



Children Protection and Safeguarding Policy

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Staff member responsible:	Adam Terrell
Role:	Deputy Head (Pastoral)
Revised On:	Sept 2025
Ratified by governing board:	18th December 2025
Review Due:	Sept 2026

FREWEN COLLEGE SCHOOL SAFEGUARDING AND CHILD PROTECTION POLICY

Frewen College fully recognises its responsibilities for safeguarding and child protection

We have a whole school approach to safeguarding, which is the golden thread that runs throughout every aspect of Frewen College.
Our fundamental priority is our children and their wellbeing; this is first and foremost.

Policy agreed:	September 2025
Policy published (including on website):	September 2025
Next review:	September 2026
Policy Owner:	Adam Terrell - Designated Safeguarding Lead (DSL) and Designated Teacher for Looked After Children

Key Safeguarding Personnel			
Role	Name	Telephone	Email
Headmaster	Mr Mark Loveday	01797 252494	Headmaster@frewencollege.co.uk
Deputy Head (Pastoral) Designated Safeguarding Lead (DSL) – Designated Teacher for Looked after Children and Prevent Lead	Mr Adam Terrell	01797 254103	Adam.terrell@frewencollege.co.uk DSL@Frewencollege.co.uk (Team email)
Deputy Head (Academic)	Mrs Hazel McCalvey	01797 252494	Hazel.mccalvey@frewencollege.co.uk
Deputy Designated Safeguarding Lead (DDSL) – Head of Boarding	Miss Hannah Lewis	01797 252494	Hannah.lewis@frewencollege.co.uk DSL@Frewencollege.co.uk (Team email)

The				key
Deputy Designated Safeguarding Lead (DDSL) -	Mrs Jemma Holt	01797 252494	DSL@Frewencollege.co.uk (Team email)	
Deputy Designated Safeguarding Lead (DDSL) - Head of Key Stage 3	Ms. Rachael Taylor-Wade	01797 252494	DSL@Frewencollege.co.uk (Team email)	
Deputy Designated Safeguarding Lead (DDSL) – Head of Key Stage 4	Mrs Claire Jackson	01797 252494	DSL@Frewencollege.co.uk (Team email)	
Designated Governor for Safeguarding and Prevent Duties	Mrs Heather Miller		Office@frewencollege.co.uk	
Chair of Governors	Mr John Stevenson		CHgov@frewencollege.co.uk	

safeguarding responsibilities within each of the roles above are set out in Keeping Children Safe in Education (2025)

If you believe a child has suffered or is likely to suffer significant harm, Children’s Social Care must be contacted immediately:

Children’s Social Care referrals:

Single Point of Advice (SPoA): Mon-Thurs 8:30am-5pm and Fri 8:30am-4:30pm. Contacting the Single Point of Advice (SPoA):
Telephone: 01323 464222 Email: 0-19.SPOA@eastsussex.gov.uk

For a serious concern about a child that cannot wait until the next working day please contact the Emergency Duty Service:

- Out of Hours Social Care Service – Children’s services: 01273 335905/6
- Out of Hours Social Care Service Adult Services: 01323 636399

Contacting the East Sussex Local Authority Designated Officer (LADO) – Allegations about adults who work with children:

Telephone Number: 01273 481544 [Referral Form](#) Email: ESSCP.Contact@eastsussex.gov.uk Out of hours: **01273 335 906**

If you believe a child is at immediate risk of significant harm or injury, you must call the emergency services on 999.

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For the information of the whole school community (employees, visitors, pupils, Governors), Appendix 3 of this policy includes the main responsibilities of the DSL, D/DSL, Headmaster and Board of Governors.

Introduction

Frewen College is committed to safeguarding and promoting the welfare of children. We will fulfil our local and national responsibilities as laid out in the following key documents:

- Working Together to Safeguard Children (2023)
- Keeping Children Safe in Education (2025)
- The procedures of the Safeguarding Vulnerable People Partnership (formerly WSCB)
- Information sharing – Advice for practitioners providing safeguarding services to children, young people, parents and carers (2024)

The aim of this policy is to ensure:

- all our pupils are safe and protected from harm.
- safeguarding procedures are in place to help pupils to feel safe and learn to stay safe.
- adults in Frewen College community are aware of the expected behaviours and Frewen College's legal responsibilities in relation to safeguarding and child protection

Scope

Safeguarding children is defined as:

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

The term 'safeguarding children' covers a range of measures including child protection procedures. It encompasses a whole-school preventative approach to keeping children safe, including online, that incorporates pupil health and safety; school behaviour management and preventing child-on-child abuse; supporting pupils with medical conditions; Relationships, Sex and Health (RSHE) education and Personal, Social, Health and Economic (PSHE) education; providing first aid and site security.

Consequently, this policy is consistent with all other policies adopted by the Board of Governors and should be read alongside the following policies relevant to the safety and welfare of our pupils:

- Relationships, Sex and Health Education/ PSHE
- Online safety policy
- Behaviour policy, incl. pupil use of mobile and smart technology
- Whistleblowing policy
- Complaints policy
- SEND policy
- Filtering and Monitoring policy
- Safer Recruitment policy
- Reasonable use of force policy
- Health and safety policy
- Use of Devices in the Classroom Policy
- Low level concerns
- E-safety policy
- Equal opportunities policy
- Mental Health and Wellbeing policy
- Missing Child policy
- Attendance and registration policy
- Recruitment, Selection and Disclosure policy
- Teaching and Learning policy
- Equality Statement
- Administration of medicines
- Staff Behaviour policy
- Anti-Bullying policy
- Sharing of Nudes and Semi-nudes policy
- Prevent policy

Frewen College is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. It is our aim that all students fulfil their potential.

This policy applies to all staff in our school. For the purposes of this policy:

- **Staff** refers to all those working for or on behalf of Frewen College, full-time or part-time, in a paid or regular voluntary capacity.
- **A volunteer** is a person who performs any activity that involves spending time, unpaid in school (except for approved expenses).
- **Parent** refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.
- **Child** refers to all children on Frewen College roll and any child under the age of 18 who comes into contact with Frewen College. This includes unborn babies.

Any safeguarding concerns or disclosures of abuse relation to a child at school, outside of school and online are within the scope of this policy.

Expectations

All staff are:

- familiar with this safeguarding policy and have an opportunity to contribute to its review.
- alert to signs and indicators of possible abuse and wider safeguarding issues.
- aware of the importance of professional curiosity.
- able to record and report concerns as set out in this policy.
- able to deal with a disclosure of abuse from a child.
- involved in the implementation of individual education programmes, integrated support plans, child in need plans and interagency child protection plans as required.

In addition, all staff have read and understood Part 1 or Annex A of the latest version of Keeping Children Safe in Education (KCSIE 2025). School leaders and staff who work directly with children have also read Annex B and Part 5.

The Board of Governors

As the key strategic decision makers and vision setters for the school, the Governors will make sure that our policies and procedures are in line with national and local safeguarding requirements. They will work with the senior leaders to make sure the following safeguarding essentials are in place:

Training/ Teaching	Policy/ Procedures	Key safeguarding roles
<ul style="list-style-type: none"> • Whole school approach to broad and balance curriculum embedding safeguarding teaching. • D/DSL training • Designated teacher training • KCSIE Part 1 or Annex A (and Annex B and Part 5 for staff working directly with children) • Staff training, including regular safeguarding updates • Children taught about keeping safe online • Online safety training for staff • Preventing radicalisation • Teaching staff confidence to deliver RSHE/ PSHE to all pupils • Annual review of online safety arrangements • Nominated governor for safeguarding will ensure training is updated every 2 years 	<ul style="list-style-type: none"> • Child-on-child abuse • Pupil voice • Online safety • Whistleblowing • Staff Behaviour Policy (for safer working practice), incl. low-level concerns about staff conduct • Early help • Mental health • Multi-agency working • Children who are absent and/or missing from education • Children with SEND and a physical health issue • Reporting abuse, incl. dealing with a child at immediate risk/ Safeguarding Vulnerable People Partnership (SVPP) procedures • Honour based abuse (HBA) • Female genital mutilation (FGM) • Behaviour policy 	<ul style="list-style-type: none"> • Designated Safeguarding Lead (DSL) who is a senior member of the leadership team. • Deputy Designated Safeguarding Leads (DDSLs) • Designated teacher for looked after children (even if there are none on roll) • Senior mental health lead • Pastoral and well-being staff • Nominated governor for whistleblowing • Nominated governor for filtering and monitoring & online safety. • Filtering and monitoring & online safety lead. • Nominated Governor for attendance • Senior attendance champion (DSL)

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	<ul style="list-style-type: none"> • Relationships, Sex and Health Education (RSHE) policy • Staff contribution to policy • Safeguarding policy review 	
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The Governors also ensure the School has an appropriate filtering system which is monitored and relevant actions taken, and that the leadership team (including the Headmaster and DSL) and all staff have an awareness and understanding of the provisions in place, manage them effectively and know how to escalate concerns when identified, as set out in KCSiE 2025.

Concerns and allegations management: The Governors are responsible for liaising with the Local Authority Designated Officer for Allegations (LADO) and other partner agencies in the event of an allegation of abuse being made against the Headmaster. See also 'Managing concerns and allegations against staff'.

Audit: The designated member of the Board of Governors for safeguarding collaborates with the Headmaster and the D/DSL to complete an annual safeguarding audit return to the local authority.

Safer recruitment: Our Governors monitor Frewen College's safer recruitment practice, in line with the requirements in KCSiE 2025, including scrutiny around the DSL and / or Headmaster monitoring of the Single Central Record (SCR).

Monitoring and review

The Headmaster ensures that the policies and procedures, adopted by the governing body (particularly those concerning referrals of cases of suspected abuse and neglect), are understood, and followed by all staff and should be easily understood by staff, children and parents, by re-visiting regularly.

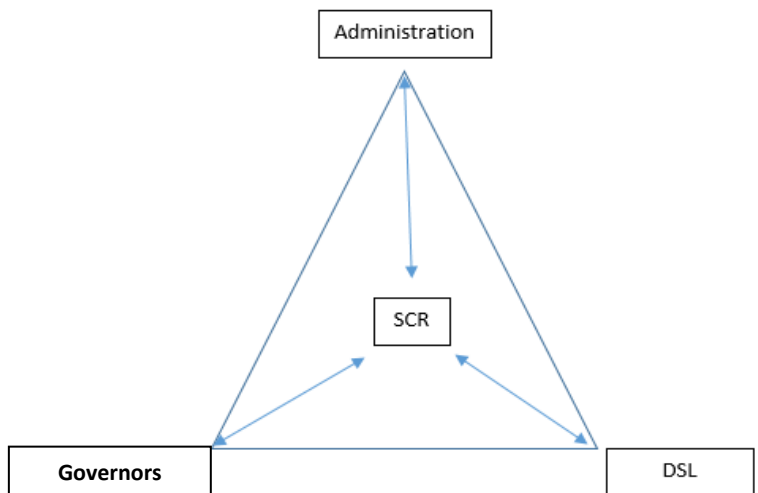
The Headmaster reports at least three times per year to the Chair of Governors around the effectiveness of the school's safeguarding procedures, and in particular, child-on-child incidents, including all aspects of trend analysis. The school's approach to online safety and filtering and monitoring is reviewed annually as a minimum.

Safeguarding is an agenda item for every senior leadership team and Board of Governors meeting. The Headmaster ensures that safeguarding is an agenda item for every senior leadership team (SLT) and every staff meeting. This policy is reviewed annually or earlier as required by changes to legislation or statutory guidance. The nominated Governor meets the DSL every half term (six times a year) to monitor the effectiveness of this policy.

Mandatory procedures – Staff and adults in College

Safer recruitment, selection, disclosure policy and procedures inclusive of the single central record (SCR) for staff appointments:

Please refer to our Safer Recruitment Policy for safer recruitment processes and checks, and we follow the guidance set out in Part 3 of KCSiE (currently in force). We scrutinise all applications for paid or voluntary posts. We undertake interviews and make appropriate checks through the Disclosure and Barring Service (DBS). We maintain a single central record (SCR) of the essential checks as set out in KCSiE (2025), that have been carried out and certificates obtained and the details of these checks are recorded in the SCR. The SCR applies to: all staff (including supply staff and teacher trainees on salaried routes) who work at the school; the Board of Governors alongside volunteers. Before starting work, the details of these checks are recorded and shortlisted candidates are informed by the school that online searches are carried out as part of due diligence checks.



Through risk assessments, the school appropriately checks staff of other organisations working with our pupils on external trips, including adults who supervise pupils on work experience. In any case where the required documentation is unavailable or checks have failed, Frewen College is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. It is our aim that all students fulfil their potential.

not been completed prior to the starting date for any member of staff or other adult who may have access to pupils, then a risk assessment will be carried out to determine the appropriate course of action, e.g. allowing appropriately supervised access for a specified period or postponing the starting date. Assurances are sought for contractors who are required on site, including identification checks on arrival. Appropriate vetting checks are carried out by Frewen College for self-employed individuals.

Visitors and visiting speakers: All visitors complete a signing in/out process, wear a school ID badge and lanyard and are provided with key safeguarding information including the contact details of safeguarding personnel in school. This is provided as a leaflet and given to them on arrival to the school site. Scheduled visitors in a professional role (e.g. fire officer, police, NSPCC staff) are asked to provide evidence of their role and employment details (usually an identity badge) upon arrival at school. Careful consideration is given to the suitability of any external organisations. School completes an assessment of the education value, and the age appropriateness of what is going to be delivered by the scheduled visitor prior to booking a visit.

If the visit is unscheduled and the visitor is unknown to the school, we will contact the relevant organisation to verify the individual's identity if necessary. Additionally, a risk assessment will be carried out. Unidentified visitors will be challenged by staff or reported to the Headmaster. The *Prevent* statutory guidance requires schools to set out clear protocols for ensuring that any visiting speakers who may fall within the scope of the *Prevent* duty, whether invited by staff or by the pupils themselves, are suitable and appropriately supervised; this will include a barred list check and internet search if appropriate. At Frewen College, speakers are never left alone with pupils. The interaction between the *Prevent* requirement to check speakers and KCSIE (DfE: 2025) is likely to mean in practice that checks on visiting speakers will be recordable on the SCR either as checks on staff or un-prescribed checks on volunteers. In accordance with the ISSR, checks are recorded in the SCR by reference to the usual considerations such as role, frequency, supervision, payment and employment by another organisation.

Site safety: Risk assessments are undertaken and maintained in accordance with the school's health and safety policy. The school ensures that when our premises are hired or rented to other organisations (ASC, evening and weekend clubs) including shared site providers who work with children, those organisations adhere to the guidance for out-of-school settings.

Off-site visits and exchange visits: We carry out a risk assessment prior to any off-site visit and designate the specific roles and responsibilities of each adults, whether employed or volunteers. We seek written assurances from any alternative provision provider that appropriate safer recruitment checks have been completed, and safeguarding policy & procedures are in place. A site visit is also completed by DSL and/or SENCO.

Where there are safeguarding concerns or allegations that happen offsite, staff will follow the procedures described above and in the safeguarding flowcharts as appropriate. A copy of the flowcharts is taken on off-site visits for reference.

Any adult over 18 in a host family will be subject to DBS checks. We work with partner schools abroad to ensure that similar assurances are undertaken prior to any overseas visit by our pupils.

See also the training requirements, schedule and record of training.

Staff behaviour policy (for safer working practice): Frewen College is committed to positive academic, social and emotional outcomes for our pupils underpinned by a strong safeguarding ethos. We are equally committed to the protection and welfare of our staff, who are expected to adhere to the highest standards of professional behaviour.

The Staff Behaviour Policy sets out staff behaviours that should be avoided as well as those that constitute safe practice and supports our commitment to safeguarding children. Teaching staff are additionally expected to act within the guidance of the 'personal and professional conduct' section of the Teacher's Standards.

Identifying the signs: All staff know how to recognise and are alert to the signs of neglect, abuse, exploitation, and wider safeguarding issues, including but not limited to child-on-child sexual violence and harassment, child-on-child abuse, 'all' risks of harm outside of the home and within the local area including online. Definitions of abuse, set out in 'What to do if you're worried a child is being abused – Advice for practitioners' (2015), 'Keeping Children Safe in Education' (2025) along with notes from safeguarding training, are important reference documents for all staff. Every member of staff is provided with a copy of Part 1 or Annex A of KCSiE which they are required to read, and which also includes supporting guidance about several specific safeguarding issues. Staff who work directly with children are also required to read Annex B and Part 5 of KCSiE (2025).

Responding to concerns/disclosures of abuse: Staff adhere to the organisation's safeguarding training requirements when concerned about abuse or when responding to a disclosure of abuse. Staff understand that they must NOT:

- take photographs of any injuries.
- postpone or delay the opportunity for the child to talk.
- take notes while the child is speaking or ask the child to write an account.
- try to investigate the allegation.
- promise confidentiality e.g. say they will keep 'the secret'.
- approach or inform the alleged abuser.

When a child discloses an allegation or concern, all staff should:

- listen carefully.
- avoid asking leading questions.
- observe their behaviour.
- reassure the individual that the allegation/complaint will be taken seriously and that they will be supported and kept safe
- ensure that the individual is not made to feel ashamed for making the report or given the impression that they are creating a problem by making the report.
- be aware that the individual may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful. Staff should exercise professional curiosity and speak to the DSL if they have concerns
- determine how best to build trusted relationships with children and young people which facilitate communication

Pupils are able to raise a concern with any member of the school staff. This is shared with pupils annually at a safeguarding assembly led by the DSL. Form tutors revisit this half-termly with their form groups. It is our expectation that tutors will build positive and trusting relationships with their classes and that tutors will act as co-ordinators between school and home, with the support of the DSL team where necessary.

All staff must record any concern about or disclosure by a pupil of abuse or neglect and report this to the D/DSL using the standard form. It is the responsibility of each adult in school to ensure that the D/DSL receives the record of concern without delay. In the absence of the D/DSL, staff members know to speak directly to SPOA. In some circumstances, the D/DSL or member of staff seeks advice by ringing the SPOA for advice.

The D/DSL will liaise with safeguarding partners and work with other agencies in line with Working Together (2018) and will refer to National Police Chief's Council guidance for schools to understand when they should consider calling the police.

The D/DSL will provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

The D/DSL consistently monitors all children with concerns, whether a request for service to the East Sussex SPOA or appropriate Local Authority Children's Services has been made or not.

During term time, the DSL and/or a DDSL is always available during school hours for staff to discuss any safeguarding concerns. The D/DSL provides feedback to any staff who share concern/s.

The voice of the child is central to our safeguarding practice and pupils are encouraged to express and have their views given due weight in all matters affecting them.

The school will consider the lived experience when supporting pupils, in line with the requirements of KCSIE 2025

Online safety: Our Online Safety policy details the actions and behaviour required from students and members of staff at Frewen College in order to maintain a safe electronic environment and is based on current best practice drawn from a wide range of sources. The policy has been developed with regard to paragraphs 134-137 of KCSIE 2025. Within our Online Safety Policy, and in line with our Safeguarding Child Protection Policy, we have clearly defined roles and responsibilities for staff, volunteers, pupils and parents. Important areas within our policy include proficient teaching of students about online safety; educating parents/guardians; acceptable use of social media platforms by staff and students and cyber-bullying.

Frewen College is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. It is our aim that all students fulfil their potential.

As a residential school, we address online safety with the upmost importance and recognise that vigilance in online safety is vital for ensuring successful safeguarding. Therefore, this policy should be read and understood in conjunction with our Online Safety Policy, which is publicly available on the school website and on request from the school office. The internet and technology are increasingly essential tools for learning and socialising, and so our approach to online safety is designed to enable the school to make the most of these hugely valuable resources while preventing the risks associated with them and mitigating negative effects.

We have an effective whole school approach to online safety which empowers us to protect and educate our pupils and staff in their use of technology and establishes mechanisms to identify and intervene where an online safety concern arises. The Senior Leadership Team ensures that pupils are safe from potentially harmful and inappropriate content including terrorist and extremist material when accessing the internet on school devices and school networks through appropriate levels of filtering, internet safety rules and online safety education with the curriculum in line with our Online Safety and Cyberbullying policies.

Staff are aware that technology is a significant component in many safeguarding and wellbeing issues. In many cases abuse will take place concurrently via online channels and in daily life. Pupils understand the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise young people, especially pupils and vulnerable adults. Our DSL takes lead responsibility for filtering and monitoring and Frewen College follows the DfE Filtering and monitoring standards, currently in force. We use Securus (monitoring) and RM SafetyNet (filtering system) on our devices and networks. We also make every effort to meet the Cyber Security Standards set out in KCSIE 2025. **The Headmaster and school Governors are required to understand the filtering and monitoring system, with refresher training provided each year.**

In planning curriculum input in relation to online safety we will ensure materials are differentiated to take account of the different ages, levels of understanding and vulnerabilities of our pupils so that all pupils are enabled to access this input effectively. This includes the rise of harmful online challenges, online hoaxes, **misinformation, disinformation and the rise of Artificial Intelligence (AI)** which the school educates about within our online safety curriculum. The breadth of issues classified within online safety are considerable but can be categorised into **four** areas of risk:

- **CONTENT:** being exposed to illegal, inappropriate or harmful content;
- **CONTACT:** being subjected to harmful online interaction with other users;
- **CONDUCT:** personal online behaviour that increases the likelihood of, or causes harm, such as the sending of explicit images or online bullying;
- **COMMERCE:** risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

Online Safety is a running and interrelated theme which is reflected in our policies and procedures. Children are taught about safeguarding, including online safety. Online safety is considered as part of our whole school safeguarding approach and wider staff training (including at induction) and curriculum planning. A personalised or contextualised approach is taken for more vulnerable children, victims of abuse and some children with SEND.

Frewen College ensures that parents and carers are made aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school or college (if anyone) their child is going to be interacting with online. Parents and carers are offered advice and guidance in support of identifying the risks that may be present to children online, including providing links to current advice and guidance on Internet Safety, social media and online radicalisation risks through [Internet Matters](#) and the National Child Exploitation and Online Protection Command (CEOP) www.ceop.police.uk. Parents are provided links to current advice and guidance on internet safety via the Parent Portal.

Frewen College acknowledges the fact many children have unlimited and unrestricted access to the internet via mobile phone networks, the school will follow its policy on the use of mobile and smart technology in school to safeguard children and will follow child-on-child abuse procedures when mobile phones are used by a child whilst in school to sexually harass their peers via their mobile and smart technology, share indecent images: consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content. The school adheres to the DfE Filtering and Monitoring standards, and the Cyber Security Standards set out in KCSiE (2025). **Our online safety mechanisms are reviewed annually, and staff training includes online safety, as well as filtering and monitoring systems.**

Managing concerns and allegations against staff (including supply teachers, volunteers and contractors, and those from organisations or individuals using Frewen College premises):

Frewen College is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. It is our aim that all students fulfil their potential.

When services or activities at the School are provided under the direct supervision or management of school staff, this Policy will apply in relation to any safeguarding concerns or allegations.

Where services or activities are not under the direct supervision or management of the School, the School will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and the School will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the School on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll. The School will ensure that the DSL or DDSL can be contacted and/or is available at all times the school premises is in use, whether that activity is a school or non-school activity and regardless as to whether the children attending are on the school roll.

Where anyone in the School has a concern about the behaviour of an adult (including online) who works or volunteers at Frewen College, including supply staff and contractors, and those from organisations or individuals using Frewen College premises, they must immediately consult the Headmaster who will refer to the local authority Designated Officer for Allegations (LADO). Frewen College follows the procedure set out by the SVPP 'Allegations against adults' flowchart.

Any concern or allegation against the Headmaster will be reported to the Governors without informing the Headmaster.

All staff must remember that the welfare of a child is paramount and must not delay raising concerns for fear a report could jeopardise their colleague's career. Frewen College promotes an open and transparent culture in which all concerns about adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

Any allegation of abuse will be dealt with in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation.

In addition to the concern/allegation management process, Frewen College's DSL will also refer suspected abuse to the East Sussex SPOA or appropriate Local Authority Children's services as described in 'responding to a concern.'

All members of staff and volunteers have read and signed to confirm they have understood the School's Staff Behaviour Policy (for safer working practice), all supply staff and contractors are made aware of expectations of their behaviour. Concerns and allegations reported relating to supply staff and contractors will be notified to their employers for investigation and potential referral to LADO.

Frewen College will appoint a 'case manager' to lead any investigation where the reported allegation does not meet the allegations threshold to consider a referral to the LADO. This is the headmaster or where the headmaster is the subject of an allegation, the Board of Governors.

Managing low-level concerns about adults: Frewen College operates a 'low-level' concerns policy in accordance with KCSIE. 'Low-level' refers to behaviour that is: inconsistent with expectations set out in the Staff Behaviour Policy, including inappropriate conduct outside of work, and/or does not meet the allegations threshold, or is otherwise not considered serious enough to consider a referral to the LADO.

All low-level concerns will be reported to the Headmaster; low-level concerns about the Headmaster will be reported to the nominated Governor.

Frewen College will:

- ensure all staff are clear about what appropriate behaviour is (as set out in the Staff Handbook), and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others;
- empower staff to share any low-level safeguarding concerns;
- provide a responsive, sensitive and proportionate handling of such concerns when they are raised, for both the child/ren and the adult; and,
- respond to reports of low-level concerns in accordance with our HR conduct procedures by addressing unprofessional behaviour and support the individual to correct it at an early stage. If the concern has been raised via a third party, the Headmaster will collect as much evidence as possible by speaking:
 - directly to the person who raised the concern, unless it has been raised anonymously;

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- to the individual involved and any witnesses.

Reporting low-level concerns helps to create and embed a culture of openness, trust and transparency in which the school's values and expected behaviour are constantly lived, monitored and reinforced by all staff.

Staff are encouraged to self-refer where they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

All low-level concerns will be recorded in writing, retained and reviewed to help recognise any weakness in the school safeguarding system so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

Whistleblowing: In accordance with our whistleblowing policy and procedures all staff and pupils can raise concerns about poor or unsafe practice and potential failures in Frewen College safeguarding regime. Our whistleblowing procedures (including our child-friendly whistleblowing mechanisms), which are also reflected in staff training and our staff behaviour policy, and shared with pupils, are in place for such concerns to be raised with the headmaster. Systems are in place and well promoted so that children can confidently report concerns or abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.

If a staff member feels unable to raise an issue with the headmaster in school as above or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:

- The NSPCC whistleblowing helpline. Staff can call: 0800 028 0285 from 08:00 to 20:00, Monday to Friday, or email help@nspcc.org.uk.
- A member of the governing body

Escalation of concerns: Effective working together depends on an open approach and honest relationships between colleagues and between agencies.

Staff must be confident and able to professionally disagree and challenge decision-making as an entirely legitimate activity; a part of our professional responsibility to promote the best safeguarding practice. Staff are encouraged to press for re-consideration if they believe a decision to act/not act in response to a concern raised about a child is wrong.

If we are on the receiving end of a professional challenge, we see this as an opportunity to reflect on our decision making.

Record keeping and information sharing

The school:

- liaises with partner organisations (alternative provisions, East Sussex Council, other relevant local authorities etc.) to ensure any safeguarding records for learners are shared on transition and within 5 days for an in-year transfer or within the first 5 days of the start of a new term:
 - by the setting/school/organisation previously attended by the child.
 - by our DSL when the child leaves our school.

For any child dual-registered with another school/setting/organisation, the school continues to be responsible for the safeguarding of the placed pupil thus the DSL will regularly liaise with the DSL at that base to ensure information is shared in the child's best interests. This includes contextual safeguarding information about relationships that young people form in their neighbourhoods, schools and online to enable assessment and intervention to happen within these extra-familial contexts.

- keeps clear and comprehensive written records of all pupil safeguarding and child protection concerns using MyConcern, with a body map, including how the concern was followed up and resolved as well as a note of any action taken, decisions reached and the outcome. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program, etc.
- ensures all pupil safeguarding and child protection records are kept securely in a locked location.
- ensures the records incorporate the wishes and views of the pupil.

The D/DSL acts in accordance with Information Sharing – Department for Education (DfE) (May 2024). Information about pupils at risk of harm is shared with members of staff in keeping with the seven golden rules to sharing information in the DfE guidance.

Frewen College is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. It is our aim that all students fulfil their potential.

We are committed to work in partnership with parents and carers. In most situations, we will discuss initial concerns with them. However, the D/DSL will not share information where there are concerns that if so doing would:

- place a child at increased risk of significant harm
- place an adult at increased risk of serious harm
- prejudice the prevention, detection or prosecution of a serious crime
- lead to unjustified delay in making enquiries about allegations of significant harm to a child, or serious harm to an adult.

When we become aware that a child is being privately fostered, we remind the carer/parent of their legal duty to notify East Sussex Children's Social Care. We follow this up by contacting Children's Social Care directly.

Mandatory procedures – Supporting children

A culture of listening to children: We have a whole school approach to listening to children and have systems in place which create an environment where children feel safe to share their concerns and worries and know they will be taken seriously. These systems operate with the best interests of the child at their heart.

Children can safely express their views and give feedback. Frewen College's safeguarding team are clearly identifiable to our pupils. We regularly gather pupil voice via forums and surveys, this data informs our practice and policies.

Curriculum – teaching about safeguarding: Our pupils access a broad and balanced curriculum (age and stage of development appropriate) that promotes their spiritual, moral, cultural, mental and physical development, and prepares them for the opportunities, responsibilities and experiences of life.

We provide opportunities for pupils to develop skills, concepts, attitudes and knowledge that promote their safety, and well-being.

The PSHE and citizenship curriculum, incorporating Relationships, Sex and Health (RSHE) education specifically includes the following objectives:

- Developing pupil self-esteem and communication skills
- Developing strategies for self-protection including online safety
- Developing a sense of the boundaries between appropriate and inappropriate behaviour in adults and within peer relationships (positive relationships and consent)

Examples of topics:

- healthy and respectful relationships
- boundaries and consent
- stereotyping, prejudice and equality
- body confidence and self-esteem
- how to recognise an abusive relationship, including coercive and controlling behaviour
- the concepts of, and laws relating to-sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and FGM, and how to access support, and
- what constitutes sexual harassment and sexual violence and why these are always unacceptable.

Remote learning: If Frewen College is required to change the way provision to children is offered due to exceptional circumstances e.g. during a pandemic lockdown, self-isolation, staff responsibilities to remain alert to the signs and risks of abuse to children will continue to apply. In such circumstances:

The DSL will:

- work closely with social care and partner agencies to support children in these circumstances and to identify children who may be at risk for the first time and/or benefit from additional support.
- use specific local and national guidance about safeguarding in such circumstances to inform practice e.g. UK Safer internet centre guidance, DfE safeguarding and remote education and will ensure staff, children, and families are provided with written:
 - amended DSL arrangements as required (names, location and contact details)
 - temporary changes to procedures for working with children e.g. online.
 - amended procedures for reporting concerns
 - safeguarding training arrangements

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- timescales for such changes so that all children, families and staff understand when such arrangements will end, and arrangements revert to those in place prior to the events leading to the need for the temporary changes.

We will ensure the curriculum we offer during such circumstances, continues to promote learners' spiritual, moral, cultural, mental and physical development.

Early help: At Frewen College, all our staff can identify children who may benefit from early help as a problem emerges and discuss this with the D/DSL. Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

- Is disabled or has certain health conditions and has specific additional needs
- Has special educational needs (whether or not they have a statutory education, health, and care plan)
- Has a mental health need
- Is a young carer
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement as association with organised crime groups or county lines
- Is frequently missing/goes missing from education, home or care (SPoA will be contacted for Level 2 Early Help Keywork support for children who are severely absent from school)
- Has experienced multiple suspensions, is at risk of being permanently excluded from schools, or in Alternative Provision or a Pupil Referral Unit
- Is misusing drugs and other alcohol themselves
- Is at risk of modern slavery, trafficking, and/or sexual or criminal exploitation
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- Is at risk of being radicalised or exploited
- Has a parent or carer in custody, or is affected by parental offending
- Is a privately fostered child
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage

The D/DSL uses:

- East Sussex's Front Door (MASH and Early Support Hub).
- The Digital Assessment and Referral Tool as appropriate as part of a holistic assessment of the child's needs.
- Liaises with East Sussex SEND service.
- Various resources to identify and respond to harmful sexual behaviour.

Safety of our Boarding Pupils: At Frewen College the safety of our boarders extends to 24 hour provision. Any safeguarding concerns involving a boarder will be treated in the same way as any pupil at Frewen College. For further information on boarders' safety, please refer to the boarding handbooks.

Children with Special Education Needs and Disabilities (SEND) or physical health issues: Pupils with additional needs or certain health conditions face an increased risk of abuse and neglect. Staff take extra care to interpret correctly apparent signs of abuse or neglect. We never assume that behaviour, mood or injury relates to the pupil's additional needs without further exploration. Staff understand that additional challenges can exist when recognising abuse and neglect in pupils with SEND, including communication barriers. Staff recognise that children with SEND are also at a higher risk of peer group isolation and can be disproportionately affected by bullying (including prejudiced-based bullying).

To address those additional challenges, extra pastoral support is considered for children with SEND or physical health issues and they are also encouraged to discuss their concerns. The D/DSL works with the Special Educational Needs Co-ordinator (SENCo) to identify pupils with additional communication needs and whenever possible, these pupils are given the chance to express themselves to a member of staff with appropriate communication skills.

Children who identify as lesbian, gay, bisexual, or gender questioning (LGBT): Whilst we recognise that being LGBT does not inherently increase the risk of harm to children, those who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. The school endeavours to reduce the additional barriers faced for these pupils and we will provide a safe space for them to speak out or share

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their concerns with a trusted member staff as required. When supporting a gender questioning child, the school takes a cautious approach and considers the broad range of their individual needs, in partnership with the child's parents, including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. We build LGBT inclusion into part of our [Relationships Education](#), [Relationship and Sex Education](#) and [Health Education](#) curriculum, including how to counter homophobic, biphobic and transphobic bullying and abuse.

Artificial Intelligence (AI): We recognise that generative artificial intelligence (AI) tools, such as Google Bard and ChatGPT, have many uses. These include enhancing teaching and learning, and helping to protect and safeguard pupils. However, it is crucial to consider the risks carried by AI; for example, facilitating abuse in the form of bullying or grooming or exposing pupils to harmful content. This could be in the form of 'deepfakes', where AI is used to create image, audio or video hoaxes that look real. It is important that all staff are aware of the risks posed by AI tools, and that risk assessments are carried out for all new AI tools used by our school. Any use of AI to access harmful content or bully pupils will be treated in line with this policy and our anti-bullying (countering bullying) policy.

The use of 'reasonable force' in school: There are circumstances when it is appropriate for staff to use reasonable force to safeguard children. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom. Frewen College follows DfE advice for schools, which is available at [Use of Reasonable Force in Schools](#).

All staff will follow our behaviour policy and all pupils are encouraged to follow these expectations to reduce the need for the need for 'use of reasonable force.' Staff will work in collaboration with pupils and parents/carers to plan positive, proactive behaviour support which may include support plans, referral to specialist agencies and agreeing actions to reduce the occurrence of challenging behaviour.

Mandatory procedures – Specific forms of abuse and safeguarding issues

Child-on-child abuse

All children have a right to attend school and learn in a safe environment. All child-on-child abuse is unacceptable and will be taken seriously.

In addition, we have a zero-tolerance approach and will respond to all reports and concerns of child-on-child sexual violence and sexual harassment, including those that have happened outside of Frewen College, and/or online.

Staff recognise that while both boys and girls can abuse their peers, it is more likely that girls will be victims and boys instigators of such abuse. Children who are LGBTQ+ may be targeted by other children. Child-on-child abuse is not tolerated, passed off as "banter" or seen as "part of growing up". The different forms of child-on-child abuse is likely to include, but not limited to:

- bullying (including cyber bullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between peers
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm
- 'upskirting' or any picture taken under a person's clothing without their permission or them knowing to obtain sexual gratification or cause humiliation, distress or alarm.
- causing someone to engage in sexual activity without consent.
- initiation/hazing type violence and rituals.
- consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting)
- sexual violence and sexual harassment between children, as defined by Sexual Offences Act 2003 which considers rape, assault by penetration and sexual assault, all types of sexual violence. Sexual violence and sexual harassment can be between two children, or a group of children and can occur online and offline.

Consequently, child-on-child abuse is dealt with as a safeguarding issue, recorded as such, and not managed through the systems set out in Frewen College behaviour policy.

Any pupil who may have been victimised and/or displayed such harmful behaviours, along with any other child affected by child-on-child abuse, will be supported through Frewen College's pastoral system and the support will be regularly monitored and reviewed.

We will address inappropriate behaviour (even if it appears to be relatively innocuous) as this can be an important intervention that may help prevent problematic, abusive and/or violent behaviour in the future.

We acknowledge that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported. Staff maintain an attitude of 'it could happen here' where safeguarding is concerned.

We minimise the risk of child-on-child abuse by providing:

- a relevant, effective curriculum, that helps children to develop their understanding of acceptable behaviours, healthy relationships and keeping themselves safe. The curriculum is updated to reflect changes in legislation, and the mandatory teaching of Relationship Education, Relationship and Sex Education and Health Education.
- established/publicised systems for pupils to raise concerns with staff, knowing they will be listened to, supported and valued, and that the issues they raise will be taken seriously.
- training to all staff so they understand that child-on-child abuse can and does happen and are trained to be alert to any behaviours that could cause concern.
- a clear procedure for all staff to report all incidents as a safeguarding concern to the D/DSL.

Child-on-child sexual violence and sexual harassment (Please see our policy on Child-on-Child including Sexual Violence and Sexual Harassment Policy):

The DSL will follow local and national guidance when there has been a report of sexual violence and harassment between children, including reporting sexual violence to the police as well as the local authority. This will include liaising with other professionals to develop robust risk and needs assessments and multi-agency safety planning with appropriate specialist targeted work for pupils who are identified as posing a potential risk to other children. This is done using a Contextual Safeguarding approach to ensure assessments consider risks posed by any wider environmental factors present in a child's life. The DSL will record specifically the time and location of the incident, and any action required to make the location safer.

The NSPCC has a dedicated helpline 0800 136 663 to provide children who are victims of sexual abuse in schools with appropriate support and advice. The helpline also provides support to parents and professionals.

Serious violence: We are committed to success in learning for all our pupils as one of the most powerful indicators in the prevention of youth crime. Our curriculum includes teaching conflict resolution skills and understanding risky situations to help our children develop the social and emotional skills they need to thrive.

Staff are trained to recognise both the early warning signs of contextual risks and that pupils may be susceptible to exploitation and getting involved in gangs as well as indicators that a pupil is involved in serious violent crime. They are also aware of the associated risks and know the measures put in place to minimise such risks.

Children who are absent and/or missing from education: Staff report immediately to the D/DSL, if they know of any child who may be:

- absent from education persistently, or for prolonged periods and/or on repeat occasions
- missing – whereabouts unknown or
- missing education – (compulsory school age (5-16) with no school place and not electively home educated)

The designated teacher for CLA (Children Looked After) and care leavers discusses any unauthorised/unexplained absence of Child Looked After with Virtual School when required.

The DSL shares any unauthorised/unexplained absence of children who have an allocated social worker within 24 hours. Children who do not attend school regularly can be at increased risk of abuse and neglect. Where there is unauthorised/unexplained absence, and

- after reasonable attempts have been made to contact the family without success, the DSL follows the SVPP procedure and consults/refers to the IFD team as appropriate.
- there are no known welfare concerns about a pupil, we follow our procedures for unauthorised absence and report concerns to the Education Welfare Service.

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Mental health: All staff are aware that mental health problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff understand that:

- abuse and neglect, or other potentially traumatic adverse childhood experiences can have a lasting impact throughout childhood, adolescence and into adulthood. Staff are aware of how
- these experiences can impact on children's mental health, behaviour and education.
- they have a duty to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

If staff have a mental health concern about a child that is also a safeguarding concern, they will report this concern using the agreed reporting mechanisms.

Domestic abuse: Staff understand that domestic abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass but is not limited to: psychological; physical; sexual; financial; and emotional harm, including where they see, hear or experience its effects.

The DSL liaises with partner agencies as part of 'Encompass' in East Sussex. When police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the DSL ensures the organisation receives up to date relevant information about the child's circumstances and will ensure key staff provide emotional and practical support to the child according to their needs.

Preventing radicalisation: Protecting children from the risk of radicalisation is part of schools' wider safeguarding duties and is similar in nature to protecting pupils from other forms of harm and abuse.

Staff use their judgement in identifying pupils who might be at risk of radicalisation and speak to the D/DSL if they are concerned about a pupil. The D/DSL will always act proportionately, and this may include making a Prevent referral to the Channel support programme or to the Local Authority Children's Services.

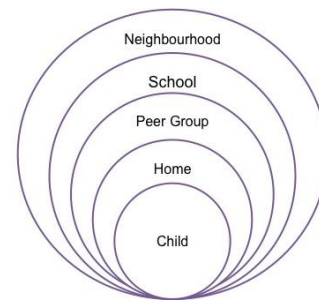
Female Genital Mutilation (FGM): FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Staff will inform the D/DSL immediately if they suspect a girl is at risk of FGM. We will report to the police any 'known' cases of FGM to the police as required by law.

Forced Marriage: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage.

Since February 2023 it has been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages. Staff will inform the D/DSL immediately if they suspect a child is at risk of forced marriage.

Contextual safeguarding: staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. Children's social care assessments should consider such factors, so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

At Frewen College, we recognise that young people's behaviours, levels of vulnerability and levels of resilience are all informed by the social, public and private, contexts in which young people spend their time. When in these extra-familial contexts young people may be exposed to healthy norms which promote pro-social relationships, or harmful norms that are conducive to abusive and exploitative relationships.



We identify, assess and intervene where possible in all of the environments where abuse and exploitation of young people can occur – in essence to take a 'contextual' approach to safeguarding. For example, our school leadership works with professionals and student body to challenge harmful, gendered school cultures, thus improving the school environment. Additionally, promote a culture of safety with the curriculum and around the school regarding students' online activities – a place where young people spend an increasing amount of time, raising their vulnerability to potential abuse. We will provide as much contextual information as possible to children's social care when a referral is made. Please visit <https://www.contextualsafeguarding.org.uk/> for more information.

Staff training

Induction: The welfare of all our pupils is of paramount importance. All staff including Governors and regular volunteers are informed of our safeguarding policy and procedures including online safety, at induction.

Our written induction schedule for staff also includes:

- Safeguarding and Child Protection policy and procedures
- Online safety (including filtering and monitoring systems)
- KCSiE update
- Children Missing Education (CME)
- Whistleblowing policy
- Behaviour Policy (pupils)
- Staff Behaviour Policy (or Code of Conduct)
- Role and identities of the DSL and DDSL
- Frewen College's response to children who are absent and/or missing from education, and Frewen College's protocol about managing absence
- Procedure to follow in case of an allegation being raised against an adult
- Professional disagreement and escalation including the SVPP Case Resolution Protocol
- Plan of support for individuals appropriate to the role for which they have been hired.
- Training on the appropriate use of MyConcern for recording and sharing information/concerns.
- Confirmation of the conduct expected of staff within the school – our Staff Code of Conduct (Appendix C). Opportunities for the new member of staff to discuss any issues or concerns about their role or responsibilities.

Frewen College has clear management processes whereby any general concerns or issues about the persons ability or suitability will be addressed.

Safeguarding training: This training is for all staff and is updated every 3 years as a minimum to ensure staff understand their role in safeguarding. Any member of staff not present at this whole school session will undertake this statutory training requirement on their return. In addition, all staff members receive safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings) as necessary and at least annually. All staff also receive training in online safety and this is updated as necessary.

Advanced training: The D/DSL has additional multi agency training which is updated every two years as a minimum. The D/DSL also attend multi-agency courses relevant to school needs. Their knowledge and skills are refreshed at least annually e.g. via e-bulletins or safeguarding networking events with other D/DSLs.

Safer Recruitment: At least one person on any appointment panel has undertaken Safer Recruitment Training. This training is updated every five years as a minimum. (Please see our Safer Recruitment Policy)

Designated Teacher for Children Looked After and Children Previously Looked after: The designated teacher for looked after children has attended training specific to the role.

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Preventing Radicalisation: All staff undertake Prevent awareness training.

Staff support: Due to the demanding, often distressing nature of child protection work, we support staff by providing an opportunity to talk through the challenges of this aspect of their role with a senior leader and to seek further support as appropriate.

Board of Governors: As well as the school's safeguarding induction programme, all Board of Governors members receive appropriate safeguarding and child protection (including online) training at induction. Safeguarding training is updated annually. Our Governors are also encouraged to attend whole school safeguarding and child protection training.

APPENDIX 1 - Allegations and concerns against adults in education settings – September 2025 (including schools, early years and alternative provision settings)

If you become aware that a member of staff/volunteer/supply/contractor/bank staff and those from organisations or individuals using the school premises, MAY have:

- 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

If you have 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.

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

- Being over friendly with children
- Having favourites
- Taking photographs of children on their mobile phone, contrary to school policy
- Engaging with a child on a one-to-one basis in a scheduled area or behind a closed door; or
- Humiliating pupils

Where a child also discloses abuse or neglect by a member of staff/volunteer/supply/contractor/bank staff and those from organisations or individuals using the school premises:

- Listen; take their allegation seriously; reassure that you will take action to keep them safe
- Inform them what you are going to do next
- Do not promise confidentiality
- Do not question further or approach/inform the person/alleged abuser

Staff should self-refer to their line manager or Designated Safeguarding Lead where they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Report immediately to Mr M Loveday (Headmaster).

Any concern or allegation against Mr M Loveday will go to Mr J Stevenson (Chair of Governors).

Unless there is clear evidence to prove that the allegation is incorrect, the person in charge will decide on the nature of the allegation/concern:

Allegations that may meet the harm threshold

If the behaviour towards the child may have met the harm threshold (KCSIE 2025, p.92) report the allegation **within one working day** to the Local Authority Designated Officer (LADO) and your HR provider:

- Telephone: 01273 481544
 - Emergency Duty Service: 01273 335 906 or 01273 335 905
- Email: ESSCP.Contact@eastsussex.gov.uk

Allegations/concerns that do not meet the harm threshold (low-level concerns)

Refer to the allegation/concerns that do not meet the harm threshold, or ‘low level’ concerns addendum flowchart (below).

APPENDIX 2 - Allegation/concerns guidance for the Headmaster – September 2025

Allegations that may meet the harm threshold

KCSIE 2025 Part 4 Section 1

The LADO will:

1. Consider the relevant facts and concerns regarding the adult and child or children, including any previous history
2. Decide on next course of action - usually straight away, sometimes after further consultation with other multi-agency parties such as the Police and HR.

If the allegation threshold is met:

- A strategy meeting will normally be held.
- Usually, a senior manager/safeguarding lead, the LADO, HR, Police and social care are invited to attend.
- Relevant information is shared, risks to children are considered and appropriate action agreed eg. child protection and other enquiries, disciplinary measures or criminal proceedings.
- A record of the meeting will be made, and regular reviews will take place until a conclusion is reached.

If the allegation threshold is NOT met:

The LADO will agree an appropriate response, eg. for the setting to undertake further enquiries or an internal investigation.

Refer to the low-level concerns procedures on the right-hand-side.

Allegations/concerns that do NOT meet the harm threshold ('low level' concerns)

KCSIE 2025 Part 4 Section 2

The Headmaster will take the following actions:

- Reports about supply staff and contractors will be notified to their employers.
- Collect information to help them categorise the type of behaviour and determine what further action may need to be taken.
- If the concern has been raised via a third party, the person in charge (or a nominated deputy) should collect as much evidence as possible by speaking:
 - directly to the person who raised the concern, unless it has been raised anonymously, and
 - to the individual involved and any witnesses.
- All low-level concerns will be recorded in writing and will include details of the concern, the context in which the concern arose along with the rationale for decisions and action taken.
- Records will be kept confidential and held securely; it is recommended that it is retained at least until the individual leaves their employment.
- Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.
- Where a pattern of such behaviour is identified, the school or college should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a low-level concern to meeting the harm threshold, in which case it should be referred to the LADO (as per Part 4, Section 1).
- Consideration should also be given to whether there are wider cultural issues within the school or college that enabled the behaviour to occur and where appropriate policies could be revised, or extra training delivered to minimise the risk of it happening again.
- The person in charge will seek advice from HR adviser and/or LADO consultation as appropriate.

APPENDIX 3 - What to do if you are worried a child is being abused or neglected *for staff, volunteers and visitors*

Be alert to signs of abuse and question unusual behaviour
If you have concerns about a child's welfare...

Where a child discloses abuse or neglect:

- Listen; take their allegation seriously; reassure that you will take action to keep them safe
- Inform them what you are going to do next
- Do not promise confidentiality
- Do not question further or

Report concerns to the Designated/Named Safeguarding Lead or their deputy:

NAME: Adam Terrell

The Designated/Named Safeguarding Lead will:

- consider further actions required, including consultation with MASH (number below)
- record in writing the discussions, decisions and reasons for decisions.

In exceptional circumstances or in the absence of a Safeguarding Lead you may contact MASH directly.

If a referral is not required:

The Designated Safeguarding Lead will oversee relevant action, e.g. pastoral support, and/or early help assessment and monitor locally.

If concerns continue

The Designated/Named Safeguarding Lead (or staff) will contact MASH to make a referral

Additional/unmet needs – the Designated Safeguarding Lead will consult with relevant agencies and undertake an Early Help Assessment (ESA) and Team around the Child meetings.

Multi-Agency Safeguarding Hub (MASH): 0300 456 0108

- Out of Hours Service: 0300 456 0100
(5.00pm to 9.00am weekdays, 4:00pm Friday to 9:00am Monday)
- If the child is in immediate risk,

MASH will:

1. Acknowledge receipt of referral
2. Decide on next course of action (within 1 working day)
3. Provide feedback decision to referrer (e.g. further assessment including: strategy discussion/child protection enquiries; no further action required for children's social care and early help assessment recommended; referral to other agency for service provision).

Appendix 4 - Related legislation and key documents:

Children Act 1989 (and 2004 update): The Children Act 1989 gives every child the right to protection from abuse and exploitation and the right to have enquires made to safeguard his or her welfare. The Act place duties on several agencies, including schools, to assist Social Services departments acting on behalf of children and young people in need (s17) or enquiring into allegations of child abuse (s47).

Education Act 2002 - This requires schools to make arrangements to safeguard and promote the welfare of children and to have regard to guidance issued by the Secretary of State for Education.

Sexual Offences Act 2003 - This act sets out an offence of 'abuse of trust' - a sexual or otherwise inappropriate relationship between an adult who is responsible for young people and a young person in his/her care.

Information Sharing – Department for Education (DfE) Advice for practitioners providing safeguarding services to children, young people, parents and carers 2024 This advice is for all frontline practitioners and senior managers working with children, young people, parents and carers who have to make decisions about sharing personal information on a case by case basis.

Counter-Terrorism and Security Act 2015 (the CTSA 2015), section 26 requires all schools, in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty.

Mental health and behaviour in schools (2018) advice to help schools to support pupils whose mental health problems manifest themselves in behaviour. It is also intended to be helpful to staff in alternative provision settings, although some of the legislation mentioned will only apply to those alternative provision settings that are legally classified as schools.

The Safeguarding Vulnerable Groups Act (2006) Section 53(3) and (4) of this applies to schools if they broker student accommodation with host families for which the host family receives a payment from a third party, such as a language school. At a future date, the regulated activity provider will have a duty to carry out a barred list check on any new carer – section 34ZA Safeguarding Vulnerable Groups Act 2006.

The Teachers’ Standards (2013) set a clear baseline of expectations for the professional practice and conduct of teachers and define the minimum level of practice expected of teachers in England.

Children Missing Education (2016) Statutory guidance for local authorities and advice for other groups on helping children who are missing education get back into it.

Preventing and Tackling Bullying (2017) Advice for schools on effectively preventing and tackling bullying.

Behaviour and Discipline in Schools (2016) Advice for headteachers and school staff on developing school behaviour policy, including an overview of their powers and duties.

APPENDIX 5 – TYPES AND SIGNS OF ABUSE AND NEGLECT INCLUDING POSSIBLE INDICATORS

Types of Abuse and Neglect Including Specific Safeguarding Issues: We are aware that abuse, neglect and safeguarding issue are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another Abuse may take place wholly online, or technology may be used to facilitate offline abuse. Issues could include:

Drug/alcohol abuse, Abuse of trust, Pupil exploitation and online safety, Fabricated or induced illness, Faith abuse, Disability and vulnerability, Bullying including cyberbullying; Vulnerable pupils; Child missing from home or care; Missing children and adults strategy; Young carers, Gender-based violence/violence against women and girls (VAWG), Hate.

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example, NSPCC offers information for schools and colleges on the TES website and also on its own website www.nspcc.org.uk/preventing-abuse/ and other government websites:

Abuse and Neglect: Keeping Children Safe in Education (DfE: currently in force 2025) defines abuse as a form of maltreatment of a
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pupil. Somebody may abuse or neglect a pupil by inflicting harm, or by failing to act to prevent harm. Our staff are aware of the indicators of abuse, neglect and exploitation (as seen below), understanding that children can be at risk of harm inside and outside of our school, inside and outside of home, and online. Exercising professional curiosity and knowing what to look for is vital for the early identification of abuse and neglect so that staff are able to identify cases of children who may be in need of help or protection.

All staff at Frewen College are aware that abuse, neglect, exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.

Staff, but especially the D/DSL 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 abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

Furthermore, our staff are aware that technology is a significant component in many safeguarding and wellbeing issues. Our students are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content. In all cases, where our staff are unsure, they will speak to the D/DSL.

Our school recognises that safeguarding issues are rarely covered with one definition or label. In most cases multiple issues will overlap with one another. Expert organisations provide guidance and practical support on specific safeguarding issues.

Indicators of abuse and neglect -abuse: Following the definition of abuse provided above, Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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. If a body map is to be used to record physical abuse, they should only be used to record observed injuries and no child should be asked to remove clothing by a member of staff of the school.

Indicators of physical abuse/ factors that should increase concern include:

- multiple bruising or bruises and scratches/bi-lateral injuries (especially on the head and face including around the mouth); clusters of bruises – e.g. fingertip bruising (caused by being grasped); bruises around the neck and behind the ears – the most common abusive injuries are to the head;
- marks indicating injury by an instrument – e.g. linear bruising (stick), parallel bruising (belt), marks of a buckle;
- bite marks; deliberate burning may also be indicated by the pattern of an instrument or object - e.g. electric fire, cooker, cigarette; scalds with upward splash marks or *tide marks*; untreated injuries; injuries to genital areas;
- recurrent injuries, burns or bald patches; having broken bones or unexplained bruising, burns or welts in different stages of healing; being unable to explain an injury, or providing explanations that are inconsistent, vague or unbelievable.
- If a child has an injury to which they cannot explain, where the parent or child is apparently secretive or evasive or if the explanation does not appear to match the injury.

Emotional abuse: Defined as 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. Staff are provided with [guidance regarding cyberbullying](#).

Indicators of Emotional Abuse: Developmental issues include delays in physical, mental and emotional development; poor school performance and speech disorders, particularly sudden disorders or changes.

Behaviour: Acceptance of punishment which appears excessive; over-reaction to mistakes; continual self-deprecation (I'm stupid, ugly, worthless etc); neurotic behaviour (such as rickling, hair-twisting, thumb sucking); self-mutilation; suicide attempts; drug/solvent abuse; running away; compulsive stealing, scavenging; acting out; poor trust in significant adults; regressive behaviour – e.g. wetting; eating disorders; destructive tendencies; neurotic behaviour; arriving early at school, leaving late.

The nature of emotional abuse: Most harm is produced in low warmth, high criticism homes, not from single incidents. Emotional abuse is chronic and cumulative and has a long-term impact. All kinds of abuse and neglect have emotional effects although emotional abuse can occur by itself. Witnessing someone harming another person – as in domestic violence, can harm children. It is sometimes possible to spot emotionally abusive behaviour from parents and carers to their children, by the way that the adults are speaking to, or behaving towards children. An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later on.

Social issues: Withdrawal from physical contact or from social interaction; over-compliant behaviour or insecure, clinging behaviour; poor social relationships.

Emotional responses: Extreme fear of new situations; inappropriate emotional responses to painful situations (“I deserve this”); fear of parents being contacted; self-disgust; unusually fearful with adults; lack of concentration, restlessness, aimlessness; extremes of passivity or aggression; excessive need for approval, attention and affection.

Neglect: Defined as 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. Far more children are registered to the category of neglect on child protection plans than to the other categories. Neglect is a difficult form of abuse to recognise and is often seen as less serious than other categories. It is, however, very damaging: children who are neglected often develop more slowly than others and may find it hard to make friends and fit in with their peer group. Neglect is often noticed at a stage when it does not pose a risk to the child. The duty to safeguard and promote the welfare of children would suggest that an appropriate intervention or conversation at this early stage can address the issue and prevent a child continuing to suffer until it reaches a point when they are at risk of harm or in significant need. Neglect is often linked to other forms of abuse, so any concerns school staff have should at least be discussed with the DSL.

Indicators of neglect: The following is a summary of some of the indicators that may suggest a child is being abused or is at risk of harm. It is important to recognise that indicators alone cannot confirm whether a child is being abused. Each child should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Don't keep it to yourself.

Physical indicators of neglect include: Constant hunger and stealing food; poor personal (including dental) hygiene – unkempt, dirty or smelly; being underweight; wearing dress unsuitable for weather; poor state of clothing; illness or injury untreated and looking sad, false smiles.

Behavioural indicators of neglect include: Constant tiredness; frequent absence from school or lateness; or arriving early at school/leaving late; missing medical appointments; becoming isolated among peers; being frequently unsupervised; stealing or scavenging, especially food and having destructive tendencies, poor relationships with peers; running away.

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. All staff at Frewen College are aware that sexual abuse of children by other children is a specific safeguarding issue in education and are aware of our policy and procedures for dealing with it. Where it comes to our notice that a pupil under the age of 13 is, or may be, sexually active, this will result in an immediate referral to Children's Services and advice being given to the DSL. This will determine how and when information will be shared with parents/guardians/carers and the investigating agencies.

Indicators of sexual abuse: Physical observations include damage to genitalia, anus or mouth; sexually transmitted infections (STIs); unexpected pregnancy, especially in very young girls; soreness in genital area, anus or mouth and other medical problems such as chronic itching; unexplained recurrent urinary tract infections and discharges or abdominal pain. The concerns listed are not exhaustive. Staff can and should also record and report other concerns about a child, such as general welfare concerns.

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE): Both CCE and CSE 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 criminal or sexual activity. It may involve an 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. CCE and CSE 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. Our school recognises that that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, including both CCE and CSE.

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

Children can become trapped by this type of exploitation, as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to. In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation. Our staff are also aware that along with the age of the child possibly being a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Child criminal exploitation – County Lines: County lines is a term used to describe gangs and criminal networks involved in trafficking illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as or across UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes. Our staff recognise that children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. A number of the indicators for CSE and CCE as detailed

above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home;
- have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters; have their bank accounts used to facilitate drug dealing.

The school has access to guidance published by the Home Office: [County Lines Toolkit For Professionals](#)

Child Sexual Exploitation (CSE): CSE is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Sexual abuse 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 clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

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. Some children do not realise they are being exploited and may believe they are in a genuine romantic relationship. For this reason, an indicator that may be present in CSE are children who have older boyfriends or girlfriends. Other indicators of CSE include children who suffer from STIs, display sexual behaviours beyond expected sexual development or become pregnant. Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: [Child sexual exploitation: guide for practitioners](#)

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

Safeguarding Issues: All of our staff at Frewen College are aware of the safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk. Detailed below are some safeguarding issues all of our staff are aware of.

Child-on-child abuse: Abuse that occurs between children, and may happen inside or outside our school, or online. At Frewen College, all of our staff are aware that this is an important safeguarding issue and are aware of our policy on child on child abuse along with the role they have in preventing it. We follow KCSIE (2025) and WtSC guidelines with regards to child-on-child abuse. Our staff understand that even if there are no reports of child-on-child abuse within the school, that does not mean it is not happening as it could be the case that abuse is not being reported. Therefore if our staff have any concerns regarding child-on-child abuse, they will speak to their D/DSL.

Our staff understand the importance of challenging inappropriate behaviour between children that is abusive in nature examples of which are listed below. Downplaying certain behaviour, for example dismissing sexual harassment as 'just banter' or 'boys being boys' can lead to a culture of unacceptable behaviour, an unsafe environment for children and in worst case scenarios worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

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

- abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse')

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- 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 videos¹¹ (also known as sexting or youth produced sexual imagery)
- upskirting - is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.
- 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).
- bullying - *Please also refer to our anti-bullying policy which sets out our procedures in order to prevent bullying and to deal with it if and when it occurs within the school.* This may be defined as deliberate, repeated (systematic) aggressive verbal, psychological or physical conduct by an individual or group against another person or persons.

Very often bullying is the act of oppressing or dominating by threat or force where the aggressor may persecute or tease in order to frighten into action or inaction. Bullying can include:

- physical: pushing, hitting, kicking, pinching etc;
- verbal: name-calling, spreading rumours, constant teasing and sarcasm;
- emotional: tormenting, ridiculing, humiliating, ignoring;
- racial: taunts, graffiti and gestures; Religious / cultural;
- sexual, sexist or homophobic: unwanted physical contact or abusive comments;
- cyber-bullying: through social networking websites, mobile phones and text messages, photographs and email.

Signs that may indicate bullying include behavioural changes such as reduced concentration, becoming withdrawn, depressed, tearful, emotionally up and down, reluctance to go to school etc.; a marked drop off in performance; Physical signs e.g. stomach aches, headaches, sleeping difficulties, bingeing on food, cigarettes or alcohol and a money shortage or frequent loss of possessions.

Domestic Abuse: The Home Office define domestic abuse as: *“Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence and abuse between those aged 16 or over, who are or have been intimate partners or family members regardless of gender and sexuality”.*

Staff understand that domestic abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass but is not limited to: psychological; physical; sexual; financial; and emotional harm.

The DSL liaises with partner agencies as part of ‘Encompass’ in East Sussex. When police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the DSL ensures the organisation receives up to date relevant information about the child’s circumstances and will ensure key staff provide emotional and practical support to the child according to their needs.

Children may suffer both directly and indirectly if they live in households where there is domestic violence. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children, affecting their ability to learn. It will often be appropriate for such children to be regarded as Children in Need under the Children Act 1989. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life. Where there is evidence of domestic violence, we will report our concerns to the appropriate agency including children’s social care and the police in order to prevent the likelihood of any further abuse taking place. Advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

NSPCC- [UK domestic-abuse Signs Symptoms Effects](#)

Refuge - [what is domestic abuse](#)

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[Safelives - young people and domestic abuse](#)

[Domestic Abuse Act 2021: Statutory Guidance](#)

We have close links with the Sussex Police force, through [Operation Encompass](#), who liaise with the college on matters of domestic violence, also providing advice for staff who may be concerned about children who have experienced domestic abuse. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990

Female Genital Mutilation (FGM): Our staff are aware they should speak to the D/DSL with regard to any concerns about female genital mutilation (FGM), and that there is a specific legal duty on them to do so. They are also aware that if, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, they must report this to the police.

Mental Health: At Frewen College, our staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Although only appropriately trained professionals should attempt to make a diagnosis of a mental health problem, our education staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. If needed, Frewen College is well placed to deal with Mental Health issues by working with the relevant external agencies (maybe need more info here).

Self-Harm and Suicidal Behaviour: Self-harm can be deliberate with the aim of a child just causing themselves an injury, attempted suicide which does not result in end of life or a successful attempt to end life resulting in death. Majority of self-harmers keep it a secret that goes undiscovered, finding it is the only way to express their feelings. Children self-harm for many reasons including: being bullied both at school or online, mental health issues, eating disorders, domestic abuse, any type of child abuse, parental conflict and bereavement. The signs of the distress the child may be under can take many forms and can include:

- cutting behaviours and self-poisoning, other forms of self-harm, such as burning, scalding, banging, hair pulling; not looking after their needs properly emotionally or physically;
- direct injury such as scratching, cutting, burning, hitting yourself, swallowing or putting things inside;
- staying in an abusive relationship, taking risks too easily, eating distress (anorexia and bulimia);
- addiction for example, to alcohol or drugs and low self-esteem and expressions of hopelessness.

During a disclosure of self-harm staff should check whether the pupil has ingested anything or has anything on their person that could cause damage or harm. Any concerns from staff members should be referred to the DSL, as an early help assessment may need to be completed to involve services that can help, or in the case of significant harm a referral can be made to Children's Services.

Serious Violence: Our staff are aware of the indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include increased absence from school or college, a change in friendships or relationships with older individuals or groups, a significant decline in educational 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.

Children in Need: A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

Children suffering or likely to suffer significant harm: Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment. This includes all forms of abuse, neglect and exploitation.

Local Authorities, within 1 working day of a referral being made, should acknowledge its receipt to the referrer and make a decision about the next steps and the type of response that is required. This will include determining whether:

- the child requires immediate protection and urgent action is required;
- any services are required by the child and family and what type of services;
- the child is in need and should be assessed under section 17 of the Children Act 1989, details for which are provided in [Working](#)

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Together to Safeguard Children.

- there is reasonable cause to suspect the child is suffering or likely to suffer significant harm, and whether enquiries must be made, and the child assessed under section 47 of the Children Act 1989. Working Together to Safeguard Children provides details of the assessment process, and
- further specialist assessments are required to help the local authority to decide what further action to take.

If this information is not forthcoming, the referrer should up the referral.

If social workers decide to carry out a statutory assessment, our staff are aware that they should do everything they can to support the assessment (supported by the D/DSL as required).

Children who are absent from education: Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. At Frewen College, our response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

Looked After Children and Previously Looked After Children: The most common reason for children becoming looked after is as a result of abuse and/or neglect. The school ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child and contact arrangements with birth parents or those with parental responsibility. The designated teacher and Member of the Board of Governors for children looked after will have the appropriate level training to equip them with the knowledge and skills to undertake their role. The designated teacher for children looked after and the DSL have details of the child's social worker and the name and contact details of the East Sussex Head of Virtual School.

A previously looked after child potentially remains vulnerable and the school ensures that all staff have the skills, knowledge and understanding to keep previously looked after children safe. Our staff are aware that 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.

This policy therefore covers all pupils at the school, including those who may be here temporarily on exchange visits. The school recognises the particular vulnerabilities of children living in a different country/culture, with possible language barriers and no family close by and provides relevant support where necessary.

Children with Special Education Needs, Disabilities or Health Issues: Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. Our school's child protection policy reflects the fact that additional barriers can exist when recognising abuse, neglect and exploitation in this group of children. These can include:

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

Private Fostering: 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 or 18 if the child is disabled. Children looked after by the local authority or who are placed in residential schools, children's homes or hospitals are not considered to be privately fostered. Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age. Frewen College 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

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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 services as soon as possible. However, where a member of staff becomes aware that a pupil may be in a private fostering arrangement they will raise this with the DSL.

Child-On-Child Sexual Violence and Sexual Harassment: Sexual violence and sexual harassment can occur between two or more children of any age and sex. It can occur also through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face-to-face (both physically and verbally) and are never acceptable.

At Frewen College, all of our staff operate with an attitude of 'it could happen here,' and will respond to all signs, reports and concerns of child-on-child sexual violence and sexual harassment, including those that have happened outside of the school or college premises, and/or online. Our school operates with a zero-tolerance approach to sexual violence and sexual harassment, making it clear that it should not be passed off as just 'banter.'

Our staff will challenge physical behaviour (potentially criminal in nature) such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts as dismissing or tolerating such behaviours risks normalising them. Whilst any report of sexual violence or sexual harassment should be taken seriously, staff at Frewen College are aware it is more likely girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children with disabilities are also three times more likely to be abused than their peers. Ultimately, it is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe.

Children with Family Members in Prison: Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, [NICCO](#) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

Children and the Court System: Frewen College recognises that children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children [5-11-year olds](#) and [12-17 year olds](#). They explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. We recognise this can be stressful for children. The Ministry of Justice has launched an online [child arrangements information tool](#) with clear and concise information on the dispute resolution service and this may be useful for some parents and carers.

Cybercrime: Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer):

- Cyber dependent crimes include unauthorised access to computers, Denial of Service (attempts to make a computer, network or website unavailable by increasing traffic) and making or supplying malware.
- Our staff are aware that Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

We take advice to ensure that our security procedures for our IT infrastructure are effective and should staff have concerns about a child's involvement with cybercrime, they will refer this to the DSL, who may contact the [Cyber Choices Programme](#). We also ensure our systems meet the [Cyber Security Standards](#) – set out by the DfE.

Homelessness: Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. Our designated safeguarding lead and deputy DSL are aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Staff are still alert to the signs that families of pupils may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

Modern Slavery and the National Referral Mechanism (NRM): 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. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. [Modern slavery: how to identify and support victims](#)

Trafficking: Child trafficking involves moving children across or within national or international borders for the purposes of exploitation. Exploitation includes children being used for sex work, domestic work, restaurant/ sweatshop, drug dealing, shoplifting and benefit fraud. Where the School is made aware of a child is suspected of or actually being trafficked/exploited, including being in Private Fostering, the DSL will report our concerns to Children's Social Care. The above list is not exhaustive and as new policy guidance and legislation develops within the remit of Safeguarding we will review and update our policy as appropriate and in line with the Local Safeguarding Children Partnership and local authority to ensure our school is a safe place to learn and work.

Preventing radicalisation: Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, preventing our students from this risk is an essential part of Frewen College's safeguarding approach:

- Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- Radicalisation is the process of legitimizing support for, or use of, terrorist violence.
- Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Our staff are alert to changes in children's behaviour which could indicate they may be in need of help or protection, and will act proportionately which may include the D/DSL making a Prevent referral.

Honour-Based Abuse (HBA) including Female Genital Mutilation and Forced Marriage: So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Indicators of Honour-based abuse: Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found on pages 38-41 of the Multi agency statutory guidance on FGM (pages 59-61 focus on the role of schools and colleges) and pages 13-14 of the Multi-agency guidelines: Handling case of forced marriage.

Actions if HBA is suspected: If staff have a concern regarding a child who may be at risk of HBV they should activate local safeguarding procedures, using national and local protocols for multiagency liaison with Police and Children's Services. In the social context of the school, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when: the explanation given does not match the injury; the explanation uses words or phrases that do not match the vocabulary of the child (adults words); no explanation is forthcoming; the child (or the parent/carer) is secretive or evasive or the injury is accompanied by allegations of abuse or assault. **We become concerned if the child or young person** is reluctant to have parents/carers contacted; runs away or shows fear of going home; is aggressive towards themselves or others; flinches when approached or touched; is reluctant to undress to change clothing for sport; wears long sleeves during hot weather; is unnaturally compliant in the presence of parents/carers; has a fear of medical help or attention or admits to a punishment that appears excessive.

Mandatory reporting duty: Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers** along with regulated health and social care professionals in England and Wales, to report to the Police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Teachers **must** personally report to the Police cases where they discover an act of FGM. Unless the teacher has a good reason not to, they should also still consider and discuss any such case with the school DSL and involve Children's Services as appropriate. The duty does not apply in relation to at risk or

suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The Forced Marriage Unit has published multi-agency guidelines - pages 32-36 focus on the role of schools and colleges. Schools and staff can contact the Forced Marriage Unit for advice or information on 020 7008 0151 or email: fmf@fco.gov.uk.

Forced Marriage: Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Since February 2023 it has been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages. Staff will inform the D/DSL immediately if they suspect a child is at risk of forced marriage.

Gangs and Youth Violence: We will endeavour to protect our children and young people from exposure to gang activity and exploitation by having robust attendance and behaviour policies and to act on relevant information or allegations. We will take all reports seriously and will share this information appropriately with other agencies to safeguard our pupils from harm.

Youth Produced Sexual Imagery (Sexting)- Please refer to our Child-on-child Abuse Policy.

The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace and the DfE provides searching screening and confiscation advice. The UK Council for Child Internet Safety (UKCCIS) Education Group has recently published [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#).

Online technology has given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal. Youth produced sexual imagery refers to both images and videos where;

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

All incidents of this nature should be treated as a safeguarding concern and in line with the guidance 'Sexting in schools and colleges: responding to incidents and safeguarding young people'. Sexual imagery of people under 18 can constitute child sexual abuse and should be responded to accordingly. If a member of staff learns of an incident involving youth produced sexual imagery they should follow the child protection procedures and refer to the DSL as soon as possible. The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff should not view, copy or print the youth produced sexual imagery. Parents should be informed, unless there is reason to believe that this would put the child at risk of harm. A referral should be made to Children's Social Care or the Police as appropriate. Immediate referral should be made to Children's Social Care/police if;

- the incident involves an adult, the imagery involves sexual acts; the imagery involves anyone aged 12 or under;
- there is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs);
- what you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent;
- there is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming – **where an immediate risk of significant harm or injury is suspected, the police must be called on 999.**

If none of the above applies then the DSL, in consultation with the Headmaster, will consider if;

- There is a significant age difference between the sender/receiver;
- there is any coercion or encouragement beyond the sender/receiver;
- the imagery was shared and received with the knowledge of the child in the imagery;
- the child is more vulnerable than usual i.e. at risk; there is a significant impact on the children involved;
- the image is of a severe or extreme nature; the child involved understands consent;
- the situation is isolated or if the image been more widely distributed; there are other circumstances relating to either the sender or recipient that may add cause for concern i.e. difficult home circumstances;
- the children have been involved in incidents relating to youth produced imagery before.

If any of these circumstances are present the situation will be escalated according to our child protection procedures, including

reporting to the police or children's social care. Otherwise, the situation will be managed within the school. The DSL will record all incidents of youth produced sexual imagery, including both the actions taken, actions not taken, reasons for doing so and the resolution in line with safeguarding recording procedures. This guidance reflects the UKCCIS Guidance.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/551575/6.2439KGNCsextinginSchools

Removal of sexual images/videos: If the incident involves sexual images or videos that have been circulated online, the victim can be supported to get the images removed through the Internet Watch Foundation (IWF). The IWF will make an assessment of whether the image is illegal in line with UK Law. If the image is assessed to be illegal, it will be removed and added to the IWF's Image Hash list.

Child Abduction And Community Safety Incidents: Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers. Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation. As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on keeping themselves safe. We provide outdoor safety lessons/assemblies to our pupils to help combat this risk, focusing on building children's confidence and abilities rather than simply warning them about all strangers. For further information, see: www.actionagainstabduction.org and www.clevernevergoes.org.

Safeguarding International Pupils: Frewen College is aware of the safeguarding implications regarding pupils from overseas who are have obtained a Tier 4 Child Pupil Visa. Specifically pertinent are the requirements that:

- Policies and procedures are in place to ensure the safety, wellbeing and protection from exploitation of sponsored pupils;
- All teaching and boarding sites meet legally required standards;
- All staff who have access to pupils have a current DBS

This policy therefore covers all pupils at the school, including those who may be here temporarily on exchange visits. The school recognises the particular vulnerabilities of children living in a different country/culture, with possible language barriers and no family close by and provides relevant support where necessary.

APPENDIX 6 – MAIN RESPONSIBILITIES OF THE DSL, DEPUTY DSL, GOVERNORS AND THE HEADMASTER

The Governing Body will ensure an appropriate senior member of staff, from the school or college leadership team, is appointed to the role of DSL. The designated safeguarding will take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). This should be explicit in the role holder's job description. They promote the welfare of children and young people and follow school policies and the staff code of conduct. The DSL should have the appropriate status and authority within the school or college to carry out the duties of the post. The role of the DSL carries a significant level of responsibility, and it is ensured that they are given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings such as those with the Local Authority and the police, and/or supporting other staff to do so, and contributing to the assessment of children. Some safeguarding activities may be delegated to deputies, but the DSL will retain ultimate lead responsibility for safeguarding and child protection.

D/DSL: It is a matter for individual schools and colleges as to whether they choose to have one or more deputy designated safeguarding leads. Any deputies should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

Availability: During term time, our DSL or D/DSL should always be available (during school or college hours) for staff in the school to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or a deputy) would be expected to be available in person, it is a matter for individual schools and colleges, working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable. The school and DSL will arrange adequate and appropriate cover arrangements for any out of hours/out of term activities including when the school is closed.

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Manage referrals:

The DSL will refer cases:

- of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care;
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme;
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required, and
- where a crime may have been committed to the Police as required. [NPCC - When to call the police](#) help understand when to consider calling the police and what to expect when working with the police.

They will have oversight of online safety and of cyber security information.

Working with staff and others:

The DSL will:

- act as a source of support, advice and expertise for all staff;
- act as a point of contact with the safeguarding partners;
- inform the headteacher of safeguarding issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations, and the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - [PACE Code C 2019](#);
- as required, liaise with the "case manager" (as per Part Four in KCSIE 2025) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member. The DSL may be a named person for staff to report low-level concerns to;
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT technicians, senior mental health leads and special educational needs co-ordinators (SENCOs), or the named person with oversight for SEND in a college and senior mental health leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically;
- liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health;
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances;
- ensuring the school's website displays and makes available all safeguarding information required by the DFE;
- report to the governing body on all aspects of safeguarding, including child-on-child incidents and online safety;
- work with the governing board to ensure the child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly;
- work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at our school - We recognise that in some settings there may be a different strategic lead for promoting the educational outcomes of children who have or have had a social worker, particularly in larger schools or colleges. Where this is the case, it is important that the DSL works closely with the lead to provide strategic oversight for the outcomes of these children and young people.

This includes:

- o knowing who the school's cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and
- o supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

Information sharing and managing the child protection file: The DSL ensures that child protection files are kept up to date and that information is kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child. Make sure records include:

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

They should ensure the file is only accessed by those who need to see it and where the file or content within is shared, this happens

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in line with information sharing advice set out in Parts one and two of KCSIE (2025).

Where children leave the school (including in year transfers):

- Ensure that the file is only accessed by those who need to see it and where the file or content within is shared, this happens in line with information sharing advice as set out by Keeping Children Safe in Education (KCSIE 2025).
- The DSL ensures that their child protection file is transferred to the new school or college 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 is transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.
- Receiving schools and colleges should ensure key staff such as designated safeguarding leads and special educational needs coordinators (SENCOs) or the named person with oversight for SEND in colleges, are aware as required.
- Consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child. Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes.
- Adhere to East Sussex Council's document retention timescales.

Raising awareness:

The DSL will:

- ensure each member of staff has access to, and understands, our school's child protection policy and procedures, especially new and part-time staff;
- ensure the school's child protection policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with the Governors regarding this;
- ensure the child protection policy is available publicly and parents know that referrals about suspected abuse or neglect may be made and the role of our school in this;
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements, and
- help promote educational outcomes by sharing information about welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school leadership staff.

Training, knowledge and skills:

The DSL and D/DSL undergoes training every 2 years to provide them with the knowledge and skills required to carry out the role and meet the expectations set out in KCSIE (2025), including those outlined in the 'Training, knowledge and skills' section of Annex C. This training should be updated at least every two years. They also undertake Prevent awareness training. Best training will provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly local authority children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- have a working knowledge of how local authorities conduct a 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 importance of the role the designated safeguarding lead has in providing information and support to local authority children social care in order to safeguard and promote the welfare of children;
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes;
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers;
- understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners;
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college;
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online;

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- obtain access to resources and attend any relevant or refresher training courses
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them and
- Refresh knowledge and skills at regular intervals and at least annually. E.g. best practice training will include harmful sexualised behaviour, unique risk of online safety, and understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

Providing support to staff

Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters including:

- ensuring staff are supported during the referrals processes;
- supporting staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

Understanding the views of children

It is important that all children feel heard and understood. Therefore, DSL and D/DSL are supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them, and
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

Holding and sharing information

The critical importance of holding, using and sharing information effectively is set out in Parts 1, 2 and 5 of KCSIE (2025), and therefore the DSL is equipped to:

- understand the importance of information sharing, both within the school and college, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners.
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).
- be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions, and understand the purpose of this. This includes instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc.
- Take lead responsibility for the effectiveness of the school's Single Central Record (SCR)

Other areas of responsibility

- The DSL will be required to safeguard and promote the welfare of children and young people and follow school policies and the staff code of conduct.
- During term time, the DSL should always be available during school hours for staff in the school to discuss any safeguarding concerns. Ideally this will be in person but can also be via phone or video call in exceptional circumstances.

Please note that this list of duties is illustrative of the general nature and level of responsibility of the role. It is not a comprehensive list of all tasks the DSL will carry out.

Governors: The Governors receive from the DSL a safeguarding report at each meeting and have a corporate responsibility for all safeguarding matters relating to the pupils of the school. This includes specific responsibilities for ensuring that all who are employed, supply services or volunteer at the school, are informed of the content of this policy and any reviews and updates. To this end, they will:

- liaise with the senior leadership of the school, the DSL and Deputy DSL, holding them to account on matters relating to safeguarding and also liaise with the LSCP and LADO as and when required by this policy;
- with the DSL, jointly produce the written annual review/audit and report where the minutes are sufficiently detailed to demonstrate both the breadth and the depth of the review, which is shared with the local authority;

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- check the staff's understanding and implementation of the policy, ensuring that they are all aware of the referral process and how to implement safeguarding protocols;
- monitor the policy, procedures and the efficiency with which they are implemented;
- ensure that there are clear job specifications for the DSL and Deputy DSL who have the knowledge, skills and understanding necessary to keep safe children who are looked after by a local authority;
- find out, on each visit to the school, if the policy is known in practice by talking to a number of staff and volunteers right across the school to see if they would know who to go to in the case of a suspected abuse and what they would do in terms of comments they might make to the child;
- review how children are taught about safeguarding, including online, through the curriculum and PSHEE;
- ensure the school contributes to interagency working in line with the Working Together to safeguard children (DfE: currently in force) through effective communication and cooperation with local agencies.

The Headmaster and DSL will ensure that the safeguarding and child protection policy and procedures adopted by the Chair of Governors are implemented and followed by all staff and:

- allocate sufficient time and resources to enable the DSL and Deputy DSL to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings;
- that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively;
- that reporting wrongdoing by staff in the workplace that does not involve safeguarding and welfare of pupils is dealt with in accordance with the school's Whistleblowing procedures;
- provide immunity from retribution or disciplinary action against staff in the event of them 'whistleblowing' in good faith; ensure that pupil's safety and welfare are addressed through the curriculum and be able to understand safer recruitment procedures and processes and deal with allegations against members of staff and volunteers.

APPENDIX 7 – WHERE A YOUNG PERSON DISCLOSES ABUSE OR NEGLECT, THE FOLLOWING SEQUENCE OF EVENTS SHOULD BE ADHERED TO

The following safeguarding procedures apply where you become aware a member of staff/volunteer has, or a child discloses to you that an adult has behaved in a way that has, or may have harmed a child; possibly committed a criminal offence against or related to a child or behaved towards a child or children in a way that indicates they may pose a risk of harm to a child.

Create a safe environment by offering the child a private and safe place if possible. Stay calm and reassure the child and stress that he/she is not to blame. Tell the child that you know how difficult it must have been to confide in you.

Listen to what the child has to say and take them seriously; stay calm and reassure the child but advise that you cannot promise confidentiality or to keep a secret (as this may not ultimately be in the child's best interest). Do not make promises you cannot keep. If there is a requirement for immediate medical intervention, assistance should be called for. A suggested form of words that may help when talking to children and which will likely need to be simplified for some of our pupils are as follows: *"I will keep our conversation confidential and agree with you what information I can share, unless you tell me something that will affect your personal safety or that is illegal, but I will tell you if I am going to pass information on and who to."* Tell the child what you are going to do next after the disclosure.

When talking to the child, do not interview the child and keep questions to a minimum. Do not display shock or disbelief. Encourage the child to use his/ her words and do not ask leading questions, interrupt their dialogue, or make assumptions which might give particular answers. Do not repeat the disclosure over and over or ask the child to repeat it other than to clarify what is being said. Seek consent from the child to share any information disclosed but should consent not be given, an explanation can be given as to why the DSL must be told. When the child has finished speaking, do not leave the child alone, but speak to someone who can help keep the child safe, that person should not speak to the child about the situation, but should offer comfort and reassurance that the right steps have been taken.

Record in detail the circumstances and timings of the disclosure including the nature and extent of any injuries, explanations given by the child (as much as possible in the child's own words) and the action taken (which may be used in any subsequent court proceedings), within 24 hours of the disclosure. Record in writing the child's name, address and date of birth along with the child's behaviour and emotional state, who else was present at the time of the disclosure. Sign (with time and date) all notes made and give them to the DSL. Call for immediate assistance from the DSL or deputy DSL or follow the procedures for allegations against staff, volunteers, and Proprietors. The DSL (or other responsible person within the scope of this policy) will then deal with the matter. The official school safeguarding form should also be completed by the person who receives the allegation and forwarded to the DSL.

Do not take responsibility for investigating the allegation yourself, as investigation is the sole statutory responsibility of Children's Services and/or the police. Reassure the child that the matter will be dealt with. Do not approach or inform the alleged abuser. Immediately inform the DSL so any required action can be taken to protect the pupil. The DSL will consider the information and decide on the next steps. In any case, only inform necessary people and do not speak in any way about the fact or the content of the disclosure. Every complaint or suspicion of abuse from within or outside the School will be taken seriously and action taken in accordance with this policy.

Never take photographs of injuries or examine marks and injuries solely to assess whether they may have been caused by abuse or investigate or probe, aiming to prove or disprove possible abuse. Do not assume that someone else will take the necessary action. Do not speculate or accuse anybody, confront another person (adult or child) allegedly involved, offer opinions about what is being said or about people allegedly involved or forget to record what you have been told. Never fail to pass on the information onto the correct person or ask a child to sign a written copy of the disclosure or a 'statement'.

A child protection guide cue card

We are committed to safeguard and promoting the welfare of all at our school.

A code of good practice for staff and volunteers designed for you to keep with you – Carry it.

A Code of Practice is intended to provide a readily accessible reference promoting the principle of our Child Protection Policy. What happens if:

You suspect a child is being abused or neglected:

- 1. Immediately inform the Designated Safeguarding Lead (DSL).**
- 2. Record and date any facts which are relevant to your concern and pass these onto the DSL.**

Do not investigate the issue yourself.

A child discloses to you abuse by someone else

Allow the child to speak without interruptions, accepting what is said and without investigating further or asking leading questions.

Reassure the child that 'it is not their fault' and that they were right to tell you.

Record in the child's own words details of the disclosure and refer this immediately to the DSL. Do not investigate the issue yourself.

You receive an allegation about a member of staff or yourself

Immediately inform the Headmaster of the allegation.

Record and date the details of the allegation in writing.

Do treat everyone with respect

Do provide an example of behaviour you wish others to follow

Do plan activities which involve more than one other person being present, or at least which are within hearing of others

Do respect a young person's right to personal privacy

Do provide access for young people to talk to others about any concerns they may have.

Do recognise, and allow for, the special needs of young people with disabilities and learning difficulties

Do encourage young people with disabilities and learning difficulties

Do encourage children and adults to point out attitudes and behaviour that they do not like

Do avoid inappropriate physical or verbal contact with young people

Do remember that someone else might misinterpret your actions

Do respect the cultural, religious and ethnic backgrounds of others

Do recognise that caution is required even in sensitive moments of counselling

Do avoid situations that compromise your relationship with young people

Do NOT permit abusive peer activities (e.g. bullying racism or others)

Do NOT judge or jump to conclusions about others

Do NOT show favouritism to any individual

Do NOT be drawn into attention seeking behaviour, such as crushes/tantrums

Do NOT make inappropriate remarks or gestures Do NOT rely on good reputation

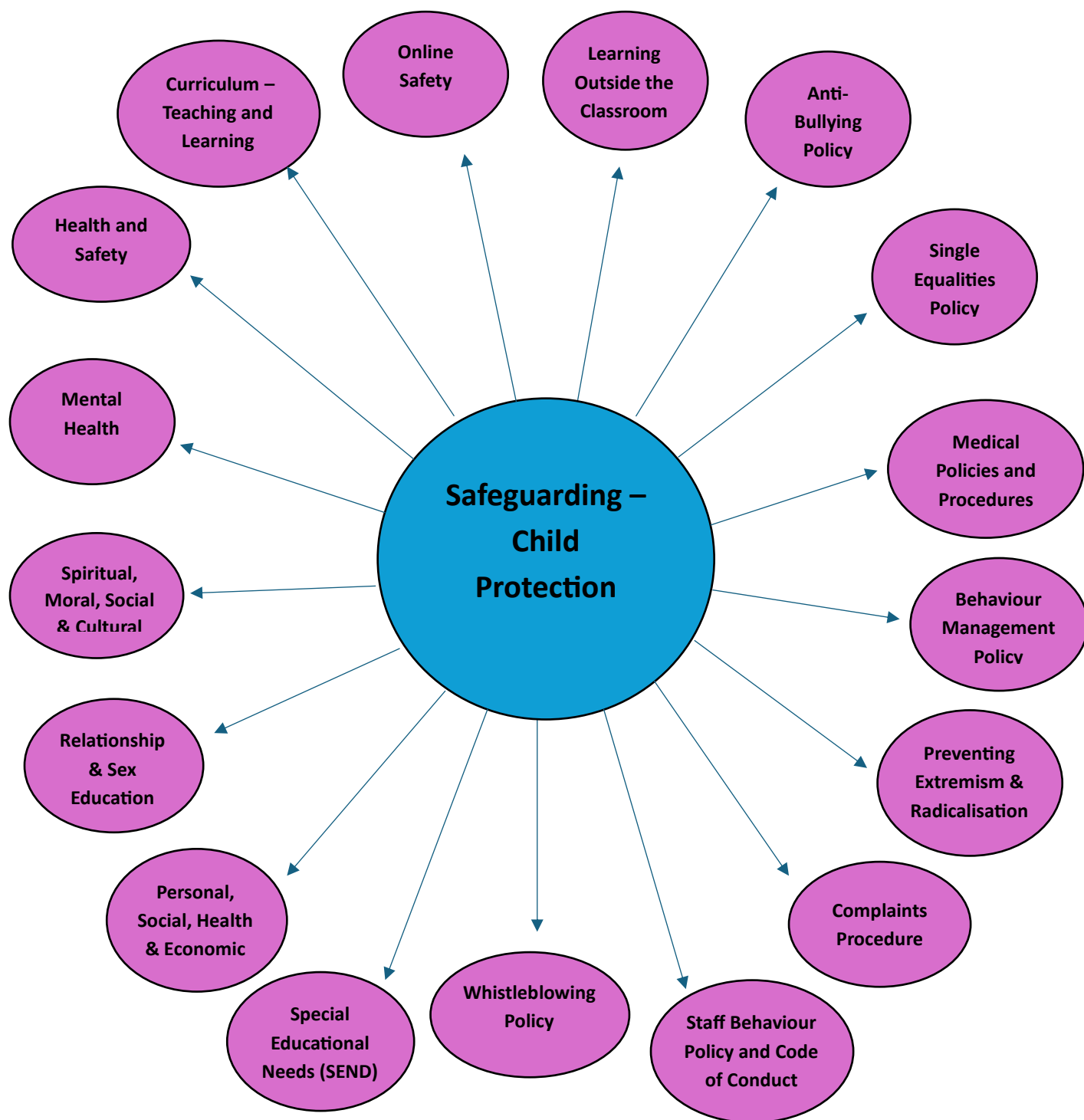
Do NOT believe 'it could never happen to me'

Do NOT interview or meet with children in private or outside of school Do NOT let concerns or allegations of abuse go unrecorded

Do NOT play physical contact games with young people.

APPENDIX 9 - THE ORGANISATION AND RELATIONSHIP OF SAFEGUARDING AND PASTORAL CARE POLICIES AND PROCEDURES AT FREWEN COLLEGE

Ensuring that our community is collectively responsible and able to ensure that we keep our pupils safe at all times is the fundamental aim for our school. Frewen College has developed a series of policies and procedures that are intended to support this endeavour. The following diagram illustrates the inter-relationship of these policies.



- Missing Children Procedure
- Adverse Childhood Experiences (ACEs)
- Anderson Children Multi-Agency Learning Review
- County Lines
- Briefing: Neglect
- Briefing: Harmful Sexual Behaviour (HSB)
- Briefing: Domestic Abuse
- Sharing Nude/Semi-Nude Images (previously sexting)
- Contextual Safeguarding
- Briefing: Supporting Families Enhancing Futures
- Briefing: Professional Disagreement & Escalation
- Briefing: Child Sexual Exploitation
- Briefing: Private Fostering
- Early Help

Frewen College is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment. It is our aim that all students fulfil their potential.