a student who has capacity when they leave St Piers School and College should be retained for 30 years.
- Secure destruction must be authorised by a member of the executive team.

For more guidance or support with this please speak to the Head of Safeguarding or the Information Governance Manager.

## **3.6 Children on Child Protection Plans**

It is essential that we identify all students that are subject to a Child Protection Plan. A direct enquiry will be made to referrers of all students and the information will be recorded in the referral documentation. Where staff become aware that a child accessing St Piers School and College is subject to a Child Protection Plan, this information must be passed to the Lead DSL and the head of the service. This information will be recorded in the child's records and any implications relating to this, will be recorded and shared with the staff who need to know. Such information will be treated with sensitivity and confidentiality as per our Information Governance policies.

The leadership team in school must ensure that the Lead DSL is informed of any child currently with a child protection plan who is absent without explanation. It is essential that the case holding social worker is informed

## **3.7 Children who are Looked After/Previously Looked After**

Children Looked After are those that are given accommodation away from their families at the request of their parent and those in care as the result of a Care Order.



A child is 'looked after' if they are in the care of the local authority for more than 24 hours. Legally, this could be when they are:

- living in accommodation provided by the local authority with the parents' agreement (Section 20 Children Act 1989)
- the subject of an emergency legal order to remove them from immediate danger (Section 44, Children Act 1989)
- placed in a secure children's home, secure training centre or young offender institution (Section 25 Children Act 1989)
- unaccompanied asylum-seeking children (Section 20 Children Act 1989)
- suffering or likely to suffer significant harm due to the care being given to the child by parents or if the child is beyond parental control (Section 31 Children Act 1989).

A child will stop being 'looked after' when they are either adopted, returned home or turn 18 years. The local authority will continue to support children leaving care at 18 years until they reach 25 (Care Leavers).

We know that Children Looked After are more at risk of abuse, harm and poor outcomes in life and so it is important that where a child is identified as Looked After, that proactive measures are implemented to protect them and monitor their safety and wellbeing.

St Piers School and College will ensure that staff have the necessary skills and understanding to keep looked after children safe.

A Designated Teacher takes lead responsibility for ensuring school staff understand the things which can affect how looked-after and previously looked after children learn and achieve and how the whole school supports the educational achievement of these students.

### **3.8 Children Subject to Care Orders**

Where a Care Order has been placed on a child due to suffering or at risk of suffering significant harm due to the parental care given (section 31 of the Children's Act 1989), it is crucial that staff understand who has parental responsibility for the child, and who has the power to make specific decisions in the child's life. There may be specific stipulations in the Care Order about the access that a particular parent has to a child and the restrictions of this, and therefore it is important that all appropriate staff understand this for each child so as to not put the child at further risk. This must be well documented within the records for a child and the implications for St Piers School and College. If you have any concerns about this, please speak to the Head of Safeguarding and Quality Practice or the Head of your service.

### **3.9 Private Fostering**

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

Children looked after by the local authority or who are placed in residential schools, 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.



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

If you have any concerns about students where you think they may be in private fostering, please speak to the Safeguarding Team immediately.

### 3.10 Employee Protection

St Piers School and College works with students in an environment of openness and transparency. Safer working practices and adherence to policy, protects both staff and students. All concerns about staff practice will be dealt with confidentially, and information stored securely.

We have a Whistleblowing Procedure which all staff are made aware of during their safeguarding training. This procedure states that all staff have a duty to raise concerns about student wellbeing and safety, but that if they feel unable to do so through the normal reporting procedures, then there are other ways in which they can raise their concerns to ensure they are not subject to any detriment because of raising a concern.

The full processes involved in this can be found in the Employee Protection, Whistleblowing and Managing Allegations Procedures, which all staff are encouraged to read thoroughly.

*Please see the Whistleblowing and Confidential Disclosures Procedure*

### 3.11 Support: Students, Family and Staff

**Students:** Students at St Piers School and College are supported to understand who they can approach with their concerns. Posters are on display within all services with the contact details for organisations who they can talk to, such as Childline and the relevant regulators (Ofsted and CQC). Students are also encouraged to speak to a member of staff about their worries or concerns, and this is reinforced in keywork sessions and student meetings.

Children's and Adults' Services will advise us regarding giving appropriate support to a student who is involved in any investigation or enquiry. A student may need to be interviewed, if this is feasible, and would need to be accompanied by someone for both support and care. Such interviews with a student would be undertaken by social workers and/or specially trained Police Officers and can take place on site or possibly at a special video interview suite, whatever is appropriate for the student and the situation. Staff may be asked to support a student with such an interview, or their parents/carers may attend to support.

During and after an investigation into a safeguarding concern, support will need to be planned and offered to the students involved to ensure their wellbeing is monitored and strengthened. The Independent Advocacy service may be requested to support a child or young person, and support may also be provided through St Piers School and College's medical and therapeutic teams.

**Family:** Summary information regarding Safeguarding Processes at St Piers School and College is contained in the prospectuses.

Parents can access the Child and Adult Protection and Safeguarding Policy and Procedures on the St Piers School and College website. Children's and Adults' Services will advise us regarding giving appropriate support to families involved in safeguarding enquiries or with protection plans in place.



**Staff:** We recognise that staff who have become involved with a student who has suffered harm or appears to be likely to suffer harm may find the situation stressful and upsetting. It can also be very worrying and concerning for staff to raise their concerns. The Safeguarding Team will support staff by providing an opportunity to talk through their anxieties and to seek further support as appropriate. This can be through the half termly safeguarding clinics that are scheduled (the dates of these are advertised to staff on the intranet) or through St Piers School and College supervision and support sessions. Supervisions are a key mechanism for supporting staff and enabling them an opportunity to speak about any concerns about the students they work with, including safeguarding concerns. Children's or Adults' Services may offer support to the DSLs and other members of staff who could be involved in an enquiry.

Staff can also utilise the *Employee Assistance Programme* for advice and support.

## 4. Related Information

### 4.1 Related Policies and Procedures

(These documents can be found on the Intranet.)

- Anti-bullying Guidelines
- Code of Conduct
- Comments, Compliments, and Complaints Procedure
- Consent Procedure
- Disciplinary Procedure
- Employee Protection Procedure
- Health and Safety Policy and Arrangements
- Inclusivity, Equality and Diversity Policy
- Low Level Concerns Procedure
- Managing Allegations Procedure
- Medication Policy and Procedures
- Missing Student Procedure
- Online Safety Policy and Procedure
- Personal and Intimate Care Guidelines
- Positive Behaviour Strategy
- Recruitment Policy and Procedure
- Relationships and Sexual Education and Wellbeing Policy and Procedure
- Responding to Harmful Sexual Behaviour, Sexual Harassment and Violence.
- Signs of Abuse Guidelines
- Vetting Procedure
- Visitors Procedure
- Whistle-blowing Procedure

### Monitoring

This Procedure will be reviewed annually by the Trust Board, along with the Child and Adult Protection and Safeguarding Policy Statement, with advice from the Safeguarding Team.



Staff will also be asked to evaluate the effectiveness of the procedures whenever they have had occasion to put them into practice as part of their Refresher Safeguarding Training.

<b>This policy is agreed by the Trust Board and will be implemented by all departments.</b>	
<b>Signed:</b>	
<b>Chief Executive</b>    <b>Mark Devlin, Chief Executive</b>	<b>01 September 2024</b>
<b>Chair of Trustee Board</b>    <b>Chair of Trustee Board: Simon Neville</b>	<b>01 September 2024</b>
	<b>Date of next review: 31 August 2025</b>

## Version table

**Date of creation: January 2024**

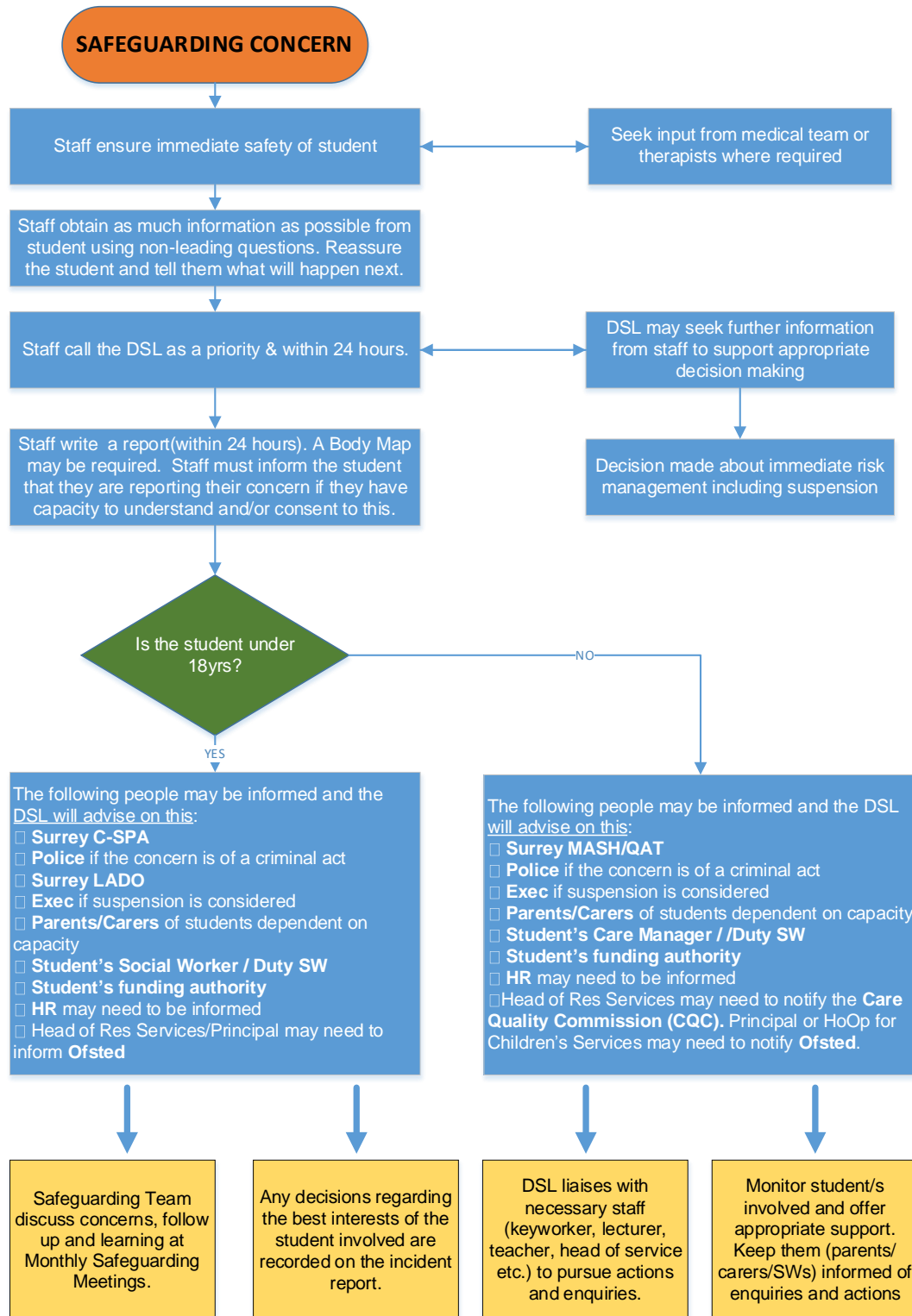
**Approved by: Simone Hopkins**

<b>Version no.</b>	<b>Date of changes</b>	<b>Reasons for change</b>	<b>Changes made by</b>
<b>1</b>	<b>22 Aug 2023</b>	<b>KCSIE updates - 2023</b>	<b>Gill Walters</b>
<b>2</b>	<b>Feb 2024</b>	<b>Governor/Trustee/Lead Executive roles updated.  Internal escalation procedure and flow chart updated.</b>	<b>Gill Walters</b>
<b>3</b>	<b>August 2024</b>	<b>KCSIE- updates 2024  General review</b>	<b>Gill Walters</b>





## Appendix 1: St Piers School and College and Young Epilepsy's Safeguarding Procedures Flowchart



## Appendix 2 – St Piers Escalation to Trust Board and EGB

