

## SAFEGUARDING AND CHILD PROTECTION POLICY 2025-26

<b>Version:</b>	Six
<b>Author:</b>	Mr Ali Raja, Designated Safeguarding Lead
<b>Reviewed:</b>	September 2025
<b>Review date:</b>	September 2026
<b>Approved by:</b>	Mrs Anne Fletcher, Chair of Governors

### Safeguarding Statement 2025 "It could happen here"

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children and preventing impairment of children's mental and physical health or development.

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.

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

### Key Personnel

**Designated Safeguarding Lead (DSL):** Ali Raja [araja@copthorneprep.co.uk](mailto:araja@copthorneprep.co.uk)

**EYFS Safeguarding Lead (EYFS DDSL):** Faye Rumble [frumble@copthorneprep.co.uk](mailto:frumble@copthorneprep.co.uk)

#### Deputy DSLs:

Kylie McGregor [kmgregor@copthorneprep.co.uk](mailto:kmgregor@copthorneprep.co.uk)

Mark Bone [mbone@copthorneprep.co.uk](mailto:mbone@copthorneprep.co.uk)

Karen Harris [kharris@copthorneprep.co.uk](mailto:kharris@copthorneprep.co.uk)

Mandy Huckle [mhuckle@copthorneprep.co.uk](mailto:mhuckle@copthorneprep.co.uk)

Abigail Humphries [ahumphries@copthorneprep.co.uk](mailto:ahumphries@copthorneprep.co.uk)

Faye Rumble [frumble@copthorneprep.co.uk](mailto:frumble@copthorneprep.co.uk)

**Nominated Child Protection Governor:** Deborah Grimason

**Executive Headmaster:** Ben Purkiss [bpurkiss@copthorneprep.co.uk](mailto:bpurkiss@copthorneprep.co.uk)

**Chair of Governors:** Anne Fletcher [gov\\_afletcher@copthorneprep.co.uk](mailto:gov_afletcher@copthorneprep.co.uk)

## Contents

### Page

4	Terminology
5	Introduction
6	Policy Context
7	Policy Aims
7	Policy Principles and Values
8	Definition of Safeguarding
9	Related Safeguarding Policies
9	Policy compliance, monitoring and review
10	Professional expectations, roles and responsibilities
10	The Governing Body
12	The Head of School
13	The Designated Safeguarding Lead
16	The Deputy Designated Safeguarding Lead(s)
17	All Staff
19	Confidentiality, Sharing and Withholding Information
19	Child Protection Procedures
20	Recognising Indicators of Abuse, neglect, and exploitation
21	Reporting and responding to safeguarding concerns
23	Dealing with safeguarding concerns
24	Low-Level Concerns
25	Complaints
25	What is Child Abuse?
27	Child-on-Child Abuse
28	Sexual Violence and Sexual Harassment between children in the school
28	Responding robustly to reports of Sexual Violence and Sexual Harassment
28	Risk Assessment
30	Nude and/or semi-nude image sharing by children
31	Harmful Sexual Behaviour (HSB)
31	Anti-Bullying/Cyberbullying
32	Safety/Cybercrime
32	Radicalisation, Extremism and Terrorism
33	Domestic Abuse
34	Boarding
35	Child Sexual Exploitation (CSE)
36	Child Criminal Exploitation (CCE)
36	Modern Slavery
36	Female Genital Mutilation (FGM)
37	Forced Marriage
37	So-called 'Honour'-based abuse (HBA)
38	Mental Health
38	Supporting children Potentially at Greater Risk of Harm
38	Homelessness
38	Private Fostering Arrangements
39	Looked After Children and Previously Looked After Children
39	Children with Special Education, Needs and Disabilities or Health Issues
39	Children Missing Education
40	Pupils Missing Out on Education (PMOOE)



# COPTHORNE PREP

41	Attendance and Behaviour
41	Restrictive Physical Intervention
41	Children who are Lesbian, Gay, Bi or Trans (LGBT)
42	Online Safety
42	Policies and Procedures
43	Appropriate filtering and monitoring on school devices and networks
43	Responsibilities
44	Decision Making and Reviewing our Filtering and Monitoring Provision
44	Appropriate filtering
45	Appropriate Monitoring
45	Remote/Online learning
45	Staff Engagement and Expectations
45	Staff awareness, induction and training
46	Safer Recruitment and Allegations Against Staff
46	Safer recruitment and safeguarding checks
46	Safe Culture
46	Additional Resources
46	Appendix 1: Categories of Abuse
50	Appendix 2: Concern Form
51	Appendix 3: Body Map
52	Appendix 4: What to do if you have a welfare concern in Cophthorne Prep School

We exist to inspire curiosity and questioning, a love of learning and courage to speak out, confidence in problem solving and innovation along with an appreciation of the people and the world around us.

Copthorne Prep School is an outstanding, ambitious, nurturing, diverse and transformative community which places wellbeing, innovation, learning to learn and breadth at the heart of pupil experience, encouraging and enabling achievement for all.

We are committed to providing an environment in which all pupils are challenged to be the best they can be and one in which pastoral care and well-being underpin academic, co-curricular and sporting excellence. We believe in providing an education for life for all Copthornians and we seek to ensure that the learning experience at our school blends the best of tradition with the exciting opportunities provided by new technology. We believe that a truly excellent school is about more than academic achievement alone: it is also about developing a passion for learning, a capacity for independent and critical thinking, self-awareness and resilience, self-confidence without arrogance and genuine interests that extend beyond the confines of the classroom.

At Copthorne School we focus on developing the whole person, aiming to ensure that each pupil leaves here ready for the challenges of senior school and beyond and understanding their responsibilities towards others. We want our pupils to leave Copthorne well equipped to engage positively with a rapidly changing world as accomplished problem solvers and innovators, confident in their ability to lead and with a clear appreciation of and respect for the views and potential of others.

## Terminology

Safeguarding and promoting the welfare of children is defined as:

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

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

**Abuse** reference to abuse in the policy may also mean or indeed include need, neglect or harm as appropriate.

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

**Child looked after (CLA)** used internally in Surrey County Council rather than looked after children  
C-SPA refers to the Single Point of Access and the Child Protection Consultation Line

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

**Staff** refers to all those working for or on behalf of the school, full or part time, temporary or permanent, in either a paid or voluntary capacity.

**Child(ren)** includes everyone under the age of 18. On the whole, this will apply to pupils of our school; however, the policy will extend to visiting children and students from other establishments

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

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

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

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

**MASH** refers to the Multi Agency Safeguarding Hub (West Sussex)

**IFD** refers to the Integrated Front Door (West Sussex)

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

## Child Focused Approach to Safeguarding

### 1.1 Introduction

- Copthorne Prep School recognise our statutory responsibility to safeguard and promote the welfare of all children. Safeguarding and promoting the welfare of children is **everybody's** responsibility and everyone has a role to play. All members of our community (staff, volunteers, governors, leaders, parents/carers, wider family networks and pupils) have an important role in safeguarding children and all have an essential role to play in making our community safe and secure.
- Copthorne Prep School believe that the best interests of children always come first. All children (defined in law and in this policy as those up to the age of 18) have a right to be heard and to have their wishes and feelings taken into account and all children regardless of age, sex (gender), ability, culture, race, language, religion or sexual identity or orientation, have equal rights to protection.
- Staff working with children at Copthorne Prep School will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child and if any member of our community has a safeguarding concern about any child or adult, they should act and act immediately.
- This policy applies where there are any child protection concerns regarding children who attend Copthorne Prep School but may also apply to other children connected to Copthorne Prep School, for example, siblings, or younger members of staff (under 18s) or children on work placements.



# COPTHORNE PREP

- Copthorne Prep School recognises the importance of providing an ethos and environment within the school that will help children to be safe and to feel safe. In Copthorne Prep School children are respected and are encouraged to talk openly. We will ensure children's wishes and feelings are taken into account when determining what safeguarding action to take and what services to provide.
- Copthorne Prep School recognises the importance of adopting a trauma informed approach to safeguarding; we understand there is a need to consider the root cause of the children's behaviour and consider any underlying trauma.
- Our core safeguarding principles are:
  - \* **Prevention:** positive, supportive, safe culture, curriculum and pastoral opportunities for children, safer recruitment procedures.
  - \* **Protection:** following the agreed procedures, ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns.
  - \* **Support:** adopt a child centred approach and provide support for all pupils, parents/carers and staff, and where appropriate, implement specific interventions for those who may be at risk of harm.
  - \* **Collaboration:** with both parents where possible, and other agencies to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.

The procedures contained in this policy apply to all staff, including governors, temporary or third-party agency staff and volunteers, and are consistent with those outlined within 'Keeping Children Safe in Education' 2025.

## 1.2 Policy Context

This policy applies to all members of staff and Governors/Leadership Committee in Copthorne Prep School. This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, 'Keeping Children Safe in Education' 2025 which requires individual schools and colleges to have an effective child protection/safeguarding policy. This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes but is not limited to:

- \* [Working Together to Safeguard Children \(2018\)](#) which sets out the multi-agency working arrangements to safeguard and promote the welfare of children and young people and protect them from harm; in addition, it sets out the statutory roles and responsibilities of schools.
- \* ['What to do if you are Worried a Child is Being Abused' 2015](#)
- \* [Keeping Children Safe in Education \(KCSIE, 2025\)](#) is statutory guidance issued by the Department for Education (DfE) which all schools and colleges must have regard to when carrying out their duties to safeguard and promote the welfare of children.
- \* [Early Years Foundation Stage statutory framework \(2021\)](#) is statutory guidance which sets standards that school and childcare providers must meet for the learning, development, and care of children from birth to 5 years in Ofsted registered schools.
- \* [Local Guidance from the Local Safeguarding Partnership: Surrey Safeguarding Children Partnership \(SSCP\) including SSCP Procedures.](#)
- \* [The National Minimum Standards for Boarding Schools](#)

## Guidance and documents referred to in this policy:

- \* [Surrey Safeguarding Children Partnership protocols, guidance and procedures](#)
  - \* [Keeping children safe in education 2025](#)
  - \* [Disqualification under the Childcare Act 2006 \(updated 2019\)](#)
  - \* [FGM Act 2003 Mandatory Reporting Guidance 2015 \(updated January 2020\)](#)
  - \* [Teachers' standards](#)
  - \* [Information sharing advice for safeguarding practitioners](#)
  - \* [The Equality Act 2010](#)
  - \* [Sexual Violence and Harassment guidance](#)
  - \* [The Prevent Duty: Departmental advice for Schools and childminders \(December 2023\)](#)
  - \* [Relationships Education, Relationships and Sex Education and Health Education guidance](#)
  - \* [Independent School Standards Regulations 2014](#)
  - \* [Data Protection Act 2018 Overview and GDPR \(updated Aug 2020\)](#)
  - \* [Charities Act 2011](#)
  - \* [Sharing nudes and semi-nudes: advice for education settings working with children and young people \(updated March 2024\)](#)
- Section 175 of the Education Act 2002 requires school governing bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are pupils at a school, or who are pupils under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.
  - Copthorne Prep School will follow local or national guidance in response to any emergencies. We will amend this policy and our procedures as necessary but regardless of the action required, our safeguarding principles will always remain the same and the welfare of the child is paramount
  - Copthorne Prep School recognise that as a result of the Covid-19 pandemic, some members of our community may have been exposed to a range of adversity and trauma including bereavement, anxiety and in some cases experienced increased welfare and/or safeguarding risks. We will work with local services, such as health and the local authority, to ensure necessary support is in place.

## This policy works in conjunction with the following internal School policies, procedures and records:

- Staff Recruitment Procedures
- Recruitment, Selection and Disclosure Policy and Procedure
- Whistleblowing Policy
- Single Central Register of Appointments
- Copthorne School Code of Conduct (Staff Behaviour Policy)
- Behaviour Policy
- Attendance Policy
- Anti-Bullying Policy
- Online Safety Policy
- IT Acceptable Use Policy
- Missing Pupil Policy
- Relationships and Sex Education Policy





# COPTHORNE PREP

- Health and Safety Policy
- Equality, Diversity and Inclusion Policy
- First Aid Policy (including Administering Medicines)
- EYFS Safer Eating and Food & Drink Policy

## External Agency Contacts

Due to Cophthorne Prep School being in 2 Counties – West Sussex and Surrey, there is reference to 2 authorities and their contact details throughout the document. Whom to contact is dependent on where the pupil or adult lives.

### Add West Sussex

The School's local Children's Safeguarding Partnership is Surrey Safeguarding Children Board (SSCB). The website can be found [here](#). The Independent Schools Inspectorate (ISI) website can be found [here](#). We also work closely with the Boarding Schools Association (BSA) whose website can be found [here](#)

Surrey Children's Services:  
Children's Single Point of Access (C-SPA)

Anyone can contact the C-SPA about a child, young person or parent/carer who needs support in Surrey. This could be a concern about how the child is developing, issues that the parent or carer is experiencing, or you suspect a child is being neglected or subjected to physical, sexual, or emotional abuse.

Surrey's Child Protection Consultation Line for advice and support (0300 470 9100 option 3).  
If a child is in immediate danger, the police should be contacted on 999.

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

Requests for support should be sent securely by email to [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk) using the Request for Support Form.

You must contact the local authority that a pupil lives in - this government website will help identify which local council to report child abuse to and their contact details: Report child abuse to a local council - GOV.UK.

## Early help

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

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



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

### **Emergency Duty Team (EDT)**

Emergency Duty Team (EDT), provides an emergency social care service for urgent situations which are out of normal office hours. If your call is not answered, please do leave a message and your contact details for someone to get back to you.

EDT is available 5pm-9am, Monday – Friday, Weekends 24 hours a day.

Phone: 01483 517898 Email: [edt.ssd@surreycc.gov.uk](mailto:edt.ssd@surreycc.gov.uk)

### **The Local Authority Designated Officer (LADO):**

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

The LADO can be contacted by: Email: [LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk)

Telephone: 0300123 1650 option 3

Online: LADO Referral Form

**OFSTED** Safeguarding Children: 0300 123 3155 (Monday to Friday 8.00am to 6.00pm). Email: [whistleblowing@ofsted.gov.uk](mailto:whistleblowing@ofsted.gov.uk) Disclosure and Barring Service: 01325 953795. The government webpage can be found here. Teaching Regulation Agency information and details can be found here. Tel: 0207 593 5393.

### **Further safeguarding advice is available from:**

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

Childline: <https://www.childline.org.uk/>

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

### **Equalities Statement**

With regards to safeguarding we will meet our duties under the Equality Act 2010. General duties include to eliminate discrimination, harassment, victimisation, and other conduct that is prohibited by the Equality Act 2010.

We aim to advance equality of opportunity between people who share a protected characteristic and people who do not share it, as well as to foster good relations across all protected characteristics between people who share a protected characteristic and people who do not share it.

Staff are aware of the additional barriers to recognising abuse and neglect in children with Special Educational Needs and Disabilities (SEND). This will be in line with our Special Educational Needs and Disability Policy.

Caterham School also adheres to the principles of and promotes anti-oppressive practice in line of the United Nations Convention of the Rights of the Child and the Human Rights Act 1998.

The School's Equality, Diversity and Inclusion Policy provides further guidance.

## **Introduction**

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002, and in line with statutory guidance: 'Working Together to Safeguard Children' 2023, Revised Safeguarding Statutory Guidance 'Framework for the Assessment of Children in Need and their Families' 2000, 'What to do if You are Worried a Child is Being Abused' 2015,

'Relationships Education, Relationships and Sex Education (RSE)' statutory guidance 2025 and 'Prevent duty guidance' 2023.

The policy also reflects both statutory guidance Keeping Children Safe in Education 2025 and Surrey Safeguarding Children Partnership (SSCP) Procedures.

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

This policy applies to all members of staff and trustees in the School. This policy is a legal requirement and an ISI Reporting Standard (ISSR 7).

## **1.3 Policy Aims**

The aims of this policy are:

- To provide staff with the framework to promote and safeguard the wellbeing of children and in doing so ensure they meet their statutory responsibilities.
- To ensure consistent good practice across the school and ensure that safeguarding follows a whole school approach.
- Clarifying safeguarding expectations for members of the school's community, staff, Governing body/Proprietor/Management Committee, children, and their families.
- Contributing to the establishment of a safe, resilient, and robust safeguarding culture in the school built on shared values; that children are treated with respect and dignity, taught to treat each other and staff with respect, feel safe, have a voice and are listened to.
- Supporting contextual safeguarding practice recognising that the school's site can be a location where harm can occur.
- School expectations for developing knowledge and skills within the school's community (staff, children, parents/carers) to the signs and indicators of safeguarding issues and how to respond to them.
- \* Early identification of need for vulnerable learners and provision of proportionate interventions to promote their welfare and safety.
- Working in partnership with children, parents/carers, and other agencies in the Surrey Safeguarding Childrens Partnership and West Sussex IFD partnership.



## 1.4 Policy Principles and Values

- The welfare of the child is paramount
- Maintain an attitude of “It could happen here”
- Maintain a “zero-tolerance” approach to sexual violence and sexual harassment.
- Children have a right to feel safe and secure, they cannot learn effectively unless they do so.
- All children have a right to be protected from harm and abuse.
- All staff have a role in the prevention of harm and abuse and an equal responsibility to act immediately on any suspicion or disclosure that may indicate a child is at risk of harm, either in the school or in the community, taking into account contextual safeguarding, in accordance with statutory guidance.
- We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working to protect and safeguard children.
- Whilst the school will work openly with parents/carers as far as possible, it reserves the right to contact social care or the police, without notifying parents/carers if this is believed to be in the child’s best interests.
- We will always act in the best interests of the child and ensure that our decisions around safeguarding take a child-centred and coordinated approach.

## 1.5 Definition of Safeguarding

- \* In line with ‘Working Together to Safeguard Children’ and KCSIE 2025, safeguarding and promoting the welfare of children is defined for the purposes of this policy as:
  - \* Providing help and support to meet the needs of children as soon as problems emerge
  - \* Protecting children from maltreatment, whether that is within or outside the home, including online
  - \* Preventing the impairment of children’s mental and physical health or development
  - \* Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
  - \* Taking action to enable all children to have the best outcomes.
- Child protection is part of safeguarding and promoting the welfare of all children and is defined as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.
- Cophthorne Prep School acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):
  - \* Abuse, neglect, and exploitation
  - \* Bullying, including cyberbullying
  - \* Child-on-child abuse
  - \* Children with family members in prison
  - \* Children who are absent or missing from education
  - \* Child missing from home or care
  - \* Child Sexual Exploitation (CSE)
  - \* Child Criminal Exploitation (CCE)
  - \* Contextual safeguarding (risks outside the family home)
  - \* County lines and gangs
  - \* Domestic abuse
  - \* Drugs and alcohol misuse
  - \* Fabricated or induced illness
  - \* Faith abuse



# COPTHORNE PREP

- \* Gender based abuse and violence against women and girls
- \* Hate
- \* Homelessness
- \* Human trafficking and modern slavery
- \* Mental health
- \* Nude or semi-nude image sharing, aka youth produced/involved sexual imagery or 'sexting'
- \* Online safety
- \* Preventing radicalisation and extremism
- \* Private fostering
- \* Relationship abuse
- \* Serious violence
- \* Sexual violence and sexual harassment
- \* So-called 'honour-based' abuse, including Female Genital Mutilation (FGM) and forced marriage
- \* 'Up-skirting'

(Also see Part one and Annex B within 'Keeping Children Safe in Education 2025)

## 1.5 Related safeguarding policies

- This policy should be read in conjunction with the policies listed below:
  - \* Anti-bullying
  - \* Attendance
  - \* Behaviour
  - \* Complaints
  - \* Data protection
  - \* eSafety
  - \* Health and Safety
  - \* First aid
  - \* Online safety
  - \* Relationship, Sex and Health Education (RSHE)
  - \* Safer Recruitment
  - \* Social Media
  - \* Staff Code of Conduct
  - \* Whistleblowing

## 1.6 Policy compliance, monitoring and review

- Copthorne Prep School will review this policy at least annually (as a minimum) and will update it as needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. The policy will also be revised following any national or local updates, significant local or national safeguarding events and/or learning, and/or any changes to our own procedures.
- All staff (including temporary staff and volunteers) will be provided with a copy of this policy (hard copy in the Staff Room)
- Parents/carers can obtain a copy of the Safeguarding Policy and other related policies on request. Additionally, our policies can be viewed via the school website.



- The policy forms part of our school development plan and will be reviewed annually by the governing body who will have responsibility for oversight of safeguarding and child protection systems.
- The Designated Safeguarding Lead and headteacher will ensure regular reporting on safeguarding activity and systems to the governing body. The governing body will not receive details of individual pupil situations or identifying features of families as part of their oversight responsibility.

## 2.0 Key Responsibilities

### 1.3 Governance and leadership

- The governing body and leadership team have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation. The governing body have regard to the KCSIE guidance and will ensure our policies, procedures and training is effective and complies with the law at all times.
- The governing body will facilitate a whole school approach to safeguarding which involves everyone. They will ensure that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development, so that all systems, processes, and policies operate with the best interests of the child at their heart.
- The governing body are aware of the obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements set out by Surrey and West Sussex Safeguarding Children Multi-Agency Partnership.
  - \* This includes but is not limited to safeguarding all members of the school community (for example, staff, pupils, parents./carers and other family members) identified with protected characteristics within the Equality Act; age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.
  - \* For further information about our approaches to equality, diversity and inclusion, please access our schools' policies via the website.
- The governing body and leadership team will ensure that there are policies and procedures in place to ensure appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- The governing body will ensure an appropriate senior member of staff, from the leadership team is appointed to the role of designated safeguarding lead. The governing body and leadership team will ensure that the DSL is supported in their role and is provided with sufficient time so they can provide appropriate support to staff and children regarding any safeguarding and welfare concerns.
- \* The school has a nominated governor for safeguarding and Child Protection. The nominated governor will support the DSL and have oversight in ensuring that the school has an effective policy which interlinks with other related policies, that locally agreed procedures are in place and being followed, and that the policies are reviewed at least annually and when required.
- The governing body should ensure that all members receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the school are effective and support the delivery of a robust whole school approach to safeguarding. Training should be regularly updated.
- Copthorne Prep has effective safeguarding policies and procedures including a Safeguarding and Child Protection Policy, a Staff Behaviour Policy or Code of Conduct, a Behaviour Policy and a response to children who go missing from education.



# COPTHORNE PREP

- Policies are consistent with SSCP/West Sussex and statutory requirements, are reviewed annually (as a minimum) and updated if needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt and that the Safeguarding and Child Protection policy is available on the school website.
- Ensure recruitment, selection and induction follow safer recruitment practice including all appropriate checks.
- \* Staff have been trained appropriately and this is updated in line with guidance and all staff have read KCSIE (2025) part 1 and Annex B. Additionally, there are mechanisms in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance.
- Ensure that, as part of the requirement for staff to undergo regular updated safeguarding training, including online safety and the requirement to ensure children are taught about safeguarding, is integrated, aligned, and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning.
- Consider the above training requirements, Governing bodies should have regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all children.
- All staff including temporary staff/supply staff, volunteers and contractors are provided with the school's Safeguarding and Child Protection policy and if applicable the staff behaviour policy.
- Take a proportionate risk-based approach to the level of information that is provided to temporary staff, volunteers and contractors.
- Copthorpe Prep has procedures for dealing with allegations of abuse against staff (including the Headteacher) volunteers and against other children and that a referral is made to the DBS and/or the Teaching Regulation Agency (as applicable) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have, had they not resigned.
- \* Policies and processes are in place to deal with concerns (including allegations) which do not meet the harm threshold or low-level concerns as defined in KCSIE 2025.
- A member of the senior leadership team has been appointed by the Governing body as the DSL who will take lead responsibility for safeguarding and child protection and that the role is explicit in the role holder's job description.
- That on appointment, the DSL and DDSL undertake interagency training (SSCP Foundation Modules 1 and 2) and also initially undertake DSL 'New to Role' with 'Refresher' training at least every two years as well as attending DSL network events, to refresh knowledge and skills.
- Children are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through PSHE and RSE.
- Governors will regularly review the effectiveness of filtering and monitoring systems in place to safeguard children online.
- Ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.



- The school will comply with DfE and the Surrey County Council Policy Guidance for Safeguarding Children Missing Education and Education Other Than At School.
- Clear systems and processes are in place for identifying possible mental health concerns, including routes to escalate and clear referral and accountability systems.
- Ensure that safeguarding and child protection files are maintained as set out in KCSIE 2022 Annex C.
- Enhanced DBS checks (without barred list checks unless the governor is also a volunteer at the school) are in place for all Governors/Proprietors/Management Committee.
- \* Ensure section 128 checks are undertaken as defined in KCSIE 2025.

## 2.1 The Headteacher

In addition to the role and responsibilities of all staff the Headteacher will ensure that:

- The school fully contributes to inter-agency working in line with Working Together to Safeguard Children (2018) guidance.
- The Safeguarding and Child Protection Policy and procedures are implemented and followed by all staff.
- That the school has appropriate policies in place that make it clear that sexual harassment, online sexual abuse and sexual violence (including sexualised language) is unacceptable, with appropriate sanctions and support in place.
- \* That the school's staff have appropriate knowledge of KCSIE (2025) part 5.
- That all children are supported to report concerns about harmful sexual behaviour freely. That concerns are taken seriously and dealt with swiftly and appropriately, and children are confident that this is case. Comprehensive records of all allegations are kept. Pupils who have concerns about sexual behaviour—whether their own or that of others can access confidential support and guidance through the Shore Space resource, which is signposted by the school as part of our commitment to safeguarding and promoting wellbeing. [Home - Shore](#)
- All staff are aware of the role of the DSL, including the identity of the DSL and any DDSL's.
- Sufficient time, training, support, funding, resources, including cover arrangements where necessary, is allocated to the DSL to carry out their role effectively, including the provision of advice and support to school staff on safeguarding and child protection matters, to take part in strategy discussions/meetings and other inter-agency meetings and/or support other staff to do so; and to contribute to the assessment of children.
- Opportunities are provided for a co-ordinated offer of early help when additional needs of children are identified.
- That DDSLs are trained to the same standard as the DSL and the role is explicit in their job description.





# COPTHORNE PREP

- Adequate and appropriate DSL cover arrangements are in place for any out of hours/out of term activities.
- Where there is a safeguarding concern that the child's wishes and feelings are taken into account when determining what action to take and what services to provide.
- Child-centred systems and processes are in place for children to express their views and give feedback.
- All staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle-blowing procedures.
- Children are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online
- That allegations or concerns against staff and other adults are dealt with in accordance with guidance from the DfE, SSCP and Surrey County Council (SCC) or West Sussex MASH.
- That statutory requirements are met to make a referral to the Disclosure and Barring Service and additionally in the case of teaching staff the Teacher Regulation Agency where they think an individual has engaged in conduct that harmed (or is likely to harm) a child; or if the person otherwise poses a risk of harm to a child.

**Record low-level concerns in cases which concern a member of staff/supply staff/contractor or a volunteer. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that will be respected as far as reasonably possible**

## **1.4 Designated Safeguarding Lead (DSL)**

- The school has appointed Ali Raja, Deputy Head and a member of the senior leadership team, as the Designated Safeguarding Lead (DSL).
- The DSL has overall responsibility for the day-to-day oversight of safeguarding and child protection systems (including online safety and understanding the filtering and monitoring systems and processes in place) in Copthorne Prep School. Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.
- Copthorne Prep School has also appointed Deputy DSLs who will have delegated responsibilities and act in the DSL's absence.
  - \* Karen Harris – SENCO
  - \* Abigail Humphries – Year 3 class teacher and pastoral lead
    - \* Mark Bone – Head of Innovation
  - \* Mandy Huckle – Matron and Wellbeing Ambassador
  - \* Faye Rumble – Deputy Head of Nursery (EYFS DDSL)
- Details of the DSL and DDSLs are available on the website, the notice board in reception, safeguarding leaflet and other visible areas of the school.
- The DSL (and the deputies) will be more likely to have a complete safeguarding picture and will be the most appropriate person to advise staff on the response to any safeguarding concerns.



- It is the role of the DSL to carry out their functions as identified in Annex C of KCSIE. This includes but is not limited to:
  - \* Acting as the central contact point for all staff to discuss any safeguarding concerns.
  - \* Maintaining a confidential recording system for safeguarding and child protection concerns.
  - \* Co-ordinating safeguarding action for individual children.
    - When supporting children with a social worker or looked after children, the DSL should have the details of the child's social worker and the name of the virtual school head in the authority that looks after the child, with the DSL liaising closely with the designated teacher.
  - \* Liaising with Surrey County Council/West Sussex County Council and other agencies and professional in line with KCSIE and WTSC.
  - \* Where necessary, contact Surrey's Child Protection Consultation Line for advice and support (0300 470 9100 option 3), or West Sussex on 01403 229 900
- \* Manage and submit a Request for Support Form for a child if there are concerns about suspected harm or abuse, to the C-SPA, and act as a point of contact and support for school staff. Requests for support should be sent securely by email to [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk) using the Request for Support Form. Urgent referrals should be made by telephone 0300 470 9100 (and ask for the priority line).
  - \* For West Sussex use their referral forms West Sussex raise a concern form.
  - \* Report concerns that a child may be at risk of radicalisation or involvement in terrorism, use the Prevent referral form to refer cases by e-mail to [preventreferrals@surrey.pnn.police.uk](mailto:preventreferrals@surrey.pnn.police.uk). If the matter is urgent then the Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101 or 01483 632 982 and ask to speak to the Prevent Supervisor for Surrey. The DfE has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (0202 7340 7265).
  - \* Refer cases where a crime may have been committed to the Police as required. NB: NPCC – When to call the police should help DSLs understand when they should consider calling the Police and what to expect when they do.
  - \* Liaise with the “case manager” and Local Authority Designated Officer (LADO) for child protection concerns in cases which concern a member of staff/supply staff/contractor or a volunteer.
  - \* Follow relevant DfE guidance and KCSIE 2022 on ‘Child on Child abuse’ when a concern is raised that there is an allegation of a child abusing another child within the school.
  - \* When there has been a report of sexual violence, make an immediate risk and needs assessment. Additionally, where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis and will be put in place as required.
  - \* Encourage and promote a culture of listening to children and taking account of their wishes and feelings, amongst all staff.
  - \* Access training and support to ensure they have the knowledge and skills required to carry out the role.
  - \* Have a secure working knowledge of SSCP procedures and understand the assessment process for providing early help and statutory intervention, in line with [Surrey's Effective Family Resilience levels of need document](#).
  - \* Have a clear understanding of access and referral to the local early help offer and will support and advise members of staff where early help intervention is appropriate.
  - \* Have a working knowledge of how Surrey Country Council and West Sussex conduct an initial child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
  - \* Representing, or ensure the school is appropriately represented at multi-agency safeguarding meetings (including child protection conferences).



# COPTHORNE PREP

- \* Managing and monitoring the school role in any multi-agency plan for a child.
- \* Being available during term time (during school hours) for staff in the school to discuss any safeguarding concerns.
- \* Ensuring adequate and appropriate DSL cover arrangements in response to any closures and any out of hours and/or out of term activities.
- \* Taking lead responsibility for online safety, including understanding the filtering and monitoring systems and processes in place.
- \* Helping promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and the school leadership staff.
- \* Ensuring all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE.
- \* Liaising with the headteacher to inform them of any safeguarding issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This includes being aware of the requirement for children to have an Appropriate Adult (PACE Code C 2019)
- \* Understand the lasting impact that adversity and trauma can have, including on the children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes.
- \* Understand and support the delivery with regards to the requirements of the Prevent duty and provide advice and guidance to staff on protecting children from radicalisation.
- \* Liaise with Cophthorne Prep staff (especially pastoral support, behaviour leads, schools' health colleagues and the SENDCO) on matters of safety and safeguarding and consult Surrey's Effective Family Resilience document to inform decision making and liaison with relevant agencies.
- \* Be alert to the specific needs of children in need, those with Special Educational Needs and Disability (SEND) and young carers.
- \* Understand the risks associated with online activity and be confident that they have the up-to-date knowledge and capability to keep children safe whilst they are online at the school; in particular understand the additional risks that children with SEND face online and the associated and appropriate support they require.
- \* DSL training should be updated at least every two years and their knowledge and skills refreshed at regular intervals but at least annually. DSL will update in both West Sussex and Surrey but DDSL will only update in one county – Surrey.
- \* Work with the Headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at the school.
- \* Keep up to date, detailed, accurate records (either written or using appropriate secure online software), that include all concerns about a child even if there is no need to make an immediate referral and record the rationale for decisions made and action taken. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program. This is monitored via 'My Concern'
- \* Ensure that an indication of the existence of the additional safeguarding/child protection file is marked on the child's main file record.
- \* Ensure that when a child transfers school (including in-year), their safeguarding/child protection file is passed to the new school as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.



- \* If the transit method requires that a copy of the safeguarding/child protection file is retained until such a time that the new school acknowledges receipt of the original file, the copy should be securely destroyed on confirmation of receipt.
- \* Ensure that where a child transfers to a school and is on a child protection plan, child in need plan or is a child looked after, their information is passed to the new school immediately and that the child's social worker is informed. In addition, consideration should be given to a multi-agency schools transition meeting if the case is complex or on-going.
- \* Ensure that all appropriate staff members have a working knowledge and understanding of their role in case conferences, core groups and other multi-agency planning meetings, to ensure that they attend and are able to effectively contribute when required to do so; where a report is required, this should be shared with the parents prior to the meeting.
- \* Ensure that the case holding social worker is informed of any child currently with a child protection plan who is absent without explanation.
- \* Organise safeguarding and child protection induction, regularly updated training and a minimum of annual updates (including online safety) for all school staff, keep a record of attendance and address any absences.
- \* Ensure each member of staff has access to, and understands, the schools Safeguarding and Child Protection policy procedures, especially new and part-time staff.
- \* Ensure that in collaboration with the school leadership and Governors/Proprietors/Management Committee, the Safeguarding and Child Protection Policy is reviewed annually, and the procedures and implementation are updated and reviewed regularly.
- \* Ensure that the Safeguarding and Child Protection Policy is available publicly and that parents/carers know that referrals about suspected abuse or neglect may be made and the role of the school in this.
- \* Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances.
- \* Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and leadership staff.
- \* Establish and maintain links with the SSCP/West Sussex to make sure staff are aware of training opportunities and the latest policies on local safeguarding arrangements.
- \* Contribute to and provide, with the Headteacher and Chair of Governors, the biennial (s157 s175) Statutory Audit for Safeguarding Arrangements and Termly Safeguarding Data Collections via The Virtual College – ENABLE to Surrey County Council.
- \* The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. Deputy DSLs will be trained to the same standard as the DSL. The DSL's training will be updated formally at least every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.

## **1.5 Deputy Designated Safeguarding Lead (DDSL)**

- In addition to the role and responsibilities of all staff the DDSL will:
  - \* Be trained to the same standard as the DSL and the role is explicit in their job description.
  - \* Provide support and capacity to the DSL in carrying out delegated activities of the DSL; however, the lead responsibility of the DSL cannot be delegated.
  - \* In the absence of the DSL, carry out the activities necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the DSL, the DDSL will assume all the functions of the DSL.

## **1.6 Members of Staff**



# COPTHORNE PREP

- Our staff play a particularly important role in safeguarding as they are in a position to observe any changes in a child's behaviour or appearance, identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating.

## **All Staff will:**

- Maintain an attitude of "It could happen here" with regards to safeguarding.
- Understand that safeguarding is "everyone's responsibility".
- Maintain a "zero-tolerance" approach to sexual violence and sexual harassment.
- \* Read and understand Part 1 of statutory guidance KCSIE (2025). Those working directly with children will also read Annex B
- In addition to this all staff will be aware of the systems in place which support safeguarding including reading this Safeguarding and Child Protection Policy; the Behaviour Policy; the Staff Behaviour Policy (code of conduct); safeguarding response to children who go missing from education; and the role of the DSL.
- Know who and how to contact the DSL and DDSL, the Chair of Governors and the Governor responsible for safeguarding.
- Be aware of indicators of abuse, neglect, and exploitation understanding that children can be at risk of harm inside and outside of the school, inside and outside of home and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse, neglect, and exploitation so that staff are able to identify cases of children who may be in need of help or protection.
- Be able to identify vulnerable learners and take action to keep them safe. Information or concerns about learners will be shared with the DSL where it includes those:
  - \* who may need a social worker and may be experiencing abuse or neglect
  - \* requiring mental health support
  - \* may benefit from early help
  - \* where there is a radicalisation concern
  - \* where a crime may have been committed
- Provide a safe environment in which children can learn.
- Report any concerns via the online safeguarding system 'My Concern'.
- Establish and maintain an environment where children feel secure, are encouraged to talk and are listened to.
- Ensure children know that there are adults in the school who they can approach if they are worried or have concerns.
- All staff are aware 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.
- Ensure only appropriately trained professionals attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- Take immediate action if they have a mental health concern about a child that is also a safeguarding concern, following our Safeguarding and Child Protection Policy and procedures.
- Plan opportunities within the curriculum for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe.
- Attend training in order to be aware of and alert to the signs of abuse, neglect, and exploitation.
- Know how to respond to a child who discloses harm or abuse following training of 'Working Together to Safeguard Children' (2018), and 'What to do if you are worried a child is being abused' (2015).
- Record their concerns if they are worried that a child is being abused and report these to the DSL immediately that day. If the DSL is not contactable immediately a DDSL should be informed.





- Be prepared to refer directly to the Children's Single Point of Access (C-SPA) or IFD (Integrated Front Door) and the Police if appropriate, if there is a risk of significant harm and the DSL or their DDSL is not available.
- \* Follow the allegations procedures, as set out in this policy and KCSIE 2025, if the disclosure is an allegation against a member of staff, supply staff, volunteer or contractor.
- \* Report low-level concerns (as defined in KCSIE 2025) about any member of staff/supply staff/volunteer or contractor to the DSL/Head via 'Confide'.
- Provide support for children subject to early help, child in need or child protection and be involved where appropriate, in the implementation of individual plans to further safeguard vulnerable learners and understand their academic progress and attainment and maintain a culture of high aspirations for this cohort.
- A member of staff who is approached by a child should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they need to pass information to other professionals to help keep the child and/or other children safe. The degree of confidentiality should always be governed by the need to protect the child.
- Notify the DSL or their DDSL of any child on a child protection plan or child in need plan who has unexplained absence.
- Understand early help and be prepared to identify and support children who may benefit from early help. Liaise with other agencies that support children and provide early help.
- Be aware that children may not feel ready or know how to someone they are being abused, exploited, or neglected, and/or they may not recognise these experiences as harmful. This could be due to their vulnerability, disability and/or sexual orientation or language barriers.
- Be mindful that the Teacher Standards states that teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

## 1.7 Professional expectations, roles and responsibilities

### **Cophthorne Prep School will ensure:**

- \* It operates safer recruitment procedures in line with KCSIE 2025 which includes statutory checks on the suitability of staff to work with children.
- \* All staff receive information about the school safeguarding arrangements, the school's safeguarding statement, staff behaviour policy (code of conduct), Safeguarding and Child Protection policy, the role and names of the Designated Safeguarding Lead (DSL) and their deputy Designated Safeguarding Lead (DDSL), and [Keeping Children Safe in Education 2025 part 1 and annex B](#). All staff will complete a questionnaire and sign to say they have read and understood it. This applies to the Governing body/Proprietor/Management Committee in relation to part 2 of the same guidance.
  - \* All staff receive safeguarding and child protection training (including online safety) at induction. Training is regularly updated as required, and at least annually to continue to provide them with relevant skills and knowledge to safeguard children effectively.
  - \* All members of staff are trained in and receive regular updates in online safety and reporting concerns.
  - \* All members of staff maintain a zero-tolerance approach to sexual violence and sexual harassment.
  - \* All staff and Governors/Proprietors/Management Committee have regular safeguarding and child protection awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse.
  - \* The Safeguarding and Child Protection Policy is made available via the school website and a paper copy is available upon request for parents/carers.
  - \* All parents/carers are made aware of the responsibilities of staff members with regard to safeguarding and child protection procedures
  - \* Provide a coordinated offer of early help when additional needs of children are identified and contribute to early help arrangements and inter-agency working and plans. The school's lettings policy will seek to ensure the suitability of adults working with children on the school



site at any time and ensure that any groups who use the school's premises have Safeguarding and Child Protection policies and procedures in place.

- \* Community users organising activities for children are aware of the school's Safeguarding and Child Protection Policy, guidelines and procedures.

## 2.6 Confidentiality, Sharing and Withholding Information

- All matters relating to safeguarding and child protection will be treated as confidential and only shared as per the '[Information Sharing Advice for Practitioners' \(DfE 2018\) guidance](#). The school will refer to the guidance in the [Data protection: toolkit for schools](#) to support school with data protection activity, including compliance with General Data Protection Regulation (GDPR).
- \* In addition, we will refer to the [DfE Data Protection guidance for schools \(DfE, 2025b\)](#), which will help school staff, leaders and governors understand how to comply with data protection law, develop their data policies and processes, know what staff and pupil data to keep and follow good practices for preventing personal data breaches.
- Information will be shared with staff within the school who 'need to know'.
- Relevant staff have due regard to GDPR principles which allow them to share (and withhold) information.
- 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](#) and GDPR are not a barrier to sharing information where a failure to do so would place a child at risk of harm. There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.
- All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing.
- All staff will always endeavour to gain parent/carers consent to refer a child to social care unless to do so could put the child at greater risk of harm or impede a criminal investigation.

## 3.0 Child Protection Procedures

### 3.1 Look out for anyone in need of Early Help

Any child may benefit from Early Help, but Copthorne Prep School staff should be particularly alert to the potential need for help for a child who:

is disabled or has certain health conditions and has specific additional needs

- has special educational needs (whether or not they have a statutory Education, Health and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home or care,
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

### 3.2 Recognising indicators of abuse, neglect, and exploitation

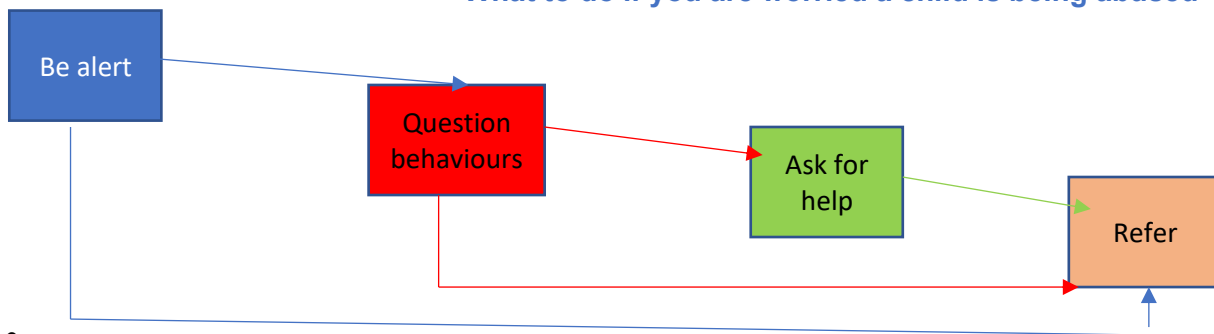




# COPTHORNE PREP

- Staff will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child.
- All staff are made aware of the definitions and indicators of abuse, neglect, and exploitation as identified by 'Working Together to Safeguard Children' and 'Keeping Children Safe in Education'. This is outlined locally within the Surrey and West Sussex Support Levels guidance.
- Copthorpe Prep School recognises that when assessing whether a child may be suffering actual or potential harm there are four categories of abuse (see Appendix 1):
  - \* Physical abuse
  - \* Sexual abuse
  - \* Emotional abuse
  - \* Neglect
- By understanding the indicators of abuse, neglect, and exploitation, we can respond to problems as early as possible and provide the right support and services for the child and their family.
- All members of staff are expected to be aware of and follow the below approach if they are concerned about a child:

## 'What to do if you are worried a child is being abused' 2015



- Copthorpe Prep School recognises that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of child abuse, neglect, and exploitation can vary from child to child.
- Children develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child. It is important to recognise that indicators of abuse, neglect, and exploitation do not automatically mean a child is being abused, however all concerns should be taken seriously and will be explored by the DSL on a case-by-case basis.
- Copthorpe Prep School recognises abuse, neglect and safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label alone. In many cases, multiple issues will overlap with one another, therefore staff will always be vigilant and always raise concerns with a DSL and add it to My Concern.
- Parental behaviours can indicate child abuse or neglect, so staff will be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.
- Children may report abuse happening to themselves, their peers, or their family members. All reports made by children to staff will be taken seriously and will be responded to in line with this policy.
- Safeguarding incidents and/or behaviours can be associated with factors and risks outside the school. Children can be at risk of abuse or exploitation in situations outside their families; extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.



# COPTHORNE PREP

- Cophthorne Prep School recognises that technology can be a significant component in many safeguarding and wellbeing issues; children are at risk of abuse online from people they know (including other children) and from people they do not know; in many cases, abuse will take place concurrently via online channels and in daily life.
- Cophthorne Prep School recognises that some children have additional or complex needs and may require access to intensive or specialist services to support them.
- Following a concern about a child's safety or welfare, the searching and screening of children and confiscation of any items, including any electronic devices, will be managed in line with the school's Behaviour Policy.
  - \* The DSL (or deputy) will be informed of any searching incidents where there were reasonable grounds to suspect a pupil was in possession of a prohibited item as listed in our behaviour policy. The DSL (or deputy) will then consider the circumstances of the pupil who has been searched to assess the incident against any potential wider safeguarding concerns.
  - \* Staff will involve the DSL (or deputy) without delay if they believe that a search has revealed a safeguarding risk.

## 3.2 Reporting and responding to safeguarding concerns

- The following procedures apply to all staff working in the school and will be covered in training to enable staff to understand their role and responsibility.
- The aim of the procedures is to provide a robust framework which enables staff to take appropriate action when they are concerned that a child is being harmed or abused or is at risk of harm or abuse.
- The prime concern at all stages must be the interests and safety of the child. Where there is a conflict of interest between the child and an adult, the interests of the child must be paramount.
- All staff are aware that very young children and those with disabilities, special needs or with language delay may be more likely to communicate concerns with behaviours rather than words. Additionally, staff will question the cause of knocks and bumps in children who have limited mobility.
- If a member of staff suspects abuse, spots signs or indicators of abuse, or they have a disclosure of abuse made to them they must:
  - \* Make an initial record of the information related to the concern as soon as possible. It needs to include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and details regarding any action taken, decisions reached and the outcome. This can be done via 'My Concern' – all staff will be given access to record suspicions on 'My Concern'. Details must include:
    - \* Date
    - \* Time
    - \* Place
    - \* Who was present
    - \* Context
    - \* Details of disclosure/concern (using the child's words)
    - \* Demeanour/non-verbal behaviours of the child
    - \* Any injuries
    - \* Rationale for decision making
    - \* Actions taken
    - \* Grading – behaviour/abuse etc
- All safeguarding concerns, discussions, decisions, and reasons for those decisions, will be recorded in writing on the school safeguarding system (My Concern) and passed without delay to the DSL.



- Records should be completed as soon as possible after the incident/event, using the child's words and will be signed and dated by the member of staff reporting the concern. Children protection/safeguarding records will record facts and not personal opinions. A body map will be completed if visible injuries to a child have been observed. (See appendix 3)
- If there is an immediate safeguarding concern the member of staff will consult with a DSL before completing the form as reporting urgent concerns take priority.
- If members of staff are in any doubt about recording requirements, they will discuss their concerns with the DSL (or deputy).
- The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available.
- The records must be signed and dated by the author or / equivalent on electronic based records
- Child protection records are kept confidential and stored securely. Child protection records will be kept for individual children and will be maintained separately from all other records relating to the child in the school. Child protection records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL.
- All child protection records will be transferred in accordance with data protection legislation to the child's subsequent school, under confidential and separate cover as soon as possible; within 5 days for an on-year transfer or within the first 5 days of the start of a new term. Child protection files will be transferred securely to the new DSL, separately to the child's main file, and a confirmation of receipt will be obtained.
- In addition to the child protection file, the DSL will also consider if it would be appropriate to share any information with the DSL at the new school or college in advance of a child leaving, for example, information that would allow the new school to continue to provide support.
- Where the school receives child protection files from another setting, the DSL will ensure key staff such as the SENDCo, will be made aware of relevant information as required.
- Where a pupil joins the school and no child protection files are received, the DSL will proactively seek to confirm from the previous setting whether any child protections exist for the pupil, and if so, if the files have been sent.
- In the absence of the DSL or DDSL, staff must be prepared to refer directly to C-SPA/IFD (and the Police if appropriate) if there is the potential for immediate significant harm or contact the consultation line at the C-SPA/IFD for support and advice.

### **Following a report of concern the DSL must:**

- \* Using the Effective Family Resilience of Levels of Need document decide whether or not there are sufficient grounds for suspecting harm, in which case a request for support must be made to the C-SPA/IFD and the Police if it is appropriate.
- \* Normally the DSL should try to discuss any concerns about a child's welfare with the parent/carer and where possible obtain their agreement before making a referral to the C-SPA/IFD. However, this should only be done when it will not place the child at increased risk or could impede a Police investigation. Where there are doubts or reservations about involving the child's family, the DSL should clarify with the C-SPA/IFD or the Police whether the parents/carers should be told about the referral and, if so, when and by whom. This is important in cases where the Police may need to conduct a criminal investigation. The child's views should also be considered.
- \* If it is suspected that a child is suffering, or is likely to suffer, harm or abuse the DSL must contact the C-SPA/IFD. If the DSL feels unsure about whether a referral is necessary, they can phone the C-SPA/IFD consultation line to discuss concerns.
- \* When a child needs urgent medical attention and there is suspicion of abuse the DSL should take the child to the accident and emergency unit at the nearest hospital, having first notified the C-SPA/IFD. The DSL should seek advice about what action the C-SPA/IFD will take and about informing the parents/carers, remembering that parents/carers should normally be informed that a child requires urgent hospital attention.



- \* The exception to this process will be in those cases of known FGM where there is a [mandatory reporting duty](#) for the teacher to report directly to the Police where they either:
  - Are informed by a girl under 18 that an act of FGM has been carried out on her; or
  - Observe 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 that the act was necessary for the girl's physical or mental health or for the purposes connected with labour or birth.
  - The DSL should also be made aware.
- The DSL should keep a record of the rationale for any decisions made.

### 3.3 Dealing with safeguarding concerns

#### All staff:

- A member of staff who is approached by a child should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they need to pass information to other professionals to help keep the child and/or other children safe. The degree of confidentiality should always be governed by the need to protect the child.
- Additional consideration needs to be given to children with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.
- All staff should know who the DSL is and who to approach if the DSL is unavailable. All staff have the right to make a referral to the C-SPA/IFD or Police directly and should do this if, for whatever reason, there are difficulties following the agreed protocol, for example, they are the only adult on the school premises at the time and have concerns about sending a child home.
- Guiding principles
  - \* Receive
  - \* Reassure
  - \* Respond
  - \* Report
  - \* Record
  - \* Remember
  - \* Review (by the DSL)

#### What happens next?

- It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. The member of staff should be informed by the DSL what has happened following a report being made. If they do not receive this information, they should seek it out.
- If they believe that the concern has not been acted upon appropriately, they should inform the Headteacher or Safeguarding Governor or contact the C-SPA/IFD for advice.
- Safeguarding concerns and allegations made about staff, including supply teachers, volunteer and contractors
- Surrey's LADO procedure will be followed where it is alleged that anyone working in the school that provides education for children under 18 years of age, including supply staff, volunteers and contractors or another adult who works with children has:
  - \* behaved in a way that has harmed a child, or may have harmed a childand/or
  - \* possibly committed a criminal offence against or related to a childand/or
  - \* behaved towards a child or children in a way that indicates he or she may pose a risk of harm to childrenand/or



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

- The last bullet point above includes behaviour that may have happened outside of the school, that might make an individual unsuitable to work with children, this is known as transferable risk.
- In dealing with allegations or concerns against an adult, staff must without delay:
- Report any concerns to the Headteacher immediately.
- If an allegation is made against the Headteacher, the concerns need to be raised with the Chair of Governors as soon as possible. If the Chair of Governors is not available, then the LADO should be contacted directly.
- There may be situations when the Headteacher, Chair of Governors will want to involve the Police immediately if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.
- Once an allegation has been received by the Headteacher, Chair of Governors will contact the LADO (as part of their mandatory duty) on 0300123 1650 option 3 LADO or Email: [LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk) immediately and before taking any action or investigation. If West Sussex they will contact 01403 229 900 or email [LADO@westsussex.gov.uk](mailto:LADO@westsussex.gov.uk)
- Following consultation with the LADO inform the parents/carers of the allegation unless there is a good reason not to.
- In liaison with the LADO, the school will determine how to proceed and if necessary, the LADO will refer the matter to Social Care and/or the Police.
- If the matter is investigated internally, the LADO will advise the school to seek guidance in following procedures set out in part 4 of KCSIE (2022) and the SSCP procedures.

### 3.4 Low-level concerns

- The term low-level concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the school may have acted in a way that:
  - \* is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and
  - \* does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.
- The purpose of reporting low-level concerns is to create and embed a culture of openness, trust and transparency in which the school’s values and expected behaviour set out in the staff code of conduct are lived, monitored and reinforced constantly by all staff.
- Cophthorne Prep creates an environment where staff are encouraged and feel confident to self-refer where they have found themselves in a situation.
- Reports should be made to the DSL/Headteacher via ‘Confide’ in a timely manner. If the DSL/Headteacher has any doubt as to whether the information which has been shared about the individual as a low-level concern in fact meets the harm threshold, they will consult with the LADO.

### 3.5 Confidentiality and information sharing

- Cophthorne Prep School recognises our duty and powers to hold, use and share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE.
- Where reasonably possible, the school will hold more than one emergency contact number for each pupil. There is an expectation that contact information will be held for both parents, unless doing so would put a child at risk of harm.





- It is good practice for schools to have additional options to contact a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern.

### 3.6 Complaints

- All members of the school community should feel able to raise or report any concerns about children's safety or potential failures in the school safeguarding regime. The school has a complaints procedure available to parents, pupils and members of staff and visitors who wish to report concerns or complaints. This can be found on the website.
- Whilst we encourage members of our community to report concerns and complaints directly to us, we recognise this may not always be possible. Children, young people and adults who have experienced abuse in education can contact the NSPCC 'Report Abuse in Education' helpline on 0800 136 663 or via email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)
- All staff, including temporary staff/supply staff and volunteers, should be aware of their duty to raise concerns, where they exist, about the management of safeguarding and child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the school's safeguarding arrangements.
- If it becomes necessary to consult outside the school, they should speak in the first instance, to the Area Schools Officer or LADO in accordance with the Whistleblowing Policy.
- Staff are encouraged to use an external, independent and confidential service provided by Navex Global, who can be contacted on their freephone helpline number 0800 069 8180 and through the [Navex Global web pages](#)
- [The NSPCC whistleblowing helpline](#) is also available for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about a way a concern is being handled by their school. 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](mailto:help@nspcc.org.uk).
- Whistleblowing regarding the Headteacher should be made to the Chair of the Governing Body/ whose contact details should be available to staff.

### 4.0 What is Child Abuse

- Cophthorne Prep School is aware of the range of specific safeguarding issues and situations that can put children at greater risk of harm. In addition to Part one, DSLs, school leaders and staff who work directly with children will read Annex B of KCSIE which contains important additional information about the following specific forms of abuse and safeguarding issues.
- Where staff are unsure how to respond to specific safeguarding issues, they should follow the processes as identified in part 3 of this policy and speak with the DSL or a deputy. All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos. 8 can be signs that children are at risk.
- **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.



# COPTHORNE PREP

- **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child
- **Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.
- Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
- **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); 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 Surrey [Neglect Risk Assessment Tool](#) is used to support with the initial identification of neglect.
- For further information on indicators of abuse can be accessed via [NSPCC](#).

## 4.1 Child-on-child abuse

- All members of staff at Copthorne Prep school recognise that children can abuse other children (referred to as child-on-child abuse, previously known as 'peer-on-peer' abuse), and that it can happen both inside and outside of school and online.
- Copthorne Prep School recognises that child-on-child abuse can take many forms, including but not limited to:
  - \* Bullying, including cyberbullying, prejudice-based and discriminatory bullying
  - \* Abuse in intimate personal relationships between children
  - \* Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
  - \* Sexual violence and sexual harassment





- \* Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- \* 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
- \* Up-skirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- \* Initiation/hazing type violence and rituals.
- \* Any allegations of child-on-child abuse will be recorded, investigated, and dealt with in line with this safeguarding policy and KCSIE (in particular, part 2 and 5).

See appendix 1 for detailed definitions

- Copthorne Prep School adopts a zero-tolerance approach to child-on-child abuse. We believe that abuse is abuse and it will never be tolerated or dismissed as 'just banter', 'just having a laugh', 'part of growing up' or 'boys will be boys'; this can lead to a culture of unacceptable behaviours and can create an unsafe environment for children and a culture that normalises abuse, which can prevent children from coming forward to report it.
- All staff have a role to play in challenging inappropriate behaviours between children. Staff recognise that some child-on-child abuse issues may be affected by gender, age, ability and culture of those involved. For example, for gender-based abuse, girls are more likely to be victims and boys more likely to be perpetrators.
- Copthorne Prep School recognises that even if there are no reported cases of child-on-child abuse, such abuse is still likely to be taking place and it may be the case that it is just not being reported. As such, it is important that staff speak to the DSL (or deputy) about any concerns regarding child-on-child abuse.
- The school will challenge physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts.
- Copthorne Prep School believes that all children have a right to attend our school and learn in a safe environment. Children should be free from harm by adults and other children.
- Copthorne Prep School want children to feel able to confidently report abuse and know their concerns will be treated seriously. All allegations of child-on-child abuse will be reported to the DSL and will be recorded, investigated and dealt with in line with associated school policies, including anti-bullying and behaviour. Pupils who experience abuse will be offered appropriate support, regardless of where the abuse takes place.
- Concerns about pupils' behaviour, including child-on-child abuse taking place offsite will be responded to as part of a partnership approach with pupils, and parents/carers. Offsite behaviour concerns will be recorded and responded to in line with existing appropriate policies.

#### 4.2 Child-on-child sexual violence and sexual harassment

- When responding to concerns relating to child-on-child sexual violence or harassment, Copthorne Prep School will follow the guidance outlined in Part 5 of KCSIE.
- Copthorne Prep School recognises that sexual violence and sexual abuse can happen anywhere and all staff will maintain an attitude of 'it could happen here'. The school recognises sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children and can occur online and face-to-face (both physically and verbally). Sexual violence and sexual harassment is **never** acceptable.
- **All** victims of sexual violence or sexual harassment will be reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, or ever be made to feel ashamed for making a report.



- Abuse that occurs online or outside of the school will not be dismissed or downplayed and will be treated equally seriously and in line with relevant policies.
- Cophthorne Prep School recognises that the law is in place to protect children and young people rather than criminalise them, and this will be explained in such a way to pupils that avoids alarming or distressing them.
- Cophthorne Prep School recognises that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory, so children may not be able to recall all details or timeline of abuse. All staff will be aware certain children may face additional barriers to telling someone, for example because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation.

## **Prevention**

- Taking a whole school approach to safeguarding and child protection
- Providing training to staff
- Providing a clear set of values and standards, underpinned by the school's behaviour policy and pastoral support; and by a planned programme of evidence-based content delivered through the curriculum.
- Engaging with specialist support and interventions.

## **Responding robustly to reports of sexual violence and sexual harassment**

- Children making any report of sexual violence or sexual harassment including 'upskirting' (The Voyeurism Offences Act 2019) will be taken seriously, kept safe and be well supported.
- If the report includes an online element staff will be mindful of the Searching, screening and confiscation at school guidance.
- The key consideration is for staff not to view or forward illegal images of a child. The guidance provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection.

## **4.3 Risk Assessment**

- Following a report, the DSL will make an immediate risk and needs assessment on a case-by-case basis.
- The risk assessment will consider:
  - \* 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
  - \* The risk assessment will be recorded and kept under review.
- Where there has been other professional intervention and/or specialist risk assessments, these professional assessments will be used to inform the school's approach to supporting and protecting children.
- Support regarding risk assessments can be accessed from the Surrey Education Services Education Safeguarding Team Resources Hub.
- **Action:**
- It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.



- **The DSL will consider:**
  - 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.
  - That sexual violence and sexual harassment can take place within intimate personal relationships between children.
  - Importance of understanding intra familiar harms and any necessary support for siblings following incidents
  - Ongoing risks to victim, other children, adult students, or staff.
  - Other related issues or wider context.
- **Confidentiality:**
  - The victim may ask the school not to tell anyone about the sexual violence or sexual harassment. If the victim does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies. The DSL should consider:
    - parents or carers should normally be informed (unless this would put the victim at greater risk)
    - the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care, and
    - rape, assault by penetration and sexual assaults are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.

- **Options:**
  - Manage internally
  - Early help intervention
  - Request for support to the C-SPA
  - Report to the Police (generally in parallel with a request for support to the C-SPA)

All concerns, discussions, decisions and reasons for decision will be recorded on 'My Concern'.

- **Ongoing Response:**
  - The DSL will manage each case individually and will ensure the risk assessment is reviewed regularly with relevant partner agencies, for example the Police and social care.
  - Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, schools should be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately.
  - Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim.
  - The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart on the school premises and on transport where appropriate.



- Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the school will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and may lead to the view that allowing the perpetrator to remain in the same school would seriously harm the education or welfare of the victim (and potentially themselves and other children).
- Where a criminal investigation into sexual assault leads to a conviction or caution, the school will, if it has not already, consider any suitable sanctions in light of their behaviour policy, which may include consideration of permanent exclusion. Where the perpetrator is going to remain at the school, the Headteacher should continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on school premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.
- The victim, alleged perpetrator and any other children and adults affected will receive appropriate support and safeguards on a case-by-case basis.
- The school will take any disciplinary action against the alleged perpetrator in accordance with the school behaviour policy.
- The school recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.
- The school will consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.
- The school recognises that children who have experienced sexual violence display a wide range of responses to their experiences including clear signs of trauma, physical and emotional responses, or no overt signs at all.
- The school will in most instances engage with both the victim's and alleged perpetrator's parents when there has been a report of sexual violence; this might not be necessary or proportionate in the case of sexual harassment and will depend on a case-by-case basis. The exception to this is if there is a reason to believe informing a parent /carer will put a child at additional risk. Any information shared with parents/carers will be in line with information sharing expectations, our confidentiality policy, and any data protection requirements, and where they are involved, will be subject to discussion with other agencies (e.g. Children's Social Work Service and/or the police) to ensure a consistent approach is taken.
- If at any stage the DSL is unsure how to proceed, advice will be sought from the Education Safeguarding Service.

#### **4.4 Nude and/or semi-nude image sharing by children**

- The term 'sharing nudes and semi-nudes' is used to mean the sending or posting of nude or semi-nude images, videos or live streams of/by young people under the age of 18. Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal, which makes responding to incidents complex.
- Copthorne Prep School recognises that consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as youth produced/involved sexual imagery or 'sexting') can be a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).
- When made aware of concerns involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos by children, staff are advised:
  - \* To report any concerns to the DSL immediately
  - \* Never to view, copy, print, share, forward, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already inadvertently viewed imagery, this will be immediately reported to the DSL.
  - \* Not to delete the imagery or ask the child to delete it.
  - \* To avoid saying or doing anything to blame or shame any children involved.



- \* To reassure the child(ren) involved and explain that the DSL will be informed so they can receive appropriate support and help. Do not promise confidentiality, as other agencies may need to be informed and be involved.
- \* Not to investigate or ask the child(ren) involved to disclose information regarding the imagery
- \* To not share information about the incident with other members of staff, children/young people, or parents/carers, including the families and child(ren) involved in the incident; this is the responsibility of the DSL.

#### 4.5 Harmful Sexual Behaviour (HSB)

- Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. HSB can occur online and/or face-to-face and can also occur simultaneously between the two. HSB will be considered in a child protection context.

#### The schools response to HSB:

- We will use the [Brook Traffic Light Tool](#) uses a traffic light system to categorise the sexual behaviours of children this will help us
- Make decisions about safeguarding children and young people
- Assess and respond appropriately to sexual behaviour in children and young people
- Understand healthy sexual development and distinguish it from harmful behaviour

By categorising sexual behaviours, the school can work with other agencies to the same standardised criteria when making decisions and can protect children with a multi-agency approach.

The school recognises that it is vital that professionals agree on how behaviours should be categorised regardless of culture, faith, beliefs, and their own experiences or values.

#### 4.5 Anti-Bullying/Cyberbullying

- Our school's policy on anti-bullying is set out in our Anti-bullying policy which includes measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- We keep a record of known bullying incidents which is shared with and analysed by the Governing body. All staff are aware that children with SEND and/or children who identify as Lesbian, Gay, Bisexual or Transgender (LGBT) are more susceptible to being bullied/victims of child abuse.
- The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.
- Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.
- 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. If the anti-bullying procedures are seen to be ineffective, the Headteacher and the DSL will also consider child protection procedures.
- PSHE education regularly provides opportunities for children to understand bullying is wrong, its impact and how to deal with it.
- LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse.





- Copthorpe Prep School has an online safety policy which empowers us to protect and educate pupils, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. The school also has a clear policy on the use of mobile and smart technology, Particular reference to the use of mobile phones being prohibited in the EYFS school.
- The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk, content, contact, conduct and commerce.
- Children are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated. The school's online safety co-ordinator is Mr Mark Bone.
- The school will follow the guidance around [harmful online challenges and online hoaxes](#) when supporting children and sharing information with parents/carers.
- Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the DSL will consider a referral into the [Cyber Choices](#) programme.
- This programme aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

## 4.7 Radicalisation, Extremism and Terrorism

- [The Prevent Duty for England and Wales \(2015\)](#) 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.
- Extremism is the promotion or advancement of an ideology <https://www.gov.uk/government/publications/new-definition-of-extremism-2024/new-definition-of-extremism-2024> based on violence, hatred or intolerance<sup>1</sup>, that aims to:
  1. negate or destroy the fundamental rights and freedoms of others; or
  2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights or
  3. intentionally create a permissive environment for others to achieve the results in (1) or (2).
- Radicalisation refers to 'the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups'.
- Terrorism is 'an action that endangers or causes serious violence to a person/people; causes serious violence to a person/people; causes serious damage to property; or seriously interferes with an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.'
- Some children are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal or dangerous. This can happen both online and offline.
- The school is clear that exploitation of vulnerable children and radicalisation should be viewed as a safeguarding concern and follows the DfE guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism.
- It is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL making a Prevent referral.
- The DSL should report concerns that a child may be at risk of radicalisation or involvement in terrorism, use the [Prevent referral form](#) to refer cases by e-mail to [preventreferrals@surrey.pnn.police.uk](mailto:preventreferrals@surrey.pnn.police.uk) . If the matter is urgent then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101 or 01483 632982 and ask to speak to the Prevent Supervisor for Surrey. The DfE has also set up a dedicated telephone



# COPTHORNE PREP

helpline for staff and Governors/Proprietor/ Management committee to raise concerns around Prevent (020 7340 7264).

- School staff receive training to help identify early signs of radicalisation and extremism.
- Opportunities are provided in the curriculum to enable children to discuss issues of religion, ethnicity and culture and the school follows the [Promoting fundamental British values through SMSC](#).
- The School Governors, Headteacher and the DSL will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessment may include, due diligence checks for external speakers and private hire of facilities, anti-bullying policy and other issues specific to the school's profile, community and philosophy.
- Although not a cause for concern on their own, possible indicators when taken into consideration alongside other factors or context may be a sign of being radicalised.

Indicators of vulnerability include:

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

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. The Department of Education guidance The Prevent Duty should be referred

Further information and a list of such indicators can be found at [Radicalisation and Extremism - Examples and Behavioural Traits \(educateagainsthate.com\)](#)

## 4.8 Domestic Abuse

- Copthorne Prep School recognises that:
  - \* Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents.
  - \* Domestic abuse can include, but is not limited to, psychological (including coercive control), physical, sexual, economic, or emotional abuse.
  - \* Children can be victims of domestic abuse if they see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse).
  - \* Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background, and domestic abuse can take place inside or outside of the home.





- \* Domestic abuse can take place within different types of relationships, including ex-partners and family members.
  - \* There is always a potential for domestic abuse to take place when parents/families separate, or for existing domestic abuse to persist or escalate post separation.
  - \* Domestic abuse can have a detrimental and long-term impact on children's health, well-being, development, and ability to learn.
  - \* Domestic abuse concerns will not be looked at in isolation and our response will be considered as part of a holistic approach which takes into account children's lived experiences.
  - \* It is important not to use victim blaming language and to adopt a trauma informed approach when responding to concerns relating to domestic abuse.
- If staff are concerned that a child may be at risk of seeing, hearing, or experiencing the effects of any form of domestic abuse, or in their own intimate relationships, immediate action should be taken by speaking to the DSL or deputy.
  - [Domestic Abuse Act](#) received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).
  - All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.
  - The school is enrolled onto the Operation Encompass scheme, a joint project between Surrey Police, Surrey Domestic Abuse Service and Surrey schools, the school is also enrolled with the West Sussex Operation encompass. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the DSL in the school before the child or children arrive at the school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs.

#### **4.9 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

- Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

#### **Child Sexual Exploitation (CSE)**

- CSE is a form of child sexual abuse. CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.



- Any concerns that a child is being or is at risk of being sexually exploited should be passed immediately to the DSL.
- The school is aware there is a clear link between regular non-attendance and CSE. Staff will consider a child to be at potential CSE risk in the case of regular non-attendance at and make reasonable enquiries with the child and parents/carers to assess this risk.
- All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. All staff, but especially the DSL will consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.
- In all cases if the DSL identifies any level of concern the DSL should contact the C-SPA/IFD and if a child is in immediate danger the Police should be called on 999.
- The school is aware that often a child 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.
- The school includes the risks of sexual exploitation in the PSHE and RSE curriculum.

## **Child Criminal Exploitation (CCE)**

- Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.
- County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. Children are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.
- Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt.
- Any concerns that a child is being or is at risk of being criminally exploited will be passed without delay to the DSL. The DSL will then contact the C-SPA and if there is concern about a child’s immediate safety, the Police will be contacted on 999.
- The school is aware there is a clear link between regular non-attendance at school 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/carers to assess this risk.

### **4.11 Serious Violence**

- There are a number of indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include:
  - \* increased absence from the school
  - \* a change in friendships or relationships with older individuals or groups
  - \* a significant decline in performance
  - \* signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries
  - \* Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.



- Staff are aware that violence can often peak in the house just before and after the children attend the school which includes travelling to and from the school.

## 4.12 Modern Slavery

- Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.
- If there are any concerns that any member of the community is a victim or involved with modern slavery, concerns should be shared with a DSL or deputy and will be responded to in line with this policy.

## 4.13 Female Genital Mutilation (FGM)

- 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 directly and immediately to the Police 101 where they either:
  - \* Are informed by a girl under 18 that an act of FGM has been carried out on her; or
  - \* Observe 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 that the act was necessary for the girl's physical or mental health or for the purposes connected with labour or birth.
- The duty applies to all persons who are employed or engaged to carry out 'teaching work' 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 DSL; however, the DSL should be informed.
- School staff are trained to be aware of risk indicators of FGM.
- Concerns about FGM outside of the mandatory reporting duty should be reported using the school's Safeguarding and Child protection procedures. Staff should be particularly alert to suspicions or concerns expressed by female children about going on a long holiday during the summer holiday.
- There should also be consideration of potential risk to other girls in the family and the wider community. Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the Police by calling 999.
- There are no circumstances in which a member of staff should examine a girl.

## 4.14 Forced Marriage

- A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual, and emotional pressure. It may also involve physical or sexual violence and abuse.
- Forced marriage is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.
- A forced marriage is not the same as an arranged marriage which is common in many cultures. The families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.
- School staff should never attempt to intervene directly as a school or through a third party. Contact should be made with the C-SPA and/or the Forced Marriage Unit 200 7008 0151
- Whilst all staff will speak to the DSL or deputy if they have any concerns about FGM, there is a specific legal reporting duty on teachers.



- \* Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to personally report to the police where they discover that FGM appears to have been carried out on a girl.

#### 4.15 So-called Honour Based Abuse (HBA)

- So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.
- All forms of HBA are abuse, regardless of the motivation, and concerns will be responded to in line with this policy. Staff will report any concerns about HBA to the DSL or deputy. If there is an immediate threat, the police will be contacted.
- 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.
- HBA might be committed against people who:
  - \* become involved with a boyfriend or girlfriend from a different culture or religion.
  - \* want to get out of an arranged marriage.
  - \* want to get out of a forced marriage.
  - \* wear clothes or take part in activities that might not be considered traditional within a particular culture.
- It is considered a violation of human rights and may be a form of domestic and/or sexual abuse.
- **One Chance Rule**
- 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 child who is a potential victim and have just one chance to save a life.
- The school is aware that if the victim is not offered support following disclosure that the 'One Chance' opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBA cases.

#### 4.16 Mental Health

- All staff recognise that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- Staff are aware that children's experiences, for example where children have suffered abuse, neglect, and exploitation, or other potentially traumatic Adverse Childhood Experiences (ACEs), can impact on their mental health, behaviour and education.
- Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or deputy.

#### 5.0 Supporting Children Potentially at Greater Risk of Harm

- Whilst all children should be protected, Copthorne Prep School acknowledges that some groups of children are potentially at greater risk of harm. This can include the following groups:

##### 5.1 Homelessness

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

##### 5.2 Private Fostering Arrangements



- A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 years old or 18 years old if the child is disabled.
- Looked After Children by the local authority or those who are placed in residential schools, children's homes or hospitals are not considered to be privately fostered.
- Private fostering occurs in all cultures and children may be privately fostered at any age.
- The school recognises that most privately fostered children remain safe and well but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the child has been trafficked into the country.
- By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Social Care immediately. However, where a member of staff becomes aware that a child may be in a private fostering arrangement, they will raise this with the DSL and the DSL will notify the C-SPA immediately.

### **5.3 Looked After Children and Previously Looked After Children**

- The most common reason for children becoming looked after is because of abuse and/or neglect.
- 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.
- A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.
- The designated teacher and governor for looked after children will have the appropriate level of training to equip them with the knowledge and skills to undertake their role.
- The designated teacher will work with Surrey's Head of virtual School for both looked after children and previously looked after children (or West Sussex if applicable)

### **5.4 Children with special educational needs and disabilities or health issues**

- Copthorne Prep School acknowledges that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges and barriers for recognising abuse, neglect, and exploitation.
- Copthorne Prep School recognises that children with SEND may face additional communication barriers and experience difficulties in managing or reporting abuse or challenges. Children with SEND will be supported to communicate and ensure that their voice is heard and acted upon.
- All members of staff are encouraged to appropriately explore potential indicators of abuse such as behaviour, mood changes or injuries and not to assume that they are related to the child's disability. Staff will be mindful that children with SEND, or certain medical conditions may be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Members of staff are encouraged to be aware that children with SEND can be disproportionately impacted by safeguarding concerns, such as exploitation, peer group isolation or bullying including prejudice-based bullying.
- Any reports of abuse will require close liaison with the DSL and SENDCo. The school will consider extra pastoral support and attention for these children along with ensuring any appropriate support for communication is in place.

### **5.5 Children missing education**

- All children are entitled to an efficient, full-time education which is suitable to their age, ability, aptitude, and any SEND they may have.





# COPTHORNE PREP

- The school recognises that children missing education, can be a vital warning sign of a range of safeguarding possibilities. They are also at significant risk of underachieving, being victims of abuse and harm, exploitation, radicalisation, and not being in education, employment or training (NEET) later in life.
- Where possible the school will hold more than one emergency contact number for each child.
- The school will ensure that there is a record of joiners and leavers as defined in [The Education \(Pupil Registration\) \(England\) 2006 \(amended 2016\)](#).
- When removing a child's name, the school will notify the Surrey County Council/West Sussex of: (a) the full name of the child, (b) the full name and address of any parent with whom the child normally resides, (c) at least one telephone number of the parent, (d) the child's future address and destination school, if applicable, and (e) the ground in regulation 8 under which the child's name is to be removed from the school register.
- The school will make reasonable enquiries to establish the whereabouts of a child jointly with the Local Authority, before deleting the child's name from the school register if the deletion is under regulation 8(1), sub-paragraphs (f) (iii) and (h) (iii) of [The Education \(Pupil Registration\) \(England\) 2006 \(amended 2016\)](#).

The school will:

- Enter children on the admissions register on the first day on which the school has agreed, or has been notified, that the child will attend the school.
  - Notify Surrey County Council/West Sussex within five days of adding a child's name to the admission register. The notification must include all the details contained in the admission register for the new child.
  - Monitor each child's attendance through their daily register and follow Surrey County Council/West Sussex procedure in cases of unauthorised absence.
  - Remove a child's name from the admissions register on the date that the child leaves the school.
  - The school will notify Surrey County Council/West Sussex when they are about to remove a child's name from the school register under any of the fifteen grounds listed in the regulations, no later than the date that the child's name is due to be removed.
- 
- Where parents/carers notify the school, in writing, of their intention to Electively Home Educate (EHE) the school will forward a copy of the letter to the Surrey County Council Inclusion Team.
  - Where parents/carers orally indicate that they intend to withdraw their child to EHE and no letter has been received, the school will not remove the child from roll and will notify the Inclusion Team at the earliest opportunity.

## 5.6 Pupils Missing Out on Education (PMOOE)

- Most children engage positively with school and attend regularly. However, to flourish, some children require an alternative education provision or may require a modified timetable to support a return to full time education provision. It is recognised that children accessing alternative provision, or a reduced/modified timetable may have additional vulnerabilities. Ofsted refer to these as PMOOE because they are not accessing their education in school in the 'usual way'.
- The school will gain consent (if required in statute) from parents/carers to put in place alternative provision and/or a reduced or modified timetable
- The school will ensure that parents/carers (and the Local Authority where the child has an Education Health Care Plan (EHCP) are given clear information about alternative provision placements and reduced/modified timetables: why, when, where, and how they will be reviewed.
- The school will keep the placement and timetable under review and involve parents/carers in the review. Reviews will be frequent enough to provide assurance that the off-site education and/or modified timetable is achieving its objectives and that the child is benefitting from it.





- The school will monitor and track children attending alternative provision to ensure that the provision meets the needs of the child. The school continues to be responsible for the safeguarding of that pupil. The school will obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment,
- The school will comply with regular data returns requested by the Surrey County Council/West Sussex, regarding all children, of statutory school age, attending alternative provision and/or on a reduced/modified timetable.
- The school leadership will report to Governors information regarding the use and effectiveness of alternative provision and modified/reduced timetables. The school will also report to Governors/Proprietors/Management Committee any formal direction of a child to alternative provision to improve behaviour.

## **5.7 Attendance and Behaviour**

- Additional policies and procedures are in place regarding school attendance and behaviour.
- The school recognises that absence from and exclusion from may be indicators of abuse, neglect, and exploitation, including the exploitation of children. The DSL will regularly liaise with members of staff with responsibility for behaviour and attendance to ensure risk is identified and appropriate intervention is in place to protect children from harm.
- The school will work in partnership with Surrey/West Sussex Police and other partners for reporting children that go missing from the school site during the school day. Staff will be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

## **5.8 Restrictive Physical Intervention**

- Copthorne Prep School acknowledges that staff must only ever use physical intervention as a last resort, when a child is at immediate risk of harming themselves or others, and that at all times it must be the minimal force necessary to prevent injury to another person. Such events should be fully recorded and signed by a witness.
- Staff who are likely to need to use physical intervention will be appropriately trained in Crisis Prevention Institute (CPI) techniques
- Staff understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection and/or disciplinary procedures.
- Copthorne Prep School recognises that sometimes touch is appropriate in the context of working with children, and all staff have been given safe practice guidance to ensure they are clear about their professional boundaries.
- When applying disciplinary measures such as physical intervention or isolation for children with SEND the school will consider the risks, given the additional vulnerabilities of these children.

## **5.9 Children who are Lesbian, Gay, Bi, or Trans (LGBT)**

- The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm, however, Copthorne Prep School recognises that children who are LGBT or are perceived by other children to be LGBT (whether they are or not) can be targeted by other children or others within the wider community.
- Caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of Autism and/or attention deficit hyperactivity disorder.
- It is recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.



- As such, when supporting a gender questioning child, we will take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. We will refer to the DfE Guidance for Schools and Colleges in relation to Gender Questioning Children, when deciding how to proceed.
- Copthorpe Prep School recognises risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. LGBT is included within our Relationship and Sex Education and Health Education curriculum and our staff will endeavour to reduce the additional barriers faced and provide a safe space for children to speak out or share any concerns

## 6.0 Online Safety

- It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. Copthorpe Prep School will adopt a whole school approach to online safety which will empower, protect, and educate our pupils and staff in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.
- Copthorpe Prep School will ensure online safety is considered as a running and interrelated theme when devising and implementing our policies and procedures, and when planning our curriculum, staff training, the role and responsibilities of the DSL and parental engagement.
- Copthorpe Prep School identifies that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
- Online risk refers to the potential for harm that children and young people may encounter through digital technologies, including the internet, social media, gaming platforms, and AI-powered tools. These risks can be categorized into four key areas:
  - \* **Content Risk** – Exposure to inappropriate, harmful, or misleading material, such as:  
Pornography, violence, or extremist content  
Misinformation, disinformation, fake news, and conspiracy theories  
Content promoting self-harm, eating disorders, or suicide
  - \* **Contact Risk** – Harm arising from interactions with others online, including:  
Grooming, exploitation, or coercion  
Cyberbullying or harassment  
Persuasive tactics used by influencers or anonymous users
  - \* **Conduct Risk** – Risks related to a child's own behavior online, such as:  
Sharing personal information or images  
Engaging in harmful challenges or trends  
Using generative AI tools inappropriately or unsafely
  - \* **Commerce Risk** – Exposure to financial exploitation or scams, including:  
In-game purchases or gambling  
Phishing and identity theft  
Fraudulent schemes targeting children or families
- \* Prep School recognises that technology and the risks and harms related to it evolve and change rapidly. The school will carry out an annual review of our approaches to online safety, supported by an annual risk assessment, which considers and reflects the current risks our children face online.  
(See Part 2 of KCSIE reference tools)
- The headteacher will be informed of any online safety concerns by the DSL, as appropriate. The DSL will report to the named governor for safeguarding who will report on online safety practice and incidents, including outcomes, on a regular basis to the wider governing body.



- Artificial Intelligence (AI) in Education: The school recognises the growing role of Artificial Intelligence (AI), including generative AI tools, in teaching and learning. While these technologies offer opportunities for innovation and personalised learning, their use must be carefully managed to ensure pupil safety and data protection. Staff are expected to use AI tools responsibly, ensuring that any content generated is age-appropriate, accurate, and aligned with curriculum objectives. The use of generative AI must be monitored to prevent exposure to inappropriate or misleading material, including misinformation and disinformation. Staff are responsible for supervising pupil interactions with AI tools and reporting any concerns to the Designated Safeguarding Lead (DSL). The school will regularly review its filtering and monitoring systems to ensure they are effective in managing emerging risks associated with AI technologies.

## 6.1 Policies and procedures

- The DSL has overall responsibility for online safety within the school but will liaise with other members of staff (Head of Innovation and DDSL), IT technicians (IMS) and curriculum leads as necessary.
- The DSL will respond to online safety concerns in line with our safeguarding policy and other associated policies, including our Anti-bullying Policy, Social Media Policy and Behaviour Policies.
  - \* Internal sanctions and/or support will be implemented as appropriate
  - \* Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures (West Sussex and Surrey).
- Copthorne Prep School uses a wide range of technology. This includes: computers, laptops, iPads, and other digital devices, the internet, our learning platform, intranet and email systems.
  - \* All school owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.
- Copthorne Prep School recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras, wearable technology and any other electronic devices with imaging and/or sharing capabilities.
- In accordance with KCSIE and EYFS, Copthorne Prep School has appropriate mobile and smart technology and image use policies in place, which are shared and understood by all members of the community. These policies can be found in the green folder in the Staff Room and on shared resources.
  - \* All mobile phones will be kept locked away if teaching in EYFS.
  - \* In all other areas of the school, the mobile phones should be kept out of site to the children and only used in areas where there are no children i.e. the Staffroom during breaks.

## 6.2 Appropriate filtering and monitoring on school devices and networks

- Copthorne Prep School will use the guidance issued by the Department for Education – filtering and monitoring standards.
- Copthorne Prep School will:
  - \* Identify and assign roles and responsibilities to manage filtering and monitoring systems. The school uses Smoothwall for Filtering and it is monitored by the Head of Innovation (DDSL) and IMS.
  - \* Review filtering and monitoring provision at least annually.
  - \* Block harmful and inappropriate content without unreasonably impacting teaching and learning – the list of ‘highlighted’ words are regularly reviewed.
  - \* Have effective monitoring strategies in place that meet our safeguarding needs.
- Copthorne Prep School will do all we reasonably can to limit children’s exposure to online harms through school provided devices and networks and in line with the requirements of the Prevent Duty and KCSIE, we will ensure that appropriate filtering and monitoring systems are in place.



# COPTHORNE PREP

- When implementing appropriate filtering and monitoring, Copthorne Prep School will ensure that 'over blocking' does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.
- Whilst filtering and monitoring is an important part of our online safety responsibilities, it is only one part of our approach to online safety and we recognise that we cannot rely on filtering and monitoring alone to safeguard our pupils; effective safeguarding practice, robust policies, appropriate classroom/behaviour management and regular education/training about safe and responsible use is essential and expected.
  - \* Pupils will use appropriate search tools, apps and online resources as identified by staff, following an informed risk assessment.
  - \* Internet use will be supervised by staff as appropriate to pupils age, ability and potential risk of harm.

## **Responsibilities**

- Our governing body has overall strategic responsibility for our filtering and monitoring approaches, including ensuring that our filtering and monitoring systems are regularly reviewed, and that the leadership team and relevant staff have an awareness and understanding of the appropriate filtering and monitoring provisions in place, manage them effectively and know how to escalate concerns when identified.
- Ali Raja (DSL), a member of the SLT and Deborah Grimason, governor, are responsible for ensuring that our school has met the DfE Filtering and monitoring standards for schools and colleges.
- Our Senior Leadership Team are responsible for:
  - \* Procuring filtering and monitoring systems.
  - \* Documenting decisions on what is blocked or allowed and why.
  - \* Reviewing the effectiveness of our provision.
  - \* Overseeing reports.
  - \* Ensuring that all staff understand their role, are appropriately trained, follow policies, processes and procedures and act on reports and concerns.
  - \* Ensuring the DSL and IT services providers and Head of Innovation (DDSL) have sufficient time and support to manage their filtering and monitoring responsibilities.
- The DSL has lead responsibility for overseeing and acting on:
  - \* Any filtering and monitoring reports
  - \* Any safeguarding concerns identified
  - \* Checks to filtering and monitoring system with the help of Head of Innovation (DDSL)
- The IT services have technical responsibility for:
  - \* Maintaining filtering and monitoring systems
  - \* Providing filtering and monitoring reports
  - \* Completing technical actions identified following any concerns or checks to systems
  - \* Working with the senior leadership team and DSL to procure systems, identify risks, carry out reviews and carry out checks.
- All members of staff are provided with an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring as part of our induction process, and in our child protection staff training.
- All staff, pupils and parents/carers have a responsibility to follow this policy to report and record any filtering or monitoring concerns.

## **Decision making and reviewing our filtering and monitoring provision**

- When procuring and/or making decisions about our filtering and monitoring provision, our SLT will work closely with the DSL and Head of Innovation /IT service providers. Decisions will be recorded and informed by an approach which ensures our systems meet our school specific needs and circumstances including but not limited to our pupil risk profile and specific technology use.



# COPTHORNE PREP

- Any changes to the filtering and monitoring approaches will be assessed by staff with safeguarding, educational and technical experience and, where appropriate, with consent from the leadership team; all changes to the filtering policy are logged and recorded.
- Our school undertakes an at least annual review of our filtering and monitoring systems to ensure we understand the changing needs and potential risks posed to our community.
- In addition, our school undertakes regular checks on our filtering and monitoring systems, which are logged and recorded, to ensure our approaches are effective and can provide assurance to the governing body that we are meeting our safeguarding obligations. Tests are undertaken on a monthly basis by the Online Safety Co-ordinator using SWGfL – Test Filter. The date and time of each test, together with the results will be recorded in the DSL's Team for future reference. The DSL and DDSL's working together, will regularly undertake specific keyword searches for both text and images, to ensure the effectiveness of the filter using both staff and pupil logins. The date and time of each of these test sessions, the specific keywords used, and the filtering results will be recorded in the DSL's Team for future reference.

## Appropriate filtering

- Copthorne Prep School's education broadband connectivity is provide through [Fastnet](#) and Copthorne Prep uses [Smoothwall](#) for its filtering solution.
  - \* Smoothwall is a member of Internet Watch Foundation (IWF)
  - \* Smoothwall has signed up to Counter-Terrorism Internet Referral Unit list (CTIRU)
  - \* Smoothwall is blocking access to illegal content including child sexual abuse material (CSAM)
  - \* Smoothwall blocks access to sites which could promote or include harmful and/or inappropriate behaviour or material. This includes but is not limited to content which promotes discrimination or extremism, drugs/substance misuse, malware/hacking/ gambling, piracy and copyright theft, pro-self-harm, eating disorder and/or suicide content, pornographic content and violent material.
- We filter internet use on all school owned, or provided, internet enabled devices and networks.
- Our filtering system is operational up to date and is applied to all users, including guest accounts, all school owned devices and networks and all BYOD devices using the school broadband connection.
- Copthorne Prep School works with Smoothwall, Head of Innovation and our IT service providers to ensure that our filtering policy is continually reviewed to reflect our needs and requirements.
- Filtering breaches will be reported to the DSL and technical staff and will be recorded and escalated as appropriate and in line with relevant policies.
- Where appropriate, parents/carers will be informed of filtering breaches involving their child.
- If staff are teaching topics which could create unusual activity on the filtering logs, or if staff perceive there to be unreasonable restrictions affecting teaching, learning or administration, they will report this to the Head of Innovation, DSL and/or the leadership team.

## Appropriate monitoring

- Copthorne Prep School will appropriately monitor internet use on all school provided devices and networks.
- All users will be informed that use of our devices and networks can/will be monitored and that all monitoring is in line with data protection, human rights and privacy legislation.
- If a concern is identified via our monitoring approaches:
  - \* Where the concern relates to pupils, it will be reported to the DSL and will be recorded and responded to in line with relevant policies, such as child protection, acceptable use, and behaviour policies.
  - \* Where the concern relates to staff, it will be reported to the headteacher (or chair of governors if the concern related to the headteacher), in line with our staff code of conduct policy.

## 6.4 Remote/online learning





# COPTHORNE PREP

- Copthorne Prep School will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements and any local/national guidance.
- All communication with pupils and parents/carers will take place using school provided or approved communication channels; for example, school provided email accounts and phone numbers and agreed systems: Teams, iSAMS
- Staff and pupils will be encouraged to report issues experienced at home and concerns will be responded to in line with our child protection and other relevant policies.

## **7.0 Staff Engagement and Expectations**

### **7.1 Staff awareness, induction and training**

- \* All members of staff have been provided with a copy of part one of the current version of KCSIE 2025 which covers safeguarding information for staff.
- \* School leaders, including the DSL and governors will read KCSIE 2025 in its entirety.
- \* School leaders and all members of staff who work directly with children will read annex B of KCSIE 2025.
  - \* All members of staff have signed to confirm that they have read and understood the national guidance shared with them. The signed forms are kept as hard copy in the DSL's office.
  - \* All new staff and volunteers (including agency staff) receive safeguarding and child protection training (including online safety, which amongst other things, will include ensuring an understanding of the expectations and responsibilities in relation to filtering and monitoring) to ensure they are aware of the school internal safeguarding processes, as part of their induction.
  - \* All staff members will receive appropriate child protection training (including online safety) that is updated at least annually, to ensure they are aware of a range of safeguarding issues and how to report concerns. The main training will take place in the September INSET each year with top-ups at subsequent INSET. All members of staff are expected to undertake two Educare courses each half term to keep them up-to-date with the training and understanding.
  - \* All governors receive appropriate safeguarding and child protection training at induction. This training equips them with the knowledge to provide strategic challenge to be assured that our safeguarding policies and procedures are effective and support the delivery of a robust whole school approach to safeguarding.

### **8.1 Safer recruitment and safeguarding checks**

- Copthorne Prep School is committed to ensuring that we develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our pupils and staff.
- Copthorne Prep School will follow Part Three, 'Safer Recruitment' of KCSIE 2025 and relevant guidance from the DBS.
- The governing body and leadership team are responsible for ensuring that the school follows safe recruitment processes as outlined within guidance.
- The governing body will ensure that at least one of the persons who conducts an interview has completed safer recruitment training.
- The school maintains an accurate Single Central Record (SCR) in line with statutory guidance.
- Copthorne Prep School advises all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, reprimands, and warnings.
- As part of our safer recruitment procedures, the school conducts online pre-recruitment checks for all shortlisted candidates, reviewing publicly available information to identify any safeguarding concerns prior to appointment, in line with data protection regulations.
- Where external organisations use school premises for activities involving children, the school ensures appropriate safeguarding arrangements are in place. Any safeguarding allegations involving external providers will be responded to promptly and in accordance with statutory guidance, including notifying relevant authorities and reviewing the organisation's continued use of the premises.





## 8.2 Safe Culture

- As part of our approach to safeguarding, the school has created and embedded a culture of openness, trust and transparency in which our values and expected behaviour as set out in our staff code of conduct are constantly lived, monitored and reinforced by all staff (including supply teachers, volunteers and contractors) and where all concerns are dealt with promptly and appropriately.
- Staff are encouraged and should feel confident to self-refer, if they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.
- All staff and volunteers should feel able to raise any concerns about poor or unsafe practice and potential failures in the school safeguarding regime. They can do this by speaking to the Headteacher or recording on My Confide. If the allegation is against the Headteacher, the Chair of Governors should be informed. The leadership team at Copthorne Prep School will take all concerns or allegations received seriously.
- All members of staff are made aware of the school Whistleblowing procedure. It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk.

### Additional Resources

[Surrey Safeguarding Children Partnership webpages](#)

[Surrey Education Services \(surreycc.gov.uk\)](#) – Education Safeguarding Resources Hub

[Graded Care Profile 2](#)

[NSPCC | The UK children's charity | NSPCC](#)

[CEOP ThinkuKnow webpages](#)

[Anti Bullying Alliance webpages](#)

[Childnet International](#)

[Safer Internet Centre webpages](#)

[Contextual Safeguarding Network webpages](#)

[Lucy Faithfull Foundation webpages](#)

### Appendix one: Categories of Abuse

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children. It should be noted that abuse can be carried out both on and offline and be perpetrated by men, women and children.

### Sexual Abuse

It is important that schools are aware of sexual violence and the fact children can, and sometimes do, abuse other children in this way and that it can happen both inside and outside of school. When referring to sexual violence in this advice, we do so in the context of child-on-child sexual violence.

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

**Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

**Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (NOTE- Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

**Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (NOTE – this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

### **What is consent?**

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

- a child under the age of 13 can never consent to any sexual activity
- the age of consent is 16
- sexual intercourse without consent is rape.

Further information about consent can be found here: [Rape Crisis England & Wales - Sexual consent.](#)

### **Signs that MAY INDICATE Sexual Abuse**

- Sudden changes in behaviour and performance
- Displays of affection which are sexual and age inappropriate
- Self-harm, self-mutilation or attempts at suicide
- Alluding to secrets which they cannot reveal
- Tendency to cling or need constant reassurance
- Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby
- Distrust of familiar adults, for example, anxiety of being left with relatives, a childminder or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Fear of undressing for PE
- Sexually transmitted disease
- Fire setting

### **Physical Abuse**

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

### **Signs that MAY INDICATE physical abuse**

- Bruises and abrasions around the face
- Damage or injury around the mouth



# COPTHORNE PREP

- Bi-lateral injuries such as two bruised eyes
- Bruising to soft area of the face such as the cheeks
- Fingertip bruising to the front or back of torso
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns
- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot
- Aggressive behaviour or severe temper outbursts.
- Injuries need to be accounted for. Inadequate, inconsistent, or excessively plausible explanations or a delay in seeking treatment should signal concern.

## **Emotional Abuse**

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

## **Signs that MAY INDICATE emotional abuse**

- Over reaction to mistakes
- Lack of self-confidence/esteem
- Sudden speech disorders
- Self-harming
- Eating disorders
- Extremes of passivity and/or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parents being contacted
- Unwillingness or inability to play
- Excessive need for approval, attention, and affection

## **Neglect**

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

## **Signs that MAY INDICATE neglect**

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing



# COPTHORNE PREP

- Frequent lateness or non-attendance
- Untreated medical problems
- Poor relationship with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight
- Low self esteem

## Appendix 2 – Concern Form

To be used when a member of staff is unable to access My Concern. This form needs to be given to the DSL as soon after the event as possible.

<b>Date:</b>		<b>Time:</b>
<b>Pupil's Name</b>		
<b>Staff Member's name</b>		

### The Concern

Notes: Record what you have seen, who told you and when. Make reference to previous information, referencing previous logging where appropriate.



What?	
Who?	
Where?	
When?	

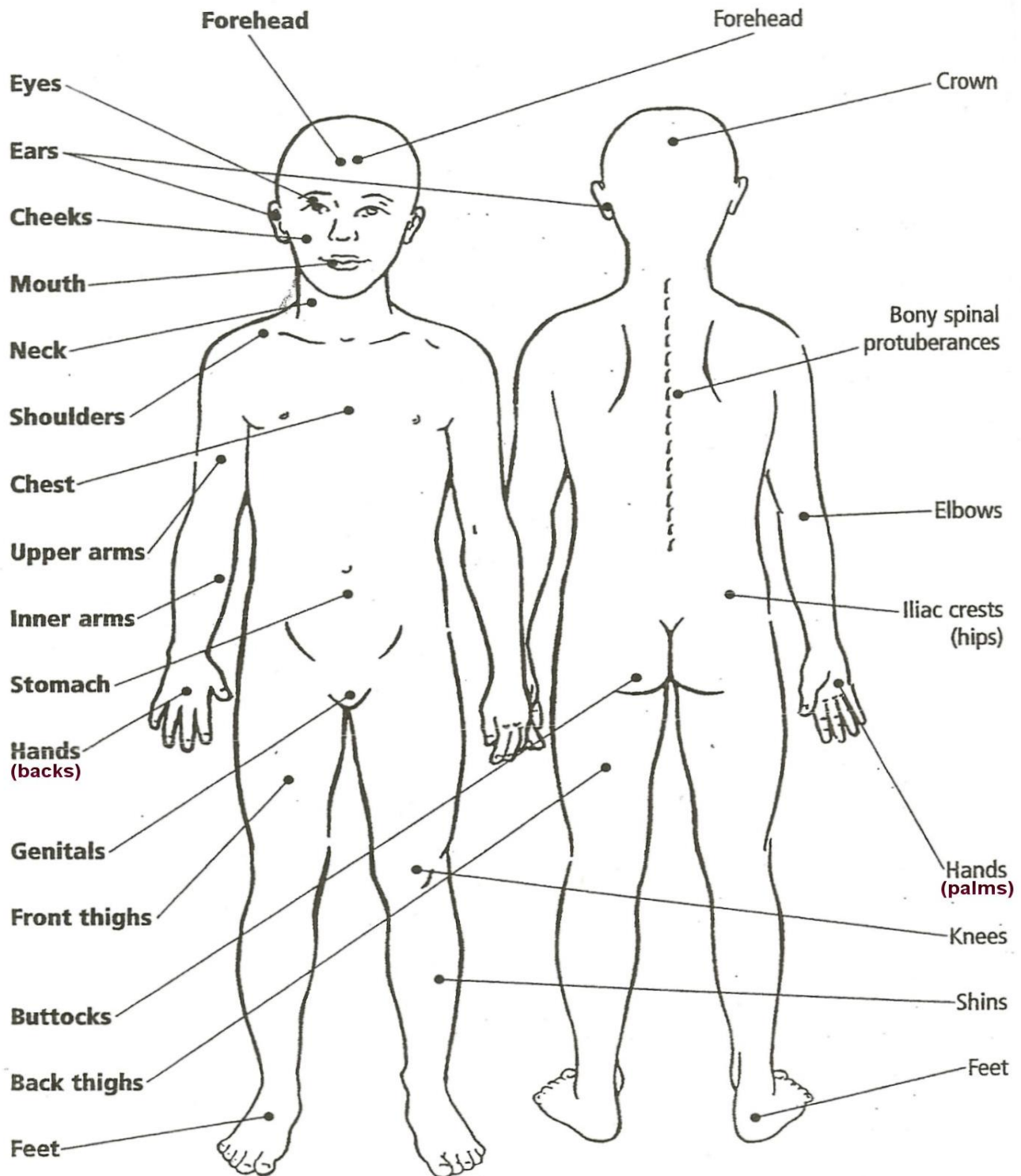
Signed \_\_\_\_\_

Dated \_\_\_\_\_



## NON-ACCIDENTAL INJURY

## ACCIDENTAL INJURY







## Appendix 4

### What to do if you have a welfare concern in Copthorne Prep School

#### Why are you concerned?

For example

- Something a child has said, for example, an allegation of harm
- Child's appearance; may include unexplained marks/bruises as well as dress
- Behaviour change(s)
- Witnessed concerning behaviour

#### Act immediately and record your concerns. If urgent, speak to a DSL first.

Follow the school procedure

- Reassure the child
- Clarify concerns, using open questions if necessary (**TED**: Tell, Explain, Describe)
- Use child's own words and record facts, not opinions.
- Sign and date your records
- Seek support for yourself if required from DSL (Nylie McGregor)

#### ↓ Inform the Designated Safeguarding Lead ↓

- Consider whether a child is at immediate risk of harm; are they safe to go home?
- If a child is at risk of immediate harm, call the Integrated Front Door on 0300 470 9100 (outside office hours – 01483 517898) or the Police on 999 **immediately**
- Access the Surrey Support Level Guidance document and procedures: [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk)
- Refer to other agencies as appropriate, for example, Internal or community services, early help open access, LADO, Police, or make a Request for Support via Integrated Children's Services: 03000 411 111

If unsure, consult with Area Education Safeguarding Advisor (0300 470 9100 option 3), or West Sussex on 01403 229 900

#### If you are unhappy with the response

##### Staff:

- Follow local authority/safeguarding partnership escalation procedures
- Follow school whistleblowing procedures

##### Pupils or Parents:

- Follow school complaints procedures (link via website)

#### Record decision making and action taken in the pupil child protection file

#### Monitor

Be clear about:

- What you are monitoring, for example, behaviour trends, appearance.
- How long you will monitor
- Where, how and to whom you will feedback, and how you will record

#### Review and request further support if necessary

At all stages, the child's circumstances will be kept under review  
The DSL/staff will request further support if required to ensure the **child's safety** is **paramount**