Child Protection and Safeguarding Policy

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Safeguarding Statement

City of London Freemen's School recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils, which is defined as follows:

- protecting children from maltreatment;
- 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; and
- taking action to enable all children to have the best outcomes.

Therefore, we:

- make every effort to provide an environment in which children and adults feel safe, secure, valued and respected, and feel confident to talk if they are worried, believing they will be effectively listened to.
- are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice
- are always guided by the imperative to act in the best interests of the child

Key Personnel and Contact Details

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Ms Clare Verga
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01372 822426

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Ms Sophie Blair (Head of Senior School and Head of Wellbeing)
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01372 822484

Designated Teacher for Looked After and Previously Looked After Children

Mr. Nigel Legg (Safeguarding Co-ordinator)
nigel.legg@freemens.org
01372 822480 ext. 201

Our local safeguarding partnership, which sets locally agreed multi-agency safeguarding arrangements, is Surrey Safeguarding Children Partnership

Surrey Local Authority Designated Officer (LADO) - 0300 123 1650

Surrey County Council Children's Single Point of Access (C-SPA)
0300 470 9100 (Mon.-Fri. 0900-1700) cspa@surreycc.gov.uk

Surrey County Council Emergency Duty team (out of hours) - 01483 517898

Surrey Schools Child Protection Consultation Line – 0300 470 9100 (Mon.-Fri. 0900-1700)

NSPCC Whistleblowing Helpline - 0800 028 0285

Local Children's Services (South East Surrey) - 0300 123 1620 / 01483 518104 (out of hours)

Any issues surrounding Female Genital Mutilation – Contact Police on 101

City of London safeguarding contact person:

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Department of Community & Children's Services
City of London
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Guildhall, London
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1. Policy Statement

1.1. The Board of Governors takes seriously its responsibility under section 175/157 of the Education Act 2002 to: safeguard and promote the welfare of children; work together with other agencies to ensure adequate arrangements within the School to identify, assess, and support those children who are suffering harm, be it physical or mental. Accordingly, a member of the Board (currently Ms Clare Verga) is appointed as Safeguarding Governor to take leadership responsibility for the organisation's safeguarding arrangements.

1.2. This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and the Education Act 2002. It has regard to (i.e. complies with):

- *Keeping Children Safe in Education (September 2026) (KCSIE)*
- KCSIE also provides links to various toolkits and to additional advice and support on: abuse; bullying; children missing from education, home or care; children with family members in prison; child exploitation; drugs; so-called 'honour-based abuse' including FGM and forced marriage; health and well-being; homelessness; private fostering; radicalisation and violence.
- KCSIE incorporates the additional statutory guidance, Disqualification under the Childcare Act 2006 (September 2018)
- KCSIE also refers to the non-statutory advice for practitioners: What to do if you're worried a child is being abused (March 2015)
- Relationships Education, Relationships and Sex Education (RSE) and Health Education (2019, updated July 2025 for introduction in September 2026)
- KCSIE refers also to When to call the police, non-statutory guidance from the National Police Chiefs' Council
- Working Together to Safeguard Children (December 2023) (WT)
- WT refers to the non-statutory but important advice: Information sharing (2018)
- Prevent Duty Guidance: for England and Wales (December 2023). This is supplemented by on-statutory advice and a briefing note:
    - *The Prevent Duty: an introduction for those with safeguarding responsibilities (September 2023)*
    - *The use of social media for on-line radicalisation (July 2015)*
- Working Together to Improve School Attendance (August 2024)

1.3. This Policy is in line with Surrey Safeguarding Children Partnership's procedures, which can be found at https://surreyscb.procedures.org.uk/

1.4. It is based on SSCP's model safeguarding policy but has been adapted to reflect local procedures.

1.5. This Policy is made available to parents of pupils and parents of prospective pupils on an unrestricted part of the School's web-site and is provided, on request and free of charge, in paper format via post or in electronic format via e-mail. A hard copy can be inspected at the School's Gatehouse, and hard copies are also available from Junior and Senior School Receptions.

1.6. This policy is amended as soon as any part of it becomes out of date. Amendments are made by the Designated Safeguarding Lead. Any changes to the policy are reviewed by the Headmaster and discussed in an SLT meeting.

1.7. This policy is reviewed at least annually by the Board of Governors or as events or changes to legislation require.

1.8. This Policy should be read in conjunction with the following documents / guidance / policies, all of which are available on request and free of charge from the Deputy Head's office:

Anti-bullying
Admissions
Attendance
Behaviour
Boarding
Boarding A-Z (pupil's guide)
Boarding Staff Handbook
Contractors on School Premises
Curriculum
Drugs and Drug Testing
Equality, Diversity and Inclusion
First Aid
Guardianship
Health, Safety and Wellbeing
Missing Child- Boarders
Missing Child- Day Pupils
Online Safety
Private Tuition
PSHE schemes of work
Recruitment Guide
Recruitment and Selection Policy (City of London Corporation)
Relationships and Sex Education
Reporting Safeguarding Concerns
Risk Assessment Guide
Risk Policy
Searches and Confiscation Policy
Security Policy
Staff Code of Conduct (Appendix 8 of this Policy)
Summer School Staff Handbook
Teaching and Learning
Transport Policy
Use of Restrictive Interventions
Whistleblowing (City of London Corporation)

1.9. Safeguarding issues specific to boarding include: overnight stays; unaccompanied free time; guardianship arrangements; increased opportunity for use of the School's internet facility; potential for using Virtual

Private Networks in order to circumvent the School's filtering and monitoring systems; maintaining personal privacy from staff and other boarders; security during night hours. These are addressed in the following supporting documents: Guardianship Policy; Boarding Policy; Boarding Staff Handbook; A-Z of Boarding; Missing Child (Boarders).

1.10. This policy applies to all members of our school community, including boarders.

2. Policy Principles

2.1. The welfare of the child is paramount.

2.2. All children regardless of age, sex, culture, language, race, ability, sexual orientation, gender identity, gender reassignment or religion have equal rights to protection, safeguarding and opportunities.

2.3. We recognise that all adults, including temporary staff, trainee teachers, volunteers and governors, have a full and active part to play in protecting our pupils from harm and have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm.

2.4. All staff believe that our school should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child.

2.5. Young people should feel safe, secure, valued and respected. They should also feel confident to, and know how to, approach adults if they are in difficulties, believing they will be effectively listened to.

2.6. Pupils and staff involved in child protection issues will receive appropriate support.

3. Policy Aims

3.1. To demonstrate the School's commitment with regard to safeguarding and child protection to pupils, parents and other partners.

3.2. To raise the awareness of all teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.

3.3. To provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we, the school, contribute to assessments of need and support packages for those children.

3.4. To emphasise the need for good levels of communication between all members of staff.

3.5. To develop a structured procedure within the School which will be followed by all members of the school community in cases of suspected abuse.

3.6. To develop and promote effective working relationships with other agencies, especially the Police and Social Care.

3.7. Clarifying procedures to ensure that all staff working within our School who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory DBS check (according to guidance)1, and that a single central record is kept for audit.

3.8. We comply with the Disqualification under the Childcare Act 2006 guidance issued in August 2018.

[1] https://www.gov.uk/government/collections/dbs-checking-service-guidance--2

4. Values

4.1. Supporting Children

1.1.1. We recognise that a child who is abused or witnesses violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth.

1.1.2. We recognise that the School may provide the only stability in the lives of children who have been abused or who are at risk of harm.

1.1.3. We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

1.1.4. The School supports all children by:

1.1.4.1. encouraging self-esteem and self-assertiveness, through the curriculum as well as our relationships, whilst not condoning aggression or bullying;
1.1.4.2. promoting a caring, safe and positive environment within the school;
1.1.4.3. responding sympathetically to any requests for time out to deal with distress and anxiety;
1.1.4.4. offering details of helplines, counselling or other avenues of external support such as www.kooth.com and ChildLine;
1.1.4.5. liaising and working together with all other support services and those agencies involved in the safeguarding of children;
1.1.4.6. notifying social care as soon as there is a significant concern;
1.1.4.7. providing a coordinated offer of early help when additional needs of children are identified and contributing to early help arrangements and inter-agency working and plans;
1.1.4.8. providing continuing support to a child about whom there have been concerns who leaves the school by ensuring that appropriate information is copied under confidential cover to the child's new setting and ensuring that the school medical records are forwarded as a matter of priority. This is ensured by the Headmaster's EA notifying the Safeguarding Co-ordinator of any leavers (other than those leaving for university who have turned 18). The Safeguarding Co-ordinator then liaises with the Medical Centre.

1.1.5. Children are taught to understand and manage risk through our personal, social, health and economic (PSHE) education programme and through all aspects of school life. This includes online safety.

1.1.6. We help pupils to use the internet safely by filtering unsuitable websites and monitoring usage while avoiding 'over-blocking'. A daily Smoothwall categorised report (including a category for radicalisation) of attempts by pupils to access unsuitable sites is sent to the DSL, Safeguarding Co-ordinator, Online Safety Co-ordinator, Head of Boarding and Heads of Section (all of whom are DDSLs). Heads of Section and Head of Boarding only receive notifications regarding pupils in their section of the School. If any of those colleagues have safeguarding concerns, they share them with the DSL and agree what action, if any, to take. Further details about our systems can be found in our Online Safety Policy.

1.1.7. The School's Safeguarding and Pupil Welfare Team reviews our internet monitoring and filtering systems annually to check that they are protecting pupils (see 5.4 below for details).

4.2. **Prevention / Protection**

1.1.8. We recognise that the School plays a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection; systems for children reporting abuse should be well promoted, easily understood, easily accessible and reassure pupils that their concerns will be taken seriously.

1.1.9. We therefore:

1.1.9.1. work to establish and maintain an ethos where children feel secure, are encouraged to talk and are always listened to;

1.1.9.2. promote an inclusive, anti-discriminatory culture where racism, and other forms of discriminatory behaviour are recognised, challenged and addressed;

1.1.9.3. promote Wellbeing and thus seek to prevent the low mood / depression / anxiety that can develop into suicidal ideation, self-harm, eating disorders and children becoming a risk to themselves, including by the following measures:

- Member of SLT has role of Senior Mental Health Lead; he/she has the training, skills and time to co-ordinate our mental health strategy and provision. He/she is also a Deputy Designated Safeguarding Lead.
- School Counsellor available 4 days a week
- nurse-led Medical Centre with mental ill health suite ('The Willow')
- ~16 staff and ~16 Sixth Form pupils every year trained in Mental Health First Aid by certified provider
- Advertisement of online counselling services (e.g. Kooth, Childline)
- developing an 'Assessment for Wellbeing' approach for academic assessment to reduce counter-productive pressure and anxiety
- use of Suicidal Thoughts Disclosure risk assessments as standard procedure
- High-performance stress management workshops for KS4 pupils and parents by outside speaker
- eating disorders covered in U4 (Y9) PSHE; healthy eating and positive body image also promoted in PSHE
- Upstander/Bystander bullying scenarios covered in Assemblies for U3-U5 (Y7-11) in November 2025 to mark Bullying Awareness Week
- risks of AI covered in safeguarding slot in Staff Briefing June 2026 and eating disorders in March 2025
- The School participated in 'Hello Yellow' (World Mental Health) Day in October 2026, with a stand outside the Medical Centre to raise awareness of mental health
- non-judgemental approach by staff towards self-harm and eating disorders
- an anonymous reporting facility that can be used by any pupil at the School to report concerns about another pupil, and which is increasingly used
- Anti-bullying Ambassadors in the Junior School re-branded as Wellbeing Ambassadors in September 2026 to broaden their scope

1.1.9.4. initiate and act upon regular consultation with children e.g. training and empowering U5 (Y11) wellbeing prefects; our pupil-led Diversity Council;

1.1.9.5. ensure that all children know there is an adult in the school whom they can approach if they are worried or in difficulty. For example: posters advertising the school counsellor are displayed around the school; in the Senior School, it is advertised that a senior pastoral member of staff can always

be found in a specified location 1.15-1.45 p.m. every day; a DDSL speaks to all Senior School pupils at the beginning of the year about who the Safeguarding and Pupil Welfare Team is and that their contact details can be found on posters around the school; regular mentions in Junior School Assemblies about whom to approach if help is needed;

1.1.9.6. display and proactively advertise a pupil-inspired Bullying and Discrimination Flow-Chart, specifically designed to reassure pupils that their concerns will be taken seriously and acted upon;

1.1.9.7. include safeguarding in PSHE. In particular this will include anti-bullying work, online-safety, road safety, pedestrian and cycle training, with a view to preparing pupils for more independent travel as they get older;

1.1.9.8. give L6 Junior School prefects a dedicated safeguarding training session run by a member of the Safeguarding and Pupil Welfare Team;

1.1.9.9. ensure that all staff are aware of school guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.

5. Safe Staff, Safe School

5.1. Safeguarding Training and raising awareness

5.1.1 The Safeguarding Co-ordinator is alerted by the HR Officer of any member of staff joining the School so that he can ensure that he/she receives the correct safeguarding training. All new non-temporary staff receive safeguarding induction training, which covers:

- how we foster a 'culture of safeguarding' at Freemen's;
- signs of abuse and prejudice-based harm;
- how to respond if a pupil discloses and how to lower barriers to disclosure;
- how to report safeguarding concerns about a child and about a member of staff;
- the Early Help process and how statutory services (Child in Need / Child Protection) are accessed;
- our Child Protection and Safeguarding Policy;
- our Behaviour Policy for pupils;
- our Staff Code of Conduct, including whistleblowing and acceptable use of IT;
- the identity and role of the Designated Safeguarding Lead and DDSLs;
- online safety, including how we filter and monitor pupil internet usage;
- the School's safeguarding response to children who go missing from education;
- managing a report of child-on-child sexual violence / harassment;
- Channel Awareness / Prevent Duty (radicalisation and extremism).

With the exception Channel Awareness / Prevent, which is delivered through the City of London's Prevent module (compulsory for all new City employees), this training is delivered by the DSL or the Safeguarding Co-ordinator.

In addition, new non-temporary staff, depending on the prior training they have had and when they've had it, receive either full or refresher versions of Surrey's *Working Together to Safeguard Children* (exempt if they've had training that academic year). This training is designed to raise staff awareness and understanding of a wide range of safeguarding issues (e.g. FGM, modern slavery, online safety).

A risk-based approach is taken to the level of information and training provided to supply staff, temporary staff, trainee teachers and volunteers. As a minimum, the following are covered in training delivered by the DSL or Safeguarding Co-ordinator: signs of abuse; how to respond if a pupil discloses; how to report safeguarding concerns; identity and role of DSL and DDSLs; Staff Code of Conduct.

As a minimum, all supply staff, trainee teachers, temporary staff and volunteers are provided with a copy of the in-house guidance *Reporting Safeguarding Concerns*, our *Staff Code of Conduct* and, unless they can declare that they have already read and understood it, a copy of *Keeping Children Safe in Education* Part 1 and

Annex B (if they work directly with children or are in SLT) or (for those who do not work directly with children) Annex A.

5.1.1.1 All new non-temporary staff are provided with electronic copies of:

- *Keeping Children Safe in Education* either Part 1 and Annex A (for SLT and those who work directly with children) or Part 1 (for those who do not work directly with children);
- our *Child Protection and Safeguarding Policy*;
- the in-house guidance *Reporting Safeguarding Concerns*;
- our policy on Pupils Missing Education (which is contained within our *Child Protection and Safeguarding Policy*);
- our *Staff Code of Conduct* (appended to our *Child Protection and Safeguarding Policy*);
- City of London's *Whistleblowing Policy*;
- City of London's *Acceptable Use of IT Policy*;
- City of London's *Social Media Policy*;
- our *Staff Social Media and Photography Guidelines;*
- our *Behaviour Policy* for pupils;

which they then read and declare that they have done so.

5.1.2 All staff receive regularly up-dated safeguarding and child protection training in line with advice from Surrey Safeguarding Children's Partnership. At Freemen's, this takes two forms, namely:

5.1.2.1 frequent, punchy up-dates at Staff Briefings, Non-teaching Staff Safeguarding Briefings and via e-mail; these may focus on a specific safeguarding issue, including online safety, in order to top up staff knowledge, or may be in response to recent national, local or school-specific developments;

5.1.2.2 annual refresher of: Surrey's *Working Together to Safeguard Children* training, which is designed to raise staff awareness and understanding of a wide range of safeguarding issues (e.g. FGM, modern slavery, online safety); signs of abuse, how to respond to a disclosure, how to report safeguarding concerns, identity and role of DSL and DDSLs.

5.1.2.3 The HR Officer lets the Safeguarding Co-ordinator know of any colleagues returning from maternity leave or other long-term absence so that they can receive any annual training that they missed.

5.1.3 All Governors receive safeguarding training at induction plus annual refresher training. If they haven't previously read *Keeping Children Safe in Education*, they do so as part of their induction.

5.1.4 Whenever *Keeping Children Safe in Education* is up-dated, staff receive a copy and declare that they have read and understood either Part 1 and Annex A (for SLT and those who work directly with children) or Part 1 (for those who do not work directly with children). In addition, members of SLT confirm that they have read all the updates to KCSIE (Safeguarding Co-ordinator oversees).

5.1.5 Members of the Board of Governors receive a copy of the latest version of *Keeping Children Safe in Education* and sign to declare that they have read updates (Safeguarding Co-ordinator oversees).

5.1.6 An accurate record is kept by the Safeguarding Co-ordinator of who has received what safeguarding training and when that training was completed.

5.1.7 The names and photographs of the Designated Safeguarding Lead and Deputy Designated Safeguarding Leads are clearly advertised in the School via posters in classrooms, staff rooms and other common areas.

5.1.8 The regular contractor staff whom we have on site (currently catering and gatehouse staff employed by Thomas Franks and ISS respectively) know the identity of the DSL and DDSLs and their duty to report any concerns directly to him/them. Thomas Franks and ISS is responsible for their safeguarding training, but the DSL scrutinises their training arrangements from time to time.

5.2. **Hiring of premises**

5.2.1. We are vigilant regarding the suitability of adults working with children on school sites as a result of the School's premises being let out.

5.2.2. Freemen's has several carefully chosen term-time lets. The following control measures feature in our risk assessment for safeguarding our pupils:

- For term-time lets, we insist upon a written assurance that all adults supervising children are DBS Enhanced- checked.
- For term-time lets with no children involved, the activity leader is required to have a DBS Basic Check
- All lessees are sent a link to our *Safeguarding Policy* and asked to read it
- The Head of Boarding is aware of the times and locations of term-time lets
- Boarders do not use the sports facilities at the same time as lessees
- Our Gatehouse, which is manned by security staff during the evenings and at weekend (daytime), is aware of when any lessees are on the premises and steps up patrols accordingly
- We have CCTV covering much of the school grounds

5.2.3. Our written agreements with all lessees include a requirement to assure us that all adults supervising children are DBS-checked and that we are in receipt of a safeguarding policy that demonstrates the organisation's compliance with Keeping Children Safe in Out-of-School Settings. These policies are passed to the DSL for examination.

5.2.4. The Director of Estates and Operations is made aware of the identity of lessees. If he/she has any concerns regarding a lessee in respect of Prevent, he/she shares them with the DSL. Written agreements with lessees include a clause requiring them to disclose at least two weeks in advance the names of visiting speakers. This information is passed to the Director of Estates and Operations, who approaches the DSL if he/she has any concerns.

5.2.5. Liaison with lessees, the Chief Operating Officer, the Director of Estates and Operations, the Head of Boarding and the DSL in respect of the above is the responsibility of the Lettings Manager.

5.3. **Visitors and Contractors**

5.3.1. Visitors to the School are signed in at Reception, given a yellow lanyard to wear and accompanied at all times. Staff challenge unaccompanied visitors. There are certain exceptions to this rule (e.g. parents on site to drop off / pick up their children at normal times), details of which can be found in our *Security Policy*.

5.3.2. In common with most schools, we allow prospective families (but not lone individuals) to be shown around the School by a pupil tour guide.

5.3.3. The School has a separate document *Procedures for Contractors on School Premises*, which has been written with regard to Surrey's *Guidance on contractors working in education settings* (September 2019). Among other things it covers: the need for a sponsor who takes responsibility for co-ordinating the visit of a particular contractor; DBS requirements; signing-in/out procedures; when contractors must and need not be supervised; contact with children; a Code of Conduct that must be consented to by all contractors. Contractors who need not be supervised wear a blue lanyard.

5.3.4. We allow parents and family members to take photographs / videos of their children at appropriate events such as Sports Day and concerts but, if such images capture other children who are recognisable therein, we forbid them being shared with anyone else, especially via social media. However, no photography is permitted in the swimming complex. We publish and iterate these rules at such events.

5.4. **Internet filtering and monitoring**

5.4.1. Staff usage of the School's internet is filtered by Smoothwall and a categorised report created of any activity that might be of concern.

5.4.2. This report is seen only by the DSL and the Head of Senior School (DDSL). Concerns are followed up by the DSL, who informs the Headmaster if necessary. If the report gives cause for concern regarding the DSL, the Head of the Senior School informs the Headmaster directly.

5.4.3. Our internet filtering and monitoring system is tested annually. This includes receiving and discussing the results of a test (using the South West Grid for Learning Tool) of the effectiveness of our filtering systems in blocking dangerous content in all locations, including via AI software, which is carried out by the Safeguarding Co-ordinator and overseen by the Designated Safeguarding Lead. A record of these checks is kept.

6. Roles and Responsibilities

6.1. **All members of The Governing Body understand and fulfil their responsibilities, namely to ensure that:**

6.1.1. there is a Child Protection and Safeguarding policy together with a Staff Code of Conduct;

6.1.2. child protection, safeguarding, recruitment and managing allegations policies and procedures, including the staff code of conduct, are consistent with Surrey Safeguarding Children Partnership and statutory requirements, are reviewed annually and that the Child Protection policy is publicly available on the School website;

6.1.3. all staff including temporary staff and volunteers are provided with the School's child protection policy and staff code of conduct;

6.1.4. all SLT and staff who work directly with children have read the latest version of *Keeping Children Safe in Education* Part 1 and Annex A or (in the case those who do not work directly with children) Part 1 and that mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance;

6.1.5. the School follows the City of London's *Recruitment and Selection Policy*, *Safer Recruitment Checklist* and *Disclosure and Barring Service Policy*, which include statutory checks on staff suitability to work with children and disqualification by association regulations;

6.1.6. Senior Leadership Team members undergo safer recruitment training at regular intervals to ensure that at least one member of every selection panel has completed the training within the last five years.

6.1.7. the School has procedures for dealing with allegations of abuse against staff (including the Headmaster), volunteers and against other children and that a referral is made to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have had he or she not resigned;

6.1.8. a member of the Governing Body is nominated to liaise with the LA on Child Protection issues and in the event of an allegation of abuse made against the Headmaster.

6.1.9. a member of the Senior Leadership Team has been appointed as the DSL by the Governing Body who will take lead responsibility for safeguarding and child protection and that the role is explicit in the role holder's job description;

6.1.10. on appointment, the DSL and DDSLs undertake interagency training (Advanced Safeguarding in Surrey) and also undertake DSL 'New to Role' and 'Refresher' training every two years;

6.1.11. all other staff have safeguarding training updated as appropriate;

6.1.12. at least one member of the governing body has completed safer recruitment training, to be repeated every five years;

6.1.13. children are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through personal social health and economic education (PSHE);

6.1.14. appropriate safeguarding responses are in place for children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future;

6.1.15. appropriate online filtering and monitoring systems are in place;

6.1.16. enhanced DBS checks (without barred list checks, unless the Governor is also a volunteer at the School) are in place for all Governors;

6.1.17. any weaknesses in Child Protection are remedied immediately.

6.2. **The Headmaster ensures that:**

6.2.1. The Child Protection and Safeguarding Policy and procedures are implemented and followed by all staff;

6.2.2. sufficient time, training, support, resources, including cover arrangements where necessary, is allocated to the DSL and DDSLs to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings;

6.2.3. where there is a safeguarding concern, the child's wishes and feelings are taken into account when determining what action to take and what services to provide;

6.2.4. systems are in place for children to express their views and give feedback which operate with the best interest of the child at heart;

6.2.5. 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;

6.2.6. that pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online;

6.2.7. the responsibilities of the DSL and DDSLs are stated explicitly in their respective job descriptions;

6.2.8. he liaises with the Local Authority Designated Officer (LADO) before taking any action an on an ongoing basis, where an allegation is made against a member of staff or volunteer;

6.2.9. anyone who has harmed or may pose a risk to a child is referred to the Disclosure and Barring Service.

6.3. **The Designated Safeguarding Lead:**

6.3.1. holds ultimate responsibility for safeguarding and child protection in the School;

6.3.2. has overall responsibility for online safety in the School and oversees the work of the Online Safety Co-ordinator;

6.3.3. acts as a source of support and expertise in carrying out safeguarding duties for the whole school community;

6.3.4. encourages a culture of listening to children and taking account of their wishes and feelings;

6.3.5. is appropriately trained with updates every two years and will refresh his knowledge and skills at regular intervals but at least annually;

6.3.6. refers a child if there are concerns about possible abuse, to the Surrey Children's Single Point of Access (C-SPA)[2], and act as a focal point for staff to discuss concerns. Referrals are made in writing, following a telephone call, using the Request For Support Form[3]. If unsure as to whether or not to make a referral or to seek advice about which services would best benefit a child, the DSL rings the Surrey Schools Child Protection Consultation Line.[4]

6.3.7. liaises with the Local Authority and works with other agencies and professionals in line with *Working Together to Safeguard Children*;

6.3.8. has a working knowledge of SSCP procedures;

6.3.9. ensures that either he, or the Safeguarding Co-ordinator or other DDSL, attend case conferences, core groups, or other multi-agency planning meetings, contributes to assessments, and provides a report where required which has been shared with the parents;

6.3.10. ensures that any pupil currently with a child protection plan who is absent in the educational setting without explanation for two days is referred to his/her key worker's Social Care Team;

6.3.11. organises child protection and safeguarding induction, regularly updated training and a minimum of annual updates (including online safety) for all school staff, keeps a record of attendance and addresses any absences;

6.3.12. contributes to and provides, with the Headmaster, Chair of Governors and Safeguarding Governor, the *Audit of Statutory Duties and Associated Responsibilities* to be submitted biennially to the education safeguarding team at Surrey County Council;

6.3.13. has an understanding of locally agreed processes for providing early help and intervention and supports members of staff where early help is appropriate;

6.3.14. organises the monitoring of the school's online filters and co-ordinates the following up of any concerns that are raised as a result;

6.3.15. manages the performance of the Safeguarding Co-ordinator, delegating tasks to him and having a close awareness of his workflow;

6.3.16. keeps the Headmaster informed of all safeguarding matters;

6.3.17. keeps the Safeguarding Governor informed of all major safeguarding matters (delegable to Safeguarding Co-ordinator);

6.3.18. attends all Board of Governors meetings, giving a concise, written and anonymised update of safeguarding developments at every meeting, together with a full, written report at the September meeting;

6.3.19. ensures that the name of the DSL and DDSLS are clearly advertised in the school;

6.3.20. controls the process by which the level of risk presented by pupils is assessed, reviewed, acted upon and recorded;

6.3.21. chairs fortnightly meetings to monitor progress of 'High Risk' pupils ('Fortnighters');

6.3.22. nominates a DDSL to stand in for him if he is absent from school during school hours and communicates this arrangement to all staff in advance;

6.3.23. as Senior Attendance Champion, oversees analysis of attendance data, takes the lead on improving pupil attendance and co-ordinates our response to pupils missing education (see *Attendance Policy* for details);

6.3.24. processes and acts upon Operation Encompass notifications (see 13.5).

6.4. **The Safeguarding Co-ordinator:**

[2] All new referrals go to the Surrey Children's Single Point of Access (C-SPA) on 0300 470 9100 operating 9.00am to 5.00pm. In an emergency out of hours, referrals can be made to the Emergency Duty Team on 01483 517898.
[3] Online forms can be downloaded from the SSCP website.
[4] Surrey Schools Child Protection Consultation Line: 0300 470 9100 operating 9.00am to 5.00pm

6.4.1. acts as a DDSL and member of the School's Safeguarding and Pupil Welfare Team (see 6.5 and 6.6 below);

6.4.2. is the default deputy for the DSL in his absence;

6.4.3. under the instruction of the DSL, makes referrals to statutory services;

6.4.4. has a particular responsibility for ensuring that any inter-agency work involving the School is timely and efficient, and that information is shared wherever possible and appropriate;

6.4.5. keeps detailed, accurate written records of all concerns about a child even if there is no need to make an immediate referral, together with details of decisions reached, action taken and outcomes achieved;

6.4.6. ensures that all such records are kept confidential, stored securely and are separate from pupil records, until the child's 25th birthday;

6.4.7. ensures that an indication of the existence of the additional file in 6.4.5 above is marked on the pupil records;

6.4.8. ensures that, when a pupil leaves the school, his/her child protection file and medical records are passed to the new school within 5 days of the pupil starting there (separately from the main pupil and ensuring secure transit) and that confirmation of receipt is obtained and kept until the child's 25th birthday;

6.4.9. ensures that a copy of the CP file is retained until such a time that the new school acknowledges receipt of the original file, following which the copy is shredded;

6.4.10. in addition to sending any CP file, is proactive in sharing other relevant information about the child with his/her new school's DSL so that the best support can be put in place at the earliest juncture;

6.4.11. if we need to keep a copy of the CP records even though the child has transferred to another school, e.g. because legal proceedings are pending, a short Retention Policy is written giving the reasons why such records are retained;

6.4.12. liaises with the Admissions Department to the end that the latter send out letters to the schools of pupils joining Freemen's asking them to send any CP records;

6.4.13. receives any CP records for new joiners and shares this information on a 'need to know' basis, including with SEN staff if appropriate, so that the best support is in place for when they begin at the School;

6.4.14. convenes, chairs and arranges for circulation of agenda/minutes of termly Safeguarding and Pupil Welfare Team meetings;

6.4.15. acts as a source of support and expertise in carrying out safeguarding duties for the whole school community, including the vetting of visiting speakers with respect to the Prevent Duty;

6.4.16. curates the safeguarding notice boards and ensures that the posters advertising the Safeguarding and Pupil Welfare Team and 'What to do if you're concerned about a colleague' posters are kept up to date;

6.4.17. assists the Senior Attendance Champion; administers absence from school for child performers;

6.4.18. ensures that all staff sign to say they have read, understood and agree to work within the School's Child Protection Policy, Staff Code of Conduct, other safeguarding-relevant safeguarding policies and the latest version of *Keeping Children Safe in Education* Part 1 and Annex A or (for those non-SLT members of staff who do not work directly with children) Part 1, with SLT members in addition reading all updates to KCSIE;

6.4.19. in liaison with the DSL, organises child protection and safeguarding induction, regularly updated training and a minimum of annual updates (including online safety) for all school staff, keeping a record of attendance and addressing any absences;

6.4.20. administers the Surrey-run initial and refresher training of DSL and DDSLs;

6.4.21. liaises with the Clerk to Governors to ensure that Governors receive safeguarding training upon induction;

6.4.22. liaises with the Clerk of Governors to ensure that Governors acknowledge that they have read and understood any updates to *Keeping Children Safe in Education*;

6.4.23. by working with the Head of PSHE, ensures that pupils are taught what they need to know about safeguarding using the best resources;

6.4.24. takes the lead in educating parents about safeguarding;

6.4.25. assists the Online Safety Co-ordinator;

6.4.26. schedules 'Fortnighters';

6.4.27. contributes to and provides, with the Headmaster, Chair of Governors and Safeguarding Governor, the Audit of Statutory Duties and Associated Responsibilities to be submitted biennially to the education safeguarding team at Surrey County Council;

6.4.28. co-ordinates the enaction of the Action Plan arising from the afore-mentioned Audit;

6.4.29. prepares, obtains sign-off for and disseminates termly Safeguarding Data Collections for submission to SSCP;

6.4.30. completes the safeguarding audit as required at regular intervals by the City of London;

6.4.31. gives a safeguarding briefing for members of staff undertaking private tuition with the approval of the Headmaster, repeated every 4 years;

6.4.32. acts as the Designated Teacher for Looked After and Previously Looked After Children.

6.5. **The Deputy Designated Safeguarding Leads:**

6.5.1. together with the DSL form the School's Safeguarding and Pupil Welfare Team (see 6.6 below);

6.5.2. are deliberately drawn from different parts of the School, and include both SLT and non-SLT colleagues;

6.5.3. are trained to the same standard as the Designated Safeguarding Lead and, in the absence of the DSL, carry out those functions necessary to ensure the ongoing safety and protection of pupils. In the event of the long-term absence of the DSL, the Headmaster nominates a DDSL to assume all of the functions above.

6.5.4. commit to refreshing their knowledge and current awareness of safeguarding issues, including Prevent and Channel.

6.5.5. under the direction of the DSL, take responsibility for devising and delivering portions of safeguarding training to staff and pupils.

6.5.6. are frequently called upon by the DSL to provide a "second opinion" when deciding how best to act in a safeguarding situation;

6.5.7. are nominated by the DSL to act as lead person in respect of pupil assessed at a Level 3 of risk (the level immediately below High Risk).

6.6. **The Safeguarding and Pupil Welfare Team:**

6.6.1. consists of the DSL and DDSLS;

6.6.2. is a collegiate body where: all voices are heard and equally welcomed; opinions are given weight according to how well-argued they are, not according to who is making them; 'group-think' is actively discouraged;

6.6.3. reflects our belief that safeguarding in a school should not be dealt with solely by one or two colleagues. Members of the Team know that they can and should hold one another to account;

6.6.4. meets formally once every term to discuss how safeguarding in the School could be improved and to impart a working knowledge to all members of what the "live" safeguarding issues are in the School (whilst having due regard for the principle of "need to know"). Agenda and Minutes are distributed by the Safeguarding Co-ordinator;

6.6.5. has members who are committed to doing everything that they can within their areas of the School to promote a 'culture of safeguarding' in the School.

6.7. **All School Staff:**

6.7.1. understand that it is everyone's responsibility to safeguard and promote the welfare of children and that they have a role to play in identifying concerns, sharing information and taking prompt action;

6.7.2. consider, at all times, what is in the best interests of the child;

6.7.3. know how to respond to a pupil who discloses abuse through delivery of *Working Together To Safeguard Children* (2023), and *What To Do If You Are Worried A Child Is Being Abused* (2015); know to reassure victims of abuse, sexual violence or sexual harassment that they are being taken seriously, will be supported and kept safe, and are not creating a problem by reporting it;

6.7.4. in line with the in-house guidance *Reporting Safeguarding Concerns,* refer any safeguarding or child protection concerns to the DSL or, if necessary where the child is at immediate risk, to the Police or children's social care;

6.7.5. refer any concerns about the behaviour of a member of a staff to the Headmaster or, if those concerns are about the Headmaster, to the Chair of Governors;

6.7.6. are aware of the Early Help[5] process and understand their role within it including identifying emerging problems for children who may benefit from an offer of early help, liaising with the DSL in the first instance and supporting other agencies and professionals in an early help assessment through information sharing. In some cases staff may act as the lead professional in Early Help cases;

6.7.7. diligently record attendance of pupils in registration and monitor attendance in lessons and other activities;

6.7.8. inform their Head of Year if any tutee of theirs is frequently absent or late, or is absent for >5 consecutive school days;

6.7.9. follow our *Missing Child- Day Pupils* and *Missing Child- Boarders* procedures;

6.7.10. provide a safe environment in which children can learn.

7. Confidentiality

7.1. City of London Freemen's School recognises that in order to effectively meet a child's needs, safeguard his/her welfare and protect him/her from harm, the School must contribute to inter-agency working in line with *Working Together to Safeguard Children* (2023) and share information between professionals and agencies where there are concerns.

7.2. All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act 1998 is not a barrier to sharing information where the failure to do so would place a child at risk of harm.

7.3. All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing.

7.4. However, we also recognise that all matters relating to child protection are personal to children and families. Therefore, in this respect they are confidential and the Headmaster, DSL and DDSLs will only disclose information about a child to other members of staff on a 'need to know' basis.

7.5. We undertake to share our intention to refer a child to Social Care with their parents /carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation. If in doubt, we telephone Surrey's C-SPA Consultation Line.

[5] Detailed information on early help can be found in Chapter 1 of Working together to safeguard children

8. Child Protection Procedures

8.1. Abuse, neglect and exploitation are forms of maltreatment of a child. Somebody may abuse, neglect or exploit a child by inflicting harm or by failing to act to prevent harm. Children may be abused in the family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or by another child or children.

8.2. Further information about the four categories of abuse; physical, emotional, sexual and neglect, and indicators that a child may be being abused can be found in Appendix 1.

8.3. Any child in any family in any school could become a victim of abuse. Staff should always maintain an attitude of "It could happen here".

8.4. There are also a number of specific safeguarding concerns that we recognise our pupils may experience:

8.4.1. Child missing from education (see para 22)

8.4.2. Child missing from home or care

8.4.3. Child sexual exploitation (CSE) (see para 14 and appendix 3)

8.4.4. Bullying including cyberbullying (see para 11)

8.4.5. Domestic abuse (see para 13 and appendix 5)

8.4.6. Drugs

8.4.7. Fabricated or induced illness

8.4.8. Faith abuse

8.4.9. Female genital mutilation (FGM) (see para 16 and appendix 4)

8.4.10. Forced marriage (see para 17)

8.4.11. Gangs and youth violence (see para 15)

8.4.12. Gender-based violence/violence against women and girls (VAWG)

8.4.13. Mental health (see para 10)

8.4.14. Private fostering (see para 20)

8.4.15. Radicalisation (see para 12 and appendix 6)

8.4.16. Youth produced sexual imagery (sexting) (see para 26)

8.4.17. Teenage relationship abuse (see para 24)

8.4.18. Trafficking

8.4.19. Child on child abuse (see para 24)

8.5. Staff are aware that behaviours linked to drug taking, alcohol abuse, truanting and youth produced sexual imagery (sexting) put children in danger and that safeguarding issues can manifest themselves via child on child abuse.

8.6. We also recognise that abuse, neglect and safeguarding issues are complex and are rarely standalone events that can be covered by one definition or label. Staff are aware that in most cases multiple issues will overlap one another.

8.7. **If staff are concerned about a child's welfare**

8.7.1. Full procedures are set out in the document *Reporting Safeguarding Concerns*, which is given to all new staff at induction and can be found on the Freemen's Staff SharePoint site.

8.7.2. If staff notice any indicators of abuse/neglect or signs that a child may be experiencing a safeguarding issue, they contact the DSL (or DDSL if he can't be contacted) immediately. They then record these concerns immediately on a Safeguarding Concern Form (which can be found on the Useful Forms area of the Freemen's Staff SharePoint site) and pass it to the DSL.

8.7.3. There will be occasions when staff may suspect that a pupil may be at risk, but have no 'real' evidence. The pupil's behaviour may have changed, their artwork could be bizarre, they may write stories or poetry that reveal confusion or distress, or physical or inconclusive signs may have been noticed. Freemen's recognise that the signs may be owing due to a variety of factors, such as a parent having moved out, a pet having died, a grandparent being very ill or an accident having occurred. However, they may also indicate a child is being abused or is in need of safeguarding.

8.7.4. In these circumstances staff give the child the opportunity to talk. Typically the first response will be to ask the pupil if he/she is OK and if the member of staff can help in any way.

8.7.5. Staff should use the Safeguarding Concern Form, which can be found the Useful Forms page of the Freemen's Staff SharePoint site, to record these early concerns and give the completed form to the DSL.

8.7.6. If the pupil does begin to reveal that he/she is being harmed, staff should follow the advice below regarding a pupil making a disclosure.

8.8. **If a pupil discloses to a member of staff**

8.8.1. Full procedures are set out in the document *Reporting Safeguarding Concerns*, which is given to all new staff at induction and can be found in the Freemen's Staff SharePoint site.

8.8.2. We recognise that it takes a lot of courage for a child to disclose that he/she is being abused. (S)he may feel ashamed, guilty or scared, his/her abuser may have threatened that something will happen if he/she tells, (s)he may have lost all trust in adults or believe that what has happened is his/her fault. Sometimes (s)he may not be aware that what is happening is abuse. Alternatively, the child's experience of prejudice-based harm may have affected his/her willingness to seek help.

8.8.3. A child who makes a disclosure may have to tell his/her story on a number of subsequent occasions to the police and/or social workers. Therefore, it is vital that his/her first experience of talking to a trusted adult is a positive one.

8.8.4. During their conversation with the pupil, staff:

8.8.4.1. listen to what the child has to say and allow him/her to speak freely;
8.8.4.2. remain calm and not overact or act shocked or disgusted – the pupil may stop talking if he/she feels that (s)he is upsetting the listener;
8.8.4.3. reassure the child that it is not his/her fault and that (s)he has done the right thing in telling someone;
8.8.4.4. take pains to avoid creating the impression that the child has caused a problem by disclosing;
8.8.4.5. are not afraid of silences – staff must remember how difficult it is for the pupil and allow him/her time to talk;

8.8.4.6. take seriously what the child is disclosing;
8.8.4.7. ask open questions and avoid asking leading questions;
8.8.4.8. avoid speculation, jumping to conclusions or making accusations;
8.8.4.9. do not automatically offer any physical touch as comfort. It may be anything but comforting to a child who is being abused;
8.8.4.10. do not admonish the child for not disclosing sooner. Saying things such as "I do wish you had told me about it when it started" may be interpreted by the child to mean (s)he has done something wrong;
8.8.4.11. tell the child what will happen next.

8.8.5. If a pupil talks to any member of staff about any risks to his/her safety or wellbeing, the staff member will let the child know that he/she has to pass the information on because staff are not allowed to keep secrets.

8.8.6. The member of staff writes up his/her conversation on the Safeguarding Concern Form (which can be found on the Useful Forms area of the Freemen's Staff SharePoint site) in the child's own words as soon as possible and by the end of the same day at the latest. The record is signed, timed and dated, the member of staff's name is printed and it details where the disclosure was made and who else was present. The record is then handed to the DSL.

8.9. **Notifying Parents**

8.9.1. The School normally seeks to discuss any concerns, suspicions or disclosures about a pupil with his/her parents. These are handled sensitively. However, if the School believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care.

8.9.2. Where there are concerns about forced marriage or honour-based abuse, parents are not informed that a referral is being made, as to do so may place the child at a significantly increased risk.

8.10. **Making a referral**

8.10.1. Concerns about a child or a disclosure should be discussed with the DSL, who will help decide whether a referral to statutory services, undertaking a family help assessment or internal support is appropriate in accordance with the levels of need detailed in Surrey's Continuum of Support document[6]. However, the child's wishes and feelings are, as far as possible, taken into account when determining what action to take and what services to provide.

8.10.2. If a referral is needed then the DSL or Safeguarding Co-ordinator should make it. However, anyone can make a referral and, if for any reason a staff member thinks a referral is appropriate and one hasn't been made, (s)he can and should consider making a referral himself/herself.

8.10.3. Any such referral is made to the local authority in which the child resides.

8.10.4. The child (subject to his/her age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

8.10.5. If after a referral the child's situation does not appear to be improving, the DSL (or the person who made the referral) will press for re-consideration to ensure that their concerns have been addressed and the child's situation improves.

8.10.6. If a child is in immediate danger or is at risk of harm a referral should be made to children's social care and/or the police immediately. Anybody can make a referral.

8.10.7. Where referrals are not made by the DSL, the DSL should be informed as soon as possible.

8.11. Supporting Staff

8.11.1. We recognise that staff working in the School who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.

8.11.2. We will support such staff by providing an opportunity to talk through their anxieties with the DSL or Safeguarding Co-ordinator and to seek further support as appropriate. In such circumstances, staff can talk to the School Counsellor

8.12. Non-recent abuse

8.12.1. We recognise that abuse is abuse irrespective of whether it is recent or non-recent. Each victim of abuse is affected in a unique way, but in the majority of cases the effects are felt many years after the abuse took place. This, together with the progress made towards a better public understanding of abuse, in particular that abuse is not acceptable or to be regarded as something that is "just part of life", has meant that victims of non-recent abuse are increasingly contacting the institutions in which they were abused or were attending at the time of their abuse.

8.12.2. Any person who wishes to contact the School about non-recent abuse is encouraged to contact the Headmaster in the first instance (whose contact details can be found in the Key Personnel section of this Policy above).

8.12.3. If past pupils contact us in this regard, we shall:

- treat any such disclosure with the utmost seriousness and listen to it carefully and in full;
- honour any duty that we have to report the disclosure to the relevant authorities, while being mindful of the victim's wishes in this matter.

[6] Continuum of Support

9. Children who are particularly vulnerable

9.1. City of London Freemen's School recognises that some children are more vulnerable to abuse and neglect and that additional barriers exist when recognising abuse for some children.

9.2. We understand that this increase in risk is owing more to societal attitudes and assumptions or child protection procedures which fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment or circumstances.

9.3. In some cases possible indicators of abuse such as a child's mood, behaviour or injury might be assumed to relate to the child's impairment or disability rather than giving a cause for concern. Or a focus may be on the child's disability, special educational needs or situation without consideration of the full picture. In other cases, such as bullying, the child may be disproportionately impacted by the behaviour without outwardly showing any signs that he/she is experiencing it.

9.4. Some children may also find it harder to disclose abuse owing to communication barriers, lack of access to a trusted adult or not being aware that what they are experiencing is abuse.

9.5. To ensure that all our pupils receive equal protection, we give special consideration to children who are

9.5.1. Disabled or have special educational needs

9.5.2. Young carers

9.5.3. Affected by parental substance misuse, domestic abuse or parental mental health needs

9.5.4. Asylum seekers

9.5.5. Living away from home

9.5.6. Vulnerable to being bullied or engaged in bullying

9.5.7. Already viewed as a 'problem'

9.5.8. Living in temporary accommodation

9.5.9. Live transient lifestyles

9.5.10. Living in chaotic and unsupportive home situations

9.5.11. Vulnerable to discrimination on the grounds of race, ethnicity, religion, gender identity, disability or sexuality

9.5.12. At risk of sexual exploitation

9.5.13. Do not have English as a first language

9.5.14. At risk of female genital mutilation

9.5.15. At risk of forced marriage

9.5.16. At risk of being drawn into extremism.

10. Mental Health

10.1. The School has a Senior Mental Health Lead who is a member of SLT with the training, skills and time to co-ordinate both our provision for pupils with mental health difficulties and our proactive strategy for enhancing pupil mental health and wellbeing. He/she is a Deputy DSL and has the additional role of Head of Wellbeing.

10.2. City of London Freemen's School recognises that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. When a child appears to have a mental health problem, we try to ascertain the under-lying reasons for it rather than just seeking to address the symptoms.

10.3. If a member of staff believes that a pupil's mental health amounts to a safeguarding concern- i.e. that it means that the pupil is at risk of significant harm- he/she follows normal safeguarding procedures (i.e. reports those concerns to the DSL immediately). We recognise that, as a result of a severe mental health difficulty, a child can be at risk of significant harm to himself/herself through suicide or self-harm.

10.4. We are aware that children with mental health problems can be 'borderline' safeguarding concerns and therefore need to be monitored by the Safeguarding and Pupil Welfare Team.

10.5. Irrespective of any mental health problem giving rise to a safeguarding concern, the School is committed to helping pupils to achieve the best possible mental health- i.e. wellbeing.

10.6. Staff know that a mental health problem can manifest itself in many ways, including:

- anxiety, including about academic performance;
- listlessness / apathy / inability to engage with academic work;
- not wanting to do things that they usually like;
- lateness to school / poor attendance / school refusal;
- low mood / feelings of numbness;
- suicidal ideation / suicide attempts;
- poor relationship with food / eating disorders;
- insomnia / poor sleep patterns;
- low self-esteem / self-confidence;
- concerns about body image;
- craving affirmation and acceptance / apparent willingness to be taken advantage of by others;
- anti-social behaviour / unkind behaviour towards others;
- withdrawing from social situations;
- self-harm and/or self-neglect;
- obsessive behaviour;
- sudden changes in behaviour.

10.7. If a member of staff is concerned that a pupil may have a mental health problem that does not amount to a safeguarding concern, he/she contacts the pupil's Form Tutor and Head of Year as soon as possible, who will investigate further.

10.8. Freemen's staff never seek to make a mental health diagnosis. Rather, we help pupils and parents to access the right professional support, usually via the pupil's GP in the first instance. Sometimes we may deem it appropriate, with the consent of the pupil and parents, to make a direct referral to CAMHS (Child and Adolescent Mental Health Services). All staff know to use a 1-10 Wellbeing Scale, with agreed descriptors for each level.

10.9. The School Counsellor, who works at the School 4.5 days per week across 4 days, can give confidential[7] support to pupils, and we encourage pupils and parents to take up this offer.

10.10. As with all pupils with difficulties of a pastoral nature, a pupil with a mental health problem is entered on to the Pastoral Tracking Spreadsheet. The level at which his/her care is co-ordinated (Form Tutor, Head of Year, Deputy DSL or DSL) will depend on how serious the problem is deemed to be. Information is then shared on a need-to-know basis, including to trip leaders, with a pastoral alert added to the pupil's MIS page so that staff are aware and know to ask the Head of Year if they need more information.

10.11. The School is proactive in fostering a culture that is positive about mental health and free of stigmas around disclosing that one has a mental health problem. We also invest in continuing professional learning to ensure that the right help is on hand if a pupil or member of staff disclosed a mental health problem. To this end, we:

- have re-purposed a room in the Medical Centre ('The Willow') as a wellbeing suite for pupils who present with problems that are psychological rather than physical in nature;
- train around 16 Sixth-Formers and around 16 staff in Mental Health First Aid every year;
- have a peer mentoring scheme for Sixth-Formers to support Senior School pupils;
- use events such as U4 GCSE Options Evening to speak to parents about how they can support their children by encouragement and setting high standards while avoiding creating counter-productive pressure and low self-esteem;
- run parental seminars on topics such as mental health, anxiety and exam stress;
- annually invite a team from 'Beyond Equality' to discuss with L5 boys male mental health and the challenges faced by young men in the modern world; concurrently, girls attend workshops focusing on understanding, confronting and responding to sexism and misogyny in society;
- invite an external speaker to talk to the U5 about managing stress and performing under pressure;
- advertise online counselling services and sources of support such as Kooth and Childline;
- use Staff Briefings to raise awareness and understanding of mental health (recent topics have included eating disorders and self-harm);
- raise awareness among teaching staff of how modelling a 'growth mindset', especially around assessment, can boost self-esteem;
- cover mental health extensively in PSHE;
- have a staff Wellbeing Committee that meets termly;
- have a pupil Wellbeing Committee run by Sixth-Formers;
- conduct annual Wellbeing surveys for staff and pupils;
- participate in 'Hello Yellow' (World Mental Health) Day in October, with a stand outside the Medical Centre to raise awareness of mental health
- have a Wellbeing Week every May during which we run a series of activities and workshops for staff and pupils.

[7] subject to the usual imperative to share information where the child is judged to be at risk of harm

11. Anti-Bullying/Cyberbullying

11.1. Our policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may amount to a dereliction of our statutory safeguarding duties. This includes all forms e.g. cyber, racist, homophobic and gender-related bullying. We keep a record of known bullying incidents, which is shared with and discussed by the governing body. All staff are aware that children with SEND and / or differences/perceived differences are more susceptible to being bullied / victims of child abuse.

11.2. When there is "reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm", a bullying incident should be addressed as a child protection concern under the category of child-on-child abuse (see paragraph 24 below). If the anti-bullying procedures are seen to be ineffective, the Headmaster and the DSL will also consider implementing child protection procedures.

11.3. The subject of bullying is addressed at regular intervals in PSHE education. Bullying Awareness Week is marked every November.

12. Radicalisation and Extremism

12.1. The Prevent Duty for England and Wales (2023) under section 26 of the Counter-Terrorism and Security Act 2015 places a duty on education and other children's services to have due regard to the need to prevent people from being drawn into terrorism.

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

12.3. Some children are at risk of being radicalised- that is, of adopting beliefs and engaging in activities which are harmful, criminal or dangerous. This can happen both online and offline.

12.4. City of London Freemen's School regards any exploitation of vulnerable children and radicalisation as a safeguarding concern and follows the Department for Education guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism[8].

12.5. City of London Freemen's School 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 / Far Left / Neo Nazi / White Supremacist ideology, Northern Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

12.6. School staff receive training to help identify early signs of radicalisation and extremism. Indicators of vulnerability to radicalisation are in detailed in Appendix 6.

12.7. 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)[9]. From time to time, Assemblies focus on Fundamental British Values.

[8] https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty
[9] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/380595/SMSC_Guidance_Maintained_Schools.pdf

12.8. The Governing Body, the Headmaster and the DSL assess the level of risk within the School and put actions in place to reduce that risk. Risk assessment may include the use of School premises by external agencies, anti-bullying policy and other issues specific to the School's profile, community and philosophy.

12.9. Staff who wish to invite a speaker to the School fill in a Visiting Speaker Form (located on Freemen's Staff SharePoint site) at least a week beforehand, which, one completed, is sent automatically to the Safeguarding Co-ordinator. He assesses any risk and acts accordingly, consulting the DSL if he has concerns or is at all unsure.

12.10. When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, he/she speaks to the DSL. If the DSL judges that the threshold for a referral is met, he and the colleague complete a Prevent Referral Form together (link can be found at https://www.surreyscp.org.uk/documents/prevent-referral-form/) and send it to preventreferrals@surrey.pnn.police.uk. If the matter is urgent, Surrey Police are contacted by dialling 999. The Department of Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).

13. Domestic Abuse

13.1. Domestic abuse represents one quarter of all violent crime. It is actual or threatened physical, emotional, psychological or sexual abuse. It involves the use of power and control by one person over another. It occurs regardless of race, ethnicity, sex, class, sexuality, age, religion, mental or physical ability. Domestic abuse can also involve other types of abuse.

13.2. We use the term domestic abuse to reflect that a number of abusive and controlling behaviours are involved beyond violence.

13.3. Slapping, punching, kicking, bruising, rape, ridicule, constant criticism, threats, manipulation, sleep deprivation, social isolation, and other controlling behaviours all count as abuse.

13.4. 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 are alert to the signs and symptoms of a child suffering or witnessing domestic abuse (See Appendix 5).

13.5. City of London Freemen's School is enrolled onto the Operation Encompass scheme, a joint project between Surrey Police, Surrey County Council, Surrey Domestic Abuse Service and Surrey Schools. Accordingly, we are notified of all domestic abuse incidents that have occurred in the previous 24 hours which involved a pupil at this school (72 hours on a Monday morning). This allows us to look out for signs that they have been affected by the incident, prompting us to make a referral if necessary (we do not approach pupil or parents directly unless requested to do so by other agencies).

14. Child Sexual Exploitation (CSE)

14.1. Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. All staff are aware of the link between online safety and vulnerability to CSE.

14.2. Any concerns that a child is being or is at risk of being sexually exploited should be passed without delay to the DSL. City of London Freemen's School is aware there is a clear link between regular school absence/truanting and CSE. Staff should consider a child to be at potential CSE risk in the case of regular school absence/truanting and make reasonable enquiries with the child and parents to assess this risk.

14.3. In all cases if the tool identified any level of concern (green, amber or red) the DSL should contact Surrey C-SPA and email the completed CSE Screening Tool along with a Request For Support Form. If a child is in immediate danger the police should be called on 999.

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

14.5. City of London Freemen's School includes the risks of sexual exploitation in the PHSE curriculum. Pupils are informed of the grooming process and how to protect themselves from people who may potentially be intent on causing harm. They will be supported in terms of recognising and assessing risk in relation to CSE, including online, and knowing how and where to get help.

15. Child Criminal Exploitation (CCE) and Gangs

15.1. Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual and/or criminal activity.

15.2. There are a number of areas in which children are put at risk by gang activity, both through participation in, and as victims of, gang violence which can be in relation to their peers or to a gang-involved adult in their household.

15.3. A child who is affected by gang activity or serious youth violence may have suffered, or may be likely to suffer, significant harm through physical, sexual and emotional abuse or neglect.

15.4. Children can be vulnerable to recruitment into gangs and involvement in gang violence. This vulnerability may be exacerbated by risk factors in an individual's background, including violence in the family, involvement of siblings in gangs, poor educational attainment, or poverty or mental health problems. We are aware that children are increasingly being targeted and recruited online using social media.

15.5. Criminal exploitation of children is a typical feature of county lines criminal activity. Key identifying features of involvement in county lines are when children are missing. When the victim may have been trafficked for transporting drugs, a referral to the National Referral Mechanism should be considered with Social Care and Police colleagues.

15.6. A child who is affected by gang activity, criminal exploitation or serious youth violence can be at risk of significant harm through physical, sexual and emotional abuse. Girls may be particularly at risk of sexual exploitation.

15.7. Any concerns that a child is being or is at risk of being criminally exploited will be passed without delay to the DSL. The School is aware there is a clear link between regular non-attendance at school/college and exploitation. Staff will consider a child to be at potential risk in the case of regular non-attendance at school and make reasonable enquiries with the child and parents to assess this risk.

15.8. A request for support to the C-SPA will be made when any concern of harm to a child as a consequence of gang activity including child criminal exploitation becomes known. The DSL will contact the C-SPA. If there is concern about a child's immediate safety, the Police will be contacted on 999.

16. Female Genital Mutilation (FGM)

16.1. Female Genital Mutilation (FGM) is illegal in England and Wales under the FGM Act (2003). It is a form of child abuse and violence against women. A mandatory reporting duty requires teachers to report 'known' cases of FGM in under 18s, which are identified in the course of their professional work, to the police[10].

16.2. The duty applies to all persons in City of London Freemen's School who are employed or engaged to carry out 'teaching work' in the School, whether or not they have qualified teacher status. The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the Designated Safeguarding Lead, although the DSL should be informed.

16.3. If a teacher is informed by a girl under 18 that an act of FGM has been carried out on her or a teacher observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth, the teacher personally makes a report to the police force in which the girl resides by calling 101 by the close of the next working day.

16.4. School staff are trained to be aware of risk indicators of FGM which are set out in Appendix 4. Concerns about FGM outside of the mandatory reporting duty are reported as per the School's child protection procedures. Staff should be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer vacation period. There should also be consideration of possible risk to other girls in the family and practising community.

16.5. Where there is a risk to life or likelihood of serious immediate harm, the teacher reports the case immediately to the police, including dialling 999 if appropriate.

16.6. There are no circumstances in which a teacher or other member of staff should examine a girl.

17. Forced Marriage

17.1. 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.

17.2. Forced marriage is an appalling and indefensible practice and 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. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

17.3. A forced marriage is not the same as an arranged marriage, which is common in several 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.

[10] https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information

17.4. School staff should never attempt to intervene directly as a school or through a third party. Contact should be made with the contact centre or the Forced Marriage Unit 020 7008 0151.

18. Honour-based Abuse

18.1. 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 abuse can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

18.2. Honour based abuse might be committed against people who:

18.2.1. become involved with a boyfriend or girlfriend from a different culture or religion;

18.2.2. want to get out of an arranged marriage;

18.2.3. want to get out of a forced marriage;

18.2.4. wear clothes or take part in activities that might not be considered traditional within a particular culture.

18.3. It is a violation of human rights and may be a form of domestic and/or sexual abuse. There is no, and cannot be, honour or justification for abusing the human rights of others.

19. One Chance Rule

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

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

20. Private Fostering Arrangements

20.1. 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 or 18 if the child is disabled. Children looked after by the local authority or who are place in residential schools, children's homes or hospitals are not considered to be privately fostered.

20.2. Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.

20.3. City of London Freemen's School recognise 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.

20.4. By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible. However, where a member of staff becomes

aware that a pupil may be in a private fostering arrangement, they will raise this will the DSL and the DSL will notify Surrey Children's Social Care of the circumstances.

21. Looked After Children

21.1. The most common reason for children becoming looked after is as a result of abuse and neglect. City of London Freemen's School ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child and contact arrangements with birth parents or those with parental responsibility.

21.2. The Designated Teacher for Looked After and Previously Looked After Children is the Safeguarding Co-ordinator. He performs this duty in line with **The designated teacher for looked-after and previously looked-after children (publishing.service.gov.uk)**

21.3. The DSL has details of the social workers of any looked after pupils, together with the name and contact details of the Surrey County Council's Virtual School Head for children in care.

21.4. The DSL works with the virtual school head to discuss how Pupil Premium Plus funding can be best used to support the progress of looked after children in the School and meet the needs in the child's personal education plan.

22. Children Missing Education

22.1. Attendance, absence and exclusions are closely monitored. Unexplained and/or persistent absence from school is a potential indicator of abuse and neglect, including sexual abuse and sexual exploitation.

22.2. The DSL monitors unauthorised absences and take appropriate action, including notifying the local authority particularly where children go missing on repeat occasions and/or are missing for periods during the school day in conjunction with *Children Missing Education: Statutory Guidance for Local Authorities*[11].

22.3. Staff must be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

22.4. In order that missing pupils can be located as quickly as possible, the School requests more than one emergency contact number for parents of new pupils and that the numbers provided are contacts for at least two separate persons (usually the two parents). In addition, we request contact details for all adults with parental responsibility for the child. The Admissions Department- and then the Office Manager, if necessary- follows up these requests if they are not initially met. If a parent requests that an emergency contact is deleted, staff are vigilant in requesting an alternative number so that the above minimum level is maintained.

22.5. Further details about how we identify and act in response to missing pupils can be found in our *Attendance Policy* and *Missing Child Procedures.*

22.6. Details of how the School flags pupils leaving Freemen's in order to ensure that they continue to be in full-time education can be found in our *Admissions Policy*.

[11] https://www.gov.uk/government/publications/children-missing-education

23. Online Safety, including Cybercrime

23.1. Our pupils increasingly use electronic equipment on a daily basis to access the internet, share and view content and images via social media sites such as Facebook, X, Instagram and Snapchat and for online gaming.

23.2. Unfortunately, some adults and other children use these technologies to harm children. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing children to engage in extremist or sexual behaviour such as webcam photography or face-to-face meetings. Pupils 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.

23.3. The Assistant Head of Senior School (Lower Senior), who is a DDSL, acts as Online Safety Co-ordinator. His work is overseen by the Designated Safeguarding Lead and he is assisted in it by the Safeguarding Co-ordinator.

23.4. Freemen's is aware of the guidance *Mobile phones in schools*, which became statutory in June 2026 and is referenced in *Keeping Children Safe in Education*, stating that schools should be phone-free environments by default. Following a successful trial in Summer Term 2019, Freemen's adopted rules that restrict the use of mobile 'phones and other internet-enabled devices (e.g. smart watches). Pupils from F1 to U5 (Year 3 to Year 11) may not use them on the school site before the end of the school day, other than with staff permission, with Sixth-Formers only permitted to use them during free periods in the Sixth Form centre communal areas. Confiscation and the awarding of a sanction are automatic when these rules are infringed. There is also a ban on bringing 'smart' phones onto site for all pupils in F1 to L4 (Y3-8).

23.5. In May 2026 the School banned pupils from bringing 'smart glasses' onto site, to any school activities or while travelling to and from school.

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

23.7. Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the DSL (or a deputy), will consider a referral into the Cyber Choices programme. This programme aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

23.8. The School has a separate *Online Safety Policy*, which details measures for safe use of the School's internet by pupils, including the use of filters and monitoring of usage.

24. Arrangements for dealing with child-on-child abuse (including harassment and violence) and allegations

24.1. This paragraph should be read in conjunction with our *Anti-bullying Policy*, which is published on the public area of our website.

24.2. In most instances, the conduct of pupils towards each other is covered by our *Behaviour Policy*. However, some allegations may be of such a serious nature that they may raise safeguarding concerns. City of London Freemen's School recognise that children are capable of abusing their peers. We also recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and simply not being reported .

24.3. Abuse is abuse and will never be tolerated or passed off as 'banter', 'just having a laugh', 'boys just being boys' or 'part of growing up'. We recognise that, if it is, this can lead to a culture of unacceptable behaviour, misogyny and an unsafe environment for children.

24.4. Bullying can amount to child-on-child abuse. A bullying incident is treated as a safeguarding concern when there is reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm.

24.5. The forms of child-on-child abuse are (in a non-exhaustive list) as follows:

24.5.1. bullying (including cyberbullying, prejudice-based and discriminatory bullying),

24.5.2. discriminatory behaviour, including racism, faith-targeted abuse, and other prejudice based incidents

24.5.3. abuse in intimate personal relationships between children (also known as teenage relationship abuse)

24.5.4. physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm,

24.5.5. physical assault and harm, or the threat of harm with a weapon,

24.5.6. harmful sexual behaviour, sexual violence and sexual harassment – which may include misogyny/misandry

24.5.7. consensual and non-consensual making or sharing of nudes and semi nudes, including those generated using AI

24.5.8. causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party

24.5.9. upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and

24.5.10. initiation/hazing type violence and rituals.

24.6. The term child-on-child abuse can refer to all of these definitions and a child may experience one or multiple facets of abuse at any one time. Therefore, our response will cut across these definitions and capture the complex web of their experiences.

24.7. We recognise that pupils with SEN/D are particularly vulnerable to child-on-child abuse, and we are accordingly vigilant.

24.8. Freemen's recognises that for some (but not all) forms of child-on-child abuse it is more likely that boys will be perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously.

24.9. City of London Freemen's School aims to reduce the likelihood of child-on-child abuse through:

- the established ethos of respect, friendship, courtesy and kindness;
- high expectations of behaviour;
- clear and significant consequences for unacceptable behaviour, including for child-on-child sexual harassment;
- providing a developmentally appropriate PSHE curriculum which develops pupils' understanding of healthy relationships, acceptable behaviour, consent and keeping themselves safe;
- a culture of pupils being able to raise concerns with staff, knowing that they will be listened to, valued and believed;
- annually invite a team from 'Beyond Equality' to discuss with L5 boys male mental health and the challenges faced by young men in the modern world; concurrently, girls attend workshops focusing on understanding, confronting and responding to sexism and misogyny in society;
- trained Sixth-Formers acting as mentors to Senior School pupils, many of whom will be more vulnerable than most to child-on-child abuse;
- covering child-on-child abuse in both safeguarding training sessions for new staff;
- robust risk assessments and providing targeted support for pupils identified as being a possible risk to other pupils and those identified as being at risk;
- banning pupils from bringing 'smart glasses' onto site, to any school activities or while travelling to and from school.

24.10. Research indicates that young people rarely disclose child on child abuse and that, if they do, it is likely to be to their friends. Therefore, City of London Freemen's School will also educate pupils in how to support their friends if they are concerned about them, that they should talk to a trusted adult in the School and what services they can contact for further advice. In case fear of repercussions is a barrier to disclosure, we have a QR-code anonymous reporting facility that can be used by pupils who are worried that a peer might be suffering from (*inter alia*) child on child abuse.

24.11. Freemen's recognises the importance of having systems in place for reporting child-on-child abuse that are well promoted, easily understood and accessible, and which will encourage victims to believe that they will be taken seriously. Accordingly, we display and proactively advertise a pupil-inspired Bullying and Discrimination Flow-Chart, specifically designed to reassure pupils that their concerns will be taken seriously and acted upon. Beyond this, every opportunity is taken when engaging with pupils to iterate a "Tell us if anything or anyone is hurting you or making you feel uncomfortable: we promise to listen and to do something about it" message.

24.12. Any concerns, disclosures or allegations of child-on-child abuse in any form are referred to the DSL using our child protection procedures as set out in this policy. Where a concern regarding child-on-child abuse has been disclosed to the DSL, advice and guidance will be sought from Children's Services and, where it is clear a crime has been committed or there is a risk of crime being committed, the Police will be contacted. In line with our *Searches and Confiscation Policy*, the School may seize and examine a pupil's mobile 'phone or other device if there is good reason to suspect that it has been used to bully or abuse another child while the alleged perpetrator is under care of the School.

24.13. As with all safeguarding concerns, all disclosures, allegations, decisions, actions and the reasons for them are written down contemporaneously under the guidance of the DSL. Parents are informed at an early stage and involved in the process unless there is reason to believe that doing so would put the child at risk of harm.

24.14. If a pupil's behaviour negatively impacts on the safety and welfare of other pupils then safeguards are put in place to promote the well-being of the pupils affected and both the victim and perpetrator will be provided with support, recognising that child-on-child abuse is a safeguarding issue for the perpetrator as well as for the victim. This support will include the offer of meeting with the School Counsellor, and she will be asked to give / seek advice about the best form of ongoing support for the pupil(s) concerned that can be offered by external agencies and providers. Suspension of the pupil, against whom an allegation has been made, needs careful consideration, and the Head will seek the advice from SSCP and any other relevant City Officer before deciding on the course of action to be taken.

25. Responding to reports of child-on-child sexual violence and harassment

25.1. We recognise the incredible importance of responding well to reports of sexual violence and sexual harassment, including to those that have happened outside the school and/or online, because of the impact that it will have on the confidence of future victims to come forward. Therefore:

25.1.1. Children making a report of sexual violence or sexual harassment are taken seriously, kept safe and are well supported. The starting point regarding any report should always be that there is a zero tolerance approach to sexual violence and sexual harassment and that it is never acceptable or to be passed off as 'banter' or as 'boys will be boys'. Failure to challenge lower-level behaviour can lead to a culture that normalises misogyny and abuse, which in turn dissuades children from coming forward to report it.

25.1.2. If possible, reports are taken with two members of staff present (one of them ideally being the DSL or a DDSL), but the priority is to ensure that the child feels able and comfortable to disclose.

25.1.3. Staff taking a report never promise confidentiality.

25.1.4. Staff do not view or forward illegal images of a child.

25.1.5. Staff taking the report informs the DSL immediately and complete a written record of the disclosure.

25.1.6. If a child is at risk of harm, is in immediate danger, or has been harmed, a referral (Request for Support Form) will be made to the C-SPA email: **cspa@surreycc.gov.uk** or telephone 0300 470 9100, as appropriate.

25.1.7. In line with our *Searches and Confiscation Policy*, the School may seize and examine a pupil's mobile 'phone or other device as part of its response.

25.1.8. Parents or carers are informed at an early stage (unless this would put the child at greater risk).

25.2. **Risk Assessment**

25.2.1. Following a report the DSL makes an immediate risk and needs assessment, which considers;

- The victim, especially their protection and support.
- The alleged perpetrator, their support needs and any discipline action.
- All other children at the school.
- The victim and the alleged perpetrator sharing classes and space at school.

25.2.2. The risk assessment is recorded and kept under review.

25.2.3. Where there has been other professional intervention and/or other specialist risk assessments, these professional assessments are used to inform the School's approach to supporting and protecting pupils.

25.2.4. Support regarding risk assessments can be accessed from the Education Safeguarding Team – education.safeguarding@surreycc.gov.uk

25.3. **Action**

25.3.1. The DSL considers:

- The wishes of the victim.
- The nature of the incident including whether a crime has been committed and the harm caused.
- Ages of the children involved.

- Developmental stages of the children.
- Any power imbalance between the children.
- Any previous incidents.
- Ongoing risks.
- Other related issues or wider context.

25.4. **Options**

25.4.1. The DSL, in consultation with the Headmaster, decides between the following options:

- Manage internally
- Early Help intervention
- Refer to C-SPA
- Report to the Police (generally in parallel with a referral to C-SPA)

25.5. **Ongoing Response**

25.5.1. The DSL manages each case individually and ensures that the risk assessment is reviewed regularly with relevant partner agencies, for example the Police and Children's Social Care.

25.5.2. Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator is removed from any classes they share with the victim.

25.5.3. The DSL considers how best to keep the victim and perpetrator a reasonable distance apart on school premises and on transport where appropriate.

25.5.4. Where a criminal investigation into a rape, assault by penetration or sexual assault or leads to a conviction or caution, the School takes disciplinary action in line with its *Behaviour Policy* and *Exclusions Policy*. Whether or not allowing the perpetrator to remain in the same school or college would seriously harm the education or welfare of the victim (and potentially themselves and other pupils) is one of several factors that will be considered.

25.5.5. The victim, alleged perpetrator and any other affected children and adults are offered appropriate support. The School recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and can occur at the same time if necessary

25.5.6. Details of the incident are recorded in the SLT Sexual Harassment and Violence Log, which is reviewed by SLT and Governors annually. Where a pattern is identified, we consider whether or not this indicates that there are wider cultural issues within the School 'enabling' this behaviour. When this is deemed to be the case, our programme of education is enhanced / amended accordingly.

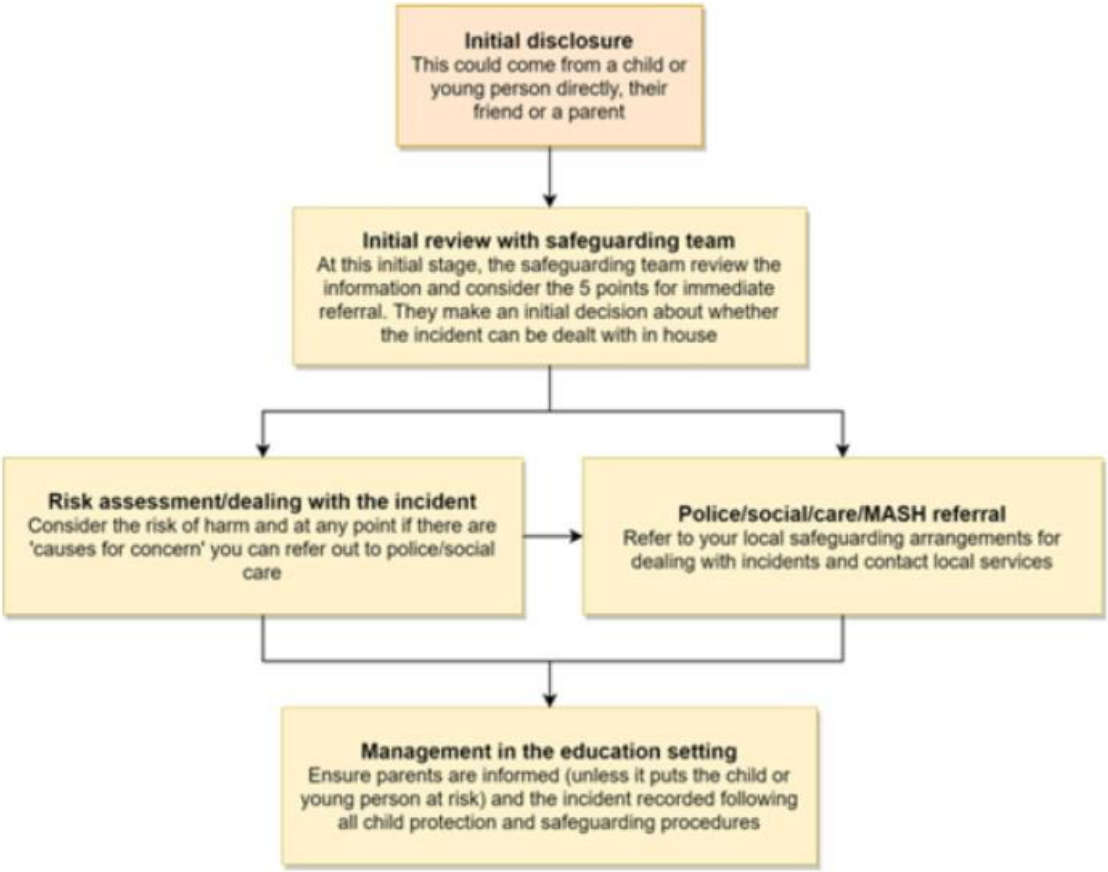
26. Nudes and semi-nudes

26.1. The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has 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- referred to henceforth as 'sharing nudes and semi-nudes'. Such imagery involving anyone under the age of 18 is illegal. As of March 2024, sending an unsolicited indecent image to anyone (cyber-flashing) is a criminal offence in England and Wales punishable with up to two years in prison.

26.2. Nudes and semi-nudes refers to both images and videos where:

- A person under the age of 18 creates and shares nudes and semi-nudes of themselves with a peer under the age of 18;
- A person under the age of 18 shares nudes and semi-nudes created by another person under the age of 18 with a peer under the age of 18 or an adult;
- A person under the age if 18 is in possession of nudes and semi-nudes created by another person under the age of 18;
- Nudes and semi-nudes can include pseudo-images where software or Artificial Intelligence (AI) has been used to manipulate someone's image to create an indecent one.

26.3. All incidents of this nature require a safeguarding response, whether consensual or not, and in line with the Department for Digital, Culture, Media & Sport guidance *Sharing nudes and semi-nudes: advice for education settings working with children and young people* (March 2024). Freemen's takes the following approach to a disclosure of the sharing of nudes



26.4. Cases where sexual imagery of people under 18 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, with the local police force informed as a matter of urgency.

Initial disclosure

26.5. If a member of staff becomes aware of an incident involving nudes or semi-nudes he/she follows the child protection procedures and refers to the DSL as soon as possible. He/she heeds the following code of practice when responding to a disclosure of nudes or semi-nudes:

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

26.6. Once informed, the DSL decides whether or not it is necessary to search for and then confiscate any device involved. This is done in accordance with the School's *Searches and Confiscation Policy*. Any confiscated device is disconnected from wi-fi and and then turned off. Devices are kept secure at all times and are stored in a locked cupboard or safe overnight. As with all safeguarding concerns, all disclosures, allegations, decisions, actions and the reasons for them are written down contemporaneously under the guidance of the DSL.

Initial review to decide whether or not an immediate referral is appropriate

26.7. The DSL should, before investigating further, convene an initial review meeting with appropriate school staff, including DDSL(s). The initial review meeting should consider the initial evidence and aim to establish:

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

26.8. Immediate referral at the initial review stage is made to the Police (via 101 or 999 if there is a threat to life) and to Surrey C-SPA if any of the following five factors are present:

1. The incident involves an adult, noting that where an adult poses as a child to groom or exploit a child or young person, the incident may first present as a child-on-child incident.
2. There is reason to believe that a young person has been coerced, blackmailed ('sextortion') or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs);
3. What you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent;
4. The imagery involves sexual acts and any pupil in the images or videos is under 13;
5. There is reason to believe a child is at immediate risk of harm owing to the sharing of the nudes and semi-nudes, for example the child is presenting as suicidal or self-harming.

26.9. If none of the above apply and the DSL feels that he/she has sufficient information on which to assess whether or not they apply, then the DSL may decide, with input from the Headmaster, not to make an immediate referral and to conduct a risk assessment.

Risk assessment to ascertain any risk of harm

26.10. The purpose of the risk assessment is to assess whether or not the pupil is at risk of harm, in which case a referral will be appropriate. If a pupil is judged not to be at immediate risk of harm, the child and his/her parents are supported by the School.

26.11. Assessing risk will probably involve interviewing the children involved, which will be done by the DSL unless the child concerned would feel uncomfortable about this and would prefer to speak to another member of staff.

26.12. Key questions to ask are:

- Why was the nude or semi-nude shared? Was it consensual or was the child or young person put under pressure or coerced?
- Has the nude or semi-nude been shared beyond its intended recipient? Was it shared without the consent of the child or young person who produced the image?
- Has the nude or semi-nude been shared on social media or anywhere else online? If so, what steps have been taken to contain the spread?
- How old are any of the children or young people involved?
- Did the child or young person send the nude or semi-nude to more than one person?
- Do you have any concerns about the child or young person's vulnerability?
- Are there additional concerns if the parents or carers are informed?
- Is there evidence of risky or harmful sexual behaviour, or of sexual behaviour that is concerning given the child's age and development (mindful that this can be a sign of abuse) ?[12]

Answering these questions can enable the DSL to categorise the incident according to Finkelhor and Wolak's terminology:

[12] Brook's Sexual Behaviour Traffic Lights Tool is used as a starting-point for discussion https://www.brook.org.uk/our-work/category/sexual-behaviours-traffic-light-tool

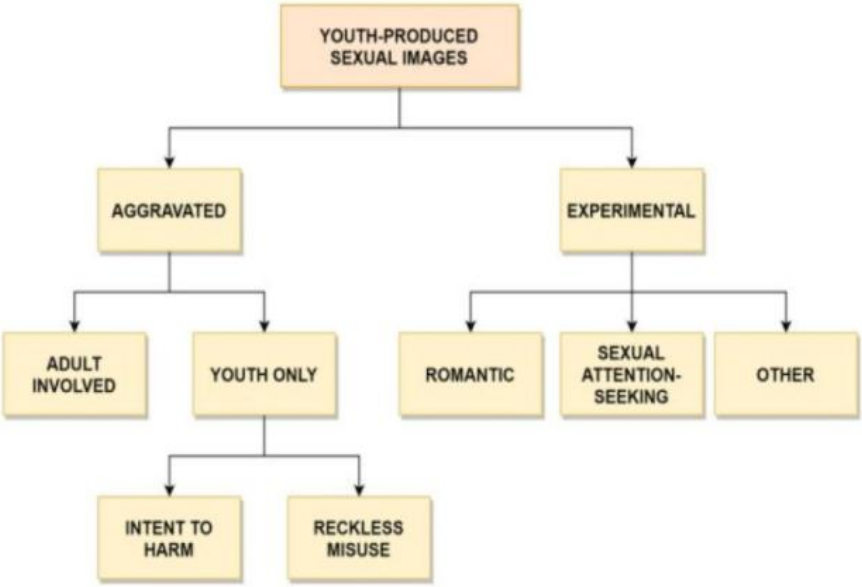


Fig 1: Sexting, a typology (Finkelhor and Wolak)

26.13. Based on the findings of the investigation, the DSL will decide, in conjunction with other colleagues involved, whether or not to make a referral to C-SPA and/or the Police. If a child is already known to children's services, C-SPA is always contacted.

Management of the incident by the School: supporting the young person / people involved

26.14. Once a school has assessed a child or young person as not at immediate risk, it may be necessary to have a conversation with them and decide the best course of action. If possible, the DSL (or equivalent) should carry out this this conversation.

26.15. However, if the child or young person feels more comfortable talking to a different member of staff, this should be facilitated where possible. It is important that the child or young person is given a sense of control over the reporting process. The DSL (or equivalent) should support the member of staff to make sure the conversation is handled appropriately, and they feel confident in discussing the incident.

26.16. The purpose of the conversation is to:

- identify, **without viewing**, what the image contains and whether anyone else has been involved
- find out whether the image has been shared between two people or shared further. This may be speculative information as images or videos may have been shared more widely than the child or young person is aware of
- discuss what actions and support might be needed, including preventing further distribution. This discussion should take into account the views of the child or young person as well as balancing what are considered to be appropriate actions for responding to the incident

26.17. When discussing the sharing of nudes and semi-nudes, it is important that the DSL (or equivalent)/member of staff:

- reassures the child or young person that they are not alone, and the education setting will do everything that they can to help and support them. They should also be reassured that they will be kept informed throughout the process
- recognises the pressures that children and young people can be under to take part in sharing an image and, if relevant, supports their parents and carers to understand the wider issues and motivations around this

- remains solution-focused and avoids any victim-blaming questions such as 'why have you done this?' as this may prevent the child or young person from talking about what has happened. For example, use questions such as 'describe what happened' or 'explain to me who was involved'
- helps the child or young person to understand what has happened by discussing the wider pressures that they may face and the motivations of the person that sent on the image(s)
- discusses issues of consent and trust within healthy relationships. Explain that it is not ok for someone to make them feel uncomfortable, to pressure them into doing things that they do not want to do, or to show them things that they are unhappy about. Let them know that they can speak to the DSL or equivalent if this ever happens
- explains the law on the sharing of nudes and semi-nudes. It is important to highlight that the law is in place to protect children and young people rather than criminalise them and should be explained in such a way that avoids alarming or distressing them
- advises the child or young person to use the IWF and Childline's Report Remove tool to report an image that has been shared online: www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/sexting/report-nude-image-online/. NCMEC's Take It Down tool can also be used to help them to anonymously remove nudes or semi-nudes that have yet to be shared online but they think might be (for example, in an incident where a young person has been threatened to have their image shared but threat has not yet been carried out): https://takeitdown.ncmec.org. (see section 2.12 of *Sharing Nudes* for further detail on reporting routes)

26.18. Children and young people who have had their nudes or semi-nudes shared publicly are:

- reassured that they have done the right thing by speaking to an adult and that the education setting and other adults are there to help
- advised:
- to - delete images or videos from social media accounts (including from cloud photo backups) if they have uploaded them themselves
- to use the IWF and Childline's Report Remove tool to report an image that has been shared online: www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/sexting/report-nude-image-online/. NCMEC's Take It Down tool can also be used to help them remove or limit the spread of nudes or semi-nudes that have been shared online: https://takeitdown.ncmec.org. (see section 2.12 of *Sharing Nudes* for further detail on reporting routes)
- on how to report sexual images or videos on individual sites to get them taken down. If the image has been shared via a mobile, they should be informed that they can contact the mobile phone operator to have a mobile number changed as this may stop others from contacting them
- to speak to the school if they are concerned about any bullying behaviour

26.19. Children and young people who have been sent a nude or semi-nude are:

- reassured that they have done the right thing by speaking out and that the education setting and other adults are there to help
- asked whether it was sent by an adult or another child or young person and if they requested the photo or if it was sent unsolicited
- advised:
- on the importance of reporting it online if it has been shared
- to delete it from their devices and accounts
- on the importance of not sharing the image further
- if they asked to receive the photos, explain that they should not put pressure onto others to do things that they are uncomfortable with

26.20. Children and young people who have shared another child's or young person's nudes or semi-nudes are:

- asked whether they asked for the photo or were initially sent it without requesting

- asked who the image has been sent to and where it has been shared. Agree next steps for taking the image down, including deleting the image from their phone or any social media accounts and reporting it to online service providers (see section 2.12 of *Sharing Nudes*).
- asked about their motivations for sharing the photo and discuss what they could have done differently. If they have reacted to an upsetting incident, such as the break-up of a relationship, by sending the photo onwards, talk about how they could have managed their feelings in a healthier and more positive way. Emphasise that whatever the reason, it is always wrong to share nudes and semi-nudes of another child or young person. This can be used as an opportunity to discuss the importance of consent and not putting pressure on others to take or share nudes and semi-nudes
- advised on the law on the sharing of nudes and semi– nudes

26.21. Children and young people who have created a nude or semi-nude of another child or young person and shared it are:

- asked who the image has been sent to and where it has been shared. Agree next steps for taking the image down, including deleting the image from their devices, any social media accounts and anywhere else it has been posted online such as group chats, and reporting it to online service providers (see section 2.12 of *Sharing Nudes*).
- asked about their motivations for creating and sharing the photo and discuss what they could have done differently. If they have reacted to an upsetting incident, such as the break-up of a relationship, by creating or sending the photo onwards, talk about how they could have managed their feelings in a healthier and more positive way. Emphasise that whatever the reason, it is always wrong to share nudes and semi-nudes of another child or young person. This can be used as an opportunity to discuss the importance of consent and how it still applies when nude and semi-nude has not been taken by the child or young person in it
- advised on the law on the sharing of nudes and semi-nudes and how it still applies to digitally manipulated or AI-generated imagery of other children and young people

Management of the incident by the School: informing and supporting parents

26.22. Parents are informed and involved in the process at an early stage unless doing so will put the child at risk of harm. If this may be the case, the DSL contacts CSPA and asks for advice. However, early involvement of parents does not preclude the School from interviewing pupils on the School's premises prior to their parents being notified.

26.23. In all situations, parents are:

- given information about the sharing of nudes and semi-nudes, what they can expect to happen next, and who will be their link person within the education setting
- given support to deal with their own feelings of upset and concern including signposting to further resources that can help them to understand the sharing of nudes and semi-nudes or support services they can contact, where appropriate
- given support on how to speak to their child about the incident
- advised on the law around the sharing of nudes and semi-nudes
- kept updated about any actions that have been taken or any support that their child is accessing, unless the child involved has specifically asked for this not to happen and is judged to be old enough to make that informed decision
- informed about sources of support for their child, in case they are feeling anxious or depressed about what has happened. This could include speaking to a Childline counsellor online or on 0800 11 11, in house counselling services where available, or a GP. If they are concerned that their child is suicidal, they should contact 999
- directed to NCA-CEOP if the child or young person discloses any further details to them that may suggest they are being groomed or sexually exploited

26.24. Parents/carers whose child has had their nudes or semi-nudes shared publicly are:

- advised to stay calm and refrain from getting angry with their child
- advised to help their child delete images from social media accounts (included from cloud photo backups) if they have uploaded them themselves
- advised to support their child use the IWF and Childline's Report Remove tool to report an image that has been shared online: www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/sexting/report-nude-image-online/. They can also help their child to use NCMEC's Take It Down tool to help them remove or limit the spread of nudes or semi-nudes that have been shared online: https://takeitdown.ncmec.org.
- advised to report sexual images on individual sites to get them taken down. If the image has been shared via a mobile, they should be informed that they can contact the mobile phone operator to have a mobile number changed
- directed to services for Harmful Sexual Behaviour, such as the National Clinical Assessment and Treatment Service (an NSPCC service) or Shore (a Lucy Faithfull Foundation service, if there have been similar incidents or they are worried about inappropriate sexual behaviour for their age
- advised to speak to the education setting if they are concerned about any bullying behaviour

26.25. Parents/carers whose child has been sent nudes and semi-nudes are advised to:

- listen to their child's concerns without criticising their decisions
- consider ways that their child could speak to the sender to stop future correspondences. Alternatively, if the child or young person prefers, informed about how to block the sender
- discuss issues of consent and trust within healthy relationships. Explain that it is not ok for someone to make them feel uncomfortable, to pressure them into doing things that they do not want to do, or to show them things that they are unhappy about. Children can speak to school and/or parents/carers if this ever happens

26.26. Parents/ carers whose child has shared another child's nudes or semi-nudes are advised to:

- stay calm and refrain from getting angry with their child
- discuss issues of consent and trust in healthy relationships or friendships. Talk about the types of things which are and aren't ok to share and how they would feel if someone shared a personal photo of them
- contact their child's education setting if they are concerned that their child is behaving in a sexually inappropriate way. They could also be directed to services for Harmful Sexual Behaviour, such as the National Clinical Assessment and Treatment Service, if appropriate.

26.27. DCMS guidance emphasises that, although staff and parents must not intentionally view any nudes or semi-nudes unless there is good and clear reason to do so, there are certain limited circumstances in which the DSL or a DDSL is empowered to view nudes or semi-nudes. However, it is the School's policy that under no circumstances will a member of staff view such images, this being on the grounds that to do so would be to compromise the pastoral and professional relationship between staff and pupils. If we are unable to ascertain whether or not to escalate the case to Police / children's services without viewing the images, we escalate as a precaution.

26.28. With respect to disciplinary action where the behaviour falls within the School's jurisdiction, the School issues sanctions of ascending gravity for sharing that falls into the categories of 'sexual attention-seeking', 'reckless misuse' and 'intent to harm'. However, it does not seek to punish *per se* the sharing of nudes or semi-nudes falling in the 'romantic' category- i.e., where it is consensual and without imbalance of power. Details can be found in our *Behaviour Policy*.

26.29. If the School decides that neither Police nor Children's Services need to be involved, the children concerned are instructed to delete any indecent images on devices and online services. This is done under the supervision of a parent or member of staff authorised by the DSL, but without the adult concerned viewing the image. Pupils are reminded that possession of such images is illegal and that, if they do not delete the imagery, they are committing a criminal offence that may be brought to the attention of the Police and will lead to serious sanctions being awarded by the School.

26.30. It may be that online service providers will need to be contacted in order to get nudes and semi-nudes deleted. In such cases the School does everything that it can to support parents and pupils through this process. If a site has no reporting function, the pupil and parents will be encouraged to report it to the Internet Watch Foundation https://www.iwf.org.uk and to use Childline's Report Remove tool https://www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/sexting/report-nude-image-online/ Alternatively, they can use Take It Down, a tool provided by the National Center for Missing and Exploited Children, to help them anonymously remove nudes or semi-nudes that they believe have been or could be shared online. They can select the nude or semi-nude on their device and the tool will generate a 'hash' or digital fingerprint that can be used by online platforms such as Snapchat, TikTok and Instagram to identify exact copies of those images or videos. The service can be used even if the child or young person is unsure whether an image has been shared: https://takeitdown.ncmec.org

26.31. The DSL, in line with safeguarding recording procedures, records all incidents of nudes and semi-nudes, including both the actions taken, actions not taken, reasons for doing so and the resolution. These are stored in the School's safeguarding filing system, with a briefer note appended to the pupil files of each of the children involved.

27. Allegations made against / concerns raised in relation to staff, trainee teachers, supply staff, volunteers, contractors or organisations or individuals hiring the School's premises

27.1. The School follows the Surrey procedures for managing allegations against staff, trainee teachers, volunteers, contractors, supply staff[13] and organisations / individuals hiring the School's premises and procedures set out in *Keeping Children Safe in Education*. Any allegation of abuse made against a member of staff will be dealt with quickly, in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation.

27.2. *Keeping Children Safe in Education* distinguishes between two levels of allegation / concern about persons working / volunteering in schools, namely:

1. allegations that may meet the harm threshold
2. allegations/concerns that do not meet the harm threshold- referred to as 'low-level concerns'

27.3. A pattern of substantiated low-level concerns regarding an individual can mean that the harm threshold is met.

27.4. *Keeping Children Safe in Education* includes specific guidance on managing allegations against supply teachers. We recognise that, although we are not the employer of supply teachers who work at the school, it is our responsibility to ensure that any allegations are dealt with properly.

27.5. All staff should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.

27.6. All Staff are made aware at induction of the School's *Staff Code of Conduct*.

27.7. Guidance about conduct and safe practice, including safe use of mobile phones by staff and volunteers will be given at induction[14].

27.8. The Headmaster and Chairman of the Board of Governors receive regular training from Surrey in managing allegations against staff. They last undertook training in October 2020.

<u>Allegations that meet the harm threshold</u>

27.9. A member of staff immediately informs the Headmaster[15] if he/she witnesses something, is party to information or receives an allegation by a pupil which suggests that anyone working in the School, including supply staff, trainee teachers, volunteers, contractors and organisations / individuals hiring the premises, has:

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

[13] https://surreyscp.trixonline.co.uk/#s1108
[14] Refer to "Guidance for Safe Working Practice for the Protection of Children and Staff in Education Settings" available on the DfE website.
[15] or Chairman of Governors in the event of an allegation against the Headmaster

27.10. The Headmaster on all such occasions discusses the content of the allegation with the Local Authority Designated Officer (LADO)[16] at the earliest opportunity and within one working day, and before taking any further action.

27.11. If the allegation made to a member of staff concerns the Headmaster, the person receiving the allegation immediately informs the Chair of Governors, who will consult the LADO as in 27.10 above, without notifying the Headmaster first.

27.12. Suspension of the member of staff, excluding the Headmaster, against whom an allegation has been made, needs careful consideration, and the Headmaster seeks the advice of the LADO and HR in making this decision.

27.13. In the event of an allegation against the Headmaster, the decision to suspend is made by the Chair of Governors with advice from the LADO as in 27.10 above.

27.14. Any allegation regarding the Chair of Governors is referred to the LADO.

27.15. Where a member of staff is the subject of an allegation of abuse they will normally be informed of the concerns or allegations as soon as possible and given an explanation of the likely course of action. The Head will appoint a named representative to keep the individual informed of the progress of the case and consider what other support is appropriate.

27.16. Where an allegation is made against a member of the boarding staff, who is suspended pending an investigation of a safeguarding nature, the School will make appropriate arrangements for alternative accommodation for the staff member away from pupils.

27.17. If a person against whom an allegation has been made resigns or we dismiss him/her, or in the case of a volunteer we cease to use his/her services, we will report him/her to the DBS within one month and ensure that any allegation is followed up in accordance with statutory guidance.

27.18. The School will make a referral to the Teaching Regulation Agency (TRA) where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. The reasons such an order would be considered are: unacceptable professional conduct; conduct that may bring the profession into disrepute; a conviction, at any time, for a relevant offence.

27.19. We have a procedure for managing the suspension of a contract for a community user in the event of an allegation arising in that context.

27.20. Staff, parents and governors are reminded that publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law. Publication includes verbal conversations or writing including content placed on social media sites.

27.21. For all allegations, other than those found to be malicious or false, the following information is kept on the file of the person accused:

- a clear and comprehensive summary of the allegation;
- details of how the allegation was followed up and resolved;
- a note of action taken, decisions reached and whether the outcome was substantiated, unsubstantiated or unfounded;
- a copy provided to the person concerned, where agreed by children's social care or the Police;
- a declaration as to whether or not the information will be included in references

[16] Duty LADO 0300 123 1650

27.22. Substantiated allegations are included in references, with only factual information provided therein (as opposed to opinions).

27.23. In the event of continuing concerns regarding the way the investigation has been progressed, any member of staff has the right to make a direct report (see parag. 28 Whistle-blowing).

Allegations that do not meet the harm threshold (low level concerns)

27.24. A low-level concern is any concern- no matter how small, and even if no more than causing a sense of unease or a nagging doubt- that an adult working in or on behalf of the School or as part of a letting arrangement may have acted in a way that:

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

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

- being over friendly with children;
- having favourites;
- taking photographs of children on their personal mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door;
- using inappropriate sexualised, intimidating or offensive language.

27.25. Staff, supply staff, trainee teachers, contractors and volunteers are encouraged and expected to share any low-level concerns that they may have by following the process below. Doing so will help to embed a culture of openness and transparency in which the School's ethos and standards of behaviour are constantly lived, monitored and reinforced by all staff.

27.26. Staff are also encouraged to self-refer should they be concerned about how they have acted or how it could be misinterpreted.

27.27. **Low-level concerns should be reported to the Headmaster**. If the concern relates to the Headmaster, it should be reported to the Chairman of Governors.

27.28. The Headmaster is responsible for recording the details of low-level concerns, including the context in which the concern arose, the action taken and the rationale for the decisions made. The name of the person reporting the concern will also be noted, although any request for anonymity will be respected as far as reasonably possible. He may also need to talk to the subject of the concern together with any witnesses, all of which will also be recorded. Once completed, the record is placed in the member of staff's personnel file in an envelope marked- 'Confidential- only to be opened with permission of the Headmaster'.

27.29. The Headmaster may deem that formal or informal disciplinary action may be appropriate, in which case the School's policies will be followed as normal.

27.30. The School is committed to reviewing low-level concerns, alert to the possibility that they are indicative of wider cultural issues within the School, in which case policies will be revised and/or extra training given as appropriate

27.31. Low-level concerns regarding supply staff and contractors will be recorded by the School but also passed onto the relevant employer.

27.32. Low-level concerns are not mentioned in references unless they relate to issues which would normally be included in a reference- e.g. misconduct or poor performance.

28. Whistle-blowing

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

28.2. All staff are made aware at induction and at least annually of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the School's safeguarding arrangements. Any colleague who considers it necessary to 'blow the whistle' should follow the City of London's Whistleblowing Policy, which is given to all new staff at induction and is available in the Teacher's Guide on the Staff Shared Area.

28.3. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk.

28.4. Independent Schools Inspectorate, which inspects City of London Freemen's School, can be contacted by parents who consider it necessary to 'blow the whistle' about safeguarding procedures and practice at the School. Contact: https://www.isi.net/contact/ 020 7600 0100

28.5. Whistle-blowing regarding the Headmaster should be made to the Chair of the Governing Body (whose contact details are noted at the beginning of this document).

29. Restrictive Interventions

29.1. Freemen's is aware of and complies with the DfE guidance (part of which is statutory) *Restrictive interventions, including use of reasonable force, in schools* (April 2026)

29.2. Our *Use of Restrictive Interventions Policy* contains more details on this topic.

29.3. We recognise that touch is in some circumstances appropriate when working with children, and staff are given training on professional boundaries at Induction.

30. Children who are questioning their gender, single-sex spaces and single-sex activities

30.1. In September 2026, the Government incorporated, for the first time, guidance to schools on these issues into *Keeping Children Safe in Education*, thus putting it on a statutory footing. This was in response to an increasing number of children expressing a desire for their school, staff and pupils to treat them as a member of the opposite sex ('social transition'). This section of this Policy demonstrates our compliance with that guidance.

30.2. To begin with, the School is mindful that it is common for children to engage in activities less typically associated with their sex, such as girls playing with trucks or boys wearing feminine clothes, and that this does not necessarily mean that a child is questioning his/her gender identity, and the child should not be given the impression that it does indicate this. Accordingly, at Freemen's we proactively challenge such gender stereotypes (e.g. by in recent years strongly promoting girls' football, rugby and cricket, and by teaching that it is normal and healthy for boys to talk about their mental health).

30.3. However, the School also recognises that some children do question their gender at a young age, that this may intensify into puberty, and that it may indicate mental health needs as well as possibly making them more vulnerable to bullying. A small number of children may go on to receive a medical diagnosis of gender dysphoria.

30.4. The School does not initiate any action around a pupil questioning their gender. Rather, we act in response to child or their parent raising the issue with us.

30.5. Our initial response would be to listen and show an appropriate professional curiosity in the child's full range of experiences. If, following those discussions, a child and/or parent requests that the School make changes or put support in place to facilitate the child presenting as the opposite biological sex (i.e. social transition), the following four principles are adhered to in the following ways:

30.5.1. Schools have statutory duties to safeguarding and promote the welfare of all children

30.5.1.1. In respect of the child, the School will recommend and support a course of action which we deem to be in his/her best interests. This is not necessarily the same as the course of action desired by the parent or by the child, nor will any ideological considerations (in what is a keenly contested debate) influence the School's stance in any way.

30.5.1.2. In forming its advice, the School will be mindful of the third principle below (30.5.3) that a very careful approach should be taken towards social transition, particularly in respect of primary-aged children.

30.5.1.3. The interests and needs of other pupils in the School will also be considered.

30.5.1.4. The School is aware of the limitations of its knowledge and expertise in this area, meaning that it may be necessary to seek advice from appropriate local agencies.

30.5.2. Parents and carers should be actively involved and their views treated with importance

30.5.2.1. As with all matters pertaining to a pupil's education and welfare, the default position is that the School informs parents immediately if a pupil expresses an interest in undergoing social transition. Such communications are co-ordinated through the DSL.

30.5.2.2. An exception to this is if informing parents is judged likely to put the child at harm (unlikely and rare).

30.5.2.3. If a pupil confides in a member of staff about questioning their gender but does not request that he/she be treated any differently, the pupil will be encouraged to, with our assistance, tell his/her parents. (The School has a good track record of convincing pupils that telling their parents about pastoral challenges is for the best, achieved in large part by us offering ongoing support for them in school in partnership with their parents.) However, in line with the guidance, we do not forcibly break confidence in these situations.

30.5.2.4. In the School's experience, respectful and well-informed discussion between school and home tends to bring agreement about the best way forward, even in the most complex pastoral situations. However, where views cannot be reconciled, we recognise that it is parents- not teachers- who are legally primarily responsible for the welfare of their children. In a (rare) situation where parents are minded to oppose their child's desire for social transition but where the School concludes that social transition would be in the child's interests, any 'advocacy' for the child would never be done in the child's presence or in a manner that would undermine the parents' authority or imply disrespect for any ethical or religious stance that underpinned it.

30.5.2.5. No differently from any other scenario, and in line with our safeguarding obligations, were the School to judge that parents' approach to their child's gender-questioning was causing significant harm to him/her, we would seek the advice of Children's Services.

30.5.3. Accommodating social transition is an active intervention so schools should take a very careful approach

30.5.3.1. We agree that social transition is a very significant change that should only be entertained after very careful consideration, particularly for primary-aged children. The School is mindful that, besides genuine gender dysphoria, which is a medically diagnosed condition, there may be other factors at play when a child expresses a desire to transition.

30.5.3.2. Freemen's has two uniform codes- 'Male fit' and 'Female fit'. Although in the vast majority of cases boys adopt the former and girls the latter, pupils are at liberty to choose with their parents to wear either code as they wish. A girl adopting the 'Male fit' or a boy the 'Female fit' is <u>not</u> regarded as amounting to social transition, because the School is not being asked to make adjustments specific to that pupil.

30.5.3.3. We do not support social transition without clinic involvement, with a GP appointment recommended as the initial first step.

30.5.4. Schools should comply with their obligations under the Equality Act and Human Rights Act

30.5.4.1. Some- but not all- gender-questioning pupils will have the protected characteristic of gender reassignment under the Equality Act 2010. Where it is not certain whether or not a child has this protected characteristic, the School errs on the side of the child having it rather than not.

30.5.4.2. The School is fully cognisant and duly respectful of the *For Women Scotland* Supreme Court ruling of April 2025 that clarifies that, for the purposes of the Equality Act, the protected characteristic of sex relates to a person's biological sex.

30.5.4.3. In the case of a pupil who, following the agreement of School and parents, intends to socially transition at Freemen's, the rights of the gender-questioning child are balanced against the rights of other pupils, with the DSL taking the lead on this. In doing so, the School has close regard for the Equality and Human Rights Commission's (EHRC) code of practice that became statutory on 5/8/2026.

30.5.4.4. Without exception, we do not allow pupils into toilets, changing rooms, or boarding or residential accommodation designated for the opposite biological sex. In the case of a pupil who has socially transitioned, we would seek to provide an alternative that, while preserving our single-sex spaces, does not compromise the safety, comfort, privacy or dignity of the pupil or of other pupils. This might mean the pupil continuing to use single-sex facilities in line with their biological sex or use of a third space such an accessible or fully unisex toilet. In the boarding house (Walbrook) or on a residential school trip, it might mean the pupil either sharing a room with someone of the same biological sex or having their own room.

30.5.4.5. The DSL keeps a record of these decisions and reviews them at regular intervals.

30.5.4.6. Without exception, we do not allow pupils to participate in sports activities designated for the opposite sex where this single-sex approach has been taken for safety reasons.

30.5.4.7. Although Freemen's is a proudly co-educational school that seldom sees fit to have boys and girls participating in separate activities, there will be lawful instances in which it is deemed best for this to happen but which aren't covered in the preceding paragraphs. One example is separating boys and girls for a small number of PSHE lessons. If a pupil who is being supported in socially transitioning requests to join the activity corresponding to their gender identity rather than their biological sex, the School will take care not to discriminate against him/her on grounds of gender reassignment. This will form part of a balancing exercise of the impact- upon both the child and his/her peers- of either granting or refusing the request. This process is detailed in paragraph 275 of *Keeping Children Safe in Education 2026* and will be carried out by the DSL.

30.5.4.8. In order to honour these obligations, and in line with other legislation, the School requires parents to state their child's biological sex when applying to the School. A pupil's biological sex is noted on our Admissions Register and is available to all staff.

30.5.4.9. The School is aware of the possibility of children 'living in stealth' (i.e. concealing their biological sex from school friends and staff) and their vulnerabilities, and seeks to protect against this by requiring correct information from new parents regarding their child's biological sex.

30.6. Bullying of any kind for any reason is unacceptable at Freemen's. How we respond to incidents / allegations of bullying is detailed in our *Anti-Bullying Policy*, which also states that bullying on the basis of a protected characteristic is taken particularly seriously. Bullying someone because of their gender identity or perceived gender identity (transphobia) is likely to fall into this category.

30.7. If it has been agreed for a pupil to socially transition at Freemen's, we would expect other pupils to show them the kindness, respect and empathy that is central to our school life. Specifically, we would require them to respect the pupil's decision to transition even if they personally disagree with it. Evincing such disagreement may or may not amount to unkind behaviour, bullying or harassment, depending on its intent and impact. Deliberately calling someone by their previous name would likely amount to one of the three, and certainly would if there was intent to isolate, aggravate or upset.

30.8. However, the School is also very much conscious of the rights of pupils and staff in relation to their religion or belief; the concept of gender identity is a contested one and the act of social transition may be

objected to on bona fide ethical or religious grounds. Accordingly, a pupil or member of staff who, in good faith, respectfully and discreetly desists from language the use of which would undoubtedly affirm the pupil's adopted gender identity is respected in that choice and must not be victimised for it. Pronouns, but not proper names, would fall into this category of language.

Appendix 1 - Indicators of abuse

Neglect

Neglect is a lack of parental care but poverty and lack of information or adequate services can be contributory factors.

Far more children are registered to the category of neglect on Child in Need and Child Protection plans than to the other categories. As with abuse, the number of children experiencing neglect is likely to be much higher than the numbers on the plans.

Neglect can include parents or carers failing to:

- provide adequate food, clothing and shelter
- protect a child from physical and emotional harm or danger
- ensure adequate supervision or stimulation
- ensure access to appropriate medical care or treatment, including around allergies

NSPCC research has highlighted the following examples of the neglect of children under 12 years old:

- frequently going hungry
- frequently having to go to school in dirty clothes
- regularly having to look after themselves because of parents being away or having problems such as drug or alcohol misuse
- being abandoned or deserted
- living at home in dangerous physical conditions
- not being taken to the doctor when ill
- not receiving dental care.

Neglect is a difficult form of abuse to recognise and is often seen as less serious than other categories. It is, however, very damaging: children who are neglected often develop more slowly than others and may find it hard to make friends and fit in with their peer group.

Neglect is often noticed at a stage when it does not pose a risk to the child. The duty to safeguard and promote the welfare of children (*What to do if You're Worried a Child is Being Abused* DfE 2015) would suggest that an appropriate intervention or conversation at this early stage can address the issue and prevent a child continuing to suffer until it reaches a point when they are at risk of harm or in significant need.

Neglect is often linked to other forms of abuse, so any concerns school staff should be discussed with the DSL.

Indicators of neglect

The following is a summary of some of the indicators that may suggest a child is being abused or is at risk of harm.

It is important to recognise that indicators alone cannot confirm whether a child is being abused. Each child should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Don't keep it to yourself. The Neglect Screening Tool provides staff with a resource to identify and act on concerns regarding neglect.

Physical indicators of neglect

- Constant hunger and stealing food
- Poor personal hygiene - unkempt, dirty or smelly
- Underweight
- Dress unsuitable for weather
- Poor state of clothing
- Illness or injury untreated

Behavioural indicators of neglect

- Constant tiredness
- Frequent absence from school or lateness
- Missing medical appointments
- Repeatedly sent to school without essential medication, including that need for allergies
- Isolated among peers
- Frequently unsupervised
- Stealing or scavenging, especially food
- Destructive tendencies

Emotional abuse

Most harm is produced in *low warmth, high criticism* homes, not from single incidents.

Emotional abuse is difficult to define, identify/recognise and/or prove.

Emotional abuse is chronic and cumulative and has a long-term impact.

All kinds of abuse and neglect have emotional effects although emotional abuse can occur by itself.

Children can be harmed by witnessing someone harming another person – as in domestic abuse.

It is sometimes possible to spot emotionally abusive behavior from parents and carers to their children, by the way that the adults are speaking to, or behaving towards children. An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later on.

Indicators of emotional abuse

Developmental issues

- Delays in physical, mental and emotional development
- Poor school performance
- Speech disorders, particularly sudden disorders or changes.

Behaviour

- Acceptance of punishment which appears excessive
- Over-reaction to mistakes
- Continual self-deprecation (I'm stupid, ugly, worthless etc)
- Neurotic behaviour (such as rocking, hair-twisting, thumb-sucking)
- Self-mutilation
- Suicide attempts
- Drug/solvent abuse
- Running away
- Compulsive stealing, scavenging
- Acting out
- Poor trust in significant adults
- Regressive behaviour – e.g., wetting
- Eating disorders
- Destructive tendencies
- Neurotic behaviour
- Arriving early at school, leaving late

Social issues

- Withdrawal from physical contact
- Withdrawal from social interaction
- Over-compliant behaviour
- Insecure, clinging behaviour
- Poor social relationships

Emotional responses

- Extreme fear of new situations
- Inappropriate emotional responses to painful situations ("I deserve this")
- Fear of parents being contacted
- Self-disgust
- Low self-esteem
- Unusually fearful with adults
- Lack of concentration, restlessness, aimlessness
- Extremes of passivity or aggression

Physical abuse

Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly, it is not necessary to be concerned about most of these minor injuries. But accidental injuries normally occur on the *bony prominences* – e.g. knees, shins.

Injuries on the *soft* areas of the body are more likely to be inflicted intentionally and should therefore make us more alert to other concerning factors that may be present.

A body map can assist in the clear recording and reporting of physical abuse. The body map should only be used to record observed injuries and no child should be asked to remove clothing by a member of staff of the school.

Indicators of physical abuse / factors that should increase concern

- Multiple bruising or bruises and scratches (especially on the head and face)
- Clusters of bruises – e.g., fingertip bruising (caused by being grasped)

- Bruises around the neck and behind the ears – the most common abusive injuries are to the head
- Bruises on the back, chest, buttocks, or on the inside of the thighs
- Marks indicating injury by an instrument – e.g., linear bruising (stick), parallel bruising (belt), marks of a buckle
- Bite marks
- Deliberate burning may also be indicated by the pattern of an instrument or object – e.g., electric fire, cooker, cigarette
- Scalds with upward splash marks or *tide marks*
- Untreated injuries
- Recurrent injuries or burns
- Bald patches.

In the context of the school, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when:

- the explanation given does not match the injury
- the explanation uses words or phrases that do not match the vocabulary of the child (adults words)
- no explanation is forthcoming
- the child (or the parent/carer) is secretive or evasive
- the injury is accompanied by allegations of abuse or assault

You should be concerned if a child:

- is reluctant to have parents/carers contacted
- runs away or shows fear of going home
- is aggressive towards themselves or others
- flinches when approached or touched
- is reluctant to undress to change clothing for sport
- wears long sleeves during hot weather
- is unnaturally compliant in the presence of parents/carers.
- has a fear of medical help or attention
- admits to a punishment that appears excessive.

Sexual abuse

Sexual abuse is often perpetrated by people who are known and trusted by the child – e.g., relatives, family friends, neighbours, babysitters, and people working with the child in school, faith settings, clubs or activities. Children can also be subject to child sexual exploitation.

Sexual exploitation is seen as a separate category of sexual abuse. The SSCP CSE Screening Tool provides school staff with information regarding indicators of CSE (further information about CSE is available above).

Characteristics of child sexual abuse:

- it is often planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic
- grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent (this may occur online)
- grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives.

Most people who sexually abuse children are men, but some women sexually abuse too.

Indicators of sexual abuse

Physical observations:

- Damage to genitalia, anus or mouth
- Sexually transmitted diseases
- Unexpected pregnancy, especially in very young girls
- Soreness in genital area, anus or mouth and other medical problems such as chronic itching
- Unexplained recurrent urinary tract infections and discharges or abdominal pain

Behavioural observations:

- Sexual knowledge inappropriate for age
- Sexualised behaviour or affection inappropriate for age
- Sexually inappropriate behaviour
- Hinting at sexual activity
- Inexplicable decline in education progress
- Depression or other sudden apparent changes in personality as becoming insecure
- Lack of concentration, restlessness, aimlessness
- Socially isolated or withdrawn
- Overly-compliant behaviour
- Acting out, aggressive behaviour
- Poor trust or fear concerning significant adults
- Regressive behaviour,
- Onset of wetting, by day or night; nightmares
- Arriving early at school, leaving late, running away from home
- Suicide attempts, self-mutilation
- Suddenly drawing sexually explicit pictures
- Eating disorders or sudden loss of appetite or compulsive eating
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Become worried about clothing being removed
- Trying to be 'ultra-good' or perfect; overreacting to criticism.

Appendix 2 - Harmful sexual behaviour

The boundary between what is abusive and what is part of normal childhood or youthful experimentation can be blurred. The determination of whether behaviour is developmental, inappropriate or abusive will hinge around the related concepts of true consent, power imbalance and exploitation. This may include children and young people who exhibit a range of sexually problematic behaviour such as indecent exposure, obscene telephone calls, fetishism, bestiality and sexual abuse against adults, peers or children.

Developmental Sexual Activity encompasses those actions that are to be expected from children and young people as they move from infancy through to an adult understanding of their physical, emotional and behavioural relationships with each other. Such sexual activity is essentially information gathering and experience testing. It is characterised by mutuality and of the seeking of consent.

Inappropriate Sexual Behaviour can be inappropriate socially, inappropriate to development, or both. In considering whether behaviour fits into this category, it is important to consider what negative effects it has on any of the parties involved and what concerns it raises about a child or young person. It should be recognised that some actions may be motivated by information seeking, but still cause significant upset, confusion, worry, physical damage, etc. It may also be that the behaviour is "acting out" which may derive from other sexual situations to which the child or young person has been exposed. If an act appears to have been inappropriate, there may still be a need for some form of behaviour management or intervention. For some children, educative inputs may be enough to address the behaviour.

Further information and advice to assist in identifying and responding appropriately to sexual behaviour is available from the Brook Sexual Behaviours Traffic Light Tool[17] and the NSPCC's Responding to children who display sexualised behaviour. Surrey's Assessment, Consultation and Therapy (ACT) 01483 519606 can also assist professionals in identifying sexual behaviour of concern in children and adolescents.

[17] https://www.brook.org.uk/our-work/category/sexual-behaviours-traffic-light-tool

Appendix 3 - Child Sexual Exploitation

Staff should refer to Part A of 'Child Sexual Exploitation: Definition and a guide for practitioners, local leaders and decision makers working to protect children from child sexual exploitation' (2017)[18] for comprehensive guidance on Child Sexual Exploitation. The following list of indicators is not exhaustive or definitive but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation.

Signs include:

- going missing from home or school
- regular school absence/truanting
- underage sexual activity
- inappropriate sexual or sexualised behaviour
- sexually risky behaviour, 'swapping' sex
- repeat sexually transmitted infections
- in girls, repeat pregnancy, abortions, miscarriage
- receiving unexplained gifts or gifts from unknown sources
- having multiple mobile phones and worrying about losing contact via mobile
- online safety concerns such as youth produced sexual imagery or being coerced into sharing explicit images.
- having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)
- changes in the way they dress
- going to hotels or other unusual locations to meet friends
- seen at known places of concern
- moving around the country, appearing in new towns or cities, not knowing where they are
- getting in/out of different cars driven by unknown adults
- having older boyfriends or girlfriends
- contact with known perpetrators
- involved in abusive relationships, intimidated and fearful of certain people or situations
- socialising with groups of older people, or anti-social groups, or with other vulnerable peers
- associating with other young people involved in sexual exploitation
- recruiting other young people to exploitative situations
- truancy, exclusion, disengagement with school, opting out of education altogether
- unexplained changes in behaviour or personality (chaotic, aggressive, sexual)
- mood swings, volatile behaviour, emotional distress
- self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
- drug or alcohol misuse
- getting involved in crime
- police involvement, police records
- involved in gangs, gang fights, gang membership
- injuries from physical assault, physical restraint, sexual assault.

[18] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/591903/CSE_Guidance_Core_Document_13.02.2017.pdf

Appendix 4 - Female Genital Mutilation (FGM)

It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM.

What is FGM?

It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

4 types of procedure:

Type 1 Clitoridectomy – partial/total removal of clitoris

Type 2 Excision – partial/total removal of clitoris and labia minora

Type 3 Infibulation entrance to vagina is narrowed by repositioning the inner/outer labia

Type 4 all other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area.

Why is it carried out?

Belief that:

- FGM brings status/respect to the girl – social acceptance for marriage
- preserves a girl's virginity
- part of being a woman / rite of passage
- upholds family honour
- cleanses and purifies the girl
- gives a sense of belonging to the community
- fulfils a religious requirement
- perpetuates a custom/tradition
- helps girls be clean / hygienic
- is cosmetically desirable
- mistakenly believed to make childbirth easier

Is FGM legal?

FGM is internationally recognised as a violation of human rights of girls and women. It is **illegal** in most countries, including the UK.

Circumstances and occurrences that may point to FGM happening are:

- child talking about getting ready for a special ceremony
- family taking a long trip abroad
- child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leone, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia and Pakistan)
- knowledge that the child's sibling has undergone FGM
- child talks about going abroad to be 'cut' or to prepare for marriage

Signs that may indicate a child has undergone FGM:

- Prolonged absence from school and other activities
- Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued
- Bladder or menstrual problems
- Finding it difficult to sit still and looking uncomfortable
- Complaining about pain between the legs
- Mentioning something somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group
- Reluctance to take part in physical activity
- Repeated urinal tract infection
- Disclosure

The 'One Chance' rule

As with Forced Marriage there is the 'One Chance' rule. It is essential that settings /schools/colleges take action **without delay** and make a referral to children's services.

Appendix 5 - Domestic Abuse

How does it affect children?

Children can be traumatised by seeing and hearing violence and abuse. They may also be directly targeted by the abuser or take on a protective role and get caught in the middle. In the long term this can lead to mental health issues such as depression, self harm and anxiety.

What are the signs to look out for?

Children affected by domestic abuse reflect their distress in a variety of ways. They may change their usual behaviour and become withdrawn, tired, start to wet the bed and have behavioural difficulties. They may not want to leave their house or may become reluctant to return. Others will excel, using their time in your care as a way to escape from their home life. None of these signs are exclusive to domestic abuse so when you are considering changes in behaviours and concerns about a child, think about whether domestic abuse may be a factor.

What should I do if I suspect a family is affected by domestic abuse?

Tell the School's Designated Safeguarding Lead, who will relay your concerns to the Surrey Domestic Abuse Helpline on 01483 776822 or talk to your local outreach service.

East Surrey Domestic Abuse Services - Covering Reigate & Banstead, Mole Valley and Tandridge - 01737 771350

Your Sanctuary Outreach Service Covering Woking, Runnymede and Surrey Heath - 01483 776822

North Surrey Outreach Service - Covering Epsom & Ewell, Elmbridge and Spelthorne - 01932 260690

South West Surrey Outreach Service - Covering Guildford and Waverley - 01483 577392

Appendix 6 - Indicators of Vulnerability to Radicalisation

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

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

3. Extremism is defined by the Crown Prosecution Service as:
   The demonstration of unacceptable behaviour by using any means or medium to express views which:
   - encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
   - seek to provoke others to terrorist acts;
   - encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
   - foster hatred which might lead to inter-community violence in the UK.

4. There is no such thing as a "typical extremist": those who become involved in extremist actions 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.

5. Pupils 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 school staff are able to recognise those vulnerabilities.

6. Indicators of vulnerability include:
   - Identity Crisis – the student / pupil is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
   - Personal Crisis – the student / pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; he/she may have dissociated from their existing friendship group and become involved with a new and different group of friends; he/she may be searching for answers to questions about identity, faith and belonging;
   - Personal Circumstances – migration; local community tensions; and events affecting the student / pupil's 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 / pupil may have perceptions of injustice; a feeling of failure; rejection of civic life;
   - Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration;
   - Special Educational Need – students / pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of his/her actions and awareness of the motivations of others.

7. However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

8. More critical risk factors could include:
   - being in contact with extremist recruiters;
   - accessing violent extremist websites, especially those with a social networking element;
   - possessing or accessing violent extremist literature;

- using extremist narratives and a global ideology to explain personal disadvantage;
- justifying the use of violence to solve societal issues;
- joining or seeking to join extremist organisations; and
- significant changes to appearance and / or behaviour;
- experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

The Department of Education guidance The Prevent Duty can be accessed via this link.

Appendix 7 - Further advice

Further advice on child protection is available from:

NSPCC: http://www.nspcc.org.uk/

Childline: http://www.childline.org.uk/pages/home.aspx

CEOPSThinkuknow: https://www.thinkuknow.co.uk/

Anti-Bullying Alliance: http://anti-bullyingalliance.org.uk/

Beat Bullying: http://www.beatbullying.org/

Childnet International –making the internet a great and safe place for children. Includes resources for professionals and parents http://www.childnet.com/

Thinkuknow (includes resources for professionals and parents) https://www.thinkuknow.co.uk/

Safer Internet Centre http://www.saferinternet.org.uk/

Appendix 8 - Staff Code of Conduct

This *Staff Code of Conduct* has been written with regard to Surrey Safeguarding Children Partnership's template *Code of Conduct / Staff Behaviour Policy – Additional Policy Requirements for Schools and Colleges*.

Introduction

A relationship between an adult and a child or young person is not a relationship between equals. As a result of their knowledge, position and/or the authority invested in their role, all adults working in educational settings are in positions of trust in relation to the young people in their care. Broadly speaking, a relationship of trust can be described as one in which one party is in a position of power or influence over the other by virtue of their work or the nature of their activity. It is vital for all those in positions of trust to understand the power this can give them over those they care for and the responsibility they must exercise as a consequence of this relationship. There is potential for exploitation and harm of vulnerable young people. Adults therefore have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.

This policy should be read as guidance for all working at The City of London Freemen's School regardless of their position or specific department, including those working in the Freemen's Summer School. Information about how the School deals with breaches of the School's Code of Conduct can be found at the end of this Code.

Basic principles of staff conduct at Freemen's

To meet and maintain our responsibilities towards pupils, we need to agree standards of good practice which form a code of conduct for all staff. Good practice must include:

- Treating all pupils with respect.
- Setting the highest standards of personal conduct.
- Involving pupils in decisions that affect them.
- Encouraging positive, respectful and safe behaviour among pupils at all times.
- Being prepared to listen.
- Being alert to changes in pupils' behaviour that may indicate that they are having problems.
- Reading, understanding and following the school's safeguarding policy and other policies relating to the welfare of pupils in the school.
- Maintaining appropriate standards of conversation and interaction with and between pupils and avoiding the use of sexualised or derogatory language.
- Not humiliating pupils.
- Applying the use of reasonable force only as a last resort and in compliance with the School's *Physical Restraint Policy*.
- Referring all concerns about a pupil's safety and welfare to the Designated Safeguarding Lead.
- Respecting pupils' privacy when getting changed for activities, or in a residential setting such as Walbrook (the boarding house) or on a school trip.
- Abiding by the School's policy on alcohol consumption by staff on school trips
- Abiding by the School's policy on smoking
- Taking opportunities to promote Fundamental British Values, and never undermining them
- Observing the School's Staff Dress Code, especially the imperative to dress modestly and professionally at all times
- Being alert to conflicts of interest (e.g. if a member of staff is also a Freemen's parent), and declaring them to a member of SLT if any arise

Confidentiality

When considering whether or not to share any piece of sensitive or personal information, a balance must be struck between respecting privacy and ensuring that school staff are not unaware of information that would help them to support the pupil or member of staff concerned. At Freemen's, such information is therefore shared on a 'need-to-know' basis. Typically, any decision about who needs to know something and in what level of detail will be made by a middle or senior leader. Therefore, if a colleague receives a piece of sensitive information, he/she should not pass it on further without being told to do so. In the case of sensitive pastoral information about a child, typically only the Form Tutor, Head of Year and Designated Safeguarding Leads will be party to it.

Staff should take particular care when sending sensitive information via e-mail, checking that it is only sent to intended recipients. The use of initials instead of full names is encouraged, and e-mails should be marked Confidential.

Gossip should always be avoided; it is unprofessional, potentially harmful and not motivated by concern for the best interests of children or colleagues.

Maintaining Professional Boundaries

All adults should clearly understand the need to maintain appropriate boundaries in their contacts with pupils. Adults should always maintain appropriate professional boundaries and avoid behaviour that might be misinterpreted by others. They should report and record any incident with this potential.

Inevitably, teachers and other staff will need, on occasions to have one to one contact with pupils. In these circumstances, ensure that the setting is appropriate and that the situation cannot be misinterpreted. The door of the room should be kept open and any blinds raised, and particular care should be taken to keep a clear physical space between pupil and member of staff. If a colleague is concerned about meeting a certain pupil one-to-one, he/she should arrange for a colleague to be present, or, if that is not possible or appropriate, notify a senior member of staff of where and when the meeting is happening. Secluded areas should be avoided.

In general terms, we must maintain professional boundaries by:

- being friendly to all pupils but a friend to none;
- not having 'favourites' nor acting in a way that could be interpreted as this being the case;
- never sharing or keeping secrets with pupils; not promising or demanding secrecy from pupils;
- if told pastoral information by a pupil, sharing it with the appropriate colleague(s);
- not engaging in gossip about other members of staff or other pupils.
- not allowing a relaxed atmosphere inside or outside of the schoolroom to develop into an unprofessional informality.
- not engaging in social activity with pupils.

Physical contact

Although there are occasions when it is entirely appropriate and proper for staff to have physical contact with children, it is crucial that they only do so in ways appropriate to their professional role. Such occasions could include: using physical restraint to avoid a pupil harming himself/herself or others[19]; comforting a distressed younger child; helping a pupil to master a technique in a sport or musical instrument.

[19] see the School's *Physical Restraint Policy*

When physical contact is made with children it must be in response to their needs at that time, of minimum duration, sensitive to the respective sexes of pupil and adult, and age-appropriate. In general, the older the child the fewer the circumstances in which it would be appropriate for there to be physical contact.

Staff must seek the child's permission before initiating contact or else wait for the pupil to initiate contact. Staff must observe and take note of the child's reaction or feelings.

Staff must never touch a child in a manner or on a part of the body that may be considered inappropriate. Staff must not engage in rough play, tickling or fun fights with pupils. Physical contact must never be secretive, for the gratification of the adult or abuse a position of trust. Staff should not apply sun cream to pupils but rather invite pupils to ask a friend to do this.

If a member of staff is concerned that an episode of physical contact may have been misinterpreted, or if he/she has been subject to unwanted physical contact from a pupil, he/she should record the incident and share it with the DSL.

More detailed guidance regarding physical contact during sporting activities can be found in the *PE and Games Staff Handbook*.

Intimate Care

Given the age of Freemen's pupils, it is rare that intimate care is needed outside the Medical Centre. However, if, say, a KS2 pupil urgently needs help in the toilet, one member of staff will go in to help and a second wait just outside the door.

Pupil privacy when changing

The following protocol is to be observed around changing rooms:

- We recognise that pupils who are changing fall under our duty of care and need supervising, especially given that changing rooms are places that afford the opportunity for bad behaviour and/or bullying to take place
- Standards of behaviour in changing rooms are made clear to pupils at regular intervals, as well as the fact that staff may legitimately enter if they have good reason to do so
- By default, changing is supervised by a same-sex member of staff being positioned just outside the changing rooms with the door kept open (unless to do so opens up a line of sight to pupils who are changing)
- Supervising teachers only enter the changing rooms with a good reason to do so e.g. they suspect bad behaviour, an accident has happened, or proactive supervision of pupils with special needs
- Male staff never enter girls' changing rooms and vice versa for female staff
- Before entering, teachers announce their intention to enter
- The minimum time possible is spent in the changing rooms before leaving and, while there, teachers behave in a way that is mindful of pupils' privacy and sensitive to the potential for embarrassment
- Other than in an emergency, teachers do not use any digital devices while in a changing room

When it is necessary to enter pupils' rooms on a school trip, this task is undertaken by a member of staff of the same sex (other than in an emergency). He/she announces his/her intention to enter so that pupils have the opportunity to cover up.

The privacy of boarders is respected by staff. Details of how this works in practice can be found in the School's *Boarding Staff Handbook*.

Communication (including the use of electronic technology)

Many of our newer staff are of an age where they have grown up with new and emerging technologies. The use of smart phones means that access to the internet and social networking sites is available whenever and wherever we are.

- The Acceptable use policies (AUP) for staff should be consulted and adhered to regarding use of social media.
- Many pupils will search to see if staff have a social networking account such as Facebook and Instagram and may attempt to contact them through this media. Staff need to use their professional judgement in dealing with such contacts and where necessary explain to the pupil that they will not respond to friend requests from them as they are adults in a professional position not their friend. Where pupils do attempt to make contact through social networking sites, staff should bring the matter to the attention of the DSL.
- Staff should be judicious in their contact – including social media contact – with recent leavers and exercise professional care and judgement at all times.
- Staff members rightly use new technologies on a daily basis to support and enhance the curriculum and use internal email systems and school email addresses to communicate with pupils and their parents. However, new technologies should never be used to start or encourage a friendship or relationship with a pupil and communication should never fall into a loose informality.
- Adults should not as a general rule share any personal information with a pupil unless it is absolutely necessary.
- They should not request, or respond to, any personal information from the pupil, other than that which might be appropriate as part of their professional role.
- Adults should ensure that all communications are transparent and open to scrutiny.
- Adults should also be careful in their communications with pupils so as to avoid any possible misinterpretation of their motives or any behaviour which could be construed as grooming.
- Staff should not give any of their personal contact details to pupils or parents, including email, home or mobile telephone numbers.
- Staff should only send e-mails to pupils' school e-mail addresses.
- School mobile telephones ought to be used on school trips, with personal mobile 'phones only used as a last resort. If used, any pupil telephone numbers stored on the 'phone for safety purposes must be deleted as soon as the trip is finished.
- E-mail or text communications between an adult and a pupil outside agreed protocols may lead to disciplinary and/or criminal investigations.
- They should ensure that personal social networking sites are set at private and that pupils are never listed as approved contacts.
- Staff are not permitted to bring 'smart' glasses onto the school site, to trips or other school activities.
- In line with changes introduced to *Keeping Children Safe in Education* in 2026, staff, in order to encourage pupil adherence to our mobile phone policy, should not use their own phones for personal reasons in front of children during the school day.

Transporting pupils in vehicles

As a general rule, staff should not use their private vehicles to transport pupils. However, this is permitted either in an emergency (e.g. to take a boarder to hospital) or if there is no practicable alternative and it is planned well in advance with the permission of the Deputy Head. In all cases:

- travel must be in line with the City's travel policies, including the vehicle and driver being authorised as 'grey fleet'
- two or more pupils should be in the car wherever possible, and pupils should sit on the back seat unless space does not permit
- the member of staff ensures that seatbelts are worn by all occupants
- the Deputy Head is informed at the earliest possible opportunity

More generally, staff must transport children in line with the School's *Transport Policy*.

Favouritism

Staff should exercise care when selecting pupils for school teams, productions, trips and/or specific work tasks in order to avoid perceptions of favouritism or injustice. Similar care should be exercised when pupils are excluded from an activity. Methods of selection and exclusion should always be subject to transparent, agreed criteria.

Whilst the paragraph above puts emphasis on avoiding favouritism, it is equally important to acknowledge that exclusion from activity can be used as a form of humiliation and abuse.

Gifts and rewards

The City of London Corporation has a clear policy regarding the receipt of gifts and rewards and this should be followed very carefully.

Anti-Corruption Policy

- The giving of gifts or rewards to pupils should be part of an agreed policy for supporting positive behaviour or recognising particular achievements: for example, prizes. In some situations, the giving of gifts as rewards may be accepted practice for a group of students for example a small reward from the Houseparent for good work in supporting House life, whilst in other situations the giving of a gift to an individual pupil will be part of an agreed plan, recorded and discussed with senior management.
- The guidance does acknowledge that there may be specific occasions when a member of staff may consider it appropriate to give a pupil a small, personal gift of insignificant value but this should only happen with the agreement of the line manager.
- If gifts are given it should be done openly and not based on favouritism. Adults need to be aware however, that the giving of gifts can be misinterpreted by others as a gesture either to bribe or 'groom' a young person.
- The receiving of gifts is also an issue to be addressed and staff must not accept any gift that might be construed as a bribe by others, or lead the giver to expect preferential treatment (see the policy above). It is fashionable now for parents to buy 'thank you' cards and gifts for members of staff at the end of the academic year and it is recognised that they could cause offence by not accepting them.

Social Contact

Adults should not establish or seek to establish social contact with pupils for the purpose of securing a friendship or to pursue or strengthen a relationship. If a pupil or parent seeks to establish social contact, or if this occurs coincidentally, the member of staff should exercise his/her professional judgement in making a response and ensure that the Deputy Head is aware. There will be occasions when there are social contacts between pupils and staff, where for example the parent and member of staff are part of the same social circle. These contacts, however, will be easily recognised and openly acknowledged.

Infatuation

Occasionally, a pupil may develop an infatuation with an adult member of staff. These adults should deal with these situations sensitively and appropriately to maintain the dignity and safety of all concerned. They should remain aware,

however, that such infatuations carry a high risk of words or actions being misinterpreted and should therefore make every effort to ensure that their own behaviour is above reproach and that they keep the Deputy Head fully informed.

Grooming

All staff should be aware that a person intent on sexual abuse of children will groom children and the adults around them to ensure that they can carry out their abusive behaviour and to ensure that they do not raise anybody's suspicion or that they make other people scared to blow the whistle. Some of the behaviours described above have been employed by sex offenders to cover up or to explain away their behaviour. It is important that staff do not behave in a way that could be misinterpreted, leaving themselves open to suspicion.

The sexual exploitation of children and young people

The sexual exploitation of children and young people has been identified throughout the UK, in both rural and urban areas, and in all parts of the world. It affects boys and young men as well as girls and young women. It robs children of their childhood and can have a serious long-term impact on every aspect of their lives, health and education. It damages the lives of families and carers and can lead to family break-ups. Sexual exploitation of children and young people is completely unacceptable and we must to do all we can to help eradicate it. Children who are sexually exploited are the victims of sexual abuse and should be safeguarded from further harm. All staff should ensure that they are aware of vulnerability demonstrated by colleagues and pupils and respond appropriately.

Protecting children from the risk of radicalisation

In order for schools and childcare providers to fulfil the Prevent duty, it is essential that all members of staff are able to identify children and colleagues who may be vulnerable to radicalisation, and know what to do when they are identified. Protecting children from the risk of radicalisation should be seen as part of the wider safeguarding duties.

Schools and childcare providers can also build pupils' resilience to radicalisation by promoting fundamental British values and enabling them to challenge extremist views. It is important to emphasise that the Prevent duty is not intended to stop pupils debating controversial issues. On the contrary, schools should provide a safe space in which children, young people and staff can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.

The Legal Position

All school staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards children and young adults must be beyond reproach. Breaches of this code may well result in serious disciplinary action and may fall into the category of gross misconduct resulting in dismissal.

In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a pupil under 18 may be a criminal offence, even if that pupil is over the age of consent. Colleagues need to properly understand the law. This offence has nothing to do with the legal age of consent; it deals specifically with the abuse of a position of trust. This means that whether the young person consented is not the issue that determines whether the offence is committed and even if it is shown that a young person did consent to the relationship this does not detract from the seriousness of the offence. The legal definition of a child is a person under the age of 18 and all staff must be aware of this fact. If convicted of this offence, a person is likely to serve a custodial sentence and have their name added to the sex offender register.

The sexual activity referred to does not just involve physical contact including penetrative and non-penetrative acts, it may also include non-contact activities, such as causing children to engage in or watch sexual activity or the production of pornographic material. This description of sexual activity includes the sending of explicit sexual images, emails and texts.

Whistleblowing

If staff have concerns about safeguarding practices within the School, they should report them and feel encouraged to do so. In such circumstances, the City's *Whistleblowing Policy* should be followed.

Staff conduct in Walbrook (the boarding house)

There are additional standards of staff behaviour to be observed when in Walbrook, even if spending time there as a visitor, and these can be found in the *Boarding Staff Handbook*.

Private Tuition

Staff must not engage in private tuition or coaching of a child without first reading and following the School's guidance on private tuition. This is available on Freemen's Staff, with the Safeguarding Co-ordinator as the first point of contact.

Procedures for dealing with breaches of this Code

Any breaches of this Code generally fall into one of three categories:

1. Behaviour or alleged behaviour that meets the harm threshold as defined in Part 4 of *Keeping Children Safe in Education*
2. Behaviour or alleged behaviour that meets the definition of a 'low-level concern' as set out in *Keeping Children Safe in Education*
3. Behaviour or alleged behaviour that breaches the Code but does not fall into either of the categories defined in *Keeping Children Safe in Education*- i.e., is in no way safeguarding-related

The School's procedures in respect of 1 and 2 are set out in the School's *Safeguarding Policy* under the section on Allegations against staff.

Behaviour breaching the Code of Conduct that is in no way safeguarding-related (or allegations of the same) is responded to in line with the City's *Disciplinary Policy*.

Appendix 9 - Types of abuse and neglect

The following definitions are taken from *Working Together to Safeguard Children* (2023). In addition to these definitions, it should be understood that children can also be abused by being sexually exploited, honour based abuse, forced marriage or female genital mutilation. To support the local context, all staff have access to Surrey's Continuum of Support for children and families in Surrey document.

What is abuse and neglect?

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

Physical abuse

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

Emotional abuse

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

Sexual abuse

This involves forcing, causing or inciting a child to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, such as acts of penetration, whether that is with part of a person's body or an object (e.g. rape or assault by penetration), and non-penetrative acts such as masturbation, kissing, rubbing, and touching over clothing. Sexual abuse may also include non contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online as well as offline, and technology can be used to facilitate offline abuse. Sexual

abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Children can be sexually abused within the family, an institution or a community setting, and are more likely to know their abuser than not. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it. There are specific offences for children under 13, who can never provide valid consent to sexual activity and there are specific offences which make clear that sexual activity with a child under 16 is an offence, regardless of whether they agreed to that activity.

Neglect

This is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion 13 from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

The SSCP Neglect Strategy and the Neglect Screening Tool is available to provide a more detailed information regarding neglect.