



# Safeguarding Policy

Safeguarding is everyone's responsibility

Approved by	Trust Board	Date Approved	18 July 23
Review cycle	Annual	Date of next review	July 2024

## Contents

1. Policy Statement.....	1
2. Organisational Responsibilities.....	2
2.1 Designated Safeguarding Leads Responsibilities.....	3
2.2 Staff and Volunteer Responsibilities.....	3
3. Safeguarding Information.....	4
3.1 Definitions of harm.....	4
3.2 Child on Child Abuse.....	5
3.3 General safeguarding advice .....	8
4. Reporting Procedures.....	9
4.1 Responding to a disclosure.....	10
4.2 Other helpful contacts.....	10
4.3 Reacting to a disclosure .....	11
4.4 Parents/ carers .....	11
4.5 Finding a Solution Together ( <i>FaST</i> process) .....	11
5. Allegations Made Against Staff, Volunteers, Contractors, Organisations or Individuals using the school premises .....	12
5.1 Low Level Concerns (please refer to the Staff Code of Conduct for further information).....	12
6. Confidentiality And Whistle Blowing.....	13
7. Safer Recruitment Policy Statement .....	13
8. Additional Relevant Policies/ Procedures.....	14
8.1 References .....	14

### 1. Policy Statement

This Policy applies to anyone working for or on behalf of Enlighten Learning Trust (ELT) including the board of trustees, paid staff, volunteers, sessional workers, agency staff and students. Its purpose is to protect and enhance the safety and well-being of all children and young people by actively promoting awareness, good practice and sound procedures.

We believe the safety and well-being of children and young people is of the utmost importance and that they have a fundamental and equal right to be protected from harm regardless of age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation. We recognise our statutory responsibility for safeguarding: the safety, protection and well-being of all children and young people that the Trust supports and interacts with, is paramount and has priority over all other interests. This includes responding immediately and appropriately where there is a suspicion that any young person under the age of 18 years old may be a victim of bullying, harassment, abuse (including physical, sexual, emotional) or neglect.

*'Young Person' means those under 18 years old including all of those up to their 18<sup>th</sup> birthday- as designated a 'child' within the terms of the Children's Act 1989.*

The Trust Board and Local Governing Bodies of ELT are committed to safeguarding and promoting the welfare of children and young people and expect all staff and volunteers to share this commitment. Our academies are safe places for children, where our responsibilities for safeguarding children are taken seriously. ELT fully adopts Keeping Children Safe in Education 2023 (KCSIE) and takes seriously its responsibility under section 175/157 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure there are robust arrangements within our school to identify, assess, and support those children who are suffering harm or at risk of suffering harm. This policy is underpinned by KCSIE 23 which should be referred to in any instances where further assurance or guidance is required.

The Trust's Senior Designated Officer for Safeguarding is Anthony Marsh. Should you wish to contact him directly with any concerns, please email [amarsh@enlightenlt.education](mailto:amarsh@enlightenlt.education).

The Trustee with responsibility for Safeguarding is Mr Hugh Betterton, who can be contacted by email at [hbetterton@enlightenlt.education](mailto:hbetterton@enlightenlt.education).

The Trust encourages a culture of listening to and engaging in dialogue, with children seeking their views in ways that are appropriate to their age, culture and understanding.

All Trust Schools have a Designated Safeguarding Lead (DSL) who is expected to understand and implement their role as required by [Keeping Children Safe in Education \(Appendix C of KCSIE\)](#).

All Trust schools use CPOMs for the recording and management of safeguarding records.

This policy has been drawn up based on legislation, policy and guidance that seeks to protect children in England including the Children's Act 2004 and "Working Together to Safeguard Children 2018". [Working together to safeguard children \(PDF\)](#) (DfE), 2018 provides the key statutory guidance for anyone working with children and young people. All procedures and policies pertaining to safeguarding should be regularly reviewed and updated on an annual basis.

## **2. Organisational Responsibilities**

The Trust is responsible for the implementation of the Safeguarding Policy and delegates operational responsibility to the DSL within each school to manage the Safeguarding Policy and its implementation.

It is the responsibility of the DSL to take and document appropriate action following any expression of concern and make referrals to the appropriate agency.

The Trust will ensure that the DSL participates 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 will be made aware of this Safeguarding Policy and related relevant procedures as part of their induction and their contract of employment.

All staff/volunteers will be informed and have access to regular training as required to update their knowledge on safeguarding. More information can be found here; [Training - Surrey Safeguarding Children Partnership \(surreyscp.org.uk\)](https://surreyscp.org.uk)

Please note that the safeguarding partnership training offer is available on Olive (Surrey's LMS). The link for registration and booking is:

<https://surreycoun.plateau.com/learning/user/portal.do?siteID=SCA&landingPage=login>

The Trust will work in accordance with guidance and good practice from the Surrey Safeguarding Children Partnership. More information can be found at: [Surrey Safeguarding Children Partnership \(surreyscp.org.uk\)](https://surreyscp.org.uk)

## **2.1 Designated Safeguarding Leads Responsibilities**

Each schools DSL will ensure that all members of staff/volunteers have timely and relevant safeguarding training and that all members of staff make effective and timely use of CPOMS as our reporting mechanism.

They will ensure that they and all DDSLs have read and signed a printed copy of the job description for the role of DSL as contained within KCSIE. They will use the Trust DSL annual safeguarding planner to guide actions during the academic year.

They will ensure that procedures are in place to Keep children safe during community activities, after-school clubs and tuition by adhering to the [non-statutory guidance for providers running out of school settings](#).

They will also ensure that the school website contains a page explaining how the school safeguards children.

Training for the DSL should be accessed from Surrey Safeguarding Children Partnership. Staff and volunteers can also access a range of multi-agency safeguarding training. More information can be found here; [Surrey Children's Services Academy \(SCSA\) - Surrey County Council \(surreycc.gov.uk\)](https://surreycc.gov.uk)

The DSL will take appropriate action following any expression of concern, disclosure or reported incident and make referrals to the appropriate agency.

Lead DSLs work with appropriate curriculum leads to ensure that Relationships, Sex and Health Education is taught proactively and delivered in line with statutory guidance. Where a scheme of work is being used, appropriate leaders must ensure that coverage within the scheme reflects that in the statutory guidance. If required, additional provisions should be put in place to deliver context specific content not covered by the scheme so that children are taught how to keep themselves and others safe.

## **2.2 Staff and Volunteer Responsibilities**

Any new member of staff or volunteer with direct contact with young people will be taken through this policy as part of the induction process and offered training soon after commencing their post. All staff and volunteers are to participate in timely and relevant training.

All staff have a duty to ensure that any suspected incident, allegation, or other manifestation relating to child protection is reported using the procedures detailed below in this policy.

If in any doubt about what action to take, employees must seek advice from one of the named Safeguarding Leads or in their absence the School's Head Teacher, the CEO or the Director of Primary who holds delegated Trust responsibility for safeguarding.

### **3. Safeguarding Information**

#### **3.1 Definitions of harm**

For the purpose of this policy, The Trust 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.
- Harmful Sexual Behaviour - The Brook Traffic Light Tool (see below) uses a traffic light system to categorise the sexual behaviours of young people and is designed to help professionals (this tool has been updated and DSLs are undertaking Brooks training to be able to access the up-to-date digital version):
  - Guide and 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, we 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.

### 3.2 Child on Child Abuse

All staff recognise that children can and do abuse other children both inside and out of school and online and that procedures for dealing with child on child abuse are the same as those contained below in section 4. This includes staff proactively challenge inappropriate behaviours between children.

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

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- Abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’).
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- 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).
- Upskirting, 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).

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.		
<p><b>What is a green behaviour?</b></p> <p>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.</p> <p><b>What can you do?</b></p> <p>Green behaviours provide opportunities to give positive feedback and additional information.</p> <p><b>Green behaviours</b></p> <ul style="list-style-type: none"> <li>• holding or playing with own genitals</li> <li>• attempting to touch or curiosity about other children's genitals</li> <li>• attempting to touch or curiosity about breasts, bottoms or genitals of adults</li> <li>• games e.g. mummies and daddies,</li> <li>• doctors and nurses</li> <li>• enjoying nakedness</li> </ul>	<p><b>What is an amber behaviour?</b></p> <p>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.</p> <p><b>What can you do?</b></p> <p>Amber behaviours signal the need to take notice and gather information to assess the appropriate action.</p> <p><b>Amber behaviours</b></p> <ul style="list-style-type: none"> <li>• preoccupation with adult sexual</li> <li>• behaviour</li> <li>• pulling other children's pants down/skirts up/trousers down against their will</li> <li>• talking about sex using adult slang</li> </ul>	<p><b>What is a red behaviour?</b></p> <p>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.</p> <p><b>What can you do?</b></p> <p>Red behaviours indicate a need for immediate intervention and action.</p> <p><b>Red behaviours</b></p> <ul style="list-style-type: none"> <li>• persistently touching the genitals of other children</li> <li>• persistent attempts to touch the genitals of adults</li> <li>• simulation of sexual activity in play</li> <li>• sexual behaviour between young children involving penetration with objects</li> </ul>

<ul style="list-style-type: none"> <li>• interest in body parts and what they do</li> <li>• curiosity about the differences between boys and girls</li> </ul>	<ul style="list-style-type: none"> <li>• preoccupation with touching the genitals of other people</li> <li>• following others into toilets or changing rooms to look at them or touch them</li> <li>• talking about sexual activities seen on TV/online</li> </ul>	<ul style="list-style-type: none"> <li>• forcing other children to engage in sexual play</li> </ul>
<p><b>Behaviours: age 5 to 9 and 9 to 13</b></p> <p>All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.</p>		
<p><b>What is a green behaviour?</b></p> <p>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.</p> <p><b>What can you do?</b></p> <p>Green behaviours provide opportunities to give positive feedback and additional information.</p> <p><b>Green behaviours 5-9</b></p> <ul style="list-style-type: none"> <li>• feeling and touching own genitals</li> <li>• curiosity about other children's genitals</li> <li>• curiosity about sex and relationships, e.g. differences between boys and girls, how sex happens, where babies come from, same-sex relationships</li> <li>• sense of privacy about bodies</li> <li>• telling stories or asking questions using swear and slang words for parts of the body</li> </ul> <p><b>Green behaviours 9-13</b></p> <ul style="list-style-type: none"> <li>• solitary masturbation</li> <li>• use of sexual language including swear and slang words</li> <li>• having girl/boyfriends who are of the same, opposite or any gender</li> <li>• interest in popular culture, e.g. fashion, music, media, online games, chatting online</li> <li>• need for privacy</li> <li>• consensual kissing, hugging, holding hands with peers</li> </ul>	<p><b>What is an amber behaviour?</b></p> <p>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.</p> <p><b>What can you do?</b></p> <p>Amber behaviours signal the need to take notice and gather information to assess the appropriate action.</p> <p><b>Amber behaviours 5-9</b></p> <ul style="list-style-type: none"> <li>• questions about sexual activity which persist or are repeated frequently, despite an answer having been given</li> <li>• sexual bullying face to face or through texts or online messaging</li> <li>• engaging in mutual masturbation</li> <li>• persistent sexual images and ideas in talk, play and art</li> <li>• use of adult slang language to discuss sex</li> </ul> <p><b>Amber behaviours 9-13</b></p> <ul style="list-style-type: none"> <li>• 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</li> <li>• verbal, physical or cyber/virtual sexual bullying involving sexual aggression</li> <li>• LGBT (lesbian, gay, bisexual, transgender) targeted bullying</li> <li>• exhibitionism, e.g. flashing or mooning</li> <li>• giving out contact details online</li> <li>• viewing pornographic material</li> <li>• worrying about being pregnant or having STIs</li> </ul>	<p><b>What is a red behaviour?</b></p> <p>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.</p> <p><b>What can you do?</b></p> <p>Red behaviours indicate a need for immediate intervention and action.</p> <p><b>Red behaviours 5-9</b></p> <ul style="list-style-type: none"> <li>• frequent masturbation in front of others</li> <li>• sexual behaviour engaging significantly younger or less able children</li> <li>• forcing other children to take part in sexual activities</li> <li>• simulation of oral or penetrative sex</li> <li>• sourcing pornographic material online</li> </ul> <p><b>Red behaviours 9-13</b></p> <ul style="list-style-type: none"> <li>• exposing genitals or masturbating in public</li> <li>• distributing naked or sexually provocative images of self or others</li> <li>• sexually explicit talk with younger children</li> <li>• sexual harassment</li> <li>• arranging to meet with an online acquaintance in secret</li> <li>• genital injury to self or others</li> <li>• forcing other children of same age, younger or less able to take part in sexual activities</li> <li>• sexual activity e.g. oral sex or intercourse</li> <li>• presence of sexually transmitted infection (STI)</li> <li>• evidence of pregnancy</li> </ul>



<b>Behaviours: age 13 to 17</b> All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.		
<p><b>What is a green behaviour?</b></p> <p>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.</p> <p><b>What can you do?</b></p> <p>Green behaviours provide opportunities to give positive feedback and additional information.</p> <p><b>Green behaviours</b></p> <ul style="list-style-type: none"> <li>• solitary masturbation</li> <li>• sexually explicit conversations with peers</li> <li>• obscenities and jokes within the current cultural norm</li> <li>• interest in erotica/pornography</li> <li>• use of internet/e-media to chat online</li> <li>• having sexual or non-sexual relationships</li> <li>• sexual activity including hugging, kissing, holding hands</li> <li>• consenting oral and/or penetrative sex with others of the same or opposite gender who are of similar age and developmental ability</li> <li>• choosing not to be sexually active</li> </ul>	<p><b>What is an amber behaviour?</b></p> <p>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.</p> <p><b>What can you do?</b></p> <p>Amber behaviours signal the need to take notice and gather information to assess the appropriate action.</p> <p><b>Amber behaviours</b></p> <ul style="list-style-type: none"> <li>• accessing exploitative or violent pornography</li> <li>• uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress,</li> <li>• withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing</li> <li>• concern about body image</li> <li>• taking and sending naked or sexually provocative images of self or others</li> <li>• single occurrence of peeping, exposing, mooning or obscene gestures</li> <li>• giving out contact details online</li> <li>• joining adult- only social networking sites and giving false personal information</li> <li>• arranging a face to face meeting with an online contact alone</li> </ul>	<p><b>What is a red behaviour?</b></p> <p>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.</p> <p><b>What can you do?</b></p> <p>Red behaviours indicate a need for immediate intervention and action.</p> <p><b>Red behaviours</b></p> <ul style="list-style-type: none"> <li>• exposing genitals or masturbating in public</li> <li>• preoccupation with sex, which interferes with daily function</li> <li>• sexual degradation/humiliation of self or others</li> <li>• attempting/forcing others to expose genitals</li> <li>• sexually aggressive/exploitative behaviour</li> <li>• sexually explicit talk with younger children</li> <li>• sexual harassment</li> <li>• non-consensual sexual activity</li> <li>• use of/acceptance of power and control in sexual relationships</li> <li>• genital injury to self or others</li> <li>• sexual contact with others where there is a big difference in age or ability</li> <li>• sexual activity with someone in authority and in a position of trust</li> <li>• sexual activity with family members</li> <li>• involvement in sexual exploitation and/or trafficking</li> <li>• sexual contact with animals</li> <li>• receipt of gifts or money in exchange for sex</li> </ul>

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.**

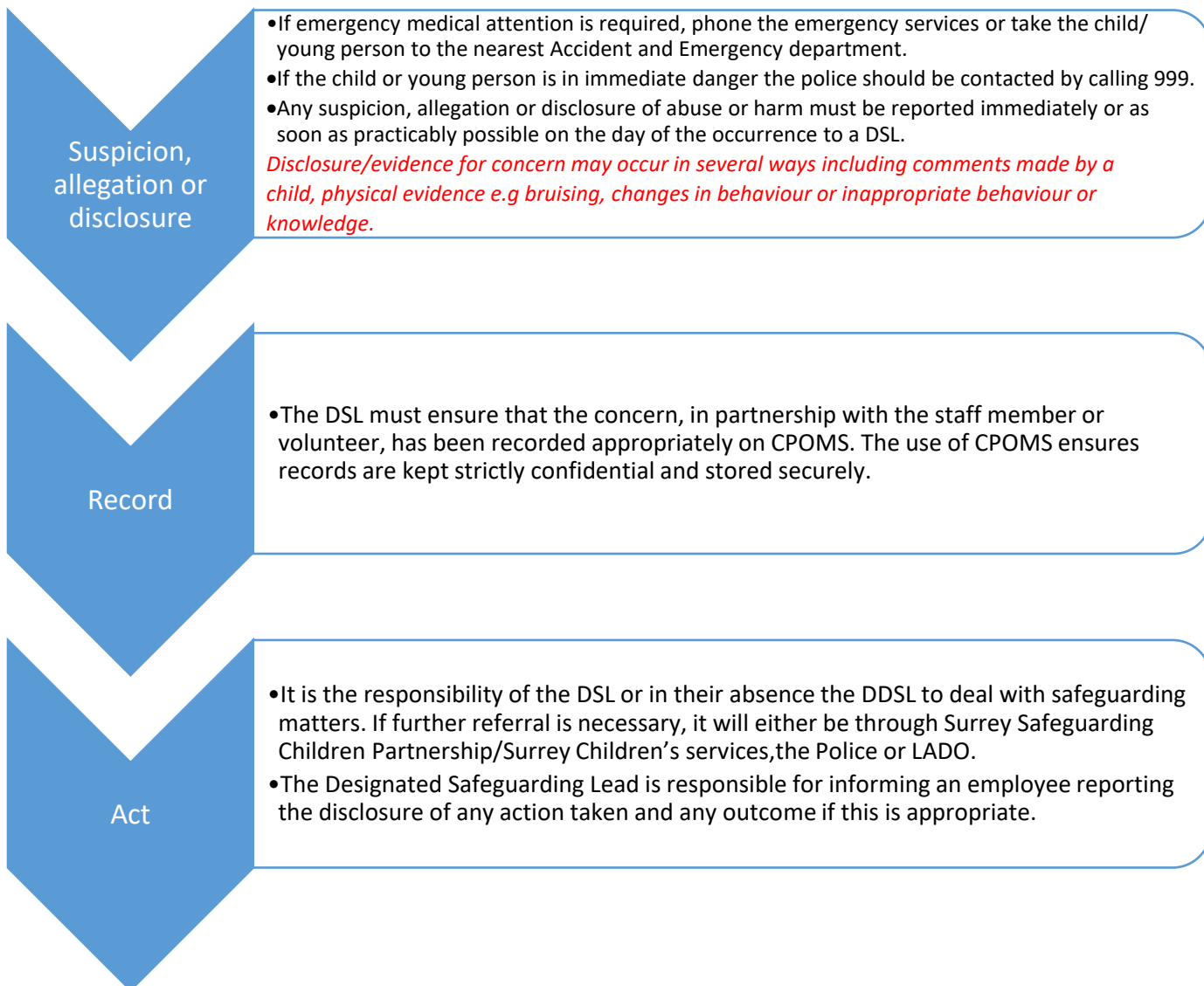
### **3.3 General safeguarding advice**

- 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.
- Always keep a record of any text or email exchanges with a young person (staff 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 well-being 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 the school premises.
- Avoid detailed discussions about your personal experiences e.g. drugs, alcohol, sex.
- Never speak to the press about a child or young person without permission from the Head Teacher.

#### 4. Reporting Procedures

In all cases it is vital to take every action which is needed to safeguard the child, children and young person(s).

*Immediate* action may be necessary in the following situations;



It is the responsibility of the DSL, 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 several workers is put together, that a picture of child abuse emerges. All staff & 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/616266/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.

#### 4.1 Responding to a disclosure

If the child or young person is not in immediate danger or requires immediate medical attention, contact the Schools DSL or one of the Deputy Designated Safeguarding Leads as soon as practical.

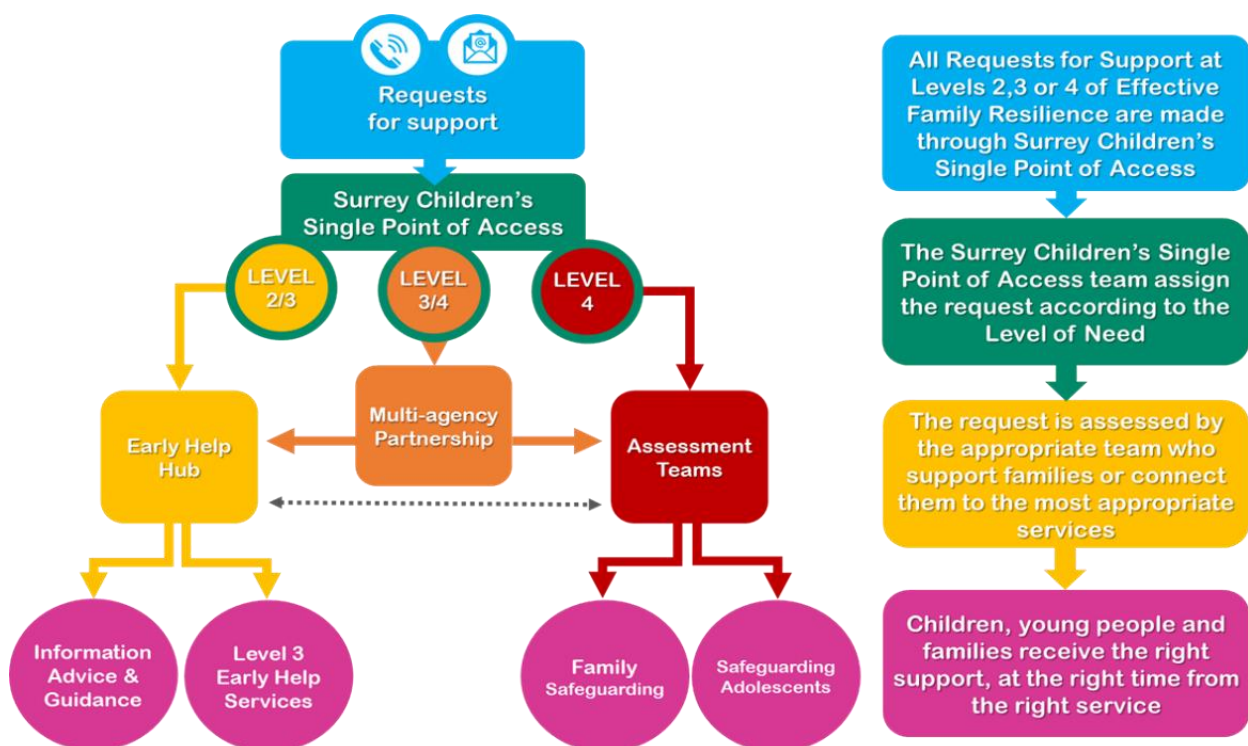
#### 4.2 Other helpful contacts

**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](mailto:cspa@surreycc.gov.uk)**



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

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

**Phone: 01483 517898**

**Email: [edt.ssd@surreycc.gov.uk](mailto:edt.ssd@surreycc.gov.uk)**

The 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.

**Phone: 0300 123 1650**

**Email: [LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk)**

**NSPCC Helpline 0808 800 5000**

#### **4.3 Reacting to a disclosure**

- Listen carefully rather than asking leading questions.
- Never promise any particular action or NOT to disclose any information shared.
- Allow silence and/or allow child, young person to be upset.
- Try to relate to the age, understanding or special needs of the child or young person.
- Record the information you have been given (on CPOMS) 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.

#### **4.4 Parents/ carers**

It is good practice to be as open and honest as possible with parents/carers about any concerns. However, you must not discuss your concerns with parent's/ carer's in the following circumstances:

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

#### **4.5 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 always essential that 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.

The detailed policy can be accessed here: [7.2 The Surrey FaST Resolution Process | Surrey Safeguarding Children Partnership \(procedures.org.uk\)](#)

## 5. Allegations Made Against Staff, Volunteers, Contractors, Organisations or Individuals using the school premises

When any form of complaint is made against an employee, volunteer or contractor, organisation or individual using the school premises, it must be taken seriously. The complaint should initially be dealt with by the Head Teacher or the most senior staff member on site at the time the complaint is made if the Head Teacher is not available. If the complaint is against the most senior member of staff on site, then the CEO must be contacted using the following email [ceo@enlightenlt.education](mailto:ceo@enlightenlt.education). If the complaint is about the CEO, then the chair of Trustees must be contacted using the following email [hcoulson@enlightenlt.education](mailto:hcoulson@enlightenlt.education).

The senior staff member must report the complaint immediately to the Headteacher and the DSL giving details of the circumstances. The Headteacher, DSL, CEO or Chair of Trustees may contact the Local Authority Designated Officer. Further information can be found here: [3.2 Managing allegations against people that work or volunteer with children | Surrey Safeguarding Children Partnership \(procedures.org.uk\)](#). They will attend the site of the allegation to gain an initial account of what has occurred from all relevant parties, including the person against whom the allegation has been made. If this is not possible, contact will be made by telephone. The Trust reserves 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.*

It is the responsibility of the Head Teacher, DSL, CEO, or the Chair of Trustees to make the decision as to whether to inform Social Services and/or the Police Child Protection Unit, depending on the nature of the allegation. In matters of allegations against staff, volunteers, organisations, or individuals using the school premises working with children, information must be provided to the Local Authority Designated Officer.

### 5.1 Low Level Concerns (please refer to the Staff Code of Conduct for further information)

Members of staff are able to identify concerns relating to the safety and welfare of children at an early stage, allowing for prompt intervention and preventing concerns from escalating. It is therefore vitally important that, if staff have any safeguarding concerns, however small, or an allegation is made about another member of staff, this is referred to the Head Teacher promptly (or to the CEO in respect of the Head Teacher; or to the Chair of Trustees in respect of the CEO) We also encourage staff to self-refer in circumstances where, for example, they have found themselves in a situation which:

- Could be misinterpreted.
- Might appear compromising to others.
- On reflection they believe they may have behaved in such a way that they consider falls below the expected professional standards.

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

- Being over friendly with children.
- Having favourites.
- Taking photographs of children on their mobile phone.
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door.
- Using inappropriate sexualised, intimidating, or offensive language.

## Procedure

- Tell the Head Teacher in all circumstances.
- Head Teacher logs the concern on the low-level concerns spreadsheet held within the confidential and secure HT HR area on Teams. The Head Teacher will monitor the spreadsheet in conjunction

with HR and where patterns of low-level concerns are emerging will follow the procedure for managing allegations above.

## **6. Confidentiality And Whistle Blowing**

The Trust 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 their Line Manager, DSL, CEO or trustee board member as appropriate. They will be fully supported throughout the process.

All staff must be aware that they have a professional responsibility to share information with other agencies 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 must be aware that they cannot promise a child that they will keep secrets/ not disclose potentially harmful information.

## **7. Safer Recruitment Policy Statement**

The Trust will apply the Working Together to Safeguard Children 2018 and SSCP Guidelines using the framework for safer recruitment and employment practice. This applies 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.

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.
- We identify and manage any identified risks.
- We 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 \(surreycc.gov.uk\)](https://www.surreycc.gov.uk/surrey-childrens-services-academy)

\*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 Head Teacher, DSL, CEO and/or trustees. 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.

## **8. Additional Relevant Policies/ Procedures**

This safeguarding policy should be read alongside our organisational policies (generally available on [The Trust website](#) and individual school websites), procedures, guidance and other related documents as well as [Keeping Children Safe in Education](#).

### **8.1 References**

- [Surrey Safeguarding Children Partnership protocols, guidance and procedures](#)
- [Working Together to Safeguard Children 2018](#)
- [Information Sharing Advice for Practitioners' guidance 2018 Surrey Education Services](#)
- [Keeping Children Safe in Education 2023](#)
- [Keeping Children Safe during community activities, after school clubs and tuition](#)



## Appendix 1

# SAFEGUARDING CHILDREN

Our schools are committed to safeguarding and promoting the welfare of children and expect all staff and volunteers to share this commitment.

**If you have any concerns regarding the safeguarding of a child at St Martin's C of E Schools please email (dsl@stmartinsepsom.school)**

**Designated Safeguarding Lead (DSL) & Trust Safeguarding Lead:**



Anthony Marsh

**Deputy Designated Safeguarding Leads (DDSL):**

 Mrs Maggie Down (Co Head Teacher) Attendance Racism	 Mrs Helen Woolvet (Assistant Head Teacher) Behaviour KS2 Pastoral KS2 Sexual Harassment Bullying	 Mrs Larissa Cannon (Assistant Head Teacher) Behaviour EYFS & KS1 Pastoral EYFS & KS1 Sexual Harassment Bullying	 Miss Jane Mason (Inclusion Lead) LAC PLAC Restraint
---	--	--	--

**All DSLs are fully committed to their roles. To find out more about what we do and your responsibilities please refer to our Safeguarding Policy which can be found on our website.**

The nominated safeguarding governor is:  
**Mrs Elzanne Smitt**

Contact details:

In the case of safeguarding allegations against the Head Teacher the CEO, Mike Boddington, should be contacted using the email: [ceo@enlightenlt.education](mailto:ceo@enlightenlt.education)

In the case of safeguarding allegations against the CEO the chair of trustees should be contacted using the email: [hcoulson@enlightenlt.education](mailto:hcoulson@enlightenlt.education)