

Moor House School & College

Child Protection and Safeguarding Policy and Procedures



This policy was agreed by governors on:	Autumn Term 2023
Who needs to read this:	All staff, Governors, parents and regular visitors to Moor House
Review cycle:	Annually
Next review date:	Autumn Term 2024
Current status:	Approved by FGB
The person responsible for this policy is:	The Designated Safeguarding Lead
The committee responsible for this policy is:	Every Child Matters Committee

Safeguarding Statement 2023

"It could happen here"

Moor House School & College recognises our moral and statutory responsibility to safeguard and promote the welfare of all children and young people.

We make every effort to provide a child-centered and coordinated approach to safeguarding where children and vulnerable adults feel safe, secure, valued, respected, and feel confident to talk if they are worried, feeling they will be listened to effectively.

Moor House encourages a culture of listening to and engaging in dialogue, with children and vulnerable adults/adults at risk, seeking their views in ways that are appropriate to their age, culture and understanding.

This child-centered approach is fundamental to safeguarding and promoting the welfare of every child. A child-centered approach means keeping the child in focus when making decisions about their lives and working in partnership with them and their families.

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

Moor House will not tolerate the abuse of adults with care and support needs. It is committed to promoting wellbeing, preventing harm, and responding effectively if concerns are raised. Moor House is committed to the aims of adult safeguarding.

Moor House strives to create a culture where sexual harassment and sexual abuse are not tolerated – in order to do this, all staff members should assume that sexual harassment and online sexual abuse are happening within our setting.

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 setting or in the community, considering 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 setting 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.

Supporting Children

Moor House School & College will support all children by:

- Providing a safe place and stability in the lives of children who have been abused or who are at risk of harm. The setting recognises that a child who is abused or witnesses abuse and/or violence may feel helpless and humiliated, may blame themselves, and may find it difficult to develop and maintain a sense of self-worth. Research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.
- Promoting a caring, safe and positive environment within the setting.

- Encouraging self-esteem and self-assertiveness, through the curriculum and through positive relationships within the setting community.
- Ensuring children are taught to understand and manage risk through Personal, Social, Health and Economic (PSHE) education and Relationship and Sex Education (RSE) and Health Education through all aspects of setting life, including staying safe online.
- Responding sympathetically to any requests for time out to deal with distress and/or anxiety.
- Ensuring children are made aware of and have access to details of helplines, counselling, or other avenues of external support.
- Liaising and working in partnership with support services and agencies involved in early help and the safeguarding of children.
- Notifying children's social care without delay if there is an immediate risk of significant harm.
- Providing continued support to children about whom they have concerns and those who leave the setting by ensuring that information is shared confidentially with the child's new setting. The setting will ensure records are forwarded as a matter of priority and within statutory timescale.

The DSL will consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

Moor House recognises that it plays a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection.

Purpose of Policy

The purpose of this policy is to provide staff, volunteers and Governors/Proprietors/ Management Committee with the framework they need in order to keep children safe and secure in our setting. The policy also informs parents and carers how we will safeguard their children whilst they are in our care. Our requirements of staff volunteers and governors are summarised below:

- Everyone who comes into contact with children and their families has a role to play.

- Moor House aims to protect and enhance the safety and well-being of all children and vulnerable adult students by actively promoting awareness, good practice, and sound procedures.
- Moor House has a Safeguarding Policy and procedures in place. Safeguarding and promoting the welfare of children is everyone's responsibility and no single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action therefore Moor House Safeguarding Policy applies to anyone working on behalf of Moor House including senior managers and the board of Trustees and Governors, paid staff, volunteers, sessional workers, agency staff and students. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centered. This means that they should consider, at all times, what is in the best interests of the child.
- A small number of students at Moor House are aged 18 and over. Appendix 12 of this policy outlines how Moor House will respond to concerns raised about a vulnerable adult/adult at risk in our setting. The DSL is also the Designated Safeguarding Adult Lead, and the DDSLs are Alerting Managers.
- Moor House encourages a culture of listening to and engaging in dialogue, with children and vulnerable adults/adults at risk seeking their views in ways that are appropriate to their age, culture and understanding.

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002 (as amended), the Non-Maintained Special Schools (England) Regulations 2015 and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended).

Statutory, national, and local guidance – this includes:

- 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 settings.
- 'What to do if you are Worried a Child is Being Abused' 2015 - Advice for Practitioners
- Keeping Children Safe in Education (KCSIE, 2023) 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.

- Local Guidance from the Local Safeguarding Partnership: Surrey Safeguarding Children Partnership (SSCP) including SSCP Procedures.

This policy was last reviewed by the Governing Body on 4th December 2023.

Signed:

A handwritten signature in black ink, appearing to read 'B Martin', with a long horizontal flourish extending to the right.

Barbara Martin
Designated Safeguarding Lead

Key Personnel

The Designated Safeguarding Lead (DSL) is: Barbara Martin Contact details: email: martinb@moorhouseschool.co.uk Telephone: 01883 712271

The deputy DSLs are:

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The nominated child protection governors are: Stuart Dennison and Laura Middleditch

Email: safeguardinggovernors@moorhouseschool.co.uk

The Headteacher and DDSL responsible for Managing Allegations against Staff and Visitors is Helen Middleton.

Contact details: email: middletonh@moorhouseschool.co.uk Telephone: 01883 712271

The Chair of Governors is: Stuart Dennison

Email: ChairOfGovernors@moorhouseschool.co.uk

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SAFEGUARDING POLICY

Definitions of harm

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. 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.

For the purpose of this policy, Moor House has defined harm as:

- *Neglect* - the persistent failure to meet the basic physical and physiological needs of the young person that results in serious impairment of their health and development, including the failure to provide adequate food, clothing, shelter and failure to respond to basic emotional needs, such as being cared for when sick.
- *Abandonment* - leaving a child alone and unattended in circumstances that are inappropriate for their age and/ or level of ability.
- *Emotional abuse* – persistent, emotional ill treatment that has a severe adverse effect on the emotional development of children and young people. It may involve conveying to them that they are not wanted, not loved or worthless. It may involve inappropriate expectations (such as taking on the responsibility of an adult within the family) being placed on the young person leaving them frightened and unable to cope. It may also involve the threatening, exploitation or corruption of children and young people.
- *Physical abuse* – hitting, kicking, shaking, slapping, and throwing, scalding, burning, poisoning, drowning, suffocating, or other action intended to cause physical harm or ill health to the child or young person. Physical harm may also be caused when a parent or carer covers up the symptoms of, or deliberately causes ill health to a child or young person within their care.
- *Racial abuse* – any type of verbal or physical abuse that is directed at an individual or group because of their racial or ethnic background.
- *Witnessing ill treatment, including domestic abuse of another person* - this may impact the health or development of a child or young person.
- *Sexual abuse or sexual exploitation* - forcing or enticing a child or young person to participate in sexual activities, whether or not the child or young person is aware or has knowledge of what is happening. It includes child prostitution, encouraging children or young people to watch or participate in the production of pornographic material, online grooming, encouraging children and young people

to behave in sexual inappropriate ways. Sexual acts include penetrative (rape or buggery) and non-penetrative acts such as touching or stroking. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

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

In relation to young people under the age of 13, consent is irrelevant. The law says 'a child under the age of 13 does not, under any circumstances, have the legal capacity to consent to any form of sexual activity'. **The Police must be informed immediately of any sexual activity involving a child under 13 years of age.**

General safeguarding advice

- Remember not to be a young people's friend, always maintain a professional manner when working with them.
- Do not accept a young person as a friend on any social networking site that you use. This also applies to all students who have left Moor House as long as they remain under 18. Moor House's expectation of Professional Boundaries should be maintained, even if a student has left Moor House, and the student is underage.
- Always keep a record of any text or email exchanges with a young person (staff and volunteers will use work telephones where available).
- Always be aware that your comments or actions may be perceived differently than intended, so be sensitive to the situation.
- Do not meet a young person alone, this is for the safety and wellbeing of the young person but also yourself. Where this is necessary, try to use public spaces for one-to-one meetings if you are not meeting in a Moor House school & College office or premises.
- Avoid detailed discussions about your personal experiences e.g. drugs, alcohol, sex.
- Never speak to the press about a child or young person

Child Protection Procedures

Reporting and Responding to Safeguarding Concerns

The following procedures apply to all staff and volunteers working in the school and will be covered by training to enable staff and volunteers to understand their role and responsibility.

The aim of our procedures is to provide a robust framework which enables staff and volunteers to take appropriate action when they are concerned that a child or young person 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 or young person. Where there is a conflict of interest between the child and an adult, the interests of the child must be paramount.

All staff and volunteers should be aware that children with SEND or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children, the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;
- communication barriers and difficulties in managing or reporting these challenges;
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in settings or the consequences of doing so.

Additionally, staff and volunteers should question the cause of knocks and bumps in children who have limited mobility.

If a member of staff or volunteer 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:
- Report it to the DSL or DDSL immediately.
- The DSL or DDSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL or DDSL is not immediately available.

- Make an accurate record (which may be used in any subsequent court proceedings) as soon as possible and within 24 hours of the occurrence, of all that has happened, including details of:
 - Dates and times of their observations
 - Dates and times of any discussions in which they were involved.
 - Place
 - Who was present
 - Context
 - Any injuries
 - Explanations given by the child/adult
 - Rationale for decision making and action taken
 - Any actual words or phrases used by the child
 - Demeanour/non-verbal behaviours of the child
 - Child's voice
 - Rationale for decision making
 - Actions
- The records must be signed and dated by the author or/equivalent on electronic-based records.
- In the absence of the DSL or DDSL, staff and volunteers must be prepared to refer directly to C-SPA (and the police if appropriate) if there is the potential for immediate significant harm.
- Disclosure or evidence for concern may occur in a number of ways including a comment made by a child, physical evidence such as bruising, a change in behaviour or inappropriate behaviour or knowledge.
- The person reporting the concern must record it, using the appropriate Reporting Yellow Form/CPOMS system. The assigned Safeguarding Lead is responsible for ensuring that a copy of the Incident Report or Request for Support referral form is available to the DSL and where a referral to the C-SPA/MASH is required that it is made to Surrey Children's Services, C-SPA, details below or to the relevant safeguarding partnership if the concern relates to a child who is not a Surrey resident and the incident did not occur in Surrey. This form/CPOMS concern must be kept strictly confidential and stored securely.
- It is the responsibility of the Safeguarding Lead (DSL/DDSL) or in their absence the Headteacher to deal with safeguarding matters. If further referral is necessary, it will either be through Surrey Safeguarding Children Partnership/Surrey Children's Services or the Police.
- The Safeguarding Lead (DSL/DDSL) will be responsible for informing the person who reported the disclosure of any action taken and any outcome if this is appropriate.
- It is also the responsibility of the DSL/DDSL to ensure any partner agencies involved

with the young person are made aware of the disclosure and the action taken where relevant and where information sharing guidance permits this.

- It is important to remember that often only when information held by a number of workers is put together, that a picture of child abuse emerges. All staff and volunteers must adhere to the information sharing protocol published by HM Government, adopted by the Children's Trust and endorsed by SSCP. Details can be found here; [Information sharing: advice for practitioners \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/616222/information-sharing-advice-for-practitioners.pdf). In addition to this, whilst respecting cultural differences, the basic requirement for children is that they are kept safe across social, ethnic and cultural boundaries.

Reacting to a disclosure

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected and/or may not recognise their experiences as harmful. Children may feel embarrassed, humiliated or threatened. This may be due to their vulnerability, disability and or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and reporting any concerns they have to the designated DSL or DDSs at Moor House School & College.

- Listen carefully rather than asking leading questions.
- Never *promise* any particular action or NOT to disclose any information shared.
- Allow silence and/or allow the child or young person to be upset.
- Try to relate to the age, understanding or special needs of the child or young person.
- Write down carefully the information you have been given as soon as possible, preferably within 24 hours and only including what you have been told.
- Discuss this as soon as possible with the DSL.
- Any decision not to tell the parents must be discussed with the DSL **unless the child or young person is in immediate danger**

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. Members 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/Principal or Safeguarding Governor or contact the C-SPA for advice.

Parents/carers

It is good practice to be as open and honest as possible with parents/carers about any concerns and where possible obtain their agreement before making a referral to the C-SPA. However, this should only be done when:

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

Where there are doubts or reservations about involving the child's family, the DSL should clarify with the C-SPA or the Police whether the parents/carers should be told about the referral and, if so, when and by whom. This is important in cases where the Police may need to conduct a criminal investigation. The child's views should also be considered. If it is suspected that a child is suffering, or is likely to suffer, harm or abuse the DSL must contact the C-SPA. If the DSL feels unsure about whether a referral is necessary, they can phone the C-SPA consultation line to discuss concerns.

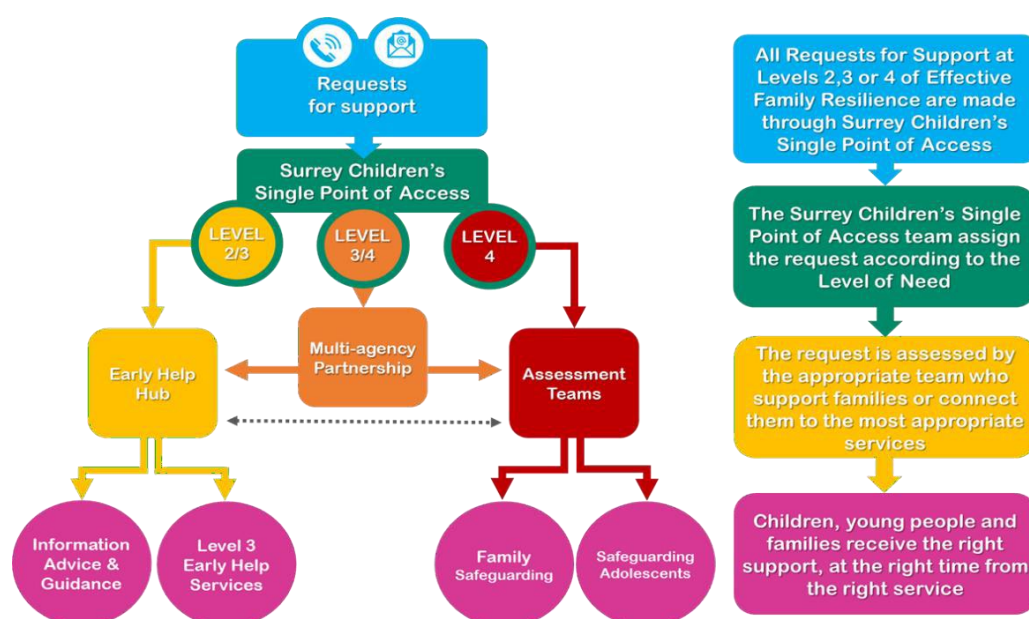
When a child needs urgent medical attention and there is suspicion of abuse the DSL/Healthcare Manager should take the child to the accident and emergency unit at the nearest hospital, having first notified the C-SPA. The DSL should seek advice about what action the C-SPA will take and about informing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

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.

Following a report of concerns the DSL or DDSL must:

1. [Using the SSCP Levels of Need](#), decide whether or not there are sufficient grounds for suspecting significant harm, in which case a referral must be made to the C-SPA and the police if it is appropriate.



Helpful contacts

- **Children's Single Point of Access (C-SPA)**, a front door to Surrey County Council services for children, provides residents and people who work with children in Surrey with direct information, advice and guidance about where and how to find the appropriate support for children and families. C-SPA is available **9am-5pm, Monday-Friday**
Phone: 0300 470 9100
Email: cspa@surreycc.gov.uk
OR
- **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
- The LADO Service manages allegations against individuals who work or volunteer with children in Surrey. If you have a concern regarding someone who works with children, please contact the LADO on 0300 123 1650.
Email: LADO@surreycc.gov.uk
- NSPCC Helpline: 0808 800 5000

Finding a Solution Together (FaST Process)

Effective working together depends upon an open approach and honest relationships between agencies and a belief in genuine partnership working. Any disputes about the safety and well-being of a child should be resolved in a timely way with all agencies working together in the best interests of the child so that the welfare of the child remains paramount.

The Partners recognise that complexity of need and range of intervention/support will not always fit into a simple formula that leads to *'the right solution'*. Often there may be no right or wrong answer and quite legitimately practitioners may exercise their professional judgement differently. It is also the case that exceptionally, the needs of some young people and families may not easily fit within a conventional application of thresholds. The purpose of the SSCP Finding a Solution Together (FaST process) is to create a transparent process that enables multi-agency practitioners to exercise their professional judgement and provide the best possible service in a timely and safe way.

It is of vital importance that children, young people and their families do not become entangled in professional disagreements. Neither should disputes detract from the focus on the child, delay effective decision making, nor lead to protracted disputes that negatively impact upon the child and/or family and on inter-agency relationships and working practice. In reaching resolution, it is essential that at all times disputes are approached in a considerate manner and one which both respects and seeks to understand the views and concerns of others from their experience and perspective when engaging with the young person/family.

Disagreements should be resolved through child-centered discussion between agencies. This escalation policy outlines the process to be followed when professionals are unable to agree about what is in the best interests of the child. The detailed policy can be accessed here:

<https://surreyscb.procedures.org.uk/skyqox/complaints-and-disagreements/the-surrey-fast-resolution-process/#s4863>

ALLEGATIONS MADE AGAINST STAFF AND VOLUNTEERS

When any form of complaint is made against an employee or volunteer, it must be taken seriously. The complaint should initially be dealt with by the Headteacher or in their absence the Head of Care or in the absence of both of these people, the most senior staff member on site at the time the complaint is made. If the complaint is against the most senior member of staff on site, then the Chair of Trustees must be informed.

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

- behaved in a way that has harmed a child, or may have harmed a child; and/or
- possibly committed a criminal offence against or related to a child; and/or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- 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 setting, that might make an individual unsuitable to work with children, this is known as transferable risk.

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

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

- Report any concerns to the Headteacher/Principal immediately.
- If an allegation is made against the Headteacher/Principal, the concerns need to be raised with the Chair of Governor/Proprietor/ Management committee as soon as possible.
- If the Chair of Governor/Proprietor/ Management committee is not available, then the LADO should be contacted directly.
- There may be situations when the Headteacher/Principal, Chair of Governor/Management committee 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/Principal, Chair of Governors/Management committee they will contact the LADO (as part of their mandatory duty) on 0300123 1650 option 3 LADO or Email: LADO@surreycc.gov.uk immediately and before taking any action or investigation.
- Following consultation with the LADO inform the parents/carers of the allegation unless there is a good reason not to.
- In liaison with the LADO, the setting 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 setting to seek guidance in following procedures set out in part 4 of KCSIE (2023) and the SSCP procedures.

- Moor House School & College will have the right to suspend from duty and/or the premises, any person who is a party to the allegation until a full investigation has been made.

This action does not imply in any way that the person suspended is responsible or is to blame for any action leading up to the complaint. The purpose of any such suspension is to enable a full and proper investigation to be carried out in a professional manner.

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 setting 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 setting’s values and expected behaviour set out in the staff code of conduct are lived, monitored and reinforced constantly by all staff.

The setting 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 Principal in a timely manner. If the Principal 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.

In the absence of the Principal low-level concerns can be made to the safeguarding lead.

ORGANISATIONAL RESPONSIBILITIES

Moor House School will be initially responsible for the implementation of the Safeguarding Policy and may designate a certain member of staff to manage the Safeguarding Policy and its implementation.

It is the responsibility of the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead to take appropriate action following any expression of concern and make referrals to the appropriate agency.

Moor House School will ensure that the Designated Safeguarding Lead and Deputy Designated Safeguarding Leads participate in regular safeguarding training on an annual basis so that they are aware of the procedures of identifying and reporting suspected cases of abuse and neglect and are up to date with any legal changes.

All staff/volunteers/Trustees and Governors will be made aware of this Safeguarding Policy and related relevant procedures as part of their induction and where appropriate their contract of employment.

All staff, volunteers, Trustees and Governors will be informed and have access to regular training as required to update their knowledge on safeguarding. This training will equip the Trustees and Governors with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place at Moor House are effective and support the delivery of a robust whole school approach to safeguarding.

Moor House School will work in accordance with guidance and good practice from the Surrey Safeguarding Children Partnership or other placing authorities for students who are not Surrey residents.

Staff and volunteers 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 (2023). Those working directly with children will also read Annex B. [Those who do not work directly with children will have the option of reading Annex A instead.]
- 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, and the Governor responsible for safeguarding.
- Be aware of indicators of abuse and neglect, understanding that children can be at risk of harm inside and outside of the setting, inside and outside of home and online.
- Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may need help or protection.
- Be able to identify vulnerable learners and act 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.
- 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 setting 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 and neglect.
- 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), 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 2023, if the disclosure is an allegation against a member of staff, supply staff, volunteer or contractor.
- All staff must report any low-level concerns (any actions where a staff member is in doubt or uncertain regarding the staff actions) about the behaviour of a member of staff or other adult in the School or College setting to the Head Teacher and follow the allegations procedures if the disclosure is an allegation against a member of staff;
- If in any doubt about what action to take, employees must seek advice from one of the named Safeguarding Leads or in their absence, Chair of the Governing Body.
- 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 tell 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.

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 Child Protection and Safeguarding Policy and procedures are implemented and followed by all staff;
- All staff are aware of the role of the Designated Safeguarding Lead (DSL), including the identity of the DSL and any deputies;
- The setting 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.
- The setting's staff have appropriate knowledge of KCSIE (2023) part 5.
- All children are supported to report concerns about harmful sexual behaviour freely.
- Concerns are taken seriously and dealt with swiftly and appropriately, and children are confident that this is the case. Comprehensive records of all allegations are kept.
- 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 child welfare 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 and young people;
- Opportunities for a coordinated offer of Early Help when additional needs of children or young people are identified.
- Ensure Deputy DSLs are trained to the same standard as the DSL and the role is explicit in their job description.
- With the Designated Safeguarding Lead ensure adequate and appropriate 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 considered when determining what action to take and what services to provide.
- Child and young person-centered systems and processes are in place for children and young people to express their views and give feedback.
- All staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle-blowing procedures.

- Students are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.
- Ensure that allegations or concerns against staff are dealt with in accordance with guidance from Department for Education (DfE), Surrey Safeguarding Children Partnership (SSCP) and Surrey County Council (SCC);
- Ensure that statutory requirements are met to make a referral to the Disclosure and Barring Service and additionally in the case of teaching staff the Teacher Regulation Agency where they think an individual has engaged in conduct that harmed (or is likely to harm) a 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.

The Designated Safeguarding Lead:

In addition to the role and responsibilities of all staff the DSL will:

- Hold the lead responsibility for safeguarding and child protection (including online safety) in the school, (including understanding the filtering and monitoring systems in place) this responsibility is not to be delegated. At Moor House we have a designated DDSL for E-Safety who supports the DSL with all matters relating to E-Safety.
- Have an “it could happen here” approach to safeguarding;
- Liaise with the local authority and work in partnership with other agencies in line with Working Together to Safeguard Children (2018)
- Manage and submit a referral for a child if there are concerns about suspected harm or abuse, to the Children’s Single Point of Access (C-SPA), and act as a point of contact and support for school staff. Referrals must be made safely and securely by email to cspa@surreycc.gov.uk using the Request for [Request for Support Form](#) urgent referrals must be made by telephone 0300 470 9100 (and ask for the priority line). At Moor House, this may also be done by Deputy DSLs;
- Where necessary contact Surrey’s Child Protection Consultation Line for advice and support (0300 470 9100 option 3).
- Report concerns that a student may be at risk of radicalisation or involvement in terrorism, following the [Prevent referral process](#) and use the Prevent referral form to refer cases by e-mail to preventreferrals@surrey.pnn.police.uk. If the

matter is urgent then Police must be contacted by dialing 999. In cases where further advice from the Police is sought dial 101 or *07795 043842 or 01865 555618* and ask to speak to the Prevent Supervisor for Surrey.

- The Department of Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).
- Refer cases to the Channel programme where there is a radicalisation concern via the C-SPA and act as a point of contact and support for staff to discuss concerns. At Moor House, this may also be done by Deputy DSLs;
- Refer cases where a crime may have been committed to the Police as required. At Moor House, this may also be done by Deputy DSLs;
- Liaise with the “case manager” and Local Authority “Designated Officer” for child protection concerns in cases which concern a member of staff or a volunteer; and refer cases where a person is dismissed or left service due to risk/harm to a child to the Disclosure and Barring Service and Teaching Regulation Agency, as required;
- Follow DfE and KCSIE guidance ‘2023 Child on Child Abuse’ when a concern is raised that there is an allegation of a pupil abusing another pupil within the school or college [Keeping children safe in education 2023\(part one only\) \(publishing.service.gov.uk\)](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1152222/Keeping_children_safe_in_education_2023(part_one_only).pdf)
- Be available during term time (during school hours) for staff in school to discuss any safeguarding concerns. Appropriate and adequate cover arrangements will be arranged by the DSL and the school leadership for any out of hours/term activities;
- Act as a source of support and expertise in carrying out safeguarding duties for the whole school community;
- Ensure that the names of the DSL and DDSs are clearly advertised, with a statement explaining the setting’s role in referring and monitoring cases of suspected abuse;
- Encourage and promote a culture of listening to children and vulnerable adults/adults at risk 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. DSL training must be updated at least every two years and their knowledge and skills refreshed at regular intervals but at least annually;
- Have a secure working knowledge of SSCP procedures and understands the assessment process for providing early help and statutory intervention, including the local authority levels of need criteria and referral arrangements.
- 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 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.
- Understand and support the school delivery with regards to the requirements of the Prevent duty and provide advice and guidance to staff on protecting children and young people from radicalisation.
- Liaise with school and college staff (especially pastoral support, curriculum or therapy leads and school health colleagues) on matters of safety and safeguarding and consult the SSCP Levels of Need document to inform decision making and liaison with relevant agencies.
- Be alert to the specific needs of children in need, those with SEND and young carers.
- 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.
- Work with the Headteacher/Principal 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 setting.
- Understand the risks associated with online activity and be confident that they have the up to date knowledge and capability to keep children safe whilst they are online at school; in particular understand the additional risks that children with SEND face online and the associated and appropriate support they require.
- Keep 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 the rationale for decisions made and action taken.
- Ensure that an indication of the existence of the additional child protection file is marked on the student school file record.
- Ensure that when a student transfers school, their child protection file is passed to the new school as soon as possible, and within statutory timescales (separately from the main pupil file and ensuring secure transit) and that confirmation of receipt is received.
- Ensure that where a student transfers school (including in-year) and is on a child protection 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 must be given to a multi-agency schools transition meeting if the case is complex or on-going.

- Ensure that a copy of the child protection file is retained until the new school acknowledges receipt of the original. The copy should then be securely destroyed.
- 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 contribute effectively when required to do so; where a report is required, this should be shared with the parents prior to the meeting.
- Ensure each member of staff has access to, and understands, the setting's Safeguarding and Child Protection policy procedures, especially new and part-time staff.
- Report to the Headteacher any significant issues for example, use of Surrey's FaST Resolution Process enquiries under section 47 of the Children Act 1989 and police investigations; This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.
- Ensure that the case holding Social Worker is informed of any child currently with a child protection plan who is absent without explanation.
- Ensure that all staff sign to say they have read, understood and agree to work within the Moor House Child Protection and Safeguarding Policy, Staff Code of Conduct and Keeping Children Safe in Education (KCSIE) Part 1 and annex A and ensure that the policies are used effectively.
- Organise child protection and safeguarding 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 that in collaboration with the school leadership and governors, the Child Protection and Safeguarding policy is reviewed annually, and the procedures and implementation are updated and reviewed regularly.
- Ensure that the Child Protection and Safeguarding Policy is available publicly and that parents are aware that referrals about suspected harm and abuse will 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 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 three safeguarding partners 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 “Audit of Statutory Duties and Associated Responsibilities” to be submitted to the Surrey County Council, Education Safeguarding Team.
- Ensure that the name of the designated members of staff for Child Protection, the Designated Safeguarding Lead and deputies, are clearly advertised in the school, with a statement explaining the school’s role in referring and monitoring cases of suspected abuse.
- Meet all other responsibilities as set out for DSLs and in Keeping Children Safe in Education 2023.

The Deputy Designated Safeguarding Lead(s):

In addition to the role and responsibilities of all staff the DDSL will:

- be trained to the same standard as the Designated Safeguarding Lead 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, carries out the activities necessary to ensure the ongoing safety and protection of children and vulnerable adults/ adults at risk. In the event of the long-term absence of the DSL an identified deputy will assume all of the functions above.

All members of The Governing Body understand and fulfil their responsibilities to ensure that:

- Moor House has effective safeguarding policies and procedures including a Child Protection Policy, a Staff Code of Conduct, Behaviour Policies for School & College and a response to children who go missing from education. Ensure policies are consistent with Surrey Safeguarding Children’s Board (SSCP) and statutory requirements, are reviewed annually and that the Child Protection and Safeguarding policy is available on the school website.
- Moor House operates a safer recruitment procedure that includes statutory checks on staff and volunteers’ suitability to work with children and disqualification by association regulations and by ensuring that there is at least one person on every recruitment

panel who has completed safer recruitment training, if there is not a panel conducting interviews then the individual will have completed the safer recruitment training.

- At least one member of the governing body has completed safer recruitment training to be repeated every five years.
- Staff and volunteers have been trained appropriately and this is updated in line with guidance and all staff and volunteers have read Keeping Children Safe in Education (2023) part 1 and Annex A and that mechanisms are in place to assist staff and volunteers 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 setting safeguarding approach and wider staff training and curriculum planning.
- Considering the above training requirements, Governing bodies/Proprietors/ Management Committee 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 and volunteers including temporary staff and volunteers are provided with the Moor House Safeguarding and Child Protection Policy and staff Code of Conduct.
- Moor House has procedures for dealing with allegations of abuse against staff and volunteers (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 been, had they not resigned.
- The nominated governors for safeguarding are identified.
- A member of the senior management team has been appointed by the Governing Body as the Designated Safeguarding Lead (DSL) who will take lead responsibility for safeguarding and child protection and that the role is explicit in the role holder's job description.
- On appointment, the DSL and DDSs undertake interagency training (SSCP Foundation Modules 1&2) and also undertake DSL 'New to Role' and 'Update' training every 2 years.
- Children and vulnerable adults/adults at risk are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through personal, social, health and economic education (PSHE) and relationship and sex education (RSE).

- Governors, Trustees and the SMT will ensure application filters and monitoring systems are in place to safeguard children online.
- The governors/Proprietors/Management Committee will regularly review the effectiveness of filtering and monitoring systems in place to safeguard children online.
- Moor House will comply with DfE and the Surrey County Council Policy Guidance for Safeguarding Children Missing Education and Education other than at school.
- That the school and college will comply with regular data returns requested by the Local Authority, regarding all students, of statutory school age, attending alternative provision and/or on a reduced or modified timetable.
- 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. The Governing Body will ensure they have clear systems and processes in place for identifying possible mental health problems, including routes to escalate and clear referral and accountability systems.
- Enhanced DBS checks (without barred list checks, unless the governor is also a volunteer at the school) are in place for all Governors.
- Ensure section 128 checks are undertaken as defined in KCSIE 2023.
- Ensure where Governing bodies/Proprietors/Management Committees hire or rent out Moor House School & College facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) they should ensure that appropriate arrangements are in place to keep children safe.
- Any weaknesses in safeguarding are remedied as soon as possible.

CONFIDENTIALITY AND WHISTLEBLOWING

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

Moor House operates a confidentiality policy. However, under no circumstances will information be kept confidential that raises concern about the safety and welfare of a child or young person.

Any staff or volunteers with concerns about anybody providing services to children and young people should report this to the Headteacher, or Chair of Trustees if the concern is about the Headteacher. If it becomes necessary to consult outside the setting, they should speak in the first instance, to the Area Schools Officer or LADO in accordance with the Whistleblowing Policy.

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 the way a concern is being handled by their setting. 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.

All staff and volunteers must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and young people in accordance with the Information Sharing Policy published by HM Government, adopted by the Children's Trust and endorsed by SSCP. The Data Protection Act 1998 and General Data Protection Regulations are not a barrier to sharing information where a failure to do so would place a child at risk of harm.

All staff and volunteers must be aware that they cannot promise a child that they will keep secrets/not disclose potentially harmful information.

SAFER RECRUITMENT POLICY STATEMENT

Moor House operates safer recruitment procedures in line with KCSIE 2023 which includes statutory checks on the suitability of staff to work with children.

Safer recruitment checks will apply to all staff and volunteers undertaking activities with children and young people including teaching, training or instruction, care or supervision, providing guidance or treatment, fostering and childcare. It could also include specific positions such as school governor, director of children's social services, and any work carried out in a limited range of specific settings such as schools where children should always be able to build relationships of trust with the people working with them.

The purpose of safer recruitment is to ensure:

- Applicants who may wish to harm adults at risk, children or young people are deterred from applying for jobs or volunteering opportunities.

- Any unsuitable applicants are rejected by scrutinising applications and exploring potential areas for concern at interview
- Unsuitable appointments are not made by having at least one member of the interview panel trained in safer recruitment; carrying out all relevant pre-employment checks* and ensuring all new staff and volunteers are given an appropriate induction.
- To identify and manage any identified risks.
- Maintain a safe and vigilant culture.

Multi-agency training on safer recruitment is available through the Surrey Children's Services Academy: [Surrey Children's Services Academy \(SCSA\) - Surrey County Council \(surreycc.gov.uk\)](http://surreycc.gov.uk)

**Disclosure and Barring Service (DBS) Checks*

All new staff and volunteers are to have a DBS check before commencing employment. Any failure to disclose convictions may result in disciplinary action or dismissal. Any positive disclosures will be discussed with the Principal and SMT lead. All this information will be kept on the personnel file. The DBS number and date of processing will be held on a secure database.

A risk assessment will be completed if there is a positive DBS check sent back.

In addition, as part of the shortlisting process we will carry out an online search as part of our due diligence on shortlisted candidates.

Safer Working Practice Agreement

Moor House School & College is committed to safeguarding and promoting the welfare and wellbeing of children and young people and expects all staff, volunteers and regular visitors to share this commitment.

It is everyone's responsibility to ensure that students are cared for appropriately and safeguarded from any harm; and their duty of care to promote the health, safety and welfare of all members of the school community.

This Safer Working Practice Agreement gives a code of conduct needed to ensure that all employees and students can work within and enjoy being part of a safe and caring environment.

It is acknowledged that the vast majority of employees behave appropriately whilst working with our students. While it is recognised that the individual members of an organisation may

hold differing values and opinions, adults working in a school are in a position of trust and their conduct is, therefore, governed by specific laws and guidance and the policies and procedures agreed by the Principal and Governing Body.

Staff occasionally express uncertainty as to what is and is not acceptable and seek guidance regarding those behaviours which, whilst most probably innocent, may be perceived by others as inappropriate*.

The following is, therefore, a code of appropriate conduct for all adults working in or on behalf of the school, including those involved in home visits or any out of school activities. Adherence to this code should ensure that both children and adults are safe from misconduct or unfounded allegations of misconduct.

You should always:

- Adhere to all school policies, many of which are specifically written with safeguarding in mind. For example: Child Protection and Safeguarding, Behaviour, Positive Handling, Anti-Bullying, Equal Opportunity and Diversity, Health and Safety;
- Abide by the Staff Code of Conduct;
- Behave in a mature, respectful, safe, fair and considered manner at all times and provide a good example and 'positive role model' to the students;
- Observe other people's right to confidentiality (Unless you need to report something to the Principal, DSL or DDSL e.g. concerns about a child protection issue);
- Treat all children and young people equally; never build 'special relationships' with individual children or confer favour on particular children or young people. This includes, for those members of staff working at partner colleges, non-Moor House students that they may come into contact with there.

Report to **the Principal, or in her absence, the Head of Safeguarding and Care (or in the case of an allegation concerning the Principal, the Chair of Governors- via the Bursar and Business Manager)** as soon as possible:

- Any behaviour or situation which may give rise to complaint, misunderstanding or misinterpretation.
- Any difficulties that you are experiencing, for example, coping with an unruly child or young person; situations where you anticipate that you may not be sufficiently qualified, trained or experienced to deal with or handle appropriately.
- Any behaviours of another person working in the school or college which give you cause for

concern or breach of this or the staff Code of Conduct or other school policies and procedures.

- Any incident prior to and following the commencement of employment that may give rise to a fixed penalty notice (not a parking fine), caution or a conviction.

You should never:

- Behave in a manner that could lead a reasonable person to question your conduct, intentions or suitability to care for other people's children;
- Touch children or young people in a manner which is or may be considered sexual, threatening, gratuitous or intimidating;
- Discriminate either favourably or unfavourably towards any child or young person;
- Arrange to contact, communicate or meet children or young people outside of work. Meet/communicate includes email, text, chat rooms or social networks such as Facebook. Other than via school owned accounts for school purposes. This includes, for those members of staff working at partner colleges, non-Moor House students that they may come into contact with there.
- Develop 'personal' or sexual relationships with children or young people;
- Push, hit, kick, punch, slap, throw missiles at or smack a child or young person or threaten to do so unless your own personal safety is threatened;
- Make inappropriate remarks or jokes of a personal, sexual, racial, discriminatory, intimidating or otherwise offensive nature either verbally or in writing;
- Intentionally embarrass or humiliate children or young people, for example, by using sarcasm or humour in an inappropriate way;
- Give or receive (other than 'token') gifts unless arranged through your line manager/ Principal, for example, outgrown sports kit, football boots or uniform;
- Invite students to your own home or, in the case of residential staff or those resident on site, your own residential area;
- Allow, encourage or condone children to act in an illegal, improper or unsafe manner e.g. smoking or drinking alcohol;
- Behave in an illegal or unsafe manner, for example, exceeding the speed limit, being under the influence of drugs or alcohol, driving a vehicle which is known to be un-roadworthy or otherwise unsafe or not having appropriate insurance, using a mobile

phone whilst driving, fail to use seatbelts and drive in a safe manner at all times whilst transporting children or young people;

- Staff must not consume or be under the influence of alcohol, illicit drugs or other illegal substances on or near school premises whilst on duty;
- Undertake any work with children when you are not in a fit and proper physical or emotional state to do so, for example, under the influence of alcohol or medication which induces drowsiness; with a medical condition which dictates that you should not be caring for children or young people; under extreme stress which is likely to impair your judgment.

I.....have read the current Moor House Policy on **Child Protection and Safeguarding Policy** and the **Staff Code of Conduct** and agree to abide by the Safer Working Practice guidance contained therein. I have read and understood "Keeping Children Safe in Education" Part 1 & Annex A (September2023).

Signed

Date

The Principal and Governors of Moor House School & College thank you for your support of the arrangements made for the safety and care of young people and adults in our school community.

.....Principal

Date

ADDITIONAL RELEVANT POLICIES/PROCEDURES

This safeguarding policy and procedures should be read alongside the appendices and our organisational policies, procedures, guidance and other related documents.

The documents can be found on the following link. [J:\POLICIES and PROCEDURES and A-Z\POLICIES FINAL \(APPROVED BY GOVS\)](#)

[Medical Policy](#)

[Anti-bullying Policy.](#)

[Behaviour Policy \(School\)](#)

[Behaviour Policy \(College\)](#)

[Curriculum Policy](#)

[Data Protection and Retention Policy](#)

[Equality Opportunities and Diversity Policy](#)

[E-Safety Policy](#)

[Health & Safety Policy](#)

[Intimate Care Policy](#)

[Complaints Policy](#)

[Positive Handling Policy](#)

[PSHE Policy](#)

[Off Site Visits Policy](#)

[Recruitment and Selection](#)

[Risk Assessment Policy and Procedures](#)

[School Attendance Policy](#)

[Relationships and Sex Education](#)

[Staff Code of Conduct](#)

[Drug Education Policy](#)

[Teaching and Learning Policy](#)

[Whistleblowing Policy](#)

References

- [Surrey Safeguarding Children Partnership protocols, guidance and procedures](#)
- [Working Together to Safeguard Children 2018](#)
- [Information Sharing Advice for Practitioners' guidance 2018](#)
- [Keeping Children Safe in Education](#)

General Indicators of Abuse Contents

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What is child abuse?

The following definitions are taken from *Working Together to Safeguard Children* HM Government (2018). In addition to these definitions, it should be understood that children can also be abused by being sexually exploited, honour-based violence, forced marriage or female genital mutilation. To support the local context, all staff have access to the [Surrey Safeguarding Children Partnership Levels of Need Threshold Document](#)

What is abuse and neglect?

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

Physical abuse

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

Emotional abuse

The persistent emotional maltreatment of a child such as to cause severe and persistent 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 cyber bullying), 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 in isolation.

Sexual abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

The activities may involve 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. It 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

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

Neglect may occur during pregnancy 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)
- ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

The [Neglect Risk Assessment Tool](#) is available to provide a more detailed information regarding neglect. Further information on indicators of abuse can be accessed via NSPCC.

Indicators of abuse: Neglect

The nature of neglect

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

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

Neglect can include parents or carers failing to:

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

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

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

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

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

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

Indicators of neglect

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

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

Physical indicators of neglect

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

Behavioural indicators of neglect

- Constant tiredness
- Frequent absence from school or lateness
- Missing medical appointments
- Isolated among peers
- Frequently unsupervised
- Stealing or scavenging, especially food
- Destructive tendencies

Emotional abuse

The nature of emotional abuse

Most harm is produced in *low warmth, high criticism* homes, not from single incidents. Emotional abuse is difficult to define, identify/recognise and/or prove. Emotional abuse is chronic and cumulative and has a long-term impact.

All kinds of abuse and neglect have emotional effects although emotional abuse can occur by itself. Children can be harmed by witnessing someone harming another person – as in domestic abuse.

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

Indicators of emotional abuse

Developmental issues

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

Behaviour

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

Social issues

- Withdrawal from physical contact
- Withdrawal from social interaction
- Over-compliant behaviour
- Insecure, clinging behaviour
- Poor social relationships
- Emotional responses
- Extreme fear of new situations
- Inappropriate emotional responses to painful situations ("I deserve this")
- Fear of parents being contacted
- Self-disgust
- Low self-esteem
- Unusually fearful with adults
- Lack of concentration, restlessness, aimlessness
- Extremes of passivity or aggression

Physical abuse

The nature of physical abuse

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

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

A body map can assist in the clear recording and reporting of physical abuse. The body map should

only be used to record observed injuries and no child should be asked to remove clothing by a member of staff of the school.

Indicators of physical abuse/factors that should increase concern

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

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

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

You must be concerned if a child:

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

Serious violence

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school. A change in

friendships or relationships with older individuals or groups, a significant decline in performance, signs of 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.

All staff should be aware of the associated risk and understand the measures in place to manage these. Advice for schools and colleges is provided in the Home Office's [Preventing youth violence and gang involvement](#) and its [Criminal-exploitation-of-children-and-vulnerable-adults-county-lines](#) guidance.

Sexual abuse

The nature of sexual abuse

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

Sexual exploitation is seen as a separate category of sexual abuse. The [SSCP professional guidance](#) provides school staff with information regarding indicators of CSE (further information about CSE is available on pages 58-61).

Characteristics of child sexual abuse:

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

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

Indicators of sexual abuse

Physical observations:

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

Behavioural observations:

- Sexual knowledge inappropriate for age
- Sexualised behaviour or affection inappropriate for age
- Sexually inappropriate behaviour
- Hinting at sexual activity
- Inexplicable decline in education progress

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

Child-on-child Sexual harassment & Sexual violence

Moor House School & College strives to create a culture where sexual harassment and sexual violence are not tolerated, where we identify issues we will intervene early to better protect children and young people.

In order to do this, all staff members should assume that sexual harassment and online sexual abuse are happening within our setting even when there are no specific reports. Moor House has put in place a whole-school approach to address them. This includes:

- A carefully sequenced RSHE curriculum, based on the Department for Education's (DfE's) statutory guidance, that specifically includes sexual harassment and sexual violence, including online. This will include time for open discussion of topics that children and young people tell us they find particularly difficult, such as consent and the sending of 'nudes'
- High-quality training for teachers delivering RSHE
- Routine record-keeping and analysis of sexual harassment and sexual violence, including online, to identify patterns and intervene early to prevent abuse
- A behavioural approach, including sanctions when appropriate, to reinforce a culture where sexual harassment and online sexual abuse are not tolerated
- We will work closely with LSPs in the area where the school or college is located so we are aware of the range of support available to children and young people who are victims or who perpetrate harmful sexual behaviour
- We will support the DDSLs and DSL designated safeguarding leads by allowing protected time when needed to engage with LSPs
- Training to ensure that all staff (and governors, where relevant) are able to:
 - better understand the definitions of sexual harassment and sexual violence, including online sexual abuse
 - identify early signs of peer-on-peer sexual abuse
 - consistently uphold standards in their responses to sexual harassment and online sexual abuse

Child on Child Abuse

Context

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment as well as their emotional wellbeing. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.

Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, adult students and school and college staff are supported and protected as appropriate.

Policy

We believe that all children have a right to attend Moor House School & College and learn in a safe environment. Children and young people should be free from harm by adults and other children or young people in our school

We recognise that children are capable of abusing other children and their peers and this will be dealt with under our child protection policy and in line with KCSiE (2023).

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

Prevention

We will minimise the risk of child-on-child abuse by making clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It will never be passed off as “banter”, “just having a laugh”, “a part of growing up” or “boys being boys”. We believe that failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it.

We believe in recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening - it may be the case that it is just not being reported. We challenge physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts, as we believe that dismissing or tolerating such behaviours risks normalising them. Moor House is:

- taking a whole school and college approach to safeguarding and child protection;
- providing training to staff;
- providing a clear set of values and standards, underpinned by the school and college behaviour policies and pastoral support; and by a planned programme of evidence-based content delivered through the curriculum;
- engaging with specialist support and interventions;

Responding to reports of sexual violence and sexual harassment

Children or young people making a report of sexual violence or sexual harassment including up-skirting 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: advice for schools (DfE 2018) 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

Staff members taking the report will inform the DSL or the Deputy DSL immediately. Staff members taking a report will never promise confidentiality.

Parents or carers should usually be informed (unless this would put the child at greater risk). If a child is at risk of harm, is in immediate danger, or has been harmed, a Request for Support will be made to the C-SPA securely email: cspa@surreycc.gov.uk or telephone 0300 470 9100, as appropriate.

Risk Assessment:

Following a report, the DSL/DDSL 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 other specialist risk assessments, these professional assessments will be used to inform the school's approach to supporting and protecting students.

Support regarding risk assessments can be accessed from the [Education Safeguarding Team](mailto:education.safeguarding@surreycc.gov.uk) – education.safeguarding@surreycc.gov.uk

Action: The DSL will consider:

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 setting 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 - 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 setting 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 10, if the alleged perpetrator is under 10, 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: The DSL will make the decision regarding the issue with the following possible options:

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

Ongoing Response:

Moor House is a small special school with a maximum of two classes per year group. The maximum class size is 12 students. The school and college acts in line with their behaviour policies and

exclusion policy. The school and college will make reasonable and proportionate adjustment within resource and provision.

The DSL/DDSL will manage each case individually and will ensure the risk assessment is reviewed regularly with relevant partner agencies, for example the Police and Children's Social Care.

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 school premises and on transport where appropriate. The appropriateness of this will be subject to the school being reasonably satisfied that the allowing the perpetrator to remain at school and/or share transport would not harm the education or welfare of the victim and/or any other pupils of Moor House.

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 or college would seriously harm the education or welfare of the victim (and potentially themselves and other pupils).

Where a criminal investigation into sexual assault leads to a conviction or caution, the school or college 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 or college, 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 and college 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 affected children and adults will receive appropriate support and safeguards on a case-by-case basis, within available resources.

The school and college will take any disciplinary action against the alleged perpetrator in accordance with the school or college behaviour policy.

The school and college recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.

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

- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- 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;

- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery) UKCIS guidance: Sharing nudes and semi-nudes advice for education settings working with children and young people;
- up skirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

While a clear focus of child-on-child abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from children to children can also be abusive.

Bullying (including cyberbullying, prejudice – based and discriminatory bullying)

The principles from the anti-bullying policy will be applied in these cases, with recognition that any police investigation will need to take priority.

Abuse in intimate personal relationships between children.

Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

These are equally not tolerated and if it is believed that a crime has been committed, will be reported to the Police.

References:

[DfE keeping Children Safe in Education 2023](#)

[DfE Sexual Violence and Sexual Harassment between Children in Schools and Colleges May 2018](#)

Harmful Sexual Behaviour

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 [Brook Traffic Light Tool](#) uses a traffic light system to categorise the sexual behaviours of young people and is designed to help professionals:

- 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, Moor House can work with other agencies to the same standardised criteria when making decisions and can protect children and young people with a multi-agency approach. We recognise it is vital that professionals agree on how behaviours should be categorised regardless of culture, faith, beliefs, and their own experiences or values.

Brook sexual behaviours traffic light tool

Behaviours: age 0 to 5

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

What is a green behaviour?

Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability. They are reflective of natural curiosity, experimentation, consensual activities and positive choices

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

Green behaviours

- holding or playing with own genitals
- attempting to touch or curiosity about other children's genitals
- attempting to touch or curiosity about breasts, bottoms or genitals of adults
- games e.g. mummies and daddies,
- doctors and nurses
- enjoying nakedness
- interest in body parts and what they do
- curiosity about the differences between boys and girls

What is an amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

Amber behaviours

- preoccupation with adult sexual behaviour
- pulling other children's pants down/skirts up/trousers down against their will
- talking about sex using adult slang
- preoccupation with touching the genitals of other people
- following others into toilets or changing rooms to look at them or touch them
- talking about sexual activities seen on TV/online

What is a red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental, or power differences. They may pose a concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Red behaviours

- persistently touching the genitals of other children
- persistent attempts to touch the genitals of adults
- simulation of sexual activity in play
- sexual behaviour between young children involving penetration with objects
- forcing other children to engage in sexual play

This is intended to be used as a guide only. Please refer to the guidance tool at <https://www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool> for further information

Print date: 01/10/2015 - Brook has taken every care to ensure that the information contained in this publication is accurate and up-to-date at the time of being published. As information and knowledge is constantly changing, readers are strongly advised to use this information for up to one month from print date. Brook accepts no responsibility for difficulties that may arise as a result of an individual acting on the advice and recommendations it contains.

Brook sexual behaviours traffic light tool adapted from Family Planning Queensland. (2012). Traffic Lights guide to sexual behaviours. Brisbane: Family Planning Queensland, Australia.

Behaviours: age 5 to 9 and 9 to 13

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

What is a green behaviour?

Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability and reflective of natural curiosity, experimentation, consensual activities and positive choices

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

Green behaviours 5-9

- feeling and touching own genitals
- curiosity about other children's genitals
- curiosity about sex and relationships, e.g. differences between boys and girls, how sex happens, where babies come from, same-sex relationships
- sense of privacy about bodies
- telling stories or asking questions using swear and slang words for parts of the body

Green behaviours 9-13

- solitary masturbation
- use of sexual language including swear and slang words
- having girl/boyfriends who are of the same, opposite or any gender
- interest in popular culture, e.g. fashion, music, media, online games, chatting online
- need for privacy
- consensual kissing, hugging, holding hands with peers

What is an amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

Amber behaviours 5-9

- questions about sexual activity which persist or are repeated frequently, despite an answer having been given
- sexual bullying face to face or through texts or online messaging
- engaging in mutual masturbation
- persistent sexual images and ideas in talk, play and art
- use of adult slang language to discuss sex

Amber behaviours 9-13

- uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- verbal, physical or cyber/virtual sexual bullying involving sexual aggression
- LGBT (lesbian, gay, bisexual, transgender) targeted bullying
- exhibitionism, e.g. flashing or mooning
- giving out contact details online
- viewing pornographic material
- worrying about being pregnant or having STIs

What is a red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental, or power differences. They may pose a concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Red behaviours 5-9

- frequent masturbation in front of others
- sexual behaviour engaging significantly younger or less able children
- forcing other children to take part in sexual activities
- simulation of oral or penetrative sex
- sourcing pornographic material online

Red behaviours 9-13

- exposing genitals or masturbating in public
- distributing naked or sexually provocative images of self or others
- sexually explicit talk with younger children
- sexual harassment
- arranging to meet with an online acquaintance in secret
- genital injury to self or others
- forcing other children of same age, younger or less able to take part in sexual activities
- sexual activity e.g. oral sex or intercourse
- presence of sexually transmitted infection (STI)
- evidence of pregnancy

Behaviours: age 13 to 17

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

What is a green behaviour?

Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability and reflective of natural curiosity, experimentation, consensual activities and positive choices

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

Green behaviours

- solitary masturbation
- sexually explicit conversations with peers
- obscenities and jokes within the current cultural norm
- interest in erotica/pornography
- use of internet/e-media to chat online
- having sexual or non-sexual relationships
- sexual activity including hugging, kissing, holding hands
- consenting oral and/or penetrative sex with others of the same or opposite gender who are of similar age and developmental ability
- choosing not to be sexually active

What is an amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

Amber behaviours

- accessing exploitative or violent pornography
- uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress,
- withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- concern about body image
- taking and sending naked or sexually provocative images of self or others
- single occurrence of peeping, exposing, mooning or obscene gestures
- giving out contact details online
- joining adult- only social networking sites and giving false personal information
- arranging a face to face meeting with an online contact alone

What is a red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental, or power differences. They may pose a concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Red behaviours

- exposing genitals or masturbating in public
- preoccupation with sex, which interferes with daily function
- sexual degradation/humiliation of self or others
- attempting/forcing others to expose genitals
- sexually aggressive/exploitative behaviour
- sexually explicit talk with younger children
- sexual harassment
- non-consensual sexual activity
- use of/acceptance of power and control in sexual relationships
- genital injury to self or others
- sexual contact with others where there is a big difference in age or ability
- sexual activity with someone in authority and in a position of trust
- sexual activity with family members
- involvement in sexual exploitation and/or trafficking
- sexual contact with animals
- receipt of gifts or money in exchange for sex

Anti-Bullying/Cyberbullying

Moor House policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures.

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 differences/perceived differences are more susceptible to being bullied/victims of child abuse.

When there is 'reasonable cause to suspect that a child or young person is suffering, or is likely to suffer, significant harm' a bullying incident must be addressed as a child protection concern. If the anti-bullying procedures are seen to be ineffective, the Headteacher and the DSL/DDSL will also consider child protection procedures.

PHSE education regularly provides opportunities for children and young people to understand that bullying is wrong, its impact and how to deal with it.

Online Safety

The school and college has an online safety policy which explains how we try to keep students safe in school and how we respond to online safety incidents. ([E-Safety Policy](#))

Children and young people increasingly use electronic equipment on a daily basis to access the internet, share and view content and images via social media sites such as Facebook, twitter, Instagram, snapchat and voodoo and for online gaming.

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

Students may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders

Students are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated. Moor House has two CEOPS-trained staff. They are: Matthew Crowhurst and Darren Heine.

Racist Incidents

Moor House acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. We keep a record of racist incidents.

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

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious 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.

Radicalisation refers to 'the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups'.

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

Moor House is clear that exploitation of vulnerable children and radicalisation should be viewed as a safeguarding concern and follows the DfE guidance for settings and childcare providers on preventing children and young people from being drawn into terrorism.

It is possible to protect 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.

Moor House staff receive training to help identify early signs of radicalisation and extremism.

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

The school governors, the Headteacher and the Designated Safeguarding Lead (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.

When any member of staff has concerns that a student may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL or a DDSL. They should then follow the safeguarding procedures and refer by e-mail to preventreferrals@surrey.pnn.police.uk following the [Prevent referral process](#) and use the Prevent referral form. If the matter is urgent then Police must be contacted by calling 999. In cases where further advice from the Police is sought dial 101 or 07795043842 and ask to speak to the Prevent Supervisor for Surrey.

The Department of Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (0800 0113764).

Indicators of vulnerability to radicalisation

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

Extremism is defined by the Government in the Prevent Strategy as:

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

Extremism is defined by the Crown Prosecution Service as:

- the demonstration of unacceptable behaviour by using any means or medium to express views which:
- encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
- Seek to provoke others to terrorist acts;
- Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
- Foster hatred which might lead to inter-community violence in the UK.

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

Students may become susceptible to radicalisation through a range of social, personal and environmental factors.

It is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.

Indicators of vulnerability include:

- Identity Crisis – the student is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
- Personal Crisis – the student may be experiencing family tensions; a sense of isolation; and low self- esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
- Personal Circumstances – migration; local community tensions; and events affecting the student's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
- Unmet Aspirations – the student 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 – students 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.

More critical risk factors could include:

- Being in contact with extremist recruiters;
- Accessing violent extremist websites, especially those with a social networking element;
- Possessing or accessing violent extremist literature;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Justifying the use of violence to solve societal issues;
- Joining or seeking to join extremist organisations; and
- Significant changes to appearance and/or behaviour;
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

The Department for Education guidance [The Prevent Duty](#) can be accessed via this link.

Domestic Abuse & Homelessness

Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, mental or physical ability. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

The 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.

Moor House is enrolled onto the Operation Encompass scheme, a joint project between Surrey Police, Surrey County Council, Surrey Domestic Abuse Service and Surrey Schools; where every school day morning our DSL or DDSL is notified of all domestic abuse incidents that have occurred and been reported to Police in the previous 24 hours which involved a child at this school (72 hours on a Monday morning). This provides an opportunity for us to ensure the right support is in place at the right time for children who are experiencing domestic abuse.

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.

Child Sexual Exploitation, Child Criminal Exploitation & Gangs, Youth-produced sexual imagery

Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of child sexual abuse.

It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can occur through the use of technology. All staff must be aware of the link between online safety and vulnerability to CSE.

Any concerns that a child is being or is at risk of being sexually exploited must be passed immediately to the DSL/DDSL.

Moor House is aware there is a clear link between regular non-attendance at school and CSE. Staff will consider a child to be at potential CSE risk in the case of regular non-attendance at school and make reasonable enquiries with the child and parents to assess this risk.

All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) 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

The DSL/DDSL will complete the Surrey Safeguarding Children's Partnership guidance and advice when there is a concern that a child is being or is at risk of being sexually exploited or where indicators have been observed that are consistent with a child who is being or who is at risk of being sexually exploited.

In all cases if the tool identifies any level of concern (green, amber or red) the DSL should contact the C-SPA and email a Request for Support Form. If a child is in immediate danger the police should be called on 999.

The school and college are aware that a child often is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. As a consequence the child may

resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse. Children also rarely self-report CSE so staff must be particularly vigilant to potential indicators of risk.

The school includes the risks of sexual exploitation in the PHSE and SRE curriculum. Students will be informed of the grooming process and how to protect themselves from people who may potentially be intent on causing harm. They will be supported in terms of recognising and assessing risk in relation to CSE, including online, and knowing how and where to get help.

Child Criminal Exploitation & Gangs

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

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

Teenagers can be particularly vulnerable to recruitment into gangs and involvement in gang violence. This vulnerability may be exacerbated by risk factors in an individual's background, including violence in the family, involvement of siblings in gangs, poor educational attainment, or poverty or mental health problems.

Criminal exploitation of children is a typical feature of county lines criminal activity. Key identifying features of involvement in county lines are when children are missing.

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.

Youth-produced sexual imagery (sexting)

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

Youth-produced sexual imagery refers to both images and videos where:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18.

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

All incidents of this nature must be treated as a safeguarding concern and in line with the UKCCIS guidance '[Sexting in schools and colleges: responding to incidents and safeguarding young people](#)'.

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

If a member of staff becomes aware of an incident involving youth produced sexual imagery they must follow the child protection procedures and refer to the DSL immediately.

The member of staff should confiscate the device involved and set it to flight mode or, if not possible, turn it off. Staff must not view, copy or print the youth-produced sexual imagery.

The DSL/DDSL should hold an initial review meeting with appropriate school or college staff and subsequent interviews with the children involved (if appropriate).

Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the child at risk of harm.

At any point in the process if there is concern a young person has been harmed or is at risk of harm a referral must be made to the C-SPA or the Police as appropriate.

Immediate referral at the initial review stage must be made to Children's Social Care/Police if:

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

If none of the above apply then the DSL/DDSL will use their professional judgement to assess

the risk to students involved and may decide, with input from the Headteacher, to respond to the incident without referral to the C-SPA or the Police.

During the decision making the DSL/DDSL will consider if:

- There is a significant age difference between the sender/receiver.
- There is any coercion or encouragement beyond the sender/receiver.
- The imagery was shared and received with the knowledge of the child in the imagery.
- The child is vulnerable, for example subject to Child in Need, Child Protection or Early Help plans, Looked After, SEND.
- There is a significant impact on the children involved.
- The image is of a severe or extreme nature.
- The child involved understands consent.
- The situation is isolated or if the image has been more widely distributed.
- There other circumstances relating to either the sender or recipient that may add cause for concern.
- The children have been involved in incidents relating to youth produced imagery before.

If any of these circumstances are present the situation will be referred according to our child protection procedures, including referral to the C-SPA or the Police. The DSL/DDSL will record all incidents of youth produced sexual imagery, including the actions taken, rationale for actions and the outcome.

FGM, Forced Marriage and So-called honour-based abuse

Female Genital Mutilation (FGM)

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

The duty applies to all staff in school who are employed or engaged to carry out 'teaching work' or work directly with children in the school, whether or not they have qualified teacher status.

The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the DSL, however the DSL must be informed.

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

School staff are trained to be aware of risk indicators of FGM.

Concerns about FGM outside of the mandatory reporting duty must be reported using the school's child protection procedures. Staff must be particularly alert to suspicions or concerns expressed by female pupils 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 practicing community. Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including dialling 999 if appropriate.

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

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 must be made with the C-SPA and/or the Forced Marriage Unit 200 7008 0151.

So-called honour-based abuse

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

Honour-based abuse might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion;
- want to get out of an arranged marriage;
- 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 members of staff must be 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 are aware that if the victim is not offered support following disclosure that the 'One Chance' opportunity may be lost. Therefore, all staff must be aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBV cases.

Private Fostering Arrangements, Looked-After Children and Previously Looked-After Children

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.

Children looked after by the local authority or who are placed in residential schools, children's homes or hospitals are not considered to be privately fostered.

Private fostering occurs in all cultures and children may be privately fostered at any age. The school recognises that most privately fostered children remain safe and well but is aware that safeguarding concerns have been raised in some cases. Therefore, all staff must be 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 pupil may be in a private fostering arrangement they will raise this with the DSL and the DSL will notify the C-SPA immediately.

Looked After Children and Previously Looked After Children

The most common reason for children becoming looked after is as a result of abuse and neglect.

The school ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child and contact arrangements with birth parents or those with parental responsibility.

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. T

The designated teacher and governor for children looked after will have the appropriate level training to equip them with the knowledge and skills to undertake their role

The designated teacher for children looked after and the DSL have details of the child's social worker and the name and contact details of the Surrey County Council's Head of Virtual School.

The designated teacher for children looked after and children previously looked after will work in partnership with the Virtual School Assistant Headteacher to discuss how Pupil Premium Plus funding can be best used to support the progress of children looked after in the school and meet the needs of the child within their personal education plan.

Children Absent from Education, Pupils Missing Out On Education and Attendance & Behaviour

Children Absent from Education

All children, regardless of their circumstances, are entitled to an efficient, full time education which is suitable to their age, ability, aptitude and any special educational needs they may have.

Moor House recognise that children missing education are at significant risk of underachieving, being victims of abuse and harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.

Where possible the school will hold more than one emergency contact number for each pupil. Moor House will ensure that there is a record of joiners and leavers as defined in [The Education \(Pupil Registration\) \(England\) 2006](#).

When removing a child's name, the school will notify the Local Authority of:

- the full name of the child;
- the full name and address of any parent with whom the child normally resides;
- at least one telephone number of the parent;
- the child's future address and destination school, if applicable; and
- 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](#).

Moor House will:

- Enter students on the admissions register on the first day on which the school has agreed, or has been notified, that the student will attend the school.
- Notify the Local Authority within five days of adding a student's name to the admission register. The notification must include all the details contained in the admission register for the new student
- Monitor each child's attendance through their daily register and follow the Moor House procedure in cases of unauthorised absence.
- Remove a student's name from the admissions register on the date that the child or young person leaves the school.

- The school will notify the Local Authority 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 notify the school, in writing, of their intention to electively home educate the school will forward a copy of the letter to the Elective Home Education Team/Education Welfare. Where parents orally indicate that they intend to withdraw their child to be home educated and no letter has been received, the school will not remove the child from roll and will notify Education Welfare at the earliest opportunity.

Pupils Missing Out on Education

The vast majority of children engage positively with school and attend regularly. However, in order to flourish, some children require an alternative education offer 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 or modified timetable may have additional vulnerabilities. Ofsted refers to these as Pupils Missing Out On Education (PMOOE), because they are not accessing their education in school in the 'usual way'.

Moor House will gain consent (if required in statute) from parents to put in place alternative provision and/or a reduced or modified timetable.

The school will ensure that and parents (and the local authority where the pupil has a statement of special educational needs) are given clear information about alternative provision placements and reduced or modified timetables: why, when, where, and how they will be reviewed.

The school will keep the placement and timetable under review and involve parents 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 pupil 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 will comply with regular data returns requested by the Local Authority, regarding all pupils, of statutory school age, attending alternative provision and/or on a reduced or modified timetable.

The school leadership will report to governors of any formal direction of a student to alternative provision to improve behaviour.

The school leadership will report to governor's information regarding the use and effectiveness of the use of alternative provision and modified timetables.

Attendance and Behaviour

Additional policies and procedures are in place regarding the Moor House attendance and behaviour.

Moor House recognises that children being absent, particularly repeatedly and/or for prolonged periods and exclusion from may be indicators of abuse and neglect, 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 setting will work in partnership with Surrey Police and other partners for reporting children that go missing from the setting site during the setting day. Staff will be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

Restrictive Physical Intervention

We acknowledge that staff must only ever use physical intervention as a last resort, when a child is at immediate risk of harming themselves or others, and that at all times it must be the minimal force necessary to prevent injury to another person. Such events should be fully recorded and signed by a witness.

Staff who are likely to need to use physical intervention will be appropriately trained in Team Teach which provides accredited, award-winning training in positive behaviour management strategies. The course equips individuals and teams working with both children and adults in a variety of settings to transform challenging situations and behaviours into positive outcomes and maintain positive relationships.

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

We recognise that sometimes touch is appropriate in the context 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 setting will consider the risks, given the additional vulnerabilities of these children.

Child Protection Expression of Concern (Yellow Form p1)



Please complete this form if you have any concern about a child or young person.

It must be filled in **immediately** after the incident/observation/disclosure and **handed personally** to either Barbara Martin DSL or any of the DDSLs: Deputy Head Teacher – Madeleine Van Niekerk, Deputy Head Teacher– Stephanie Williams, Deputy Head Teacher – Naomi Bradley, Deputy Head of Care – Danny Carroll, Health Care Manager - Susie Simpson or Residential Care Operations Manager, Darren Heine

Concerns must not be left until the following day.

STUDENT'S NAME:		DATE AND TIME:	
REPORTED BY:			
Disclosure between: _____ and _____			
Cause for concern raised by:			
Persons Present:			
Circumstances:			
Report: Please write exactly what happened and/or what was observed, including paraphrasing of any questions by an adult or comments by the child/young person including any dates or times. This must be a factual account only and must not include personal opinions or comments. Please initial and date any corrections you make.			
Body Map Attached:		Yes / No	
PRINT NAME:	SIGN:	DATE:	

Name of Young Person:

Placing Authority:

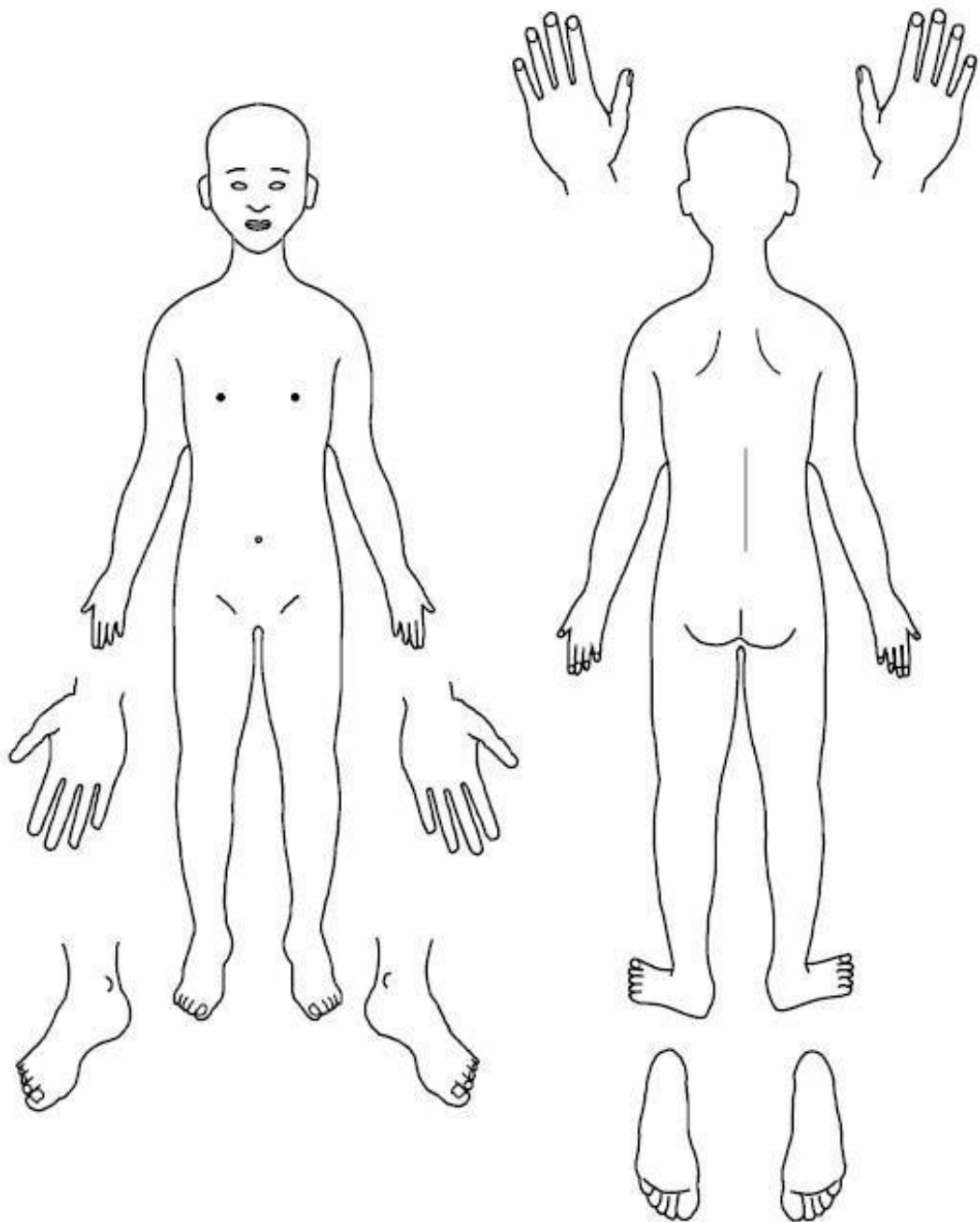
Have the following been informed?	Yes	No	By (name to be signed & printed)	Date and Time
Designated Safeguarding Lead (DSL)				
Deputy Head Teacher (DDSL) Name:				
Deputy Head of Care / Healthcare Manager / Operations Manager Please circle				
Parents (if appropriate)				
Social Care				
Named Social Worker				

[illegible]

Contact / Running record continuation sheet: page of

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BODY MAP





Additional guidance on Sexual Violence and Sexual Harassment

Introduction

In May 2018 the Department for Education released updated advice; 'Sexual violence and sexual harassment between children in schools and colleges – advice for governing bodies, proprietors, head teachers, principals, senior leadership teams and designated safeguarding leads.'

The advice is to be read and referenced alongside Keeping Children Safe in Education September 2019. The focus is sexual violence and sexual harassment between children at schools and colleges. The guidance seeks to define the issues, minimise risks and advise what to do if an incident occurs or is alleged to have occurred.

Definitions

For the purpose of this advice, 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

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;17
- sexual intercourse without consent is rape.

1. Sexual Harassment

For the purpose of this advice, when referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualized names;
- sexual "jokes" or taunting
- physical behavior, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence
- upskirting, which is a criminal offence

It may include:

- non-consensual sharing of sexual images and videos. (UKCCIS sexting advice provides detailed advice for schools and colleges);
- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media; and
- sexual exploitation; coercion and threats.

It is important that schools and colleges consider sexual harassment in broad terms. Sexual harassment (as set out above) creates an atmosphere that, if not challenged, can normalise inappropriate behaviors and provide an environment that may lead to sexual violence.

2. Context

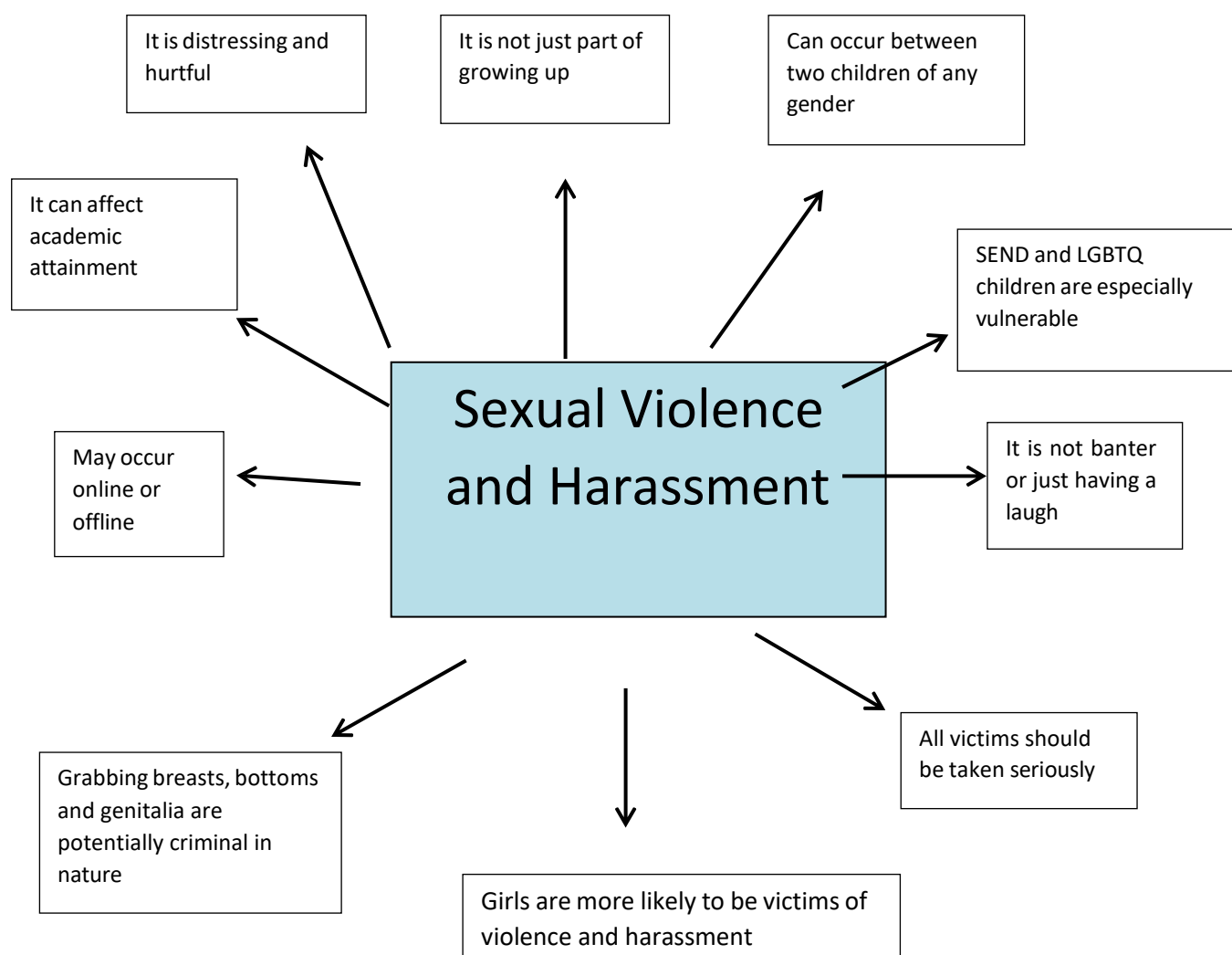
Victims and alleged perpetrators

There are many different ways to describe students who have been subjected to sexual violence and/or sexual harassment and many ways to describe those who are alleged to have carried out any form of abuse. For these purposes, we use the term 'victim' to refer to students who have been subjected to sexual violence and abuse. It is a widely recognised and understood term. Staff at Moor House recognise that not everyone who has been subjected to sexual violence and/or sexual harassment considers themselves a victim or would want to be described in this way. Ultimately, staff will be conscious of this when managing any incident and be prepared to use any term with which the individual child is most comfortable.

Equally, there are a number of ways to describe students who have carried out sexual violence

or sexual harassment. We use the term 'alleged perpetrator'. It is important to remember that, as a child, any alleged perpetrator is entitled to, deserving of, and should be provided with, a different level of support to that which might be provided to an adult who is alleged to have abused a child.

What is sexual harassment and sexual violence?



3. Responsibilities

Moor House School & College has a statutory duty to safeguard and promote the welfare of our students. As part of this duty, we have regard to guidance issued by the Secretary of State. We have behaviour policies for both the School and College and measures in place to prevent all forms of bullying. Good practice is that which allows children an open forum to talk things through and all staff should be aware of how to support children and how to manage a disclosure.

4. Curriculum

The most effective preventative education programme will be through a whole school and college approach that prepares children for life in modern Britain.

This will be achieved by:

- Encouraging healthy and respectful relationships
- Tackling prejudiced behaviour
- Challenging gender roles, stereotypes and inequality
- Promoting body confidence and self esteem
- Challenging cultures of sexual harassment
- Making it clear that violence and harassment is always wrong
- Teaching children what respectful behaviour looks like

5. Responding

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Some situations are clear:

- 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;
- Rape, assault by penetration and sexual assault are defined in law
- Creating and sharing sexual photos and videos of under-18s is illegal (often referred to as sexting). This includes children making and sharing sexual images and videos of themselves
- Upskirting

In dealing with sexual violence and sexual harassment Moor House School & College may work with statutory partners such as Children's Services and the Police. It is possible that any issues could extend beyond school and college to include online issues and the use of various social media platforms can extend the impact of the abuse.

It is essential that students are reassured that they are being taken seriously and will be supported and kept safe as far as is possible. A victim should never be given the impression they are creating a problem, nor should they be made to feel ashamed for making a report.

Remember:

- Do not promise confidentiality
- Inform the victim of the next steps
- Be supportive and respectful
- Be non-judgmental and listen to what the child is saying to you
- Ask no leading questions, use open questions
- Record the disclosure (devote time to listening to what the child is saying, write notes if it is appropriate)
- Only record the facts as the child presents them
- Do not offer personal opinions

- Inform the Designated Safeguarding Lead immediately

When to inform the alleged perpetrator will be a decision that should be carefully considered. Where a report is going to be made to children's social care and/or the police, then, as a general rule, Moor House School & College will speak to the relevant agency and discuss next steps and how the alleged perpetrator will be informed of the allegations.

The DSL should consider the following:

- 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 children's social care; and
- Rape, assault by penetration and sexual assaults are crimes. The starting point is that reports should be passed to the police.

The DSL or a DDSL will decide whether to contact Children's Services and/or the Police.

Where there has been a report of sexual violence the DSL/DDSL will make an immediate risk assessment factoring in:

- the victim
- the alleged perpetrator
- children (and sometimes staff)
- lessons where the victim and alleged perpetrator are together
- transport

As stated in the main policy the context and resources available at Moor House School & College will be considered in completing this risk assessment. Risk assessments will be recorded (written or electronic) and be kept under review.

6. Supporting young people through criminal cases

Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, Moor House School & College will be aware of anonymity, witness support and the criminal process in general so it can offer support and act appropriately. Further information for supporting children and young people can be located here <https://www.cps.gov.uk/legal-guidance/safeguarding-children-victims-and-witnesses>

In addition to the legal protections, as a matter of effective safeguarding practice, Moor House School & College will do all it reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment. Amongst other things, this will mean carefully considering, based on the nature of the report, which staff should know about the report and any support that will be in place for the children involved. Moor House will also consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.

7. Thresholds

In some cases of sexual harassment, for example one-off incidents, Moor House may take the view that the students concerned are not in need of Early Help or statutory intervention and that it would be appropriate to handle the incident internally, perhaps through utilising our behaviour and anti-bullying policies and by providing pastoral support. All concerns, discussions, decisions and reasons for decisions will be recorded (written or electronic).

Moor House may decide that the children involved do not require statutory interventions but may benefit from Early Help. Early Help means providing support as soon as a problem emerges, at any point in a child's life.

Providing Early Help is more effective in promoting the welfare of children than reacting later. Early Help can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence.

Where a child has been harmed, is at risk of harm, or is in immediate danger, Moor House should make a referral to local children's social care.

In some cases, Children's Social Care will review the evidence and decide a statutory intervention is not appropriate. Moor House will be prepared to refer again if they believe the child remains in immediate danger or at risk of harm. If a statutory assessment is not appropriate, the Designated Safeguarding Lead (or a deputy) will consider other support mechanisms such as Early Help, specialist support and pastoral support.

Where a report of rape, assault by penetration or sexual assault is made, the starting point will be that this should be passed on to the police.

If a child is convicted or receives a caution for a sexual offence, Moor House will update relevant risk assessments, ensure relevant protections are in place for all the students and, if it has not already done so, consider any suitable action in accordance with our relevant policies. If the perpetrator continues as a student, Moor House will be very clear as to expectations regarding the perpetrator now they have been convicted or cautioned. This could include expectations regarding their behaviour and any restrictions that Moor House School & College thinks are reasonable and proportionate with regard to the perpetrator's timetable.

8. Ongoing responses and additional factors to consider

Moor House School recognises the importance of providing continuing support for all students following an allegation or when an allegation has led to a conviction. As such, the following will be considered/understood:

- The age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. Moor House School & College staff are aware that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator.

- The proportionality of the response. Support will be tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape.
- Victims may not disclose the whole picture immediately. They may be more comfortable providing information on a piecemeal basis. It is essential that dialogue is kept open and encouraged. When it is clear that ongoing support will be required, Moor House School & College will ask the victim if they would find it helpful to have a designated trusted adult (for example their form tutor or Designated Safeguarding Lead) to talk to about their needs. The choice of any such adult should be the victim's. Moor House School & College will respect and support this choice. This should be because the victim wants to, not because it makes it easier to manage the situation. If required, schools and colleges should provide a physical space for victims to withdraw.
- If the victim does move to another educational institution (for any reason), the new educational institution must be made aware of any ongoing support needed. The Designated Safeguarding Lead will take responsibility to ensure this happens as well as transferring the child protection file.
- Following any report of sexual violence or sexual harassment, it is likely that some children will take "sides". Moor house School & College staff will do all they can to ensure both the victim and alleged perpetrator, and any witnesses, are not being bullied or harassed.

9. Support and specialist organisations

<u>Barnardo's</u>	https://www.barnardos.org.uk
<u>Lucy Faithfull Foundation</u>	https://www.lucyfaithfull.org.uk
<u>NSPCC</u>	https://www.nspcc.org.uk
<u>Rape Crisis</u>	https://rapecrisis.org.uk
<u>UK Safer Internet Centre</u>	https://www.saferinternet.org.uk
<u>Anti-Bullying Alliance</u>	https://www.anti-bullyingalliance.org.uk
<u>Moj Victim Support</u>	https://www.rapecentre.org.uk
<u>The Survivors Trust</u>	https://www.thesurvivorstrust.org/
<u>Victim Support</u>	https://www.victimsupport.org.uk/
<u>Gillick Competency</u>	https://learning.nspcc.org.uk/research-resources/briefings/gillick-competency-and-fraser-guidelines/
<u>Parent Zone</u>	https://parentzone.org.uk
<u>Thinkuknow</u>	https://www.thinkuknow.co.uk/parents

Safeguarding students aged 18 or over at Moor House School & College

Moor House School & College fully recognises the responsibilities it has under The Care Act 2014 and applies the six principles of the act when responding to safeguarding concerns involving students aged 18 or over. Also, the Mental Capacity Act (2005) requires there to be arrangements in place to safeguard adults at risk. This includes adults with physical, sensory, and mental impairments and learning disabilities, however those impairments have arisen, such as whether present from birth or due to advancing age, chronic illness or injury.

This appendix is to be read in conjunction with the Moor House School & College Child Protection and Safeguarding Policy and Procedures. Arrangements for safeguarding students aged 18 or over at Moor House are substantively covered in the main policy. This appendix sets any differences and additions that may apply.

Legal and Statutory Framework

- Safeguarding Vulnerable Groups Act 2006
- Deprivation of Liberty Safeguards
- Liberty Protection Safeguards
- Mental Capacity (Amendment) Act 2019
- Care Act 2014
- Mental Capacity Act 2005
- Care & Support Statutory Guidance (Updated 2018)
- Surrey Safeguarding Adults Board Adult Safeguarding Policy and Procedures

Guidance and documents referred to in this appendix:

- The Care Act (2014)
- The Care and Support Statutory Guidance
- Surrey Safeguarding Adults Board – Adult Safeguarding Policy and Procedures
- The Mental Capacity Act (2005)
- Moor House School & College Procedure for Reportable Medication Errors

Principles of the Care Act 2014

The Care Act 2014 encourages caregivers to take a person-centered approach when safeguarding vulnerable adults. When you follow the principles, you too place the vulnerable person's wellbeing and needs at the forefront of safeguarding processes. They help you directly involve the vulnerable

person and any nominated people who can help reach decisions in the vulnerable adult's best interest when managing safeguarding concerns.

The six principles of the Care Act are:

Empowerment: Students being supported and encouraged to make their own decisions and informed consent.

Prevention: It is better to act before harm occurs. We can effectively identify and appropriately respond to signs of abuse and suspected criminal offences and act before harm occurs. We make everyone aware, through provision of appropriate training and guidance, of how to recognise signs and take any appropriate action to prevent abuse occurring

Proportionality: Proportionate and least intrusive response appropriate to the risk presented.

Protection: Support and representation for those in greatest need.

Partnership: Local solutions through services working with their communities. Communities have a part to play in preventing, detecting, and reporting neglect and abuse. We will work together to place the welfare of individuals above organisational boundaries. We have effective local information-sharing and multi-agency partnership arrangements in place and staff understand these.

Accountability: Accountability and transparency in delivering safeguarding. Staff understand what is expected of them and others

Key Personnel and Terminology

These remain the same as those identified on page 6 of the policy. The Designated Safeguarding Lead (DSL) is also the Designated Safeguarding Lead for Adults (**DSAL**). In adult safeguarding the term 'Alerting Manager' is often used, i.e. the person to whom staff report concerns. At Moor House this function is fulfilled by the DSL and the DDSLs.

Policy Aims and Objectives:

Moor House School & College will not tolerate the abuse of adults with care and support needs. It is committed to promoting wellbeing, preventing harm and responding effectively if concerns are raised. Moor House is committed to the aims of adult safeguarding:

- prevent harm and reduce the risk of abuse or neglect to adults with care and support needs
- stop abuse or neglect wherever possible

- safeguard adults in a way that supports them in making choices and having control about how they want to live.
- promote an approach that concentrates on improving life for the adults concerned
- identifying and responding to abuse and neglect
- provide information and support in accessible ways to help people understand
- the different types of abuse, how to stay safe and what to do to raise a concern about the safety or well-being of an adult
- address what has caused the abuse or neglect

To contribute to meeting these aims, we will:

- Manage our services in a way which minimises the risk of abuse occurring
- Work with adults with care and support needs and other agencies to end any abuse that is taking place

To achieve these aims we will:

- Ensure that all managers, employees and volunteers have access to and are familiar with this safeguarding adult policy and procedure and their responsibilities within it
- Ensure concerns or allegations of abuse are always taken seriously
- Ensure the Mental Capacity Act is used to make decisions on behalf of those adults at risk who are unable to make particular decisions for themselves.
- Ensure staff receive training in relation safeguarding adults at a level relevant to their role.
- Ensure that people using our services, and where relevant their relatives and their friends, have access to information about how to report concerns or allegations of abuse.
- Ensure there is a named lead person to promote adult safeguarding awareness and practice within the organisation

Policy Principles and Values:

The fundamental principles and values identified in the policy remain the same. In addition, staff will adhere to the statutory guidance for safeguarding adults at risk and will apply the principles of 'making safeguarding personal' when responding to concerns raised about a student over the age of 18.

Supporting adults at risk

Who does adult safeguarding apply to?

The definition of adults that adult safeguarding processes may apply to is set out in section 42 of the Care Act 2014. They are people who:

- are aged 18 years or more, and
- have needs for care and support (whether or not these are currently being met),
- are experiencing, or are at risk of, abuse or neglect, and
- as a result of those needs are unable to protect themselves against the abuse or neglect or the risk of it.

This includes adults with physical, sensory and mental impairments and learning disabilities, however those impairments have arisen, such as whether present from birth or due to advancing age, chronic illness or injury.

Also included are people with a mental illness, or other memory impairments, and people who misuse substances or alcohol.

In this policy and procedure, the term “adult” means people coming within this definition.

https://assets.publishing.service.gov.uk/media/5a7f6122e5274a2e87db57f9/23902777_Care_Act_Book.pdf

Prevention/Protection

The measures outlined in the policy refer to the work that will also be done to support adults at risk.

Safe School and College, Safe Staff

The measures outlined in the policy refer to the work that will also be done to support adults at risk.

Roles and Responsibilities

The Headteacher

In addition to those outlined in the policy, the headteacher will also ensure that Moor House will contribute to inter-agency working in accordance with the relevant statutory guidance that applies to adults at risk.

The headteacher will also ensure that allegations or concerns against staff who work with adults are also dealt with in accordance with the relevant statutory guidance and local procedures.

The DSL/DSAL

In addition to those responsibilities outlined in the policy, the DSL will:

- Have a 'making safeguarding personal' approach with adults at risk
- Manage and submit referrals regarding adults at risk to the Surrey MASH. Referrals will be made safely and securely by email to: ascmash@surreycc.gov.uk or by completing the MASH Referral Form
- Have a secure working knowledge of SSAB procedures
- Confirm to the Governing Body, through an annual statement to the safeguarding governors that Moor House policies are consistent with Surrey Adult Safeguarding Board (SSAB) procedures and statutory requirements.

Confidentiality and Sharing information

Data protection Act 2018

Provides lawful grounds for the processing of special category personal data – without consent if the circumstances justify it – where it is in the *substantial public interest*, and necessary for the purpose of:

- (i) protecting an individual from neglect or physical, mental or emotional harm; or
- (ii) protecting the physical, mental or emotional well-being of an individual where that individual is a child or an adult at risk.

The amendment still expects the possibility of obtaining consent from an individual to be considered (and in these circumstances it would have to be explicit). However, if in the circumstances the consent cannot be given, or Moor House cannot reasonably be expected to obtain it – notably because obtaining it would prejudice the safeguarding purpose (i.e. the protection of the individual) – then the ground applies.

Information sharing - adults

If the adult at risk has the mental capacity to make informed decisions about their safety and they do not want any action to be taken, this does not preclude the sharing of information under safeguarding adults procedures with relevant professional colleagues.

If the adult with capacity does not want action to be taken but there is a public interest (such as a child or other adults also being at risk) Moor House recognises it has a duty to act.

If an adult at risk lacks capacity to make informed decisions about maintaining their safety and does not want action to be taken, Moor House will fulfil its duty in line with statutory guidance to act in their best interests.

"A person with mental capacity may choose to live in a situation which is seen as unsafe by professionals They do not, however, have a right to make decisions about the protection of other people".

Adult Protection Procedures

Following a report of concerns the DSL or Alerting Manager will adhere to the local procedures set out below.

If there is an adult safeguarding concern, it should be referred to Surrey County Council's Adult Social Care Services via the Multi-Agency Safeguarding Hub (MASH). During office hours contact the Multi Agency Safeguarding Hub (MASH) by phone or email in the first instance, if these fail, contact can be made by fax. Tel: 0300 470 9100; Email: ascmash@surreycc.gov.uk; Fax number: 01483 519862

Out of hours: Call the Adult Social Care Emergency Duty Team on: 01483 517898 In an emergency: Dial 999 for the emergency services

Further Information about what happens next is explained in the Surrey Safeguarding Adults Board Adult Safeguarding Policy and Procedures.

Dealing with disclosures:

In dealing with disclosures Moor House will apply the principle 'of Making Safeguarding Personal'. "Making safeguarding personal means [adult safeguarding work] should be person-led and outcome focused. It engages the person in a conversation about how best to respond to their safeguarding situation in a way that enhances involvement, choice and control as well as improving quality of life, wellbeing and safety."

At Moor House we will meet the aims of Making Safeguarding Personal by:

- Keeping the person at the heart of the process
- Making efforts to understand the outcomes they want to achieve from the adults safeguarding work and support them to achieve those

Consideration will also be given to whether a student can make a decision about what they should do to protect themselves from the abuse or neglect, or the risk of these that they face. If there is a belief that they may not be able to, then an assessment of capacity and, if required, a best interest decision may be required in relation to this decision in line with the requirements of the Mental Capacity Act 2005.

Allegations against adults who work with students aged 18 or over

The procedure outlined in the policy also applies in all cases where the allegation refers to a student aged 18 or over. In addition to those measures set out in the policy, Moor House will work in accordance with SSAB procedures and Adult Social Care. Allegations against adults who work with students aged 18 or over must be reported to the Principal or in their absence the Head of

What is an adult safeguarding enquiry?

Section 42 of the Care Act 2014 says that when the tests are met (an adult who is experiencing or at risk of abuse or neglect which they cannot protect themselves from because of their care and support needs) there must be an adult safeguarding enquiry. The objectives of an adult safeguarding enquiry are to:

- Establish facts
- Ascertain the adult's views and wishes.
- Assess the needs of the adult for protection, support, and redress and how they might be met
- Protect from the abuse and neglect, in accordance with the wishes of the adult
- Make decisions as to what follow-up action should be taken with regard to the person or organisation responsible for the abuse or neglect
- Enable the adult to achieve resolution and recovery The Care Act does not specify what an enquiry will consist of, nor does it create any powers for carrying out an adult safeguarding enquiry

An adult safeguarding enquiry is simply the collection of whatever actions using existing powers, duties and processes is needed to meet the purposes. The benefit of putting the matter in to an adult safeguarding framework is:

- To ensure there is proper recognition of the abuse and neglect issue
- To help the multi-agency response to the concern do the best at involving the right organisations and people, sharing information between them, having a shared understanding of the risks and how to respond to them, and to minimise duplication of effort
- To give a focus on ensuring the care and support needs of the person are taken account of

When considering whether to report an adult safeguarding concern to the police If a crime has been or may have been committed, the school will seek the student's consent. This will be in addition to raising a safeguarding concern with the local authority.

If the person has mental capacity in relation to the decision and does not want a report made, this should be respected unless there are justifiable reasons to act contrary to their wishes, such as:

- The person is subject to coercion or undue influence, to the extent that they are unable to give consent, or

- There is an overriding public interest, such as where there is a risk to other people
- It is in the person's vital interests (to prevent serious harm or distress or in life-threatening situations)
- Where there is an expectation on the school to report the matter arising from, for example, obligations to contribute to the prevention and detection of crime under the Crime and Disorder Act or where there is a statutory reporting requirement to do so

There should be clear reasons for overriding the wishes of a student with the mental capacity to decide for themselves. A judgement will be needed that takes the particular circumstances into account. If the student does not have mental capacity in relation to this decision, a 'best interests' decision will need to be made in line with the Mental Capacity Act.

How might the objectives of the enquiry be met?

Establish facts. The enquiry involves:

- Generating hypotheses
- Gathering information
- Analysis of information to test hypotheses
- Making a judgement about what has happened and why

This will include hearing from the person or organisation thought to be the source of risk.

- Ascertain the adult's views and wishes
- Speak with the person or their representative
- Use of advocacy where appropriate
- Assess the needs of the adult for protection, support and redress and how they might be met
- Protect from the abuse and neglect, in accordance with the wishes of the adult:
Developing a safeguarding plan informed by the analysis and judgements made and assessment of care and support needs.

Protection might include:

- Changes to service provision
- Developing skills
- Changing financial arrangements
- Change of accommodation. It may also include protective measures for other people that may be affected by the issue.
- Make decisions as to what follow-up action should be taken with regard to the person or organisation responsible for the abuse or neglect
- Enable the adult to achieve resolution and recovery

What is abuse:

In addition to those categories of abuse set out in the policy, abuse can also be in the form of:

1. Modern slavery

- Human trafficking
- Forced labour
- Domestic servitude
- Sexual exploitation, such as escort work, prostitution, and pornography
- Debt bondage – being forced to work to pay off debts that realistically they never will be able to

2. Neglect & acts of omission

- Failure to provide or allow access to food, shelter, clothing, heating, stimulation, and activity, personal or medical care
- Providing care in a way that the person dislikes
- Failure to administer medication as prescribed
- Refusal of access to visitors
- Not taking account of individuals' cultural, religious, or ethnic needs
- Not taking account of educational, social, and recreational needs
- Ignoring or isolating the person
- Preventing the person from making their own decisions
- Preventing access to glasses, hearing aids, dentures, etc.
- Failure to ensure privacy and dignity

3. Organisational institutional abuse

- Discouraging visits or the involvement of relatives or friends
- Run-down or overcrowded establishment
- Authoritarian management or rigid regimes
- Lack of leadership and supervision
- Insufficient staff or high turnover resulting in poor quality care
- Abusive and disrespectful attitudes towards people using the service
- Inappropriate use of restraints
- Lack of respect for dignity and privacy
- Failure to manage residents with abusive behaviour
- Not providing adequate food and drink, or assistance with eating
- Not offering choice or promoting independence
- Misuse of medication

- Failure to provide care with dentures, spectacles or hearing aids
- Not taking account of individuals' cultural, religious or ethnic needs
- Failure to respond to abuse appropriately
- Interference with personal correspondence or communication
- Failure to respond to complaints

4. Discriminatory abuse

- Unequal treatment based on age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, gender, or sexual orientation
- Verbal abuse, derogatory remarks or inappropriate use of language related to a protected characteristic
- Denying access to communication aids, not allowing access to an interpreter/signer/lip-reader
- Harassment or deliberate exclusion on the grounds of a protected characteristic
- Denying basic rights to healthcare, education, employment and criminal justice relating to a protected characteristic
- Substandard service provision relating to a protected characteristic

5. Financial or material abuse

- Theft of money or possessions
- Fraud, scamming
- Preventing a person from accessing their own money, benefits or assets
- Employees taking a loan from a person using the service
- Undue pressure, duress, threat, or undue influence put on the person in connection with loans, wills, property, inheritance or financial transactions
- Arranging less care than is needed to save money to maximise inheritance
- Denying assistance to manage/monitor financial affairs
- Denying assistance to access benefits
- Misuse of personal allowance in a care home
- Misuse of benefits or direct payments in a family home
- Someone moving into a person's home and living rent free without agreement or under duress
- False representation, using another person's bank account, cards or documents
- Exploitation of a person's money or assets, e.g. unauthorised use of a car
- Misuse of a power of attorney, deputy, appointee-ship or other legal authority
- Rogue trading – e.g. unnecessary or overpriced property repairs and failure to carry out agreed repairs or poor workmanship

6. Domestic Violence and Abuse

Domestic violence or abuse can be:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

Domestic violence and abuse include any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence, or abuse between those aged 16 or over who are or have been, intimate partners or family members regardless of gender or sexuality. It also includes so called 'honour'-based violence, female genital mutilation and forced marriage.

Coercive or controlling behaviour is a core part of domestic violence. Coercive behaviour can include:

- acts of assault, threats, humiliation and intimidation
- harming, punishing, or frightening the person
- isolating the person from sources of support
- exploitation of resources or money
- preventing the person from escaping abuse
- regulating everyday behaviour.

Sexual violence and harassment between children in schools

The measures outlined in the policy refer to the work that will also be done to support adults at risk. In addition, where an adult has been harmed or is the perpetrator of sexual violence or sexual harassment, the response will be in accordance with Surrey Safeguarding Adults Board – Adult Safeguarding Policy and Procedures.

Anti-bullying/Cyberbullying

In instances where bullying occurs involving students aged 18 or over, the response will be considered in the context of an adult safeguarding concern and the Headteacher and the DSL/DDSL will consider adult safeguarding procedures.

Online Safety

The measures outlined in the policy refer to the work that will also be done to support adults at risk. (Please read the [E-safety](#) policy)

Racist incidents

Repeated racist incidents or a single racist incident involving students aged 18 or over may lead

to consideration under adult safeguarding procedures.

Radicalisation, Extremism and Terrorism

The measures outlined in the policy refer to the work that will also be done to support adults at risk.

Domestic abuse/CSE/Child Criminal Exploitation/Youth-produced Sexual Imagery (Sexting) /Female Genital Mutilation (FGM)/Forced Marriage/Honour-based Violence

The school recognise that all the above categories constitute a form of abuse which, by virtue of their disability, are risk factors for all students at Moor House.

Private Fostering Arrangements and Looked-After Children

In addition to those measures outlined in the policy, the school will have regard to those arrangements in place for students aged 18 or over, including any local 'staying put' policies and procedures.

Children Missing Education

Children missing education are children of compulsory school age who are not registered at a school and are not receiving suitable education otherwise than at a school. This can therefore be omitted.

Students Missing out on Education – Please see this section in the main policy School Attendance and Behaviour

The Attendance Policy and Moor House College Behaviour Policy apply to students over the age of 18 in full time education at Moor House.

Restrictive Physical Intervention:

The measures outlined in the policy refer to the work that will also be done to support adults at risk.

Whistleblowing

It is also recognised that students aged 18 or over cannot be expected to raise concerns in an environment where staff fail to do so.

Medication administration

Please refer to the Moor House School & College Procedure for Reportable Medication Errors.

<https://www.surreysab.org.uk/wp-content/uploads/2021/04/SSAB-Policy-and-Procedure-2018-FINAL-v5-26.04.2021-accessibility.pdf>