ACS Safeguarding & Child Protection Policy

Please note:

ACS International Schools is committed to protecting individual's personal data and aims to remain at all times fully compliant with data protection laws and guidance from the relevant regulators. ACS further commits to ensuring that the planning and writing of all policies and procedures that involve the handling of personal data are guided by the principle of privacy by design, and that individuals' rights to have their data safeguarded are a paramount consideration in ACS' pursuit of all its operational and strategic practices.

ACS is committed to inclusion across race, gender, faith, identity and abilities. We believe that diversity helps us to fulfil our purpose, realise our vision and exemplify our values.

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1. ACS Safeguarding Statement 2024 - 2025

1.1. ACS principles and values uphold 'Safeguarding is "Everyone's Business" and stipulate all community members should maintain an attitude of "It could happen here."
1.2. At ACS, we recognise our moral and statutory responsibility to safeguard and promote the welfare of all children.
1.3. ACS is committed to providing an environment in which children and adults feel safe, secure, valued, and respected, and feel confident to talk and raise concerns if they are worried, knowing they will be listened to.
1.4. The purpose of this policy is to provide staff, volunteers, Board of Trustees, and the Leadership Team with the framework they need to keep children safe and secure in ACS schools. The policy also informs parents and carers how we will safeguard their children whilst they are in our care.

2. Terminology

Safeguarding and promoting the welfare of children is defined as:

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

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

Early Help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse.

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

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

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

Social Care refers to Children's Services in the area in which the child resides. If a child is a Looked After Child, then Social Care refers to Children's Services in their home authority.

MAP refers to the Multi-Agency Partnership.

C-SPA/MASH refers to the Children's Single Point of Access or Multi-Agency Safeguarding Hub (dependent on the local authority definition)

DSL refers to the Designated Safeguarding Lead

DDSL refers to the Deputy Designated Safeguarding Lead

LADO (Local Authority Designated Officer) is responsible for managing allegations against adults who work with children, working with the police, and children's social care.

Zero-Tolerance refers to our commitment to take seriously and act on reported incidents of bullying, harassment, discrimination, and harmful sexual behaviour.

3. Introduction

3.1. This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002 (as amended), the Education (Independent School Standards) Regulations 2014, (as amended).

3.2. All action taken by ACS will be in accordance with statutory, national, and local guidance – this includes:

- Working Together to Safeguard Children (2023), which sets out the multi-agency working arrangements to safeguard and promote the welfare of children and young people and protect them from harm; in addition, it sets out the statutory roles and responsibilities of schools
- 'What to do if you are Worried a Child is Being Abused' 2015 - Advice for Practitioners
- Keeping Children Safe in Education (2024) the statutory guidance issued by the Department for Education (DfE) which all schools and colleges must have regard to when carrying out their duties to safeguard and promote the welfare of children
- Early Years Foundation Stage statutory framework (2023) which sets standards that school and childcare providers must meet for the care of children from birth to 5 years
- Guidance from Surrey Safeguarding Children Partnership including SSCP Procedures and Hillingdon Safeguarding Children Partnership.

3.3. This policy applies to all members of staff, Trustees, and Leadership Team at ACS.

3.4. Other guidance and documents referred to in this policy:

- Disqualification under the Childcare Act 2006 (updated 2019)
- FGM Act 2003 Mandatory Reporting Guidance 2015 (updated January 2020)
- Teachers' standards
- Information sharing advice for Safeguarding practitioners
- The Equality Act 2010
- Use of Reasonable Force 2013
- Surrey County Council Safeguarding Children Missing Education (CME) and Educated Other Than at Schools (EOTaS)
- Hillingdon Guidance for Schools on Children Missing Education
- SCC Touch and The Use of Physical Intervention When Working With Children And Young People – available on Surrey Education Services (Education Safeguarding Team Resources Hub)
- Guidance for Safer Working Practice for those working with children and young people in education settings (2022).
- Prevent Duty (2023)

4. Equalities Statement

4.1. With regards to Safeguarding we will consider our duties under the Equality Act 2010.

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

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

5. Policy Aims

- To support the child's development in ways that will foster security, confidence, independence and sound mental health and wellbeing
- To provide staff with the framework to promote and safeguard the wellbeing of children and in doing so ensure they meet their statutory responsibilities
- To ensure consistent good practice across the ACS and ensure that Safeguarding follows a whole school approach
- To clarify safeguarding expectations for members of the ACS community, staff, Trustees, Leadership Team, children, and their families
- To contribute to the establishment of a safe, resilient, and robust safeguarding culture at ACS built on shared values; that children are treated with respect and dignity, taught to treat each other and staff with respect, feel safe, have a voice and are listened to
- To support contextual Safeguarding practice, recognising that any school can be a location where harm can occur
- To establish expectations for developing knowledge and skills within the ACS community (staff, children, parents/carers) to the signs and indicators of safeguarding issues and how to respond to them
- To promote early identification of need for vulnerable learners and provision of proportionate interventions to promote their welfare and safety
- To develop and promote effective working partnerships with children, parents/carers, and other agencies in the Surrey Safeguarding Children Partnership, Hillingdon Safeguarding Children Partnership, and any relevant Safeguarding Children's Partnership where a child may reside.

6. Policy Principles and Values

- The welfare of the child is paramount
- We act in the best interests of the child and ensure that our decisions around safeguarding take a child-centred and coordinated approach
- All staff maintain an attitude of 'It could happen here'
- We maintain a zero-tolerance approach to sexual violence and sexual harassment
- Children have a right to feel safe and secure, they cannot learn effectively unless they do so
- All children have a right to be protected from harm and abuse
- We promote a caring, safe, and positive learning environment within ACS

- All staff have a role in the prevention of harm and abuse and an equal responsibility to act immediately on any suspicion or disclosure that may indicate a child is at risk of harm, either in the school or in the community, taking into account contextual safeguarding, in accordance with statutory guidance
- Working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working to protect and safeguard children
- We work openly with parents/carers as far as possible. However, we reserve the right to contact social care or the police, without notifying parents/carers if this is believed to be in the child's best interests and/or in line with local threshold documents and partner agency advice.

7. Supporting Children

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

7.2. Staff have a responsibility to reassure any child making a disclosure that they are being taken seriously, and that they will be supported and kept safe. No student must ever be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment.

7.3. ACS is committed to encouraging and developing self-esteem and self-assertiveness, through the curriculum and through positive relationships within the ACS community. All children are taught to understand and manage risk, including staying safe online through Personal, Social, Health and Economic (PSHE) education and Relationship, Sex, and Health Education (RS/H/E) and Online Safety Education as integrated aspects of school life.

7.4. ACS considers requests for supportive accommodations to deal with distress and/or anxiety and will work with the child and family to develop an appropriate and supportive care plan.

7.5. ACS ensures all children are made aware of and have access to details of helplines, counselling, or other avenues of external support.

7.6. ACS works in partnership with external support services and agencies involved in Early Help and the safeguarding of children. Details of our ACS Early Help Offer can be accessed via the ACS website and directly from all schools.

7.7. ACS notifies children's social care without delay if there is an immediate risk of significant harm.

7.8. To provide continued support to children about whom there are known concerns who leave the school, ACS ensures that necessary information is shared confidentially with the child's new school taking account Data Protection and KCSIE requirements. ACS will ensure records are forwarded as a matter of priority and within statutory timescales. The DSL will consider if it would be appropriate to share any additional information with the receiving school, in advance of the child leaving, so that the right support is available to help them thrive in their new educational setting.

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

7.10. ACS has established and maintains a culture where children feel safe and secure, are encouraged to talk and are always listened to. Each ACS School holds regular consultations with its students e.g., through the regular collection of data through EIPulse, focus specific questionnaires, the availability of anonymised reporting through IMABI, participation in anti-bullying programmes, and with Social and Emotional Learning activities.

7.11. ACS ensures that all children know they can access trained adults in the school whom they can approach if they are worried or in difficulty.

7.12. ACS includes safeguarding across the curriculum, including PSHE opportunities which equip children with the skills they need to keep themselves and other safe, including online and to know to whom they should turn to for help. It is also recognised that effective education will be tailored to meet the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special education needs or disabilities.

7.13. ACS provides preventative education by creating a culture of zero tolerance for sexism, misogyny/ misandry, homophobia, biphobia and sexual violence and sexual harassment.

7.14. ACS will liaise with public authorities including social services to refer any student they consider to be homeless, or threatened with homelessness, to the appropriate housing authority.

7.15. ACS ensures all staff are aware of the procedures for their use of personal mobile technology (guidance is issued in school handbooks and contained within this policy and our Code of Conduct). Staff have discussed safeguarding issues around the use of mobile technologies and their associated risks.

8. Professional expectations, roles, and responsibilities

8.1. Role of ACS

- Details of the DSL and DDSL are available on the ACS website and contact details can be obtained from divisional receptions in person and are provided to visitors upon arrival via the school safeguarding leaflet
- ACS operates safer recruitment procedures in line with KCSIE 2024 which includes statutory checks on the suitability of staff to work with children
- All staff receive and acknowledge they have read and understood the ACS Safeguarding arrangements, ACS Safeguarding and Child Protection Policy, staff behaviour policy (Code of Conduct), the role and names of the Designated Safeguarding Lead (DSL) and the Deputy Designated Safeguarding Leads (DDSL) and have read Keeping Children Safe in Education (2024), part 1. This applies to the Trustee and Board members and Leadership Team in relation to part 2 of the same guidance
- All staff receive Safeguarding and Child Protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and

monitoring and reporting concerns) at induction in line with advice from the relevant local authority Safeguarding Children Partnership. Training is regularly updated as required, and at least annually to continue to provide staff with relevant skills and knowledge to safeguard children effectively.

- All ACS members of staff maintain a zero-tolerance approach to sexual violence and sexual harassment
- ACS IT provides compliant filtering and monitoring services enabling effective reporting of concerns
- All Trustees and Leadership Team have regular Safeguarding and Child Protection awareness training, updated by the DSL as appropriate, to maintain their understanding of the signs and indicators of abuse
- All parents/carers are made aware of the Safeguarding and Child Protection responsibilities of staff members through the availability of ACS Safeguarding and Child Protection Policy on the ACS website
- ACS provides a coordinated Early Help Offer when additional needs of children are identified and contributes to Early Help support and inter-agency plans
- ACS Lettings Policy seeks to ensure the suitability of adults working with children on the school site at any time and that any groups who use the ACS premises have Safeguarding and Child Protection policies and procedures in place
- Community users/hirers organising activities for children are aware of ACS's Safeguarding and Child Protection Policy, guidelines, and procedures and how to contact the relevant DSL
- The name of the designated members of staff for safeguarding and child protection, the DSL and DDSLs, are clearly advertised in the schools
- ACS utilises and maintains appropriate processes and systems for reporting and recording safeguarding concerns in line with data protection and privacy requirements.

8.2. All ACS Staff

- Understand that safeguarding is everyone's responsibility and maintain an attitude of "it could happen here".
- Maintain a zero-tolerance approach to sexual violence and sexual harassment
- Read and understand Part 1 of statutory guidance KCSIE (2024); those working directly with children will also read Annex B
- Be aware of the systems in place which support safeguarding including reading this Safeguarding and Child Protection Policy; the Behaviour Policy; the Code of conduct; the safeguarding response to children who go missing from education; and the role of the DSL
- Know who is and how to contact the Key Personnel for their school (including the Nominated Safeguarding Trustee)
- Be aware of indicators of abuse and neglect understanding that children can be at risk of harm inside and outside of ACS, inside and outside of home and online
- Be able to identify vulnerable learners and take action to keep them safe
- Exercise professional curiosity and know what to recognise as a cause for concern for the early identification of abuse and neglect to identify cases where a child may need Early Help or protection
- Share information or concerns about learners with the DSL where it includes concerns that a child may:
    - be experiencing abuse or neglect and may need a Social Worker
    - require mental health support
    - benefit from Early Help support
    - be at risk of radicalisation
    - have been involved in activity where a crime was committed.

- Understand Early Help and are prepared to identify and support children who may benefit from Early Help passing on this information to the DSL or DDSL through MyConcern
- Provide an environment in which children and young people feel safe, secure, valued and respected and in which they can feel confident and know how to approach adults if they are in difficulties, knowing they will be listened to effectively
- Ensure children know that there are adults in the school who they can approach if they are worried or have concerns
- 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
- Ensure only appropriately trained professionals attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one
- Take immediate action if they have a mental health concern about a child that is also a safeguarding concern, following the Safeguarding and Child Protection Policy and procedures
- Plan opportunities within the curriculum for children to develop the skills they need to assess and manage risk appropriately and keep themselves safe
- Complete training as required by ACS in order to be aware of and alert to the signs of abuse and neglect
- Know how to respond to a child who discloses harm or abuse following training of 'Working Together to Safeguard Children' (2023), and 'What to do if you are worried a child is being abused' (2015)
- Document their concerns if they are worried that a child is being abused and report these immediately through the MyConcern system. and directly to the DSL; if the DSL is not contactable, a DDSL must be informed
- Be prepared to refer directly to the Children's Single Point of Access (C-SPA/MASH), and the Police if appropriate, if there is a risk of significant harm and the DSL or their DDSL is not available
- Be aware that the DfE has also set up a dedicated telephone helpline for staff and Governors/Proprietors/management committees to raise concerns around the Prevent Duty (020 7340 7264)
- Follow the allegations procedures, as set out in this policy and KCSIE 2024, if the disclosure is an allegation against a member of staff, substitute staff, volunteer or contactor. Staff will immediately report an allegation against a member of staff to the Head of School through the CONFIDE System
- Report low-level concerns (as defined in KCSIE 2024) about any member of staff/supply staff/volunteer or contractor through the CONFIDE system
- Provide support for children subject to Early Help, Child in Need or Child Protection Plans and are the lead professional where appropriate, in the implementation of individual plans to further safeguard vulnerable learners and understand their academic progress and attainment and maintain a culture of high aspirations for this cohort
- Respond positively and reassure the child that their concerns are being taking taken seriously. Staff will be non-judgemental and use active listening when approached by a child and work with them to identify next steps
- Adhere to the ACS expectations of not promising confidentiality and informing children that they must pass information to other professionals if the child discloses any incidents of a safeguarding concern
- Notify the DSL or their DDSL of any child on a Child Protection plan or Child in Need Plan who has unexplained absence

- Understand Early Help and are prepared to identify and support children who may benefit from Early Help. Staff will liaise with other agencies that support children and provide Early Help when appropriate.
- Recognise that children may not feel ready or know how to tell someone they are being abused, exploited, or neglected, and/or they may not recognise these experiences as harmful; this could be due to their vulnerability, disability and/or sexual orientation or language barriers, so staff should always exercise professional curiosity and consult with the DSL at the earliest point of concern
- Be mindful that the Teacher Standards and ACS Foundation Standards require that teachers should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties
- Be aware of and comply with ACS guidance for their use of technology, including mobile devices.

8.3. Head of School

In addition to meeting the role and responsibilities of all staff, the Head of School will ensure that:

- The school fully contributes to inter-agency working in line with Working Together to Safeguard Children (2023) guidance
- The Safeguarding and Child Protection Policy and procedures are implemented and followed by all staff
- The school has appropriate policies in place that make it clear that sexual harassment, online sexual abuse and sexual violence (including sexualised language) is unacceptable, with appropriate sanctions and support in place.
- The school staff have appropriate knowledge of KCSIE (2024), part 5
- All children are supported to report concerns about harmful sexual behaviour and are confident that concerns are taken seriously and dealt with swiftly and appropriately
- Comprehensive records of all allegations are kept
- All staff are aware of the role of the DSL, including the identity of the DSL and any DDSLs
- Sufficient time, training, support, funding, resources, including cover arrangements where necessary, are allocated to allow the DSL to carry out their role effectively, including providing advice and support to school staff on safeguarding and Child Protection matters, participating in Strategy Discussions/Meetings and other inter-agency meetings and/or supporting other staff to do so; and contributing to the assessment of children
- Opportunities are provided for a co-ordinated offer of Early Help when additional needs of children are identified
- DDSLs are trained to the same standard as the DSL and the role is explicit in their job description
- Adequate and appropriate DSL cover arrangements are in place for any out of hours/out of term activities
- Where there is a safeguarding concern, see that the child's wishes and feelings are taken into account when determining what action to take and what services to provide
- Child-centred systems and processes are in place for children to express their views and give feedback through systems such as IMABI and EIPulse
- All staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the ACS Whistle-Blowing procedures and staff are further directed to the NSPCC's Whistleblowing Advice Line on 0800 028 0285

- Children are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online
- Allegations or concerns against staff and other adults are dealt with in accordance with statutory and local authority guidance from the DfE and local Safeguarding Children Partnership (SSCP and HSCP) and relevant county council
- Statutory requirements are met to make a referral to the Disclosure and Barring Service and additionally in the case of teaching staff to the Teacher Regulation Agency where they consider an individual has engaged in conduct that harmed (or is likely to harm) a child; or if the person otherwise poses a risk of harm to a child
- Ensure appropriate records for low-level concerns about a member of staff/substitute staff/contractor, or a volunteer are maintained securely on CONFIDE. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should usually be noted If the individual wishes to remain anonymous, then that will be respected as far as reasonably possible.

8.4. Designated Safeguarding Lead

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

- Hold the lead responsibility for Safeguarding and Child Protection (including online safety and understanding the filtering and monitoring systems in place) in ACS, understanding this responsibility is not able to be delegated
- Liaise with the appropriate local authority dependent on where the child resides and work in partnership with other agencies in line with Working Together to Safeguard Children (2023) and KCSIE (2024)
- Where necessary contact the relevant local authority Child Protection Consultation Line for advice and support
- Manage and submit the referral for a child if there are concerns about suspected harm or abuse, to the C-SPA/MASH and act as a point of contact and support for school staff.

  When a referral is required:

  - At ACS Cobham and Egham, requests for support should be sent securely by email to cspa@surreycc.gov.uk using the Request for Support Form. Urgent Child Protection referrals should be made by telephone 0300 470 9100 or 03311 435554. The details of the safeguarding concern must be confirmed in writing, as a matter of urgency, on the same day. The out of hours telephone number is 01483 517898

  - At ACS Cobham and Egham, where there are concerns that a child may be at risk of radicalisation or involvement in terrorism, DSLs must use the Prevent referral form to refer cases by e-mail to preventreferrals@surrey.pnn.police.uk. If the matter is urgent, then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101 or 07795 043842 or 01865 555618 and ask to speak to the Prevent Supervisor for Surrey

  - At ACS Hillingdon, requests for support should be sent to Portal Early Help Referral and Assessment Team using the link https://Portal-EHM.hillingdon.gov.uk. Urgent Child Protection referrals must be made by

telephone at 01895 556006. The details of the safeguarding concern must be confirmed in writing, as a matter of urgency, on the same day. The out of hours telephone number is 01895 556006.

- At ACS Hillingdon, where there are concerns that a child may be at risk of radicalisation or involvement in terrorism, DSLs must use Report concerns that a child may be at risk of radicalisation or involvement in terrorism, using the Prevent referral form to refer cases by e-mail to preventreferrals@met.pnn.police.uk. If the matter is urgent, then Police must be contacted by dialling 999. In cases where further advice from the Police is being sought dial 101 or 01895-556-006 or 07946-714637 and ask to speak to the Stronger Communities and Prevent Lead or email fgibbs@hillingdon.gov.uk

- Where a crime may have been committed consider whether the case should be referred to the Police. DSLs in UK schools will refer to NPCC- When to call the police guidance to help clarify when calling the Police is appropriate and what to expect when doing so
- Liaise with the "case manager" and Local Authority Designated Officer (LADO) for Child Protection concerns in cases which concern a member of staff/substitute staff/contractor or volunteer
- Follow relevant DfE guidance and KCSIE 2024 on 'Child on Child abuse' when a concern is raised about a child abusing another child within the school
- When there has been a report of sexual violence, make an immediate risk and needs assessment. Additionally, where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis and will be put in place as required
- Be available during term time (during school hours) for staff in the school to discuss any safeguarding concerns. Appropriate and adequate cover arrangements will be arranged by the DSL and the Head of School for any out of hours/term activities
- Act as a source of support and expertise in carrying out safeguarding duties for the school community
- Ensure that the names of the DSL and DDSLs, are clearly advertised, with a statement explaining the schools' role in referring and monitoring cases of suspected abuse
- Encourage and promote a culture of listening to children and taking account of their wishes and feelings, amongst all staff
- Regularly access appropriate training and support to ensure they have the knowledge and skills required to carry out the role
- Have a secure working knowledge of local authority Safeguarding Children Partnership procedures and understand the assessment process for providing Early Help and statutory intervention, in line with the child's local authority threshold document (Surrey, Continuum of Need Matrix, Hillingdon, The Pan London Threshold Document)
- Have a clear understanding of access and referral to external Early Help provision and support and advise members of staff where Early Help intervention is appropriate, alongside leading on internal single agency Early Help offers
- Have a working knowledge of how the child's local authority Safeguarding Children Partnership conduct an initial Child Protection Case Conference and a Child Protection Review Conference and be able to attend and contribute to these effectively when required to do so

- Understand the lasting impact that adversity and trauma can have, including on the children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes
- Understand and support the school's delivery with regards to the requirements of the Prevent duty and provide advice and guidance to staff on protecting children from radicalisation
- Liaise with school staff (especially Pastoral Leads, Behaviour Leads, School Nurses and the SENDCO) on matters of safety and safeguarding and consult the child's local authority threshold document to inform decision making and liaison with relevant agencies
- Be alert to the specific needs of children in need, those with Special Educational Needs and Disability (SEND) and young carers
- Understand the risks associated with online activity and have the up-to-date knowledge and capability to guide ACS in putting in place arrangements to keep children safe whilst they are online at ACS; in particular understand the additional risks that children with SEND face online and the associated and appropriate support they require
- Update DSL training at least every two years and refresh their knowledge and skills at regular intervals, and at least annually
- Work with the Head of School and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, Safeguarding and Child Protection issues that Children in Need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at the school
- Keep up to date, detailed, accurate records through MyConcern, that include all concerns about a child (even if there is no need to make an immediate referral to social care) and record the rationale for decisions made and action taken. This includes instances where referrals were or were not made to another agency such as Prevent program.
- Ensure that an indication of the existence of the additional Safeguarding/Child Protection file is marked on the child's main file record
- Ensure that when a child transfers school (including in-year), their safeguarding/Child Protection file is passed to the new school as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main student file, ensuring secure transit, and confirmation of receipt should be obtained
- If the transit method requires that a copy of the safeguarding/Child Protection file is retained until such a time that the new school acknowledges receipt of the original file, ensure the copy is securely destroyed on confirmation of receipt
- Ensure that where a child transfers to a school and is on a Child Protection Plan, Child in Need plan or is a Looked After Child, their information is passed to the new school immediately and that the child's Social Worker is informed. In addition, consideration should be given to a multi-agency school transition meeting if the case is complex or on-going
- Ensure that all appropriate staff members have a working knowledge and understanding of their role in Case Conferences, Core Groups and other multi-agency planning meetings, to ensure that they attend and can effectively contribute when required to do so; where a report is required, this should be shared with the parents prior to the meeting
- Report to the Head of School any significant issues for example, use of Surrey's FaST Resolution Process or Hillingdon Safeguarding Partnership Escalation: Resolving Professional Differences for enquiries under section 47 of the Children Act 1989 and Police investigations. This should include being aware of the

requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.

- Undertake Appropriate Adult training through NAAN ensuring quality provision of care in this role
- Ensure that the case holding social worker is informed of any child currently with a Child Protection plan who is absent without explanation
- Organise Safeguarding and Child Protection induction training, regular update training and a minimum of annual updates (including online safety) for all school staff, keep a record of attendance and address any absences
- Ensure each member of staff has access to, and understands, the school's Safeguarding and Child Protection policy procedures, especially new and part-time staff
- Ensure that in collaboration with the ACS Leadership Team and Trustees, the Safeguarding and Child Protection Policy is reviewed annually, and the procedures and implementation are updated and reviewed regularly
- Ensure that the Safeguarding and Child Protection Policy is available publicly and that parents/carers know that referrals about suspected abuse or neglect may be made, and the role of the school in those referrals
- Promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and Child Protection issues that children who have or have had a Social Worker are experiencing with teachers, Pastoral Leads and Head of School
- Establish and maintain links with the local authority Safeguarding Children Partnership to make sure staff are aware of training opportunities and the latest policies on local safeguarding arrangements
- Contribute to and provide to the Trustees, with the Head of School the biennial (s157 s175) Statutory Audit for Safeguarding Arrangements. DSL duties are further outlined in KCSIE (2024, Annex C) and also set forth in the role's ACS Job Description.

8.5. Deputy Designated Safeguarding Lead (DDSL)

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

- Be trained to the same standard as the DSL and have the role as an explicit part of their job description
- Provide support and capacity to the DSL in carrying out delegated activities of the DSL; however, the lead responsibility of the DSL cannot be delegated
- In the absence of the DSL, carry out the activities necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the DSL ACS will make appropriate arrangements for a DDSL to assume all the functions of the DSL.
- DDSL duties are further outlined in in the role's ACS Job Description for that role.

8.6. Board of Trustees

All members of the Board of Trustees understand and fulfil their responsibilities to ensure that:

- There is a whole school approach to Safeguarding, involving everyone in the school and ensuring that Safeguarding, and Child Protection are at the forefront and underpin all relevant aspects of process and policy development
- All members of the Board receive appropriate safeguarding and Child Protection (including online) training at induction. This training equips them with the knowledge to provide strategic challenge to test and assure themselves that the Safeguarding policies and procedures in place in the school are effective and support the delivery of a robust whole school approach to safeguarding (full training for Trustees is completed every 3 years, with annual updates). The Nominated Trustee for Safeguarding is Martha Whitmore.
- The school has effective safeguarding policies and procedures including a Safeguarding and Child Protection Policy, a Staff Code of Conduct, a Behaviour Policy and a response to children who go missing from education (CME)
- Policies are consistent with Surrey and Hillingdon Safeguarding Children Partnership and statutory requirements, are reviewed annually (as a minimum) and updated if needed to remain up to date with localised safeguarding issues as they emerge and evolve, including lessons learnt and that the Safeguarding and Child Protection policy is available on the school website
- Appropriate policies are in place to ensure that recruitment, selection, and induction follow safer recruitment practice including all appropriate checks in accordance with KCSIE (2024) and the Education (Independent School Standards) Regulations 2014, (as amended)
- All Staff have been trained appropriately and this is updated in line with guidance and all staff have read KCSIE (2024) part 1, ACS Safeguarding and Child Protection Policy and if applicable, Code of Conduct. And that mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance
- Safeguarding training, including online safety for staff and children is integrated, aligned, and considered as part of the whole school safeguarding approach following scrutiny of emerging trends and audited data to deliver effective curriculum planning
- Considering training requirements, policies set have regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment, and require teachers to have a clear understanding of the needs of all children
- The child's wishes and feelings are considered when determining what action to take and what services to provide
- The school has procedures in place for dealing with allegations against all staff (including the Head of School), volunteers and contractors; and that there is a requirement for a referral to made to the DBS and/or the Teaching Regulation Agency (as applicable) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have, had they not resigned
- Policies and processes are in place to deal with concerns (including allegations) which do not meet the harm threshold or low-level concerns as defined in KCSIE 2024
- A member of the Senior Leadership Team has been appointed by the Leadership Team as the DSL who will take lead responsibility for Safeguarding and Child Protection at each campus and that the role is explicit in the role holder's job description. DSLs and DDSLs on appointment undertake mandated local authority training with refresher training undertaken every two years as well as attending DSL network events, to refresh knowledge and skills
- Children are taught about Safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through PSHE and R(S)HE

- The Local Safeguarding Children's Partnership is informed in line with local requirements about the discharge of duties via the (s157 s175) Statutory Audit for Safeguarding Arrangements and termly safeguarding data collections.
- Alongside the Leadership Team, the effectiveness of filtering and monitoring systems in place to safeguard children online is regularly reviewed in accordance with the Meeting digital and technology standards in schools and colleges (DfE)
- Ensure that the Leadership Team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified
- ACS complies with DfE statutory guidance on Children Missing Education and the Surrey Guidance for Safeguarding Children Missing Education and London Borough of Hillingdon Children Missing Education Guidance, and local authority EOTaS guidance.
- Clear systems and processes are in place for identifying possible mental health concerns, including routes to escalate and clear referral and accountability systems
- Safeguarding and Child Protection files are maintained as set out in KCSIE 2024 Annex C
- Enhanced DBS checks (without barred list checks unless the Trustee is also a volunteer at the school) are in place for all Trustees
- Section 128 checks are undertaken as defined in KCSIE 2024
- Where ACS hires or rent out school facilities/premises to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities), appropriate arrangements are in place to keep children safe. This includes the expectation that hirers inform ACS of any safeguarding issues that have arisen during, or as a result of their use of ACS facilities. Such reports must be made to the relevant DSL to enable ACS to follow their safeguarding policies and procedures, which may include informing the Local Authority Designated Officer (LADO).
- ACS takes a proportionate, risk-based approach to the level of safeguarding-related information that is required from temporary staff, volunteers and contractors.

9. Confidentiality, Sharing and Withholding Information

9.1. All matters relating to Safeguarding and Child Protection will be treated as confidential and only shared as per the 'Information Sharing Advice for Practitioners' (DfE 2018) guidance. The school will refer to the guidance in the Data protection: toolkit for schools to support school with data protection activity, including compliance with UK General Data Protection Regulation (GDPR). Information will be shared with staff within the school who 'need to know.' Relevant staff have due regard to GDPR principles which allow them to share (and withhold) information.

9.2. All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the Data Protection Act 1998 and GDPR are not a barrier to sharing information where a failure to do so would place a child at risk of harm. There is a lawful basis for Child Protection concerns to be shared with agencies who have a statutory duty for Child Protection.

9.3. All staff will always endeavour to gain parent/carers consent to refer a child to social care unless to do so could put the child at greater risk of harm or impede a criminal investigation.

10. Reporting and Responding to Safeguarding Concerns

10.1. The following procedures apply to all staff working in the school and will be covered in training to enable staff to understand their role and responsibility. The aim of the procedures is to provide a robust framework which enables staff to take appropriate action when they are concerned that a child is being harmed or abused or is at risk of harm or abuse. The priority concern at all stages must be the interests and safety of the child. Where there is a conflict of interest between the child and an adult, the interests of the child must be paramount.

10.2. All staff must be aware that very young children and those with disabilities, special needs or with language delay may be more likely to communicate concerns with behaviours rather than words. Additionally, staff will question the cause of knocks and bumps in children who have limited mobility.

10.3. If a member of staff suspects abuse, spots signs or indicators of abuse, or they have a disclosure of abuse made to them they must make an initial record of the information related to the concern as soon as possible on the MyConcern system providing details of:

- Date
- Time
- Place
- Who was present
- Context
- Details of disclosure/concern (using the child's words)
- Demeanour/non-verbal behaviours of the child
- Child's voice
- Any injuries (using a body map to record these)
- Rationale for decision making
- Actions taken

If the record is handwritten it must be signed and dated by the author for transfer to the MyConcern system.

10.4. Staff will contact the DSL or DDSL immediately in addition to making the MyConcern report. The DSL/DDSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available.

10.5. Following a report of concerns the DSL must use the local authority Threshold Document to decide whether there are sufficient concerns for suspecting harm, in which case a request for support/referral must be made to the C-SPA/MASH and the Police if it is appropriate. If the DSL feels further advice is appropriate the school will liaise by telephone with the C-Spa Professionals Helpline.

10.6. In the absence of the DSL or DDSL, all staff must be prepared to and know how to refer directly to C-SPA/MASH (and the Police if appropriate) if there is the potential for immediate significant harm or contact the consultation line at the C-SPA/MASH for support and advice:

- At ACS Cobham and Egham referrals should be made by telephone 0300 470 9100. The details of the safeguarding concern must be confirmed in

writing, as a matter of urgency, on the same day to cspa@surreycc.gov.uk. The out of hours telephone number is 01483 517898

- At ACS Hillingdon referrals must be made by telephone at 01895 556006. The details of the safeguarding concern must be confirmed in writing, as a matter of urgency, on the same day to https://Portal-EHM.hillingdon.gov.uk. The out of hours telephone number is 01895 556006

10.7. Any concerns about a child's welfare should normally be discussed with the parent/carer and where possible their agreement obtained before making a referral to the C-SPA/MASH. However, some examples of where this is not required include:

- it could place the child at increased risk
- sexual/organised abuse is suspected
- the fabrication of an illness is suspected; or
- where the discussion could impede a Police investigation or Social Work enquiry.

This list is not exhaustive. Where there are doubts or reservations about involving the child's family, the DSL will clarify with the C-SPA/MASH or the Police whether the parents/carers should be told about the referral and, if so, when and by whom. This is important in cases where the Police may need to conduct a criminal investigation. The child's views should also be considered.

10.8. If it is suspected that a child is suffering, or is likely to suffer, harm or abuse the DSL must contact the C-SPA/MASH. If the DSL feels unsure about whether a referral is necessary, they will phone the C-SPA/MASH consultation line to discuss concerns. ACS will endeavour to seek advice on a 'no name' consultation basis. However, there may be times when the C-SPA/MASH requests the family's details to understand if they are already known to services. If C-Spa/MASH requests family details, ACS will seek advice on the appropriateness of disclosing the consultation at this time.

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

10.10. The exception to this process will be in those cases of known FGM where there is a mandatory reporting duty which requires the teacher to report directly to the Police where they either:

- Are informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for the purposes connected with labour or birth.

Following a mandatory report for FGM the DSL must also be made aware as soon as possible.

11. Staff receiving notice of Safeguarding Concerns

11.1. A member of staff who is approached by a child should listen positively and try to reassure them. Staff must not promise complete confidentiality and should explain that they will need to pass information to other professionals to help keep the child and/or other children safe. The degree of confidentiality should always be governed by the need to protect the child.

11.2. Additional consideration needs to be given to children with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.

11.3. All staff should know who the DSL is and the DDSL to approach if the DSL is unavailable. All staff have can make a referral to the C-SPA/MASH or Police directly and should do this if, for whatever reason, there are difficulties following the agreed protocol, for example, they are the only adult on the school premises at the time and have concerns about sending a child home.

11.4. Staff should adhere to the guiding principles in receiving a disclosure:

- Receive
- Reassure
- Respond
- Report
- Record
- Remember
- Review (by the DSL)

11.5. What happens next? It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. The member of staff should be informed by the DSL what has happened following a report being made. If they do not receive this information, they should seek it out. If the staff member believes that the concern has not been acted upon appropriately, they should inform the Head of School or Safeguarding Trustee or contact the C-SPA/MASH for advice.

12. Safeguarding Concerns and Allegations made about Staff, including Substitute Teachers, Volunteers and Contractors

12.1. ACS will follow Surrey's LADO procedure or Hillingdon LADO procedure, where it is alleged that anyone working in the school that provides education for children under 18 years of age, including substitute staff, volunteers and contractors or another adult who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child

and/or

- possibly committed a criminal offence against or related to a child

and/or

- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children

and/or

- behaved or may have behaved in a way that indicates they may not be suitable to work with children. (including behaviour that may have happened outside the school setting in the adult's private life, also known as 'transferrable risk').

12.2. ACS may also receive allegations relating to incidents that happened when an individual or organisation was using ACS premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities).

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

- Report any concerns to the Head of School immediately through the CONFIDE system
- If an allegation is made against the Head of School, the concerns need to be raised with the Chair of Trustees as soon as possible. Mr Bob MacNaughton, bmacnaughton@acs-schools.com
- If the Chair of Trustees is not available, then the appropriate LADO should be contacted directly:

ACS Hillingdon:

- Local Authority Designated Officer for Hillingdon, Hannah Ives, can be contacted on:

- Tel: 01895 250975/07753-431285
- Email: lado@hillingdon.gov.uk

ACS Cobham and Egham:
Surrey Duty LADO

- Tel: 0300 123 1650 (option 3)
- Email LADO@surreycc.gov.uk

12.4. There may be situations when the Head of School or Chair or Trustees will want to involve the Police immediately if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.

12.5. Once an allegation has been received by the Head of School (or Chair of Trustees) they will contact the LADO (as part of their mandatory duty) before taking any action or investigating. This process is in line with the ACS Guidance for Managing Allegations. Following consultation with the LADO, ACS will inform the parents/carers of the allegation unless there is a good reason not to. In liaison with the LADO, the school will determine how to proceed, and if necessary, the LADO will refer the matter to Social Care and/or the Police. If the matter is investigated internally, the LADO will advise the school to seek guidance in following procedures set out in part 4 of KCSIE (2024) and relevant local Safeguarding Children's Partnership.

13. Low-level concerns

13.1. The description of a concern as 'low level' does not indicate that a report or the behaviour underlying it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a

'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that:

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

13.2. The purpose of reporting low-level concerns is to create and embed a culture of openness, trust and transparency in which the ACS values and expected behaviour set out in the staff Code of Conduct are lived, monitored and reinforced constantly by all staff. The school creates an environment where staff are encouraged and feel confident to self-refer where they have found themselves in a situation where they think their behaviour could be misinterpreted or they recognise their conduct to have been inappropriate.

13.3. Reports should be made to the CONFIDE System in a timely manner. If there is any doubt as to whether the information which has been shared about the individual as a low-level concern in fact meets the harm threshold, ACS will consult with the LADO in accordance with the ACS Low Level Concerns Policy.

14. Child Abuse and Neglect

14.1. Child abuse involves maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community school 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.

14.2. All staff should be aware of the types and signs of different types of abuse and neglect so that they are able to identify children who may need help or protection. Other examples of abuse include (but are not limited to) sexual exploitation, honour-based violence, forced marriage or female genital mutilation.

14.3. Staff are directed to further information in Appendix Three.

15. Sexual Violence and Sexual Harassment Between Children at ACS (Child-on-Child Abuse)

15.1. Sexual violence and sexual harassment can occur between children of any age and sex. It can occur through a single child or a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will find the experience stressful and distressing. This will, in all likelihood, adversely affect their education attainment as well as their emotional well-being. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all children reporting sexual violence and sexual harassment are reassured that they are being taken seriously and that they will be supported and kept safe.

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

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

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying) abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery). Staff are directed to UKCIS guidance: Sharing nudes and semi-nudes advice for education settings
- 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
- 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).
- Staff are directed to Appendix Four for detailed definitions.

15.4. We believe that all children have a right to attend our school and learn in a safe environment. Children should be free from harm by adults and other children. We recognise that children are capable of abusing other children and their peers and this will be dealt with under this policy and in line with KCSIE (2024) and our ACS Behaviour Policy, where appropriate. We are clear that sexual violence and sexual harassment is not acceptable. ACS schools will minimise the risk of Child-on-Child abuse by:

- Making clear that there is a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. It will never be passed off as "banter", "just having a laugh", "a part of growing up" or "boys being boys". We believe that failure to do so can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse, leading to children accepting it as normal and not coming forward to report it
- Recognising, acknowledging, and understanding the scale of harassment and abuse and that even if there are no reports it does not mean it is not happening, it may be the case that it is just not being reported

- Challenging physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. As we believe that dismissing or tolerating such behaviours risks normalising them
- Ensuring children making any report of sexual violence or sexual harassment including "upskirting" (The Voyeurism Offences Act 2019) are taken seriously, kept safe and be well supported.
- ACS staff are directed to the annually reviewed Child on Child Abuse Prevention and Response Policy that supports staff further in the prevention, recognition and response to Child-on-Child Abuse and assessment of Harmful Sexual Behaviour (HSB).

15.5. ACS commits to these strategies to prevent Child-on-Child Abuse:

- Taking a whole school approach to safeguarding and Child Protection
- Providing specific training to staff on Child-on-Child abuse and HSB
- Undertaking regular contextual safeguarding assessments of each school to identify areas of concern and risk and responding to any identified risk
- Providing a clear set of values and standards, underpinned by the ACS Behaviour Policy, DEI Charter, and pastoral support; and by a planned programme of evidence-based content delivered through the curriculum
- Engaging with specialist support and interventions for staff and student learning
- Responding to reports of sexual violence and sexual harassment in accordance with the expectations laid out in this policy
- Providing students with a range of qualified staff to report concerns to such as teaching staff, pastoral leads, school nurses, safeguarding teams, school counsellors and independent counsellors and a means of anonymised reporting.

15.6. If the report includes an online element staff will be mindful of the DfE guidance, Searching, screening and confiscation in schools (2022). The key consideration is staff must not to view or forward illegal images of a child since they may commit an offence by doing so. The above guidance provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection.

15.7. Teaching Staff who are concerned that a device may contain illegal images should review the guidance Sharing nudes and semi-nudes: how to respond to an incident (overview).

15.8. All such incidents should be immediately reported to the Designated Safeguarding Lead (DSL) who is familiar with the full 2020 guidance from the UK Council for Internet Safety (UKCIS), Sharing nudes and semi-nudes: advice for education settings working with children and young people.

15.9. Following a report of Child-on-Child abuse the DSL will make an immediate risk and needs assessment on a case-by-case basis for each child involved.

The risk assessment will consider:

- The reporting child, especially their protection and support

- The reported child, their support needs and any sanctions
- All other children at the school
- The reporting child and the reported child sharing classes and space at school
- The risk assessment will be recorded and kept under review.

Where there has been other professional intervention and/or other specialist risk assessments, these professional assessments will be used to inform the school's approach to supporting and protecting children.

15.10. It is essential that all reporting children are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously. A reporting child should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a reporting child ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

15.11. Following an incident of Child-on-Child Abuse the DSL will consider

- The wishes of the reporting child
- The nature of the incident (including whether a crime may have been committed) and the harm caused
- Ages of the children involved
- Developmental stages of the children
- Any power imbalance between the children
- Any previous incidents
- That sexual violence and sexual harassment can take place within intimate personal relationships between children
- Importance of understanding intra familiar harms and any necessary support for siblings following incidents
- Ongoing risks to the reporting child, other children, adults, or staff.
- Other related issues or wider context.

15.12. The reporting child may ask the school not to tell anyone about the sexual violence or sexual harassment. If the reporting child does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies. The DSL should consider:

- parents or carers should normally be informed (unless this would put the reporting child at greater risk)
- the basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care, and
- rape, assault by penetration and sexual assaults are crimes. Where a report alleging rape, assault by penetration or sexual assault is made, this should be referred to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

15.13. The DSL will have to balance the reporting child's wishes against their duty to protect them and other children. When responding to incidents the DSL will progress according to the actions outlined in the ACS Responding to Reports Flowchart (See Appendix). All concerns, discussions, decisions/actions, and reasons for decision will be recorded on the MyConcern system.

15.14. The DSL will manage each case individually and will ensure the risk assessment is reviewed regularly with relevant partner agencies, for example the Police and Social Care. Where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system, schools should be aware of anonymity, witness support, and the criminal process in general so they can offer support and act appropriately. Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the reporting child.

15.15. The DSL will consider how best to keep the reporting child and reported child a reasonable distance apart on the school premises and on transport where appropriate. Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the school will take action under the ACS Behaviour Policy. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and may lead to permanent exclusion.

15.16. Where a criminal investigation into sexual assault leads to a conviction or caution, the school will, if it has not already, consider any suitable sanctions in line with the ACS Behaviour policy, which may include consideration of permanent exclusion. Where the perpetrator is going to remain at the same ACS school, the Principal should continue keeping the reporting child and reported child in separate classes and continue to consider the most appropriate way to manage potential contact on school premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.

15.17. The reporting child, the reported child and any other children and adults affected will receive appropriate support and safeguards on a case-by-case basis. The school will take any disciplinary action against the alleged perpetrator in accordance with the ACS Behaviour Policy. The school recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.

15.18. The school will consider the potential impact of social media in facilitating the spreading of rumours and exposing the reporting child's identity.

15.19. The school recognises that children who have experienced sexual violence display a wide range of responses to their experiences including clear signs of trauma, physical and emotional responses, or no overt signs at all.

15.20. While a clear focus of child-on-child abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals from children to children can also be abusive. These are equally not tolerated and if it is believed that a crime may have been committed, this will be reported to the Police. The principles from the ACS Anti-Bullying policy will be applied in these cases, with recognition that any Police investigation will need to take priority.

16. Anti-Bullying/Cyberbullying

16.1. ACS policy on Anti-Bullying is available from any of our schools upon request. It includes measures to prevent bullying (including cyberbullying, prejudice-based and discriminatory bullying) When there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm' a bullying incident should be addressed as a Child Protection concern. If the anti-bullying procedures are seen to be ineffective, the Pastoral Lead and the DSL will also consider multi-agency Child Protection procedures.

16.2. PSHE education regularly provides opportunities for children to understand bullying is wrong, its impact and how to deal with it.

16.3. Each school keeps a record of known bullying incidents which is shared with and analysed by the Head of School and Trustees.

17. Particular populations

17.1. Children with Special Educational Needs and Disabilities or Health Issues

17.1.1. ACS recognises that children with SEN/D, or certain medical or physical health conditions can face additional Safeguarding challenges both online and offline. These can include:

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

17.1.2. Any reports of abuse will require close liaison with the DSL and the school's SEN leader(s). ACS will provide extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

17.2. LGBTQ+ Students

17.2.1. Students who identify as Lesbian, Gay, Bisexual, Transgender, Queer or Questioning (LGBTQ+) are more susceptible to being bullied/victims of child abuse. 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 LGBTQ+ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+. Risks can be compounded where children who are LGBTQ+ lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and

provide a safe space for them to speak out or share their concerns with members of staff.

17.2.2. ACS takes a broadly gender-affirming stance and is led by students' disclosures to trusted adults at school about gender discomfort, identity questioning, exploration of gender nonconformity, and desire for socially transitioning. We do not consider exploration or changes in gender identity automatically to be a medical, mental health, or safeguarding concern. We will signpost students and families toward gender affirming resources, while acknowledging that different perspectives are strongly supported by others in the UK and around the world.

However, because students experiencing gender discomfort or dysphoria can be vulnerable, we seek to fully understand the child's voice through an assessment of need to evaluate their wellbeing and safety. We may seek advice from local authorities through a 'no-name' consultation. If appropriate, we will provide short-term individual counselling to support the student's challenges and concerns. Unless there is a safeguarding concern, we work toward transparency with families about their child's gender identity and in appropriate collaboration with the school community.

17.2.3. LGBTQ+ inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse.

17.3. Boarding Students

ACS acknowledges that boarding students can be particularly vulnerable to abuse within residential schools and where boarding operations are undertaken (ACS Cobham) additional procedures are in place to safeguard these children. A Boarding DSL is trained to meet the specific needs of boarders and boarding staff outside of school hours. A Trustee is nominated to monitor boarding and reports regularly to the wider Board of Trustees on boarding matters assisted by the Assistant Head of Wellbeing, Mrs Sara Thomas.

17.4. Early Childhood Students

The ACS Safeguarding & Child Protection policy applies to the Early Childhood divisions of all ACS schools. Each campus will designate a practitioner to take lead responsibility for safeguarding children within the Early Childhood division and liaising with the appropriate ACS and external personnel. ACS will inform the appropriate government inspection authorities of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises as soon as practicable and within 14 days at the latest.

18. Mobile Devices and Photography

18.1. ACS recognises the ubiquity of mobile phones and similar mobile devices and acknowledges such devices have a place in educational environments, especially where landline access is difficult and during outdoor learning activities and external visits. ACS acknowledges that such devices can sometimes be the most convenient or the only means of contact available to staff during the school day and can be helpful in ensuring children are kept safe.

18.2. ACS also recognises that such devices may be misused, and requires staff and community members to abide by the following safeguards:

- Use mobile phones appropriately, and ensure staff have a clear understanding of what constitutes misuse (for example taking personal calls during child supervision time)
- Ensure the use of a mobile phone does not detract from the quality of supervision and care of children
- Ensure all mobile phone use is open to scrutiny
- Ensure staff pay regard to parental requests to exclude their children from class photographs on webpages and other forums that may be used to promote school activities
- Ensure visitors to the school obtain permission from admissions staff, administration or the classroom teacher before taking photographs
- Ensure the use of mobile phones on outings is included in risk assessments
- Ensure mobile phone content (for example personal telephone numbers) is kept secure
- Abide by the terms of the ACS Acceptable Use Policy.

18.3. ACS recognises that those in charge of children will sometimes need to use cameras and video in their daily practice. ACS acknowledges that although most people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons, some people abuse children through taking or using images. ACS commits to the following safeguards regarding photography, video and all image capturing technology:

- The school obtains parents' and carers' consent for photographs to be taken or published (for example, on the school website or in newspapers or publications)
- The school will never combine a child's full name with his or her image in any external publications
- The school will ensure that children in photographs, video and images are appropriately dressed, and the child's dignity is always promoted
- The school will ensure that photographs, video and images of children are transmitted securely
- The school will ensure that where official photographs are taken for school publicity purposes, the school's own equipment is used
- The school will ensure that all cameras used for official photographs of the children for publicity and similar purposes are open to scrutiny
- In EYFS settings (grades Pre-K and below) personal portable electronic equipment with imaging and sharing capabilities should not be seen or used unless there are exceptional circumstances approved by the divisional principal. Further information on the use of personal portable electronic equipment with imaging and sharing capabilities in EYFS settings is provided in the divisional handbook.

19. Safety/Cybercrime

19.1. ACS has an Online Safety Policy to protect and educate students, and staff and other community stakeholders in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. Further guidance and expectations on the use of mobile and smart technology is contained within the ACS Acceptable Use Policy.

19.2. The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk, content, contact, conduct and commerce. Children are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated. ACS will follow the DfE guidance Harmful online challenges and online hoaxes when supporting children and sharing information with parents/carers when relevant concerns arise.

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

20. Racist Incidents

Our commitment to managing racist incidents is contained within the ACS Behaviour Policy and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under Child Protection procedures. A record of racist incidents is maintained each school and reviewed by Leadership Team and Trustee Board.

21. Children Absent from Education and Pupils Missing Out on Education (PMOOE)

21.1. All children are entitled to an efficient, full-time education which is suitable to their age, ability, aptitude, and any SEN/D they may have. ACS recognises that when children are absent from education, this can be a vital warning sign of a range of safeguarding risks. They are also at significant risk of underachieving, being victims of abuse and harm, exploitation, radicalisation, and not being in education, employment, or training (NEET) later in life.

21.2. The school will hold more than one emergency contact number for each child.

21.3. The school will ensure that there is a complete, accurate, and up-to-date record of joiners and leavers as defined in The Education (Pupil Registration) (England) 2006 (amended 2016).

21.4. When removing a child's name, the school will notify the relevant local authority of: (a) the full name of the child, (b) the full name and address of any parent with whom the child normally resides, (c) at least one telephone number of the parent, (d) the child's future address and destination school, if applicable, and (e) the ground in regulation 8 under which the child's name is to be removed from the school register. The school will make reasonable enquiries to establish the whereabouts of a child jointly with the Local Authority, before deleting the child's name from the school register if the deletion is under regulation 8(1), sub-paragraphs (f) (iii) and (h) (iii)of The Education (Pupil Registration) (England) 2006 (amended 2016).

21.5. ACS Schools will:

- Enter children on the admissions register on the first day on which the school has agreed, or has been notified, that the child will attend the school

- Notify the relevant Local Authority within five days of adding a child's name to the admission register. The notification must include all the details contained in the admission register for the new child
- Monitor each child's attendance through their daily register and follow the relevant Local Authority procedure in cases of unauthorised absence
- Remove a child's name from the admissions register on the date that the child leaves the school
- The school will notify the relevant Local Authority when they are about to remove a child's name from the school register under any of the grounds listed in the regulations, no later than the date that the child's name is due to be removed.

21.6. Where parents/carers notify the school, in writing, of their intention to Electively Home Educate (EHE) the school will forward a copy of the letter to the Local Authority Inclusion Team. Where parents/carers orally indicate that they intend to withdraw their child to EHE and no letter has been received, the school will not remove the child from roll and will notify the Inclusion Team at the earliest opportunity.

21.7. Most children engage positively with school and attend regularly. However, to flourish, some children may require a modified timetable to support a return to full time education provision. It is recognised that children on a reduced/modified timetable may have additional vulnerabilities. When children are not accessing their education in a school in the 'usual way' this is categorised as PMOOE. In such cases, ACS will seek to work with parents/carers to put in place a short term reduced or modified timetable.

21.8. ACS will ensure that parents/carers (and the Local Authority if the child has an Education Health Care Plan (EHCP) are given clear information about alternative provision placements and reduced/modified timetables: why, when, where, and how they will be reviewed.

21.9. ACS will keep the placement and timetable under review and involve parents/carers in the review. Reviews will be frequent enough to provide assurance that the modified timetable is achieving its objectives, and that the child is benefitting from it. ACS will monitor and track children attending alternative provision to ensure that the provision meets the needs of the child, in recognition that ACS continues to be responsible for the safeguarding of that student. (ACS will obtain written confirmation from any alternative provider or provision that the appropriate safeguarding checks have been carried out on individuals working at the establishment.)

21.10. ACS will comply with the regular data returns requested by the local authority regarding all children of statutory school age, attending alternative provision and/or on a modified/reduced timetable.

21.11. The DSLs will report to Leadership Team and Trustees information regarding the prevalence of the use and effectiveness modified/reduced timetables in the Bi-annual Safeguarding Report. ACS will also report to the Trustees any formal direction of a child to alternative provision to improve behaviour.

22. Attendance and Behaviour

22.1. Additional policies and procedures are in place regarding school attendance and behaviour. ACS recognises that children being absent, particularly repeatedly and/or for prolonged periods and exclusion from may be indicators of abuse and neglect, including the exploitation of children. The DSL will regularly liaise with members of staff with responsibility for behaviour and attendance to ensure risk is identified and appropriate intervention is in place to protect children from harm.

22.2. ACS will work in partnership with local Police and other partners for reporting children that go missing from the school site during the school day. Staff will be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

23. Restrictive Physical Intervention

23.1. ACS expects staff must only ever use physical intervention as a last resort, when a child is at immediate risk of harming themselves or others, and that always it must be the minimal force necessary to prevent injury to another person. A written record of any use of force must be recorded and signed by a witness. These records will be retained in the log of incidents of physical restraint ("Bound and Numbered Book") and copied to MyConcern for student and CONFIDE for staff concerns.

23.2. Staff who are likely to need to use physical intervention due to child's behaviour plan or care plan will be trained by an appropriately accredited training provider (Team Teach). Staff who identify as requiring this training should approach their Principal to arrange this. Each Campus DSL will arrange Positive De-Escalation Training and Crisis Prevention Institute Techniques training for their school. Staff should understand that physical intervention of a nature which causes injury or distress to a child may be considered under Child Protection and/or disciplinary procedures.

23.3. ACS recognises that sometimes touch is appropriate in the context of working with children. To support safe working practice and understand higher risk scenarios staff must sign to acknowledge they have read the ACS Code of Conduct and are provided with additional materials through their DSL which include the ACS Safer Working Practice Handout and the Safer Recruitment Consortium non-statutory document, Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings.

23.4. When applying disciplinary measures such as physical intervention or isolation for children with SEND, ACS will consider the risks, given the additional vulnerabilities of these children.

24. Whistleblowing

24.1. ACS recognises that children cannot be expected to raise concerns in an environment where staff fail to do so. All staff, including temporary staff/substitute staff and volunteers, should be aware of their duty to raise concerns, where they exist, about the management of Safeguarding and Child Protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the school's safeguarding arrangements.

24.2. If it becomes necessary to consult outside of ACS, they should speak in the first instance, to the LADO.

Local Authority Designated Officer for Hillingdon, Hannah Ives, can be contacted on:

- Tel: 01895 250975/07753-431285
- Email: lado@hillingdon.gov.uk

Surrey Duty LADO for Surrey (ACS Cobham and Egham)

- Tel: 0300 123 1650 (option 3)
- Email LADO@surreycc.gov.uk

24.3. ACS Whistleblowing Policy is available from the school office. If ACS staff feel that it is inappropriate to raise a concern to their line manager, DSL, or Head of School, then ACS has a dedicated email address - whistleblowing@acs-schools.com. The Chief Executive and the HR Director will receive emails sent to this address. In the event that the concern relates to the conduct of the Chief Executive or HR Director, staff should contact the Chair of the ACS Board at email address – chair@acs-schools.com.

25. Links with other ACS school policies:

Anti-Bullying Policy
Attendance and Continuing Enrolment Policy
Administration of Medicines
Supporting Students with Medical Conditions
Guidance for Managing Allegations
Behaviour Policy
Child on Child Abuse Prevention and Response
Complaints Policy
Curriculum Policy
DBS Policy (and Volunteer Policy)
Diversity, Equity, and Inclusion Charter
Exclusion Policy
Hosting Policy
Online Safety Policy
Health & Safety Policy
Lettings Policy
Low Level Concerns Policy (Draft Consultation)
PSHE Policy
R(S) HE Policy
Recruitment Policy
Risk Assessment Policy
School Trips Policy
Student Mental Health Policy
Staff Code of Conduct
Whistleblowing Policy

Appendix One

Key Personnel for all ACS Schools

Nominated Safeguarding Trustee is Martha Whitmore Contact details: safeguardingtrustee@acs-schools.com
Chair, Board of Trustees is Bob Macnaughton Contact details: bmacnaughton@acs-schools.com
Chief Executive is Tim Cagney Contact details: tcagney@acs-schools.com
Group Designated Safeguarding Lead is Melanie Nicholls Contact details: mnicholls@acs-schools.com, 07860 272953

Key Personnel

ACS Cobham

Designated Safeguarding Lead (DSL) Melanie Nicholls	mnicholls@acs-schools.com 07860 272953
Designated Safeguarding Lead (DSL) Derya Ibrahim	dibrahim@acs-schools.com

Deputy DSLs

Anne Ferrara	aferrara@acs-schools.com
Shannon Walters	swalters@acs-schools.com
Bev Bloem	bbloem@acs-schools.com
John Radford	jradford2@acs-schools.com
Naomi Vibrati	nvibrati@acs-schools.com
Anneke Theron	atheron@acs-schools.com
Jade Radford	jradford@acs-schools.com
Sara Thomas (Boarding)	sthomas2@acs-schools.com

Head of School

Robert Crowther	rcrowther@acs-schools.com

Key Personnel

ACS Egham

Designated Safeguarding Lead (DSL) Luke Sullivan	lsullivan@acs-schools.com

Deputy DSLs

Debbie Stanton	dstanton@acs-schools.com
Savita Choudhary	schoudhary@acs-schools.com

Head of School

Mark Wilson	mwilson@acs-schools.com

ACS Hillingdon

Designated Safeguarding Lead (DSL) Jean Glover jglover@acs-schools.com
07522 945676

Deputy DSLs

Eileen Keane	ekeane@acs-schools.com
Bernadette Richards	brichards@acs-schools.com
Maryanne Amenhar	mamenhar@acs-schools.com
Matt Keyte	mkeyte@acs-schools.com
Karen Axam	kaxam@acs-schools.com
Chris Thurston	cthurston@acs-schools.com)
Anette Hambi	ahambi@acs-schools.com)
Catherine Sheehan	csheehan@acs-schools.com

Head of School

Martin Hall	mhall@acs-schools.com

Appendix Two - Additional Safeguarding Concerns

Radicalisation, Extremism and Terrorism

The Prevent Duty for England and Wales (2023) under section 26 of the Counter Terrorism and Security Act 2015 places a duty on education and other children's services to have due regard to the need to prevent people from being drawn into terrorism. Extremism is defined as 'the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces'. Radicalisation refers to 'the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups'.

Terrorism is 'an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes with an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.' ACS schools are committed to 'Reducing Permissive Environments' to tackle the ideological causes of terrorism, building resilience through the curriculum and having effective IT and visiting speaker policies to reduce exposure to radicalising influences.

Some children are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal or dangerous. This can happen both online and offline.
ACS is clear that exploitation of vulnerable children and radicalisation should be viewed as a Safeguarding concern and follows the DfE guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism.

It is possible to protect people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff are alert to changes in children's behaviour, which could indicate that they may need help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the DSL making a Prevent Referral. The DSL should report concerns that a child may be at risk of radicalisation or involvement in terrorism, using the relevant local authority Prevent Referral Form.

If the matter is urgent, then Police must be contacted by dialling 999. In cases where further advice from the Police is sought dial 101. There is a dedicated telephone helpline 0800 0113764 for staff to raise concerns around Prevent and staff should approach the DSL immediately if they are concerned about a child being at risk of radicalisation.
All staff receive training to help identify early signs of radicalisation and extremism. Opportunities are provided in the curriculum to enable children to discuss issues of religion, ethnicity and culture and the school follows the Promoting fundamental British values through SMSC.

The Schools' Leadership Team and Trustees, along with the DSLs will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessments are informed by Counter Terrorism Local Profile (CTLP). Risk assessments include due diligence checks for external speakers and private hire of facilities, anti-bullying policy and other issues specific to the profile of ACS and each of its schools, community, and philosophy.

DSLs are aware and refer to the guidance Managing Risk of Radicalisation in your Education Setting

Domestic Abuse

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

Domestic Abuse Act received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

ACS UK schools are enrolled onto the Operation Encompass scheme. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the DSL in the school before the child or children arrive at the school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs.

Homelessness

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

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

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

CSE is a form of child sexual abuse. CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can

legally consent to have sex. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.
Any concerns that a child is being or is at risk of being sexually exploited should be passed immediately to the DSL.

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

All staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. All staff, but especially the DSL will consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

In all cases if the DSL identifies any level of concern the DSL should contact the appropriate C-SPA/MASH and if a child is in immediate danger the Police should be called on 999.
The school is aware that often a child is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. As a consequence, the child may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse. Children also rarely self-report CSE so staff must be particularly vigilant to potential indicators of risk.

The school includes the risks of sexual exploitation in the PSHE and RSE curriculum.
Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, shoplifting, or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. Children are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt.
Any concerns that a child is being or is at risk of being criminally exploited must be passed without delay to the DSL. The DSL will then contact the C-SPA/MASH and if there is concern about a child’s immediate safety, the Police will be contacted on 999.
ACS is aware there is a clear link between regular non-attendance at school and exploitation. Staff will consider a child to be at potential risk in the case of regular non-attendance at school and the DSL will make reasonable enquiries with the child and parents/carers to assess this risk.

<u>Serious Violence</u>

There are a number of indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include:

- increased absence from the school
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance

- signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries
- Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

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

Female Genital Mutilation (FGM)

FGM is illegal in England and Wales under the FGM Act (2003). It is a form of child abuse and violence against women. A mandatory reporting duty, requires teachers to report directly and immediately to the Police 101 where they are either:

- Are informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for the purposes connected with labour or birth.

The duty applies to all persons who are employed or engaged to carry out 'teaching work' whether or not they have qualified teacher status.

The duty applies to the individual who becomes aware of the case to make a report. It should not be transferred to the DSL; however, the DSL should be informed.
School staff are trained to be aware of risk indicators of FGM. Concerns about FGM outside of the mandatory reporting duty should be reported using the ACS Safeguarding and Child Protection procedures. Staff should be particularly alert to suspicions or concerns expressed by female children.

There should also be consideration of potential risk to other girls in the family and the wider community. Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the Police by calling 999.

There are no circumstances in which a member of staff should examine a girl for FGM.

Forced Marriage

A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual, and emotional pressure. It may also involve physical or sexual violence and abuse.

Forced marriage is recognised in the UK as a form of violence against women and men, domestic/child abuse, and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014. In addition, since February 2023, it is also a crime to cause a child to marry before their eighteenth birthday, even if violence, threats, or another form of coercion are not used. This applies to non-binding, unofficial 'marriages' as well as legal marriages.

A forced marriage is not the same as an arranged marriage which is common in many cultures. The families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses. ACS staff should never attempt to intervene directly as a school or through a third party. Immediate contact should be made with the C-SPA/MASH by the DSL and/or the Forced Marriage Unit 020 7008 0151.

So-called 'Honour'-based abuse (HBA)

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

- become involved with a boyfriend or girlfriend from a different culture or religion
- want to get out of an arranged marriage
- want to get out of a forced marriage
- wear clothes or take part in activities that might not be considered traditional within a particular culture.

It is considered a violation of human rights and can be a form of domestic and/or sexual abuse.

One Chance Rule

ACS staff are aware of the 'One Chance' Rule' in relation to forced marriage, FGM and HBA. Staff recognise they may only have one chance' to speak to a child who is a potential victim and have just one chance to save a life. Staff are aware that if the victim is not offered support following disclosure that the 'One Chance' opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBA cases and must follow the reporting expectations as outlined in sections 38 and 39.

Modern Slavery

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Private Fostering Arrangements

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 years old or 18 years old if the child is disabled. Looked After Children by the local authority or those who are placed in residential settings, children's homes or hospitals are not considered to be privately fostered.
Private fostering occurs in all cultures and children may be privately fostered at any age. The school recognises that most privately fostered children remain safe and well but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the child has been trafficked into the country.

By law, a parent, private foster carer, or other persons involved in making a private fostering arrangement must notify Children's Social Care immediately. However, where a member of ACS staff becomes aware that a child may be in a private fostering arrangement, they must raise this with the DSL and the DSL will notify the C-SPA/MASH immediately.

Looked After Children and Previously Looked After Children

The most common reason for children becoming looked after is because of abuse and/or neglect. Appropriate staff have information about a Child's Looked After legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child and contact arrangements with birth parents or those with parental responsibility. A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group. When there is a Looked After Child enrolled, the Designated Teacher and Safeguarding Trustee (for Looked After Children) will have the appropriate level of training to equip them with the knowledge and skills to undertake their role. The Designated Teacher will work with Head of Virtual School for both Looked After Children and Previously Looked After Children.

Appendix Three - Types of Abuse and Neglect

- Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child
- Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone
- Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children
- Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs
- ACS recognises it is a common misconception that children who grow up in affluent families do not experience adversity and neglect. ACS acknowledge children who, for one reason or another, have experienced neglect and harm despite being from otherwise affluent families. In considering affluent neglect staff should be vigilant to concerns that relate to children experiencing:
    - Emotional disconnection: Parents may work long hours, leaving children in the care of paid carers which can (though not always) leave children feeling lonely, with their emotional needs unfulfilled by their parents
    - Pressure to succeed: Parents putting a high pressure on their children to succeed academically, which can sometimes lead to psychological and emotional problems for children

- Parental alcohol and substance abuse: There may be a more relaxed attitude to parties, sex and socialising, with older children more readily having exposure or the means to buy drugs and alcohol
- Domestic abuse: Whilst violence may not be obvious, coercive control is a common feature in relationships where safeguarding issues have come to light during times of family separation or divorce, highlighted by court ordered assessments.
-

DSLs are familiar with the guidance provided by Farrer & Co, Handling Cases of Affluent Neglect in Schools.

It is also important to consider is that power and wealth can provide the means to hide issues. For example, healthcare may be delivered by private specialists which does not always allow for easy sharing of information when safeguarding issues do come to light, resulting in a poor multi-agency response.

ACS DSLs will refer to the Surrey Neglect Risk Assessment Tool to support with the initial identification of neglect.

Further information on indicators of abuse can be accessed via NSPCC.

Appendix Four - KCSIE, 2023, 458 – 461, Sexual Violence and Harassment

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

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

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

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

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

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

What is consent?

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

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

Further information about consent can be found here: Rape Crisis England & Wales - Sexual consent.

Sexual harassment

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

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

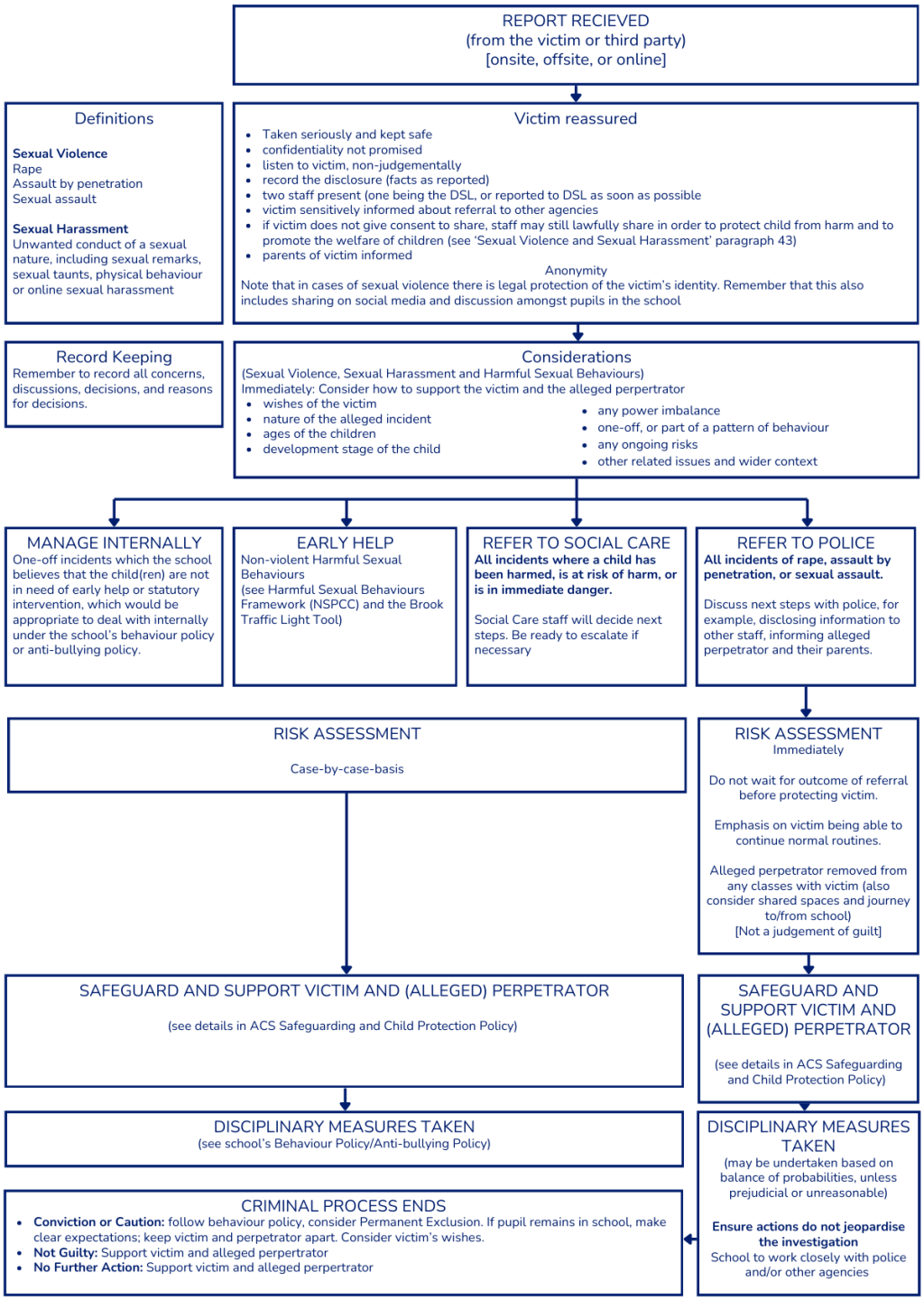
- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- sexual “jokes” or taunting
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes. Schools should be considering when any of this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim
- displaying pictures, photos or drawings of a sexual nature
- upskirting (this is a criminal offence), and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
    - consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of U18s is a criminal offence. Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK (www.gov.uk)
    - sharing of unwanted explicit content
    - sexualised online bullying
    - unwanted sexual comments and messages, including, on social media
    - sexual exploitation; coercion and threats, and
    - coercing others into sharing images of themselves or performing acts they are not comfortable with online.

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

Appendix Five - Responding to Reports of Child-on-Child abuse.

ACS INTERNATIONAL SCHOOLS

RESPONDING TO REPORTS



Appendix Six - Additional Resources

Surrey Safeguarding Children Partnership webpages
Surrey Education Services (surreycc.gov.uk) – Education Safeguarding Resources Hub
Hillingdon Safeguarding Children Partnership
NSPCC | The UK children's charity | NSPCC
CEOP ThinkuKnow webpages
Anti-Bullying Alliance webpages
Childnet International
Safer Internet Centre webpages
Contextual Safeguarding Network webpages
Lucy Faithfull Foundation webpages
Anna Freud webpages
What to do if you are worried a child is being abused
Handling Cases of Affluent Neglect in Schools