

POLICY AND PROCEDURE:

WHOLE SCHOOL POLICY FOR SAFEGUARDING INCORPORATING CHILD PROTECTION

Policy Consultation and Review

This policy is available on our school website and is available on request from the school office. We also inform parents and carers about this policy when their children join our school and through our school newsletter.

The policy is provided to all staff (including temporary staff and volunteers) at induction alongside our Staff Code of Conduct policy. In addition, all staff are provided with Part One including Annex of the statutory guidance 'Keeping Children Safe in Education', DfE (September 2026).

Last updated September 2026

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1. PURPOSE and AIMS

Claremont fully recognises its responsibility for safeguarding and promoting the welfare of children who are pupils at the school, in accordance with the DfE guidance *Keeping Children Safe in Education (September 2026)* (KCSiE) and *Working Together to Safeguard children (March 2026)* (WTtSC). All staff at Claremont are required to read at least Part 1 including Annex (Further Information), of the *KCSiE (September 2026)* document.

1.1 The purpose of Claremont's safeguarding policy is to ensure every child who is a registered pupil at our school is safe and protected from harm. This means we will always work to:

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

1.2 This policy will give clear direction to staff, volunteers, visitors and parents about expected behaviour and our legal responsibility to safeguard and promote the welfare of all children at our school.

1.3 Our school fully recognises the contribution it can make to protect children from harm and supporting and promoting the welfare of all children who are registered pupils at our school. The elements of our policy are prevention, protection and support.

1.4 This policy applies to all pupils, staff, parents, governors, volunteers and visitors.

2. OUR ETHOS

2.1 The child's welfare is of paramount importance. Our school will establish and maintain an ethos where pupils feel secure, are encouraged to talk, are listened to and are safe. Children at our school will be able to talk freely to any member of staff at our school if they are worried or concerned about something. All staff will reassure pupils that they are being taken seriously and that they will be supported and kept safe. A pupil will never be given the impression that they are creating a problem by reporting any form of abuse, not just sexual violence or sexual harassment. Nor will a victim ever be made to feel ashamed for making a report.

2.2 Everyone who comes into contact with children and their families has a role to play in safeguarding children. We recognise that staff at our school play a particularly important role as they are in a position to identify concerns early and provide help for children to prevent concerns from escalating (early help). **All staff are advised to maintain an attitude of ‘it could happen here’ where safeguarding is concerned.**

2.3 All staff and regular visitors will, through training and induction, know how to recognise indicators of concern, how to respond to a disclosure from a child and how to record and report this information. We will not make promises to any child and we will not keep secrets. Every child will know what the adult will have to do with any information they have chosen to disclose.

2.4 Throughout our curriculum we will provide activities and opportunities for children to develop the skills they need to identify risks and stay safe. This will also be extended to include material that will encourage our children to develop essential life skills and an understanding of British values. This is covered within the delivery of PSHEE (Personal, Social, Health and Economic Education) and Claremont’s unique Character Education programme. Our age-appropriate PSHEE and Relationship and Sex Education (RSE) curriculums tackle important issues such as healthy and respectful relationships, consent, gender roles, stereotyping, equality, body confidence and self-esteem and addressing cultures of sexual harassment.

2.5 At all times we will work in partnership and endeavour to establish effective working relationships with parents, carers and colleagues from other agencies in line with Working Together to Safeguard Children (2026).

3. EARLY YEARS PROVISION

The School adheres to the requirements set out in the EYFS Statutory Framework including the requirements regarding safer sleeping arrangements, paediatric first aid training, safer eating and children’s privacy in relation to toileting and nappy changes.

Designated Safeguarding Lead for the EYFS

The Designated Safeguarding Lead who takes lead responsibility for safeguarding children in the early years settings is Henry Vincent.

Use of mobile phones and cameras

The school’s policy on the use of mobile phones and cameras can be found in the school’s technology acceptable usage policy for staff, the technology acceptable usage policy for parents and pupils and the mobile phone and other electronic devices protocol and acceptable use of cameras policy for junior school (including Early Years).

Parents are not permitted to use their mobile phones or camera in or around the EYFS setting without prior approval from the head or the head of junior school.

Screen use

The School has regard to Government guidance on screen use for children in the early years, including the impact of screen time on children's health, development and wellbeing. The School's approach to screen use in the EYFS setting is age-appropriate and is set out in the School's IT Acceptable Use Policy and the EYFS Policy. Staff in the EYFS setting are aware of the risks associated with excessive or inappropriate screen use for young children and take steps to manage and limit children's exposure to screens in line with the guidance.

Safeguarding training

The School ensures staff are trained in line with the criteria set out in Annex C of the EYFS Statutory Framework and are supported to implement the Policy on an ongoing basis.

The DSL provides support, advice and guidance to all staff on an ongoing basis, and on specific safeguarding issues that may arise. The DSL attends a training course, consistent with the criteria set out in Annex C of the EYFS Statutory Framework (July 2026).

The School's safeguarding training will be renewed every year to keep up to date with changes to safeguarding procedures or as a result of any safeguarding concerns that may occur at the school.

Disclosure obligation

All staff and prospective staff are informed that they have an ongoing obligation to disclose to the School any information that may affect their suitability to work with children. This includes, but is not limited to, any cautions, convictions, relevant orders, or any other matter that may affect their suitability. This requirement is communicated at the point of recruitment and is reiterated to existing staff at regular intervals.

4. ROLES AND RESPONSIBILITIES

Whole School

Role	Name	Contact details
Designated safeguarding lead (DSL)	Jason Stanley	External: 01372 473630

Junior school - Early years foundation stage (EYFS) and Years 1 – 6

Role	Name	Contact details
Safeguarding Lead (EYFS and Years 1-6 / Deputy DSL)	Henry Vincent	External: 01372 465380

Senior school (Years 7-13)

Role	Name	Contact details
Designated safeguarding lead (DSL)	Jason Stanley	External: 01372 473630
Deputy DSL	Rachel Heard	External: 01372 467841

Governing body

Role	Name	Contact details
Safeguarding governor	Angela Kelly	External: 01372 473602
Chair of governors	Roger Martin	External: 01372 473602

4.1 It is the responsibility of every member of staff, volunteer and regular visitor to our school to ensure that they carry out the requirements of this policy and, at all times, work in a way that will safeguard and promote the welfare of all of the pupils at this school. This includes the responsibility to provide a safe environment in which children can learn.

The governing body

4.2 The governing body of Claremont is accountable for ensuring the effectiveness of this policy and our compliance with it. Although our governing body takes collective responsibility to safeguard and promote the welfare of our pupils, we also have a named governor who champions safeguarding within the school.

4.3 The governing body will ensure that:

- they facilitate a whole school approach to safeguarding. This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Ultimately, all systems, processes and policies operate with the best interests of the child at their heart;
- The safeguarding policy is in place, is reviewed annually, is available publicly via our school website and has been written in line with local authority guidance and the requirements of the Surrey Children's Safeguarding Partnership policies and procedures;
- Governors of the education committee and the lead safeguarding governor review the safeguarding policy and its associated policies and procedures annually in association with the DSL, head and head of the junior school. The chair of the committee reports the findings to all governors for final board approval.
- The school contributes to inter-agency working in line with *Working Together to Safeguard Children (2026)*;
- A member of the senior leadership team is designated to take the lead responsibility for safeguarding and child protection (including online safety) and that they have a

deputy trained to the same standard as the Designated Safeguarding Lead who has the deputy role explicit in their job description;

- All staff receive a safeguarding induction and are provided with a copy of this policy (which includes the safeguarding response to children who go missing from education), the behaviour policy and the staff code of conduct policy;
- All staff undertake appropriate child protection training, including online safety, that is updated regularly;
- Procedures are in place for dealing with allegations against members of staff and volunteers in line with statutory guidance. Governors should regularly review its effectiveness;
- Safer recruitment practices are followed in accordance with the requirements of *'Keeping Children Safe in Education' DfE (September 2026)*. *As part of the shortlisting process Claremont should consider carrying out a search (via an online search engine) as part of due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which Claremont might want to explore with the applicant at interview;*
- They remedy without delay any weakness in regard to our safeguarding arrangements that are brought to their attention;
- The recruitment, selection and disclosures policy and procedure will recognise best practice in safeguarding;
- There are procedures in place for appropriate safeguarding responses to children who go missing from education;
- Our procedures, when dealing with child on child abuse are explained to pupils through teaching and learning, PSHEE and assemblies so these can be easily understood. Our aim is that children can confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
- relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the UK GDPR.

4.4 The governing body will receive a safeguarding report at each meeting that will record the training that has taken place, the number of staff attending and any outstanding training requirements for the school. It will also record all safeguarding activity that has taken place, for example, meetings attended, reports written, training or induction given. It will not identify individual pupils.

The Heads

4.5 At Claremont, the head and the head the junior school are responsible for:

- Identifying a member of the senior leadership team to be Designated Safeguarding Lead (DSL);
- Identifying an alternate member of staff, trained to the same standard as the DSL, to act as the Deputy Designated Safeguarding Lead (DDSL) in his/her absence to ensure there is always cover for the role;
- Ensuring that the policies and procedures adopted by the governing body, particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff;
- Ensuring that all staff and volunteers feel able to raise concerns about poor or unsafe practice and such concerns are addressed sensitively in accordance with agreed whistle-blowing procedures;
- Liaise with the LADO in the event of an allegation of abuse being made against a member of staff, volunteer or supply teacher working at the school;
- Reporting to the Charity Commission any safeguarding incident that may impact the school's charitable status.

The Designated Safeguarding Lead and Deputy Designated Safeguarding Leads

4.6 The Designated Safeguarding Lead (DSL) and their deputies will carry out their roles in accordance with the responsibilities outlined in the Annex of *'Keeping Children Safe in Education'* (September 2026). The DSL will take lead responsibility for safeguarding and child protection (including online safety). The DSL and deputies will help promote educational outcomes by sharing the information about the welfare, safeguarding and Child Protection issues that children, including children with a social worker, are experiencing or have experienced, with teachers and school leadership staff. Any concern for a child's safety or welfare will be recorded in writing and given to the DSL.

4.7 The DSL at Claremont will represent our school at child protection conferences and core group meetings. Through appropriate training, contextualised knowledge and experience our DSL will liaise with Children's Services and other agencies where necessary, and make referrals of suspected abuse to Children's Services, take part in strategy discussions and other interagency meetings and contribute to the assessment of children.

4.8 The DSL and deputy DSLs will use CPOMS to maintain written records and child protection files ensuring that they are kept confidential and stored securely.

4.9 The DSL and deputy DSLs are responsible for ensuring that all staff members and volunteers are aware of our policy and the procedure they need to follow. They will ensure that all staff, volunteers and regular visitors have received appropriate child protection information during induction and have been trained within the school to the agreed school's safeguarding training materials. The DSL and deputy DSLs are also responsible for overseeing and coordinating the school's implementation of the Government's Prevent counter-terrorism duty, as described in the [*Revised Prevent Duty Guidance: for England and Wales*](#) (April 2019).

4.9.1 Where there is a safeguarding concern, the DSL/Deputy DSL will ensure that the child's wishes and feelings are considered when determining what action to take and what services to provide.

5. TRAINING and INDUCTION

5.1 When new staff, volunteers or regular visitors join our school they will be informed of the safeguarding arrangements in place. They will be given a copy of our school's Safeguarding Policy, Behaviour Policy and Staff Code of Conduct and will have our Designated Safeguarding Leads identified to them. They will also be instructed how to record and pass on safeguarding concerns.

5.2 Every new member of staff or volunteer, including providers of regular co-curricular activities, will have an induction programme that will include essential safeguarding information. This programme will include basic safeguarding information relating to signs and symptoms of abuse, including FGM and possible radicalisation, and the statutory duty to report such abuse, how to manage a disclosure from a child, how to record and issues of confidentiality, online safety, child on child abuse and harmful sexual behaviour (HSB). The induction will also remind staff and volunteers of their responsibility to safeguard all children at our school and the remit of the role of the Designated Safeguarding Leads. At induction, all staff will also be provided with a copy of Part One including Annex (Further Information) of '*Keeping Children Safe in Education*' (September 2026) which must be read and understood in the context of the school.

5.3 In addition to the safeguarding induction, all members of staff will undertake appropriate safeguarding training on a regular basis in accordance with Surrey Children's Safeguarding Partnership (SCSP) advice.

5.4 All regular visitors and volunteers to our school will be given a set of our safeguarding procedures; they will be informed of whom our DSL and alternate staff members are and what the recording and reporting system is (see Appendix 2).

5.5 The DSLs and Deputy DSLs will attend Designated Safeguarding Lead refresher training every two years and/or DSL Network Meetings and other appropriate courses to assist them in their duties, as recommended by the SCSP.

5.6 Our governing body will also undertake appropriate training to ensure they are able to carry out their duty to safeguard all of the children at our school.

5.7 We actively encourage all of our staff to keep up to date with the most recent local and national safeguarding advice and guidance. The Annex A titled Further Information in '*Keeping Children Safe in Education*' (September 2026) provides links to guidance on specific safeguarding issues such as child-on-child abuse, child sexual exploitation, HSB and female genital mutilation. The DSL also organise regular safeguarding updates for staff.

5.8 All EYFS staff are required to attend safeguarding training specifically designed for staff caring for 0-5 year olds which must cover all the areas set out in Annex C to the EYFS Statutory Framework (July 2026): “Criteria for effective safeguarding training.” Training is renewed every year by the DSL and all staff are required to attend. EYFS staff are supported to put their training into practice via regular updates and reminders from the DSL and inset training sessions, as well as termly meetings with their line manager which will always include safeguarding as an agenda item.

6. PROCEDURES FOR MANAGING CONCERNS

6.1 Claremont adheres to child protection procedures that have been agreed locally through the SCSP.

6.2 Every member of staff, including volunteers working with children at our school, are advised to maintain an attitude of *‘it could happen here’* where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child and have a responsibility to take action as outlined in this policy. When a safeguarding concern relates to a member of staff and has been referred to the headteacher, it should be considered at that point, if a LADO referral is needed. Low levels of recorded incidents at Claremont may reflect a reluctance by pupils to share their concerns with school staff.

6.2.1 Any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from education, care or from home;
- has experienced multiple suspensions and/or is at risk of being permanently excluded from school
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of ‘honour’-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child; and
- is persistently absent from education, including persistent absences for part of the school day.

6.3 All staff are encouraged to report any concerns that they have and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect and/or exploitation. In these circumstances, it is crucial that staff record and pass on concerns in accordance with this policy to allow the DSL to build up a picture and access support for the child at the earliest opportunity. Teaching staff have access to CPOMS in order to do this. A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.

6.3.1 All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of the school environment.

6.3.2 All staff, but especially the designated safeguarding lead (and deputies) should 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, sexual abuse, serious youth violence and county lines.

6.3.3 All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misandrist/misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

6.4 In cases where abuse by one or more pupils against another pupil results in 'reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm' staff at this school will refer such abuse to the relevant external agency. All children involved, whether perpetrator or victim, will be treated as "at risk".

6.5 It is *not* the responsibility of school staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and pass the information on in accordance with the procedures outlined in this policy.

6.6 The DSL should be used as a first point of contact for concerns and queries regarding any safeguarding concern in our school. Any member of staff or visitor to the school who receives a disclosure of abuse or suspects that a child is at risk of harm must report it immediately to the lead DSLs in each of the schools or, if unavailable, to a deputy DSL. Robust cover arrangements must always be in place should DSL/s be absent. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff.

6.7 All concerns about a child or young person should be reported without delay and recorded in writing, preferably using the agreed template (see Appendix 1), but also by phone or email to a DSL. If the concern is raised verbally in person or via a phone, notes must be taken. In addition, it is also considered good practice to log the incident on CPOMS.

6.8 Following receipt of any information raising concern, the DSL will consider what action to take and seek advice from Children's Services as required. All information and actions taken, including the reasons for any decisions made, will be fully documented. Concerns about a child's welfare should be referred to local authority children's social care. **Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately.**

6.8.1 Incidents involving a *child in need* should be reported **immediately** to the DSL who will contact Early Help/pastoral support/children's social care, as appropriate.

6.8.2 Incidents involving a *child at risk* should be reported **immediately** to the DSL who will contact children's social care/police if crime committed, as appropriate, immediately. If the DSL or their deputies are not available, a referral can be made directly (without needing parental consent).

6.9 All referrals will be made in line with local authority procedures as outlined in Appendix 3.

6.9.1 Children's social care assessments should consider where children are being harmed in contexts outside the home, so the school will provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

6.9.2 Anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration by raising concerns again with the DSL and/or the head(s)/headmaster. Concerns should always lead to help for the child at some point.

6.9.3 Staff should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with Children's Services, or the police if:

- the situation is an emergency and the designated senior person, their alternate and the head(s)/headmaster are all unavailable;
- they are convinced that a direct report is the only way to ensure the pupil's safety.

6.9.4 Any member of staff who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the head(s)/headmaster or the chair of governors. If any member of staff does not feel the situation has been addressed appropriately at this point should contact Children's Services directly with their concerns (parental consent is not required).

7. RECORDS AND INFORMATION SHARING

7.1 Information sharing is vital in identifying and tackling all forms of abuse and neglect and/or exploitation, and in promoting children's welfare, including their educational outcomes. The school has clear powers to share, hold and use information for these purposes. We share information with children's social care, our safeguarding partners, other organisations, agencies and practitioners as required. Schools should exercise professional judgement to ensure that any information shared is necessary and proportionate.

7.2 The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

7.3 If staff are concerned about the welfare or safety of any child at our school they will record their concern in writing. They should ensure that the record is signed and dated. Any concerns should be passed to the DSL without delay.

7.4 Any information recorded will be kept securely on CPOMS. CPOMS is managed by the DSL team. Child protection information will only be shared within school on the basis of 'need to know in the child's interests' and on the understanding that it remains strictly confidential.

7.5 Child protection information will only be kept on CPOMS or in the file and this file will be kept up to date. Records of concern, copies of referrals, invitations to child protection conferences, core groups and reports will be stored here. Records should include:

- a clear and comprehensive summary of the concern;
- details of how the concern was followed up and resolved;
- a note of any action taken, decisions reached and the outcome.

7.6 When a child leaves our school, the DSL will make contact with the DSL at the new school and will ensure that the child protection and any other relevant safeguarding files are forwarded to the receiving school in an appropriately agreed manner (preferably by electronic transfer on CPOMS). This will be separate from the pupil's school file. CFCS will retain evidence to demonstrate how the file has been transferred; this may be in the form of a written confirmation of receipt from the receiving school and/or evidence of recorded delivery. All safeguarding handovers are recorded on

spreadsheets held by PA to deputy heads and PA to head of the junior school. These are then overseen by the lead DSL in each part of the school.

7.7 In addition to the child protection file, the DSL will also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

8. WORKING WITH PARENTS AND CARERS

8.1 Claremont is committed to working in partnership with parents/carers to safeguard and promote the welfare of children and to support them to understand our statutory responsibilities in this area.

8.2 When new pupils join our school, parents and carers will be informed that we have a safeguarding policy. A copy will be provided to parents on request and is available on the school website. Parents and carers will be informed of our legal duty to assist our colleagues in other agencies with child protection enquiries and what happens should we have cause to make a referral to Children's Services.

8.3 We are committed to working with parents positively, openly and honestly. We ensure that all parents are treated with respect, dignity and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission or it is necessary to do so in order to safeguard a child from harm.

8.4 We will seek to share with parents any concerns we may have about their child *unless* to do so may place a child at increased risk of harm. A lack of parental engagement or agreement regarding the concerns the school has about a child will not prevent the DSL making a referral to Children's Services in those circumstances where it is appropriate to do so. Parental consent is not always required for a referral to be made.

8.5 In order to keep children safe and provide appropriate care for them, the school requires parents to provide accurate and up to date information regarding:

- Full names and contact details of all adults with whom the child normally lives;
- Full names and contact details of all persons with parental responsibility (if different from above);
- Two sets of emergency contact details (if different from above);
- Full details of any other adult authorised by the parent to collect the child from school (if different from the above).

The school will retain this information on the pupil file. The school will only share information about pupils with adults who have parental responsibility for a pupil or where a parent has given permission and the school has been supplied with the adult's full details in writing.

9. CHILD PROTECTION CONFERENCES

9.1 Children's Services will convene a Child Protection conference once a child protection enquiry under Section 47 of the Children Act 1989 has been undertaken and the child is judged to be at continuing risk of significant harm. A review conference will take place once a child has been made the subject of a Child Protection Plan in order to monitor the safety of the child and the required reduction in risk.

9.2 Staff members may be asked to attend a child protection conference or core group meetings on behalf of the school in respect of individual children. Usually, the person representing the school at these meetings will be the DSL. In any event, the person attending will need to have as much relevant up to date information about the child as possible; any member of staff may be required to contribute to this process.

9.3 All reports for child protection conferences will be prepared in advance using the guidance provided by Children's Services. The information contained in the report will be shared with parents before the conference as appropriate and will include information relating to the child's physical, emotional and intellectual development and the child's presentation at school. In order to complete such reports, all relevant information will be sought from staff working with the child in school.

9.4 Clearly child protection conferences can be upsetting for parents. We recognise that we are likely to have more contact with parents than other professionals involved. We will work in an open and honest way with any parent whose child has been referred to Children's Services or whose child is subject to a child protection plan. Our responsibility is to promote the protection and welfare of all children, especially children in need, and our aim is to achieve this in partnership with our parents.

10. SAFER RECRUITMENT

The school is committed to safer recruitment and the school's HR department is responsible for implementing these practices. Please see the Recruitment, Selection and disclosures policy and procedure for details.

11. SAFER WORKING PRACTICE

11.1 All adults who come into contact with our children have a duty of care to safeguard and promote their welfare. There is a legal duty placed upon us to ensure that all adults who work with or on behalf of our children are competent, confident and safe to do so.

11.2 All staff will be provided with a copy of our school's staff code of conduct at induction. They will be expected to know our school's code of conduct and technology usage policy and procedure for staff and carry out their duties in accordance with this advice.

11.3 If staff, visitors, volunteers or parent helpers are working with children alone they will, wherever possible, be visible to other members of staff. They will be expected to

inform another member of staff of their whereabouts in school, who they are with and for how long. Doors, ideally, should have a clear glass panel in them and be left open.

11.4 Guidance about acceptable conduct and safe practice will be given to all staff and volunteers during induction. These are sensible steps that every adult should take in their daily professional conduct with children. This advice can be found in '[Guidance for Safer Working Practices for Adults Who Work With Children](#)', *Safer Recruitment Consortium, May 2019*. All staff and volunteers are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.

11.5 Visiting speakers, whether invited by staff or pupils, will be supervised at all times by a member of the teaching staff to ensure that they are not putting pupils at risk from radicalisation or being drawn into terrorism or extremist activity.

11.6 When an outside/external organisation makes use of Claremont grounds and facilities, CFCS will liaise with the third party provider to seek assurances prior to their presence on site. The DSL, in partnership with the facilities manager, will work with the individual or organisation and ensure that it has appropriate safeguarding and child protection policies and procedures in place. This will include knowledge of individuals over whom they have a duty of care, and where appropriate (related to size of organisation and number of children) a DSL. The organisation should confirm that if a safeguarding issue comes to light during their time on site, it will inform the Claremont DSL and work with that individual to ensure that all next and appropriate steps are followed, which might include liaising with children's services and/or the LADO.

12. SAFEGUARDING CONCERNS AND ALLEGATIONS MADE ABOUT STAFF, INCLUDING SUPPLY TEACHERS, VOLUNTEERS AND CONTRACTORS

12.1 Our aim is to provide a safe and supportive environment which secures the well-being and very best outcomes for the children at our school. We do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made.

12.2 Allegations sometimes arise from a differing understanding of the same event, but when they occur they are distressing and difficult for all concerned. We also recognise that many allegations are genuine and there are some adults who deliberately seek to harm or abuse children.

12.3 We will take all possible steps to safeguard our children and to ensure that the adults in our school are safe to work with children. We will always ensure that the procedures outlined in Part 4 of '*Keeping Children Safe in Education*', *DfE (September 2026)* are adhered to and will seek appropriate advice from the Local Authority Designated Officer (LADO). The LADO can be contacted on 0300 123 1650.

12.4 The following applies where it is alleged that anyone working in the school, including supply teachers and volunteers, has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;

- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

12.5 If an allegation (no matter how small) is made or information is received about an adult who works in our setting which indicates that they may be unsuitable to work with children, the member of staff receiving the information should inform the head (William Brierly) or the head of junior school (Matthew Jelley) immediately. An urgent risk assessment will be carried out to determine whether or not the member of staff can continue to work in school, needs supervision or should be suspended pending further investigation. Should an allegation be made against the head of junior school (Matthew Jelley), this should be reported to the head (William Brierly). Should an allegation be made against the head (William Brierly), this will be reported to the chair of governors. In the event that neither the head or chair of governors is contactable on that day, the information must be passed to and dealt with by either the member of staff acting as head or the deputy chair of governors.

12.6 The head(s)/headmaster or chair of governors will seek advice from the LADO within one working day. No member of staff or the governing body will undertake further investigations before receiving advice from the LADO.

12.7 Any member of staff or volunteer who does not feel confident to raise their concerns with the head(s)/headmaster or chair of governors should contact the LADO directly on 0300 123 1650.

12.8 The school has a legal duty to refer to the Disclosure and Barring Service and Teaching Regulation Agency anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The LADO will discuss with the headmaster/head(s) or chair of governors whether a referral should be made to the DBS and TRA where an allegation is substantiated. The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or HR. If an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the school must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).

Referral to the Teaching Regulation Agency may be made via email to:

misconduct.teacher@education.gov.uk and completion of the relevant form:

<https://www.gov.uk/government/publications/teacher-misconduct-referral-form>

Contact details:

Teaching Regulation Agency

ADDRESS: Teacher Misconduct
Ground Floor South
Cheylesmore House
5 Quinton Road
Coventry CV1 2WT

TEL: 0207 593 5393

EMAIL: misconduct.teacher@education.gov.uk

12.9 There are restrictions on the reporting or publishing of allegations against teachers and Claremont will make every effort to maintain confidentiality and guard against unwanted publicity and comply with these restrictions which apply up to the point where the accused person is charged with an offence.

12.10 In the Early Years Foundation Stage supervision meetings take place at least once a term. These meetings are documented and filed in a confidential manner. See EYFS Supervision Policy for further details.

12.11 **Low-level concerns** – a low-level concern is any concern that an adult working at/with the school may have acted in a way that:

- is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO. If there is any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, consult with the LADO.

12.12 A 'low-level' concern does not mean that it is insignificant. A concern may be a low-level concern, no matter how small, even if it does no more than give a sense of unease or a 'nagging doubt'. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse (for example, grooming-type behaviours).

12.13 The school takes all concerns about safeguarding seriously and recognises that addressing even low-level concerns is important to create and embed a culture of openness, trust, and transparency in which the school's values and expected behaviour of its staff are constantly lived, monitored, and reinforced by all staff.

12.14 The school's staff code of conduct provides clear guidance about the standards of appropriate behaviour and actions of its staff so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil. All staff are expected to comply with the standards contained within this code of conduct at all times.

12.15 Staff must share all concerns with the DSL without delay so that it can be recorded and dealt with appropriately, sensitively, and proportionately and in a timely manner. The DSL will retain a confidential record of low-level concerns and these will be shared with the head, who will have on-going access to records of low-level concerns. Low level concerns will not be routinely shared with HR. If the low-level concern relates to the DSL, this should be reported to the head. A concern about the head should be shared with the chair of governors.

12.16 Staff are also encouraged to self-refer in the event that they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.

12.17 If a concern is raised by a third party, the head(s)/headmaster will collect as much evidence as possible by speaking to the person who has raised the concern (if known), to the individual involved and any witnesses. The concern will be recorded in accordance with this policy, in the usual way.

12.18 The school will address unprofessional behaviour at an early stage and will support the individual to correct it. All low-level concerns will be recorded in writing. The record will include details of the concern, the context within which the concern arose, and details of the action taken. The name of the reporting individual should also be included, unless they have asked to remain anonymous, which will be respected as far as reasonably possible. The records will be kept confidential, will be held securely and in compliance with the Data Protection Act 2018 and the UK GDPR at all times.

12.19 Low-level concerns will not be included in references unless they relate to issues which would normally be disclosed, for example, misconduct or poor performance.

12.20 The school will also reflect on reported concerns in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the school's safeguarding system which may require additional training or modified policies. Where a pattern is identified, the school will decide on a course of action, either through its disciplinary procedures, or, where the pattern moved from a concern to meeting the harms threshold, it will follow the above procedure and refer the matter to the designated officer.

12.21 Where a low-level concern relates to a person employed by a supply agency or a contractor, staff should share that concern with the head(s)/headmaster. The concern will be recorded in accordance with the school's low-level concern procedures, and the individual's employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

13. TYPES OF ABUSE

13.1 To ensure that our children are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

13.2 Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. 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.

13.3 There are four categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect (Definitions taken from *Working Together to Safeguard Children 2026*):

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

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

13.6 **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 (including with an object) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education. Sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

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

14. INDICATORS OF ABUSE

14.1 Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated person.

14.2 Remember, it is your responsibility to report your concerns. It is not your responsibility to investigate or decide whether a child has been abused.

14.3 All staff should also be 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. Only appropriately trained professionals should 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. If you have a mental health concern about a child that is also a safeguarding concern, you must speak to the designated safeguarding lead or a deputy immediately.

14.4 A child who is being abused and/or neglected may:

- have bruises, bleeding, burns, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful
- be reckless with regard to their own or other's safety
- self-harm
- frequently miss school or arrive late
- show signs of not wanting to go home

- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority
- become disinterested in their school work
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age,
- experience mental health problems.

14.5 Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSL to decide how to proceed. It is very important that you report your concerns – you do not need ‘absolute proof’ that the child is at risk.

15. CHILD ON CHILD ABUSE

15.1 Children can abuse other children. This is generally referred to as child on child abuse and can take many forms. Child on child abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between children and within children’s relationships (both intimate and non-intimate). This can include (but is not limited to):

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- 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;
- making or sharing of nudes and semi nudes 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).

It can happen both inside and outside of school and online. All forms of child on child abuse are unacceptable and will be dealt with swiftly, in line with this and the Behaviour, Rewards and Sanctions policy.

15.2 Harmful sexual behaviour (HSB), Sexual violence and/or 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 HSB, sexual violence and/or sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. HSB, 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. Claremont recognises that child-on-child abuse happens at our school and is probably seriously under-reported. We have a zero-tolerance approach to sexual violence and sexual harassment and are committed to creating an environment where victims feel confident in reporting their experiences.

15.3 Harmful sexual behaviour (HSB), sexual violence and/or sexual harassment are not acceptable, will never be tolerated and are not an inevitable part of growing up. Claremont will not dismiss HSB, sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”. Staff should challenge physical behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia and flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them; and not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying some behaviours related to abuse 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 understand that all of the above can be driven by wider societal factors beyond the school, such as everyday sexist stereotypes and everyday sexist language. This is why a whole school/college approach (especially preventative education) is important (see 15.8 below).

15.4 Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is statistically more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.

15.5 Children with Individual Needs are more likely to be abused than their peers and any reports of abuse involving pupils with IN will be investigated by the DSL and head of IN working in collaboration.

15.6 The fact that a child or a young person may be LGBTQ is not in itself an inherent risk factor for harm. However, children who are non-binary, lesbian, gay, bi, or trans (LGBTQ) can be targeted by their peers. In some cases, a child who is *perceived* by their peers to be LGBTQ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ.

15.7 We recognise that some pupils will sometimes negatively affect the learning and wellbeing of others (child on child abuse) and their behaviour will be dealt with under

the school's behaviour policy. Allegations of child on child abuse will be investigated by the DSL making use of the guidance provided in *Part 5 of KCSIE 2026 if the nature of the allegation is SVSH related*.

15.8 As a school we minimise the risk of allegations against other pupils by providing a developmentally appropriate PSHEE syllabus which develops pupils' understanding of acceptable behaviour and keeping themselves safe. Our age appropriate PSHEE curriculum tackles important issues such as healthy and respectful relationships, consent, gender roles, stereotyping, equality, body confidence and self-esteem and addressing cultures of sexual harassment. It is also addressed through the delivery of our Character Education programme. Finally, it is recognised that HSB exists on a continuum ranging from normal and developmentally expected behaviour to behaviour which is inappropriate, problematic and/or abusive.

15.9 Pupils know that they can report abuse to **any** member of staff because all staff have been trained in how to receive a disclosure. Form tutors, heads of house/year, the school nurses and DSLs often receive disclosures from pupils, but any member of staff should be prepared to receive reports of abuse at any time.

15.10 Signs that a child is a victim of child on child abuse are similar to those of other types of abuse (see section 14.4 above). The behaviour that children present with will depend on their particular circumstances. Rather than checking behaviour against a list, staff should be alert to behaviour that might cause concerns, think about what the behaviour might signify, encourage children to share with them any underlying reasons for their behaviour, and, where appropriate, engage with their parents/carers so that the cause(s) of their behaviour can be investigated. Where a child exhibits any behaviour that is out of character or abnormal for his/her age, staff should always consider whether an underlying concern is contributing to their behaviour (for example, whether the child is being harmed or abused by their peers) and, if so, what the concern is and how the child can be supported going forwards.

15.11 If a pupil reports that they may have been a victim of HSB, sexual violence or harassment it is essential that they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting HSB, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

15.12 Staff should respond to disclosures of this nature as they would any other safeguarding concern and as described previously in this policy. Staff taking a report should never promise confidentiality as it is very likely that it will be in the best interests of the victim to seek advice and guidance from others in order to provide support and engage appropriate agencies. The DSL (or their deputy) should be notified as soon as is practically possible.

15.13 The DSL will liaise with colleagues in other schools, the police, social services and other agencies as deemed necessary. Unless doing so would put the victim at risk, they will also inform the pupil's parents.

15.14 The school will do all it 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 put in place for the children involved.

15.15 When there has been a report of sexual violence, the DSL (or a deputy) will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim, especially their protection and support;
- the alleged perpetrator; and
- all the other children (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them.

Risk assessments will be recorded (written or electronic) and will be kept under review. At all times, we will be actively considering the risks posed to all our pupils and students and putting adequate measures in place to protect them and keep them safe.

15.16 When deciding what action to take, the DSL will consider:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of HSB, sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered;
- the nature of the alleged incident(s), including: whether a crime may have been committed and consideration of harmful sexual behaviour;
- the ages of the children involved;
- the developmental stages of the children involved;
- any power imbalance between the children. For example, is the alleged perpetrator significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
- is the alleged incident a one-off or a sustained pattern of abuse?
- are there ongoing risks to the victim, other children, or school staff?
- has the perpetrator themselves been a victim of abuse currently or in the past?
- and other related issues and wider context.

15.17 Each incident will be considered on a case-by-case basis. When to inform the alleged perpetrator(s) 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, the school will speak to the relevant agency and discuss next steps and how the alleged perpetrator(s) will be informed of the allegations. This does not stop the school from taking immediate action to safeguard our children, where required.

15.18 There are four likely scenarios for the school to consider when managing any reports of sexual violence and/or sexual harassment. Decisions and actions will be regularly reviewed and relevant policies updated to reflect lessons learnt. Where potential patterns of concerning, problematic or inappropriate behaviour are identified, the school will take action to minimise the risk of it happening again. The four scenarios are:

1. Manage internally
2. Early help
3. Referrals to children's social care
4. Reporting to the Police

15.19 Refer to *Keeping Children Safe in Education (September 2026)* for more information on these scenarios. Whatever the response, it is underpinned by the principle that there is a zero tolerance approach to sexual violence and sexual harassment at Claremont and it is never acceptable and will not be tolerated. All concerns, discussions, decisions and reasons for decisions will be recorded on CPOMS.

15.20 At this stage, the school will generally inform parents, if we have not already done so, unless there are compelling reasons not to, for example, if informing a parent is likely to put a child at additional risk.

15.21 Irrespective of the decisions taken, support for, and safeguarding of, the victim and alleged perpetrator will be undertaken by the DSL and his/her team in line with the guidance contained in *Keeping Children Safe in Education (September 2026) - Part 5*. This will include consideration of how to manage situations when the victim and alleged perpetrator might come into contact with each other (e.g. in lessons, using school transport, etc.). The school will do everything it reasonably can to protect the victim and alleged perpetrator from bullying and harassment as a result of any report they have made.

15.22 If a report is subsequently determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care maybe appropriate.

15.23 If a report is shown to be deliberately invented or malicious, the school will consider whether any disciplinary action is appropriate against the individual who made it as per our behaviour policy.

16. ONLINE SAFETY INCLUDING SHARING OF NUDE AND SEMI-NUDE IMAGES

16.1 Filtering and monitoring of IT content

Claremont utilises a variety of technological solutions to ensure that the welfare of our students in the online world is safeguarded to the same level that is expected in the physical environment. In terms of filtering, the school utilises a firewall service (Smoothwall) to filter content and thus ensure that all pupils and staff using the Claremont Wi-Fi are prevented from being able to access or receive material that is not suitable for a place of education and/or work.

It should be noted that if off site (for example on home Wi-Fi), devices issued by Claremont continue to be filtered and monitored, but 'bring your own devices' (BYOD), are not filtered by the school and it is the responsibility of parents to ensure they have sufficient safeguards in place. In monitoring terms, Claremont also uses the Smoothwall platform including the full monitoring service (FMS), to ensure that pupil devices in Years 3-11 are monitored 24/7 (including when off-site) for any inappropriate and/or concerning use of language and/or attempts to access content which is inappropriate (balanced alongside access for educational need). Smoothwall monitoring and safeguarding software triage alerts according to their severity, which includes an email alert service and a phone call to the DSL for 'L5'. For 6th form pupils who use their own computers under the BYOD scheme, their use of websites is not monitored at home or school (although on the site, our firewall will block content deemed as inappropriate).

Students are regularly reminded through tutorials, assemblies and other training of the importance of prudent and safe internet use. Finally, Claremont makes use of Sophos as an Internet security software (like anti-virus) which blocks bad applications and this is monitored by the IT team, and the Applocker product to limit and control the installation of software - in particular software frequently used to subvert other security systems.

Please note also that the use of Virtual Private Network tools (VPNs) by pupils to attempt to circumvent filtering and monitoring is not permitted and is a breach of their technology acceptable usage policy for pupils and parents and will be treated as a behaviour issue.

The DSL is ultimately responsible for all elements of the above and meets regularly with the ICLT department to ensure the systems are working as expected. These systems are reviewed and tested on an annual basis.

Parents are also reminded that student phones, when connected to 3, 4 or 5G networks, are not filtered or blocked either on-site or elsewhere. Most mobile phone networks allow a level of parental control to be applied in the same way that home Wi-Fi or broadband providers allow, and parents might like to consider the use of these.

16.2 All children will use mobile phones and computers at some time, although mobile phones must not be used on site at Claremont for pupils up to and including Year 11. Electronic devices with internet access can be a source of fun, entertainment, communication and education. However, we know that some men, women and young people will use these technologies to harm children. Online risks can be categorised into four main areas:

- **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misandrist/misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- **contact:** being subjected to harmful online interaction with other users; for example: child on child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. making or sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

Generative AI should be taken as a risk factor when examining contact and conduct in the context of online safety.

16.3 The school's technology acceptable usage policy and procedure for pupils and parents explains how we try to keep children safe online, whether they are in school or at home.

16.4 Accessing, uploading, downloading, or distributing pornographic, sexually explicit, extremist, terrorist or otherwise obscene material or material of an excessively violent or hateful nature are forbidden. This is monitored by the filtering and monitoring systems in place (see 15.1).

16.5 Pupils are taught to adhere to the same standards of behaviour online that they follow offline. Abusive, derogatory language or cyber-bullying via social media, texts or emails, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures and behaviour policy.

16.6 Sharing nudes and semi-nudes relates to the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. It is also known as youth produced sexual imagery or 'sexting'.

16.7 Claremont deems sharing nudes and semi-nudes as inappropriate and potentially unsafe behaviour which threatens the social, emotional and/or physical safety of pupils. Although sharing nudes and semi-nudes is typically voluntary at first, it raises many serious legal and social concerns, especially when the images are spread beyond the control of the sender. If the imagery is shared further, it may lead to embarrassment, bullying and increased vulnerability to blackmail and exploitation. The school has a responsibility to prevent sharing nudes and semi-nudes and the dissemination of inappropriate or offensive material and to educate both pupils and staff about the legal and social dangers. This is undertaken through staff training, PSHEE lessons, assemblies and parent talks.

16.8 Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents involving children and young people complex.

16.9 The misuse of ICT, such as sharing nudes and semi-nudes, inappropriate comments on social media, being the victim of cyber-bullying and on-line grooming, are all potential welfare concerns and identified as such in this safeguarding policy.

16.10 Sharing nudes and semi-nudes is complicated as it potentially involves a large number of pupils and those involved could be victims or perpetrators or both. Depending on the specific circumstances and gravity, the incident will be investigated on the discipline-safeguarding continuum. The response to these incidents will be guided by the principle of proportionality and the primary concern at all times will be the welfare and protection of any children and young people involved. Situations will be considered on a case-by-case context, considering what is known about the children and young people involved and if there is an immediate risk of harm. The school's response will be guided by [*Sharing nudes and semi-nudes, UK Council for Internet Safety*](#) and with reference to frameworks such as Brook's Sexual Behaviours Traffic Light Tool.

16.11 Any suspected sharing of nudes or semi-nudes must be reported to the Designated Safeguarding Lead (or their deputy) as soon as possible.

16.12 The DSL (or deputy) will hold an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.

16.13 The children or young people involved will be interviewed (if appropriate).

16.14 Parents will be informed at an early stage and involved in the process in order to best support the child or young person unless there is good reason to believe that involving them would put the child or young person at risk of harm.

16.15 A referral will be made to children's social care and/or the police immediately if there is a concern that a child or young person has been harmed or is at risk of immediate harm at any point in the process.

16.16 The initial review meeting will consider the initial evidence and aim to establish:

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

16.17 An immediate referral to police and/or children's social care through the SPA (or equivalent) will be made if at this initial stage:

- The incident involves an adult (over 18 years old)
- There is reason to believe that a child or young person has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs)
- What we know about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The images involve sexual acts and any pupil in the images or videos is under 13
- We have reason to believe a child or young person is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, they are presenting as suicidal or self-harming.

16.18 If none of the above apply, we may decide to respond to the incident without involving the police or children's social care. We can still choose to escalate the incident at any time if further information/concerns are disclosed at a later date.

16.19 The decision to respond to the incident without involving the police or children's social care will only be made in cases where the DSL (or deputy) is confident that they have enough information to assess the risks to any child or young person involved and the risks can be managed within the school's pastoral support and disciplinary framework.

16.20 The decision will be made by the DSL (or deputy) with input from the head(s)/headmaster and leadership team and input from other members of staff if appropriate. The decision should be recorded on CPOMS in line with the school's safeguarding procedures and will be based on consideration of the best interests of any child or young person involved. This will take into account proportionality as well

as the welfare and protection of any child or young person. The decision will be reviewed throughout the process of responding to the incident.

16.21 If the decision is made to deal with the incident internally, a risk assessment will be undertaken and the young person or people will be supported as described in *Sharing nudes and semi-nudes, UK Council for Internet Safety* (March 2024).

16.22 Staff and parents must not intentionally view any nudes and semi-nudes unless there is good and clear reason to do so. Wherever possible, responses to incidents will be based on what DSLs have been told about the content of the imagery. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection.

16.23 The decision to view any imagery will be based on the professional judgement of the DSL. Imagery should never be viewed if the act of viewing will cause significant distress or harm to any child or young person involved (see best practice in [*Sharing nudes and semi-nudes, UK Council for Internet Safety*](#)).

17.CHILD SEXUAL EXPLOITATION (CSE) AND DOMESTIC ABUSE

17.1 Child sexual exploitation is a form of 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.

17.2 Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. All staff are aware of the link between online safety and vulnerability to CSE. Any concerns that a child is being or is at risk of being sexually exploited should be passed immediately to the DSL.

17.3 The school 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 nonattendance at school and make reasonable enquiries with the child and parents to assess this risk. Like all forms of child sex abuse, child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17-year olds who can legally consent to have sex (some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship);
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and noncontact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;

- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

17.4 Some of the following signs may be indicators of child sexual exploitation:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who have older boyfriends or girlfriends;
- children who suffer from sexually transmitted infections or become pregnant;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

17.5 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. 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.

18. CHILD CRIMINAL EXPLOITATION (CCE)

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

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

18.3 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.

They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

18.4 It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

19. SERIOUS VIOLENCE

19.1 Serious violence can include assault, as well as carrying threatening to use or actually using weapons. All staff should be aware of the indicators, which may signal 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 self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see section 18 above). Early support for those at risk is vital and those committing violence may also be victims themselves.

19.2 All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

20. SO-CALLED ‘HONOUR-BASED’ VIOLENCE

20.1 So-called ‘honour-based’ violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the DSL.

21. FEMALE GENITAL MUTILATION (FGM)

21.1 Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

22. RADICALISATION AND EXTREMISM

22.1 Since 2010, when the Government published the Prevent Strategy (*Revised Prevent Duty Guidance for England and Wales, April 2019*), there has been an awareness of the specific need to safeguard children, young people and families from violent extremism. There have been several occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

22.2 Claremont values freedom of speech and the expression of beliefs / ideology as fundamental rights underpinning our society's values. Both pupils/students and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

22.3 The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. Claremont is clear that this exploitation and radicalisation should be viewed as a safeguarding concern.

22.4 Definitions of terrorism, radicalisation and extremism, and indicators of vulnerability to radicalisation are in Appendix 4.

22.5 Claremont seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to far right / neo Nazi / white supremacist ideology, Irish nationalist and loyalist paramilitary groups, and extremist animal rights movements.

22.6 The school governors, the head(s)/headmaster and the DSL will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessment may include the use of school premises by external agencies, anti-bullying policy and other issues specific to the school's profile, community and philosophy.

Response

22.7 When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the head(s)/headmaster and/ or to the DSL. They should then follow normal safeguarding procedures. If a crime has been committed, then Surrey Police must be contacted by dialling 999. In non-urgent cases where police advice is sought then dial 101 (see Appendix 3 Local Safeguarding Referral Procedures). The Department for Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).

22.8 Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most young people do not become involved in extremist action. For this reason, the appropriate interventions in any particular case may not have any specific connection to the threat of radicalisation, for example they may address mental health, relationship or drug/alcohol issues.

23 DOMESTIC ABUSE

23.1 Children can witness and be adversely affected by domestic abuse. This can include in their own intimate relationships (teenage relationship abuse). This school participates in Operation Encompass which is jointly run by Surrey Police and Surrey County Council with the support of Surrey Domestic Abuse Services and Surrey Children's Services. Every school day morning Surrey Police searches their systems for incidents that occurred within the previous 24 hours where a child under 18 was linked, involved in or a witness to domestic abuse or where a child was reported missing. Surrey Police shares this information and a short summary of the incident with the child's school or college. The aim is to inform the school by 9:30am so that timely support can be offered. On Monday mornings the search will be extended to include the weekend.

24. OTHER SPECIFIC SAFEGUARDING ISSUES

24.1 **All** staff should have an awareness of safeguarding issues, some of which are listed below, and should be clear as to the school's policies and procedures for responding to them. Staff should be aware that behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk. (see also para. 5.2.1 above).

24.2 The Annex (Further Information) of Part 1 of *Keeping Children Safe in Education (September 2026)* contains important additional information about specific forms of abuse and safeguarding issues. and provides links to further information from government and professional organisations:

- Child abduction and community safety incidents
- Children and the court system
- Children missing from education
- Children with family members in prison
- Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)
- County lines

- Modern slavery and the National Referral Mechanism
- Cybercrime
- Domestic abuse
- Homelessness
- So-called ‘honour-based’ abuse (including Female Genital Mutilation and Forced Marriage)
- Preventing radicalisation (and the Prevent duty and Channel)
- Child on child / child on child abuse
- Sexual violence and sexual harassment between children in schools and colleges
- Upskirting
- The response to a report of sexual violence or sexual harassment

25. RESTRICTIVE INTERVENTIONS AND THE USE OF ‘REASONABLE FORCE’

25.1 There are circumstances when it is appropriate for staff to use restrictive interventions including reasonable force and seclusions to safeguard children and young people.

The term ‘reasonable force’ covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. ‘Reasonable’ in these circumstances means ‘using no more force than is needed’. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil’s path, or active physical contact such as leading a pupil by the arm out of the classroom. The decision on whether or not to use reasonable force to control or restrain a child is down to the professional judgement of the staff concerned and should always depend on individual circumstances (see further detail in the behaviour policies).

25.2 When using reasonable force in response to risks presented by incidents involving children with individual needs or disabilities or with medical conditions, staff should in considering the risks carefully recognise the additional vulnerability of these groups. They should also consider their duties under the Equality Act 2010 in relation to making reasonable adjustments, non-discrimination and their Public Sector Equality Duty. By planning positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children, and agreeing them with parents and carers, the school will try to reduce the occurrence of challenging behaviour and the need to use reasonable force.

25.3 The term seclusion relates to a non disciplinary intervention involving keeping a pupil confined to a place away from others and prevented from leaving. This method is used to protect the individual and/or others from harm, particularly when there are high levels of emotion or behaviour dysregulation. The pupil should be supervised at all times, and when the risk has reduced sufficiently, allowed to leave.

Any use of force to safeguard children or young people should be reported to the DSL immediately.

Please refer to the Restrictive interventions, Including use of Reasonable Force in Schools guidance below for detailed information:

<https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>

26. CHILDREN MISSING FROM EDUCATION

26.1 Children missing education are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. Children missing education are at significant risk of underachieving, being victims of harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.

26.2 This school will enter pupils on the admission register at the beginning of the first day on which the school has agreed, or been notified, that the pupil will attend the school. If a pupil fails to attend on the agreed or notified date, we will undertake reasonable enquiries to establish the child's whereabouts and consider notifying the local authority at the earliest opportunity.

26.3 Pupils' attendance will be monitored through the daily register on SIMS. Absences will be followed up promptly (see Missing Child Procedure) and persistent poor absence will be referred to the local authority.

26.4 Where a pupil has not returned to school for ten days after an authorised absence or is absent from school without authorisation for twenty consecutive school days, the pupil can be removed from the admission register when the school and the local authority have failed, after jointly making reasonable enquiries, to establish the whereabouts of the child. This only applies if the school does not have reasonable grounds to believe that the pupil is unable to attend because of sickness or unavoidable cause.

26.5 This school will notify the local authority when a pupil's name is to be removed from the admission register at a non-standard transition point under any of the fifteen grounds set out in the regulations (*Children Missing Education, 2025*), as soon as the ground for removal is met and no later than the time at which the pupil's name is removed from the register (this duty does not apply at standard transition points – where the pupil has completed the school's final year – unless the local authority requests for such information to be provided). The school will notify the local authority when a child is withdrawn from the school to be electively home educated.

27. CHILDREN REQUIRING MENTAL HEALTH SUPPORT

27.1 Schools have an important role to play in supporting the mental health and wellbeing of their pupils and should take a whole school approach. Claremont pastoral staff have received training in identifying pupils with mental health issues and how to support them. Potential warning signs that a child is suffering with a serious mental health problem include changes in behaviour, difficulty sleeping, withdrawal from social situations, not wanting to do things they usually like, and physical signs of harm and/or

neglect. The senior school has appointed a mental health leader who reports to the senior deputy head /DSL. Both schools have set up a dedicated well-being spaces and ELSA trained specialists to support pupils. Further information is contained in the mental health policy.

28. GENDER QUESTIONING CHILDREN

Schools and colleges have a statutory duty to safeguard and promote the welfare of all children. They should consider how best to fulfil that duty towards a child who is questioning their gender, as well as their peers, ensuring that any agreed course of action takes account of the impact on all of those affected.

Claremont will always consider what is in the best interest of the child and will typically work with parents and carers, as well as other professionals (such as GPs and psychologists) if needed, to determine the right approach for that individual.

Claremont will adjust the approach taken dependant on the age of the child, noting that there is a difference between a child who is prepubescent and one who is going through puberty.

It is hoped that with a collaborative and supportive approach, it is possible to get the best outcome for the child. However, it should be noted that if a child does not wish to socially transition publicly, conversations between that child and a member of staff do not automatically need to be shared with parent/s, although in most cases it will be appropriate to do so.

Claremont will take a careful approach when it comes to social transition, support the child in an age-appropriate way and keep options open.

In line with the Equality Act 2010 and Human Rights Act 1998, Claremont will not confuse gender with biological sex, and there will be no exceptions for children of one biological sex being allowed to enter a space designed solely for the use of the other biological sex (for example toilets and changing spaces). However, Claremont does provide gender neutral toilets and an individual changing space for use if needed.

When pupils request to join PE or other classes designed specifically for the alternative biological sex, it is the safety of all pupils that will be the most important decision-making factor.

Claremont will consider use of name and/or pronoun changes carefully and distinguish between legal name/s and preferred name/s.

Pupils who have transitioned but then decide to 'detransition' will be provided with support.

No pupil at Claremont will be disadvantaged because they are gender questioning and any bullying of a pupil on this basis will be taken very seriously in accordance with other relevant policies.

Some children may be 'living in stealth' having internally transitioned at a young age. Staff should be alert to warning signs including fear and anxiety.

29. USE OF MOBILE DEVICES IN THE EARLY YEARS FOUNDATION STAGE (EYFS)

29.1 Photographs or footage of pupils taken for the purposes of observation and assessment must be done on school owned devices. The EYFS have iPads available for this purpose. Under no circumstances must staff use their personal devices to capture images of children (see: Mobile phone and other electronic devices protocol and acceptable use of cameras policy for junior school (including Early Years) for further information).

30. RELEVANT POLICIES

30.1 To underpin the values and ethos of our school and our intent to ensure that pupils at our school are appropriately safeguarded the following policies are also included under our safeguarding umbrella:

- Staff code of conduct
- Anti-bullying
- Behaviour rewards and sanctions (senior and junior schools)
- Confidentiality
- Drug and substance education and misuse
- Recruitment
- Whistleblowing
- Attendance
- Missing child
- Technology acceptable usage policy and procedure for staff (including use of cameras and recording equipment and pupil images by staff, including EYFS)
- Technology acceptable usage policy and procedure for pupils and parents (including e-safety)
- Mobile phone and other electronic devices protocol and acceptable use of cameras policy for junior school (including Early Years)
- Health and safety statement
- Pupils with medical needs
- Mental health
- First aid
- Educational visits
- Induction of newly appointed staff in child protection
- Arrivals policy for temporary staff
- Disability and accessibility plan
- Pastoral care and pupils support

- EYFS staff supervision policy
- EYFS policy
- Intimate care policy (Junior School)
- EYFS Nappy changing policy
- EYFS Checking on sleeping children policy

31. STATUTORY FRAMEWORK

This policy has been devised in accordance with the following legislation and guidance:

- [Keeping Children Safe in Education](#) (September 2026) ("KCSIE")
- [Working Together to Safeguard Children](#) (March 2026) ("WT")
- [Prevent duty guidance: Guidance for specified authorities in England and Wales](#) (December 2023).
- [Relationships Education, Relationships, and Sex Education \(RSE\) and Health Education](#) (July 2025).
- [Behaviour in schools](#) (February 2024)
- [Working together to improve school attendance: statutory guidance for maintained schools, academies, independent schools and local authorities](#) (July 2026)
- [Children Missing Education](#) (September 2025)
- [Digital and technology standards in schools and colleges](#) (June 2026)
- [Mobile phones in schools](#) (June 2026)
- [After school clubs, community activities, and tuition \(safeguarding guidance for providers\)](#) (February 2026)
- [The Charity Commission guidance Safeguarding and protecting people for charities and trustees](#) (June 2022)
- [Early Years Foundation Stage Statutory Framework for group and school-based providers](#) (September 2026)
- [The Education \(Independent School Standards\) Regulations](#) (December 2014)

APPENDIX 1



CLAREMONT FAN COURT SCHOOL

Recording Form for Safeguarding Concerns

Staff should report concerns on-line via CPOMS. Volunteers and staff who do not have access to CPOMS and regular school visitors should complete this form and pass it to the designated safeguarding lead if they have a safeguarding concern about a child in our school.

Full name of child	Date of Birth	Tutor/Form group	Your name and position in school

Nature of concern/disclosure	
Please include where you were when the child made a disclosure, what you saw, who else was there, what did the child say or do and what you said.	
Was there an injury? Yes / No	Did you see it? Yes / No
Describe the injury:	
Have you filled in a body plan to show where the injury is and its approximate size? NB: You should only view parts of the child's body which are normally visible. Yes / No	
Was anyone else with you? Who?	
Has this happened before?	Did you report the previous incident?
Who are you passing this information to? Name:	Date:
Position:	Time:
Your signature:	Date:

Action taken by DSL

Referred to...?

Head of Year Police School Nurse Children's
Services Integrated Parents Other
Youth Service

☐☐☐☐☐☐☐

Parents informed? Yes / No (If No, state reason)

Feedback given to...?

☐

Pastoral team

☐

Tutor

☐

Child

☐

Person who recorded disclosure

Further Action Agreed:

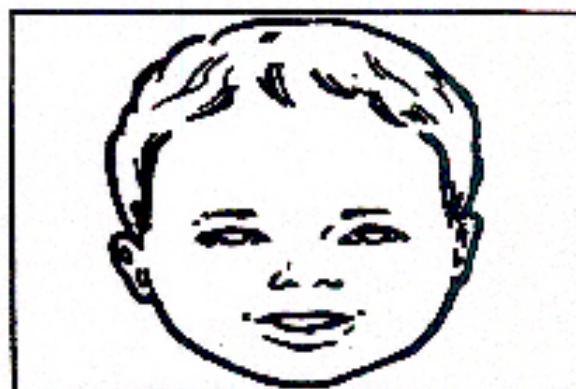
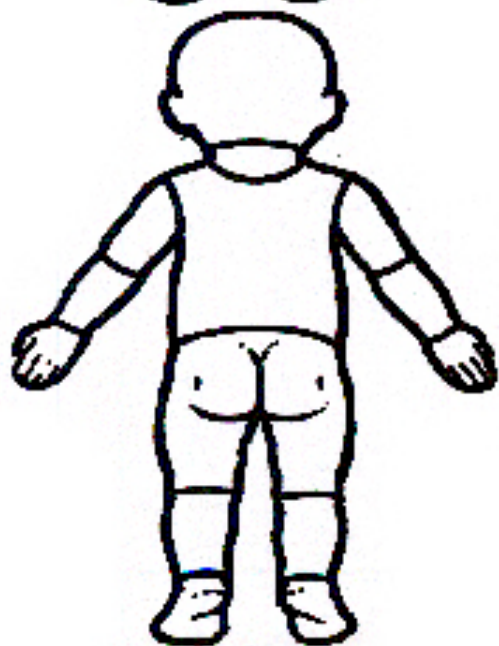
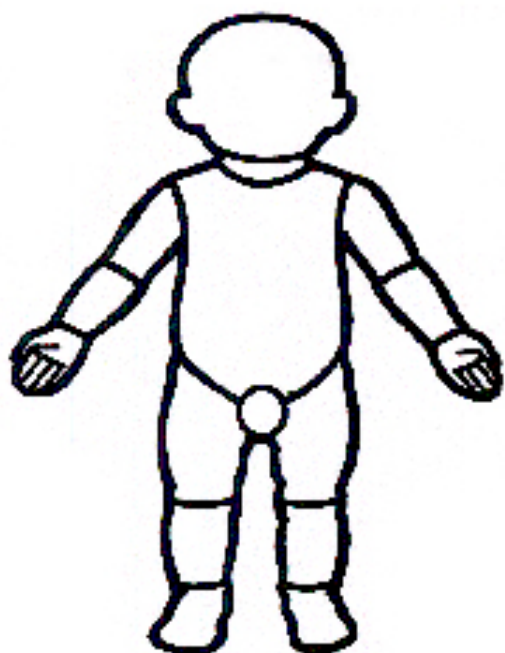
e.g. School to complete a 'request for support' form for Children's Services

Full name:

DSL Signature:

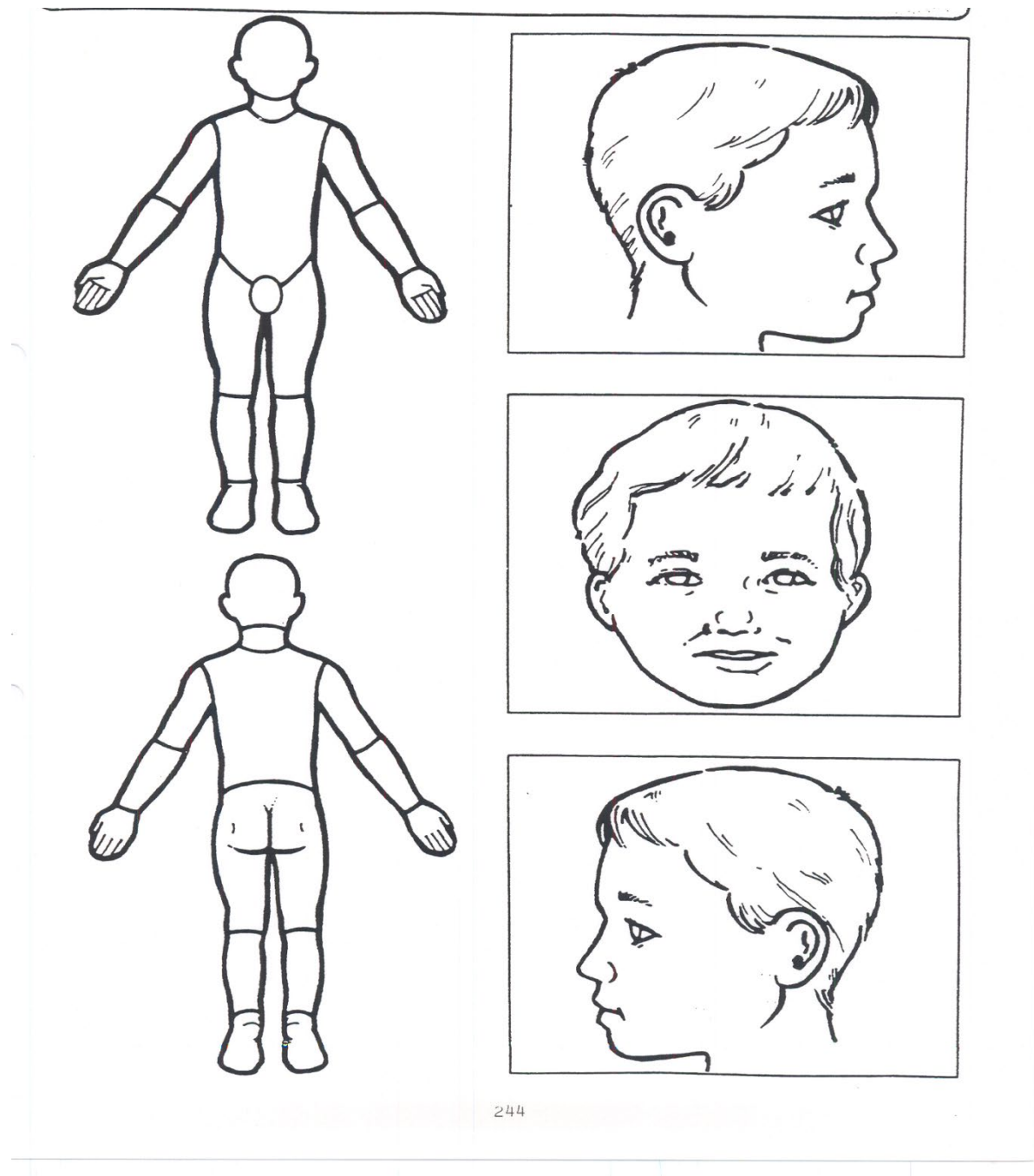
NB: You should only view parts of the child's body which are normally visible.

Young Child



Older child

NB: You should only view parts of the child's body which are normally visible.



APPENDIX 2

Safeguarding Induction Sheet for new or supply staff and regular visitors or volunteers.

We all have a statutory duty to safeguard and promote the welfare of children, and at our school we take this responsibility seriously.

At induction, all staff will also be provided with a copy of Part One and Annex: (Further Information) of *'Keeping Children Safe in Education'* (September 2026) which must be read and understood in the context of the school.

If you have any concerns about a child or young person in our school, you must share this information immediately with our Designated Safeguarding Lead or one of the Deputy post holders.

Do not think that your worry is insignificant if it is about hygiene, appearance or behaviour – we would rather you told us as we would rather know about something that appears small than miss a worrying situation.

If you think the matter is very serious and may be related to child protection, for example, physical, emotional, sexual abuse or neglect, you must find one of the designated professionals detailed below and provide them with a written record of your concern. A copy of the form to complete is attached others or obtain from the school offices. Please ensure you complete all sections as described.

If you are unable to locate a Designated Safeguarding Lead or one of the deputies, ask a member of the school office staff to find them and to ask them to speak with you immediately about a confidential and urgent matter.

Any allegation concerning a member of staff, a child's foster carer or a volunteer should be reported immediately to the head(s)/headmaster. If an allegation is made about the head or head of junior school, you should pass this information to the chair of the governing body. Alternatively, you can contact the Local Authority Designated Officer on 0300 123 1650. The people you should talk to in school are:

	Early Years Foundation Stage	Years 1 - 6	Senior School
DSL	Henry Vincent (Deputy DSL and Safeguarding lead EYFS)	Henry Vincent (Deputy DSL and Safeguarding Lead Years 1-6)	Jason Stanley (DSL)
Contact tel (int)	757	757	630
Contact tel (ext)	01372 473757	01372 473757	01372 473630

Chair of governing body: Roger Martin contact number: 01372 473602

APPENDIX 3

Local Safeguarding Referral Procedures

The point of contact when you have concerns about a child will depend on the home address of the child. Most of our pupils live in Surrey but some live in the London boroughs of Merton, Richmond or Kingston.

Surrey

If you are concerned about the safety of a child, you can contact the Surrey Children's Single Point of Access (SPA) on: 0300 470 9100 – Monday to Friday from 9am to 5pm.

Outside of these hours, call on 01483 517898 to speak to the emergency duty team. In an emergency where you are concerned for the child's immediate safety you should call [Surrey Police](#) on 999.

Local Authority Designated Officer (LADO)

A LADO referral and involvement are required when you believe any adult working with children (0-18) has harmed a child or committed a criminal offence against a child or behaved in a way that indicates that they could harm a child. In addition to this, if you believe that there is a safeguarding concern in the personal life of any adult who works with children and or that the adult resides with or is closely associated with someone on the sex offenders register, then a LADO referral will be required.

You no longer need to speak to the LADO service prior to making a referral to LADO. A referral should be made immediately using the referral form which you can find on this link:

<https://www.surreyscp.org.uk/resources/surrey-lado-referral-form-2/>

The completed referral form should be submitted to LADO@surreycc.gov.uk, a LADO will be in touch within 24 to 48 hours. This is not to say you can no longer seek advice and support where required on 0300 123 1650 (Monday to Friday from 9am to 5pm).

Although a LADO referral needs to be made within 24 hours, it is important to note that whilst you are waiting to speak to a LADO, you will need to ensure the immediate safety of the child by either seeking required medical attention and or ensuring that the staff in question has no contact with the child and or any other child. Where appropriate, you will need to consider making contact with the police. Putting in such safeguarding measures will ensure the safety of the child and will give you the reassurance whilst you wait for the LADO response which could be directly on the back of the new referral form or over the phone if required.

You can also go directly to:

North East Referral Hub: 0300 123 1610

This number provides options to speak to an allocated social worker where the child is a known open case, to report concerns about a child, for practitioners needing advice or to discuss a concern, or to contact the LADO where a concern has been raised about an adult working with children.

Channel contact details:

Lee Sawkins

Prevent Coordinator, Surrey Police

Phone: 101 extension 30910 Mobile: 07967 986388

Email: Lee.Sawkins@surrey.pnn.police.uk

Woking and North Surrey Channel contact:

David Stewart

Email: David.stewart@surrey.pnn.police.uk

Merton

Urgent referrals relating to child protection

If you believe that urgent action is needed because, for example, a child is in immediate danger or needs accommodation (upper Level 3 of the Merton Wellbeing Model), phone the MASH on **020 8545 4226** or **020 8545 4227** (Out of hours: **020 8770 5000**) and give as much information as you can.

Your information will be passed immediately to the manager who will make a decision on the risk level and acknowledge this with you within one hour. You must follow up your telephone call by sending a completed Child Protection Referral form to the MASH within 24 hours.

The Child Protection Referral form is available for download or printing at www.merton.gov.uk/casa-forms

Other child protection concerns

If you have a Child Protection concern but urgent and immediate action is not needed (lower Level 3 of the Merton Wellbeing Model), you must complete a Child Protection Referral form in as much detail as possible and send it to the MASH at mash@merton.gov.uk.

The Child Protection Referral form is available for download or printing at www.merton.gov.uk/casa-forms.

LADO

Email: lado@merton.gov.uk

Tel: 020 8545 3179

Kingston and Richmond

You can tell us about a child, young person or parent/carer that needs support in some way by contacting our Single Point of Access Team (SPA) on (020) 8547 5008. You may be concerned about the child's developmental needs, issues that the parent/carer is experiencing, or you may suspect a child is being neglected or subjected to physical, sexual, or emotional abuse.

Please note - [our on-line referral form](#) is provided by the London Borough of Richmond as part of our joint services provided by Achieving for Children. You will be taken to a page on the website <https://www.richmond.gov.uk>.

You can also call us for initial advice and guidance. In some cases, it's important to contact us before completing the form so we can respond to the child's needs quickly, especially if you're concerned that the child is at risk.

- **call us between 8am-6pm Monday to Friday**
- **or call the out of hours duty team (evenings and weekends) on (020) 8770 5000**

LADO

The LADO for Kingston and Richmond can be contacted via the Single Point of Access (see above).

NSPCC Whistle Blowing Advice Line

The Whistleblowing Advice Line offers free advice and support to professionals with concerns about how child protection issues are being handled in their own or another organisation.

If you think an organisation is putting children at risk, even if you're not certain, call us today to talk through your concerns.

Call 0800 028 0285

Email help@nspcc.org.uk

APPENDIX 4

INDICATORS OF VULNERABILITY TO RADICALISATION

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
2. Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts 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.
3. 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.
4. 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.
5. 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.
6. Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.
7. Indicators of vulnerability include:
 - Identity crisis – the student / pupil is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
 - Personal crisis – the student / pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; 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 / pupil's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
- Unmet aspirations – the student / pupil may have perceptions of injustice; a feeling of failure; rejection of civic life;
- Experiences of criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration;
- Special educational need – students / pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

8. 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.

9. 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.

APPENDIX 5

EARLY YEARS STAFF SUPERVISION POLICY AND PROCEDURE

Introduction

The introduction of supervision meetings into the early year's field is a consequence of the recommendations contained in the serious case review into Little Ted's Nursery in Plymouth in 2010.

Recommendations for supervision of staff were picked up in the Tickell Review of the EYFS. (*Tickell, C. The Early Years: Foundations for life, health and learning*).

Supervision is primarily a tool to support the management of practice. Where successful, it should provide practitioners with a route through which to raise any professional queries, to discuss career progression, to clarify roles, responsibilities and work tasks, to support performance management and to build their confidence in supporting children's development. It should also be an opportunity for practitioners to raise any concerns that they might have about children in their care, and to receive support to help them deal with difficult or challenging situations at work.

The aim of supervision is to allow staff and their supervisors to:

- Discuss challenges, concerns, issues and difficulties
- Ensure every child's safety and wellbeing
- Develop practice and competencies
- Explore feelings and emotional impact
- Review work/workload
- Identify solutions to concerns and issues.

Supervision is a regular, planned, accountable two-way process which should offer support and develop the knowledge, skills and values of an individual, group or team. Its purpose is to monitor the progress of professional practice and to help staff improve the quality of the work they do. Supervision also provides an opportunity to discuss sensitive issues including the safeguarding of children and any concerns raised about an individual or colleague's practices.

Statutory framework

In accordance with the revised EYFS Statutory Framework staff supervision is a requirement for providers under Section 3 – The Safeguarding and Welfare Requirements, clause 3.27 and 3.28 is as follows:

3.27 Providers must put appropriate arrangements in place for the supervision of staff who have contact with children and families. Effective supervision provides support, coaching, and training for the practitioner and promotes the interests of children. Supervision should foster a culture of mutual support, teamwork, and continuous improvement, which encourages the confidential discussion of sensitive issues.

3.28 Supervision should provide opportunities for staff to: • Discuss any issues – particularly concerning children’s development or wellbeing, including child protection concerns. • Identify solutions to address issues as they arise. • Receive coaching to improve their personal effectiveness.

Key responsibilities for individuals carrying out supervision

- Sessions should be organised in advance and arrangements will be changed only in exceptional circumstances
- Meetings should be well-structured, allowing both the supervisor and the supervisee to contribute to the meeting
- An appropriate place will be selected for the meeting that is free from interruptions
- All the areas included within the supervision policy will be covered.
- The meeting will be recorded accurately and a copy will be provided for the supervisee.

Key Messages for Supervisees

For everyone to gain the maximum benefit from supervision, it is essential that supervisees:

- Prepare for each meeting by reviewing notes and thinking about the issues to discuss
- Are ready to share their thoughts and ideas in the meeting
- Talk openly about what has gone well and what has been challenging
- Are prepared to plan and undertake training and other development activities as agreed with their supervisor
- Read and agree the notes from the meeting and carry out any required actions.

Suitability to work with children

Supervision meetings offer a regular opportunity for members of staff to declare any criminal offences since their last DBS or any reason or incapability to work with children. Disqualification from working with children includes living in a household with a person that is disqualified.

Significant information will be recorded as a declaration on the individual member of staff’s supervision form.

Completing the written record of the supervisory meeting

Every supervisory meeting will result in an agreed written record of what has been discussed and what actions should be taken next. Notes will be taken by the supervisor and then written up at a later date, or a handwritten record of the meeting will be completed as the meeting progresses. The record will include points for action with clear timescales and identified responsibilities. The supervisor and supervisee should agree on the content as an accurate record of the meeting, by both individuals signing and retaining a copy of the notes for future reference.



Claremont Junior School (Fan Court)

Staff Supervision Meeting Record

Supervisor Name	
Supervisee Name	
Type ☐ Quarterly ☐ Monthly	Date of meeting:

Issues Discussed	Actions/Notes	Due by

Any Training and Development Needs Identified	Actions/Notes	Due by

Support required from Supervisor	Actions/Notes	Due by

Signed by Supervisee	
Date	
Signed by Supervisor	
Date	