



Whole School Policy

Safeguarding and Child Protection Policy

	Policy to be reviewed annually		
	Committee	Date	Completed
Reviewed	Director of Pastoral Care	September 2025	✓
Reported	Safeguarding Steering	November 2025	✓
Approved	Board of Governors	December 2025	✓
Next review	Director of Pastoral Care	June 2026	

Contents

1. Child Protection: Policy Statement	5
2. Aims	6
3. Objectives.....	7
4. Recognising Child Abuse	8
<i>Physical Abuse, Neglect, Emotional Abuse and Sexual Abuse</i>	8
Physical Abuse	9
Neglect	10
Emotional Abuse	10
Sexual Abuse.....	11
Grooming.....	12
Child Sexual Exploitation	12
Child-on Child Abuse.....	13
Sexual Violence and Sexual Harassment between Children	14
Child Criminal Exploitation and County Lines	15
Cybercrime	16
Domestic Abuse.....	17
Child Abuse Linked to Faith or Belief (CALFB)	17
Female genital mutilation (FGM)	18
So called 'Honour Based' Abuse	18
Forced Marriage	19
Vulnerability to Radicalisation and 'PREVENT'	19
Additional support	21
Mental Health	21
Children who are absent from education	21
Child abduction and community safety incidents	22
Children and the court system.....	22
Children with family members in prison	22
Modern Slavery and the National Referral Mechanism	22
Homelessness	23
Significant Harm	23
Definition of Harm and Significant Harm.....	23
Recognition of Significant Harm	23
Stress and Distress.....	23
Children potentially at greater risk of harm	24
The child's wishes.....	24

5.	Roles and Responsibilities	24
	The DSLs.....	24
	Helping a child who wants to tell you about his/her abuse	27
6.	Safer Recruitment.....	27
7.	Training and Induction.....	28
8.	Monitoring and Recording	28
	Attendance	29
	Early Help and Early Help Assessment and Planning	30
	Contextual Safeguarding.....	30
	Summary of Disclosure	31
9.	Key Points to follow if you suspect, or are told of abuse	31
10.	Reporting Procedure.....	32
	Child Protection Referrals – CADS and MASH.....	33
11.	Working with Parents and Carers.....	33
12.	Safeguarding concerns and allegations made about staff, including supply teachers, volunteers, and contractors.....	33
	Low-level Concerns	35
13.	Procedures specific to Safeguarding in EYFS	35
	Reporting to Ofsted.....	37
14.	Whistleblowing.....	37
15.	Consultation/Referrals	37
16.	Protocol for Searching for a Missing Pupil	38
17.	Record Keeping and Storage	41
18.	Compliance.....	41
19.	Flow Chart for Raising Safeguarding Concerns about a Child	42

Please note: This is a large policy document. If you are reading this because a child is at risk, or you need to take immediate action in the best interests of a child or their safety, please turn to Section 10, or use the contact numbers below.

Below are the contact details for Safeguarding Leads and Local Authority

Senior School The DSL is Miss Lyndsay Fielding			
DSL	Lyndsay Fielding	lfielding@greshams.com	07900608642
DDSL	Chris Cox	ccox@greshams.com	07823321834
DDSL	Tom Burnett	tburnett@greshams.com	07917037856
DDSL	Lizzie Alexander	lalexander@greshams.com	07795571556
Prep School The DSL is Mrs Jemma Fenn			
DSL	Jemma Fenn	jffenn@greshams.com	07388940064
DDSL	James Horsley	jhorsley@greshams.com	07388940065
DDSL	Katie Fields	kfields@greshams.com	07388940063
DDSL	James Oakden	joakden@greshams.com	07824994891
DDSL	Kate Weeks	kweeks@greshams.com	
Pre-Prep School The DSL is Mrs Jemma Fenn Deputy Mrs Amanda Waters is onsite and is first port of call for all safeguarding matters during the working day (Monday – Friday) and for EYFS.			
DSL	Jemma Fenn	jffenn@greshams.com	07388940064
DDSL	Amanda Waters	awaters@greshams.com	01263714655
DDSL	Sophie Stephens	sstephens@greshams.com	07824 996 343
Governing Body			
Safeguarding Governor	Dr Sarah Maxwell	clerk@greshams.com	
Chair of Governors	Paul Marriage	clerk@greshams.com	
Local Authority			
Children's Advice and Duty Service (CADS)			0344 800 8021
Local Authority Duty Officer (LADO) Duty Desk			01603 307797
Norfolk Police (including Prevent)			101 or 999
Local Police Officer (non-urgent) – PC Graham Gower Smith			101 ext 1240
Norfolk Safeguarding Children's Partnership (general enquiries)			01603 223409

1. Child Protection: Policy Statement

- The welfare of children at Gresham's School is paramount.
- The Children's Act of 1989 and the Education Act of 2002 places a statutory responsibility upon schools to promote and safeguard every child's welfare and to have a written policy in place concerning abuse of any kind; it is the duty of all staff - both teaching and non-teaching - to play an active role in ensuring the safety and promoting the welfare of the children in the school's care.
- Safeguarding and promoting the welfare of children is defined for the purposes of this policy as: Providing help and support to meet the needs of children as soon as problems emerge; protecting children from maltreatment; whether this is inside or outside the home, including online;
- children grow up in circumstances consistent with the provision of safe and effective care; taking action to enable all children to have the best outcomes
- Should any deficiencies or weaknesses be discovered in the School's Child Protection arrangements, they will be remedied without delay.
- This policy applies to all staff and volunteers who work at Gresham's Schools, and to all support staff. It is available from the school website.
- The school's policy has due regard to Keeping Children Safe in Education (2025), Working Together to Safeguard Children (2023), and the Prevent Duty Guidance (2023)
- Our policy, in line with the Children Act 1989 and the 2004 amendment, is to take all reasonable measures to improve the wellbeing of each child and young person (pupil) in our care.
- The Head Teachers, all staff, and volunteers in regulated activity will undertake safeguarding and child protection training which will be updated at least annually, in line with Norfolk Safeguarding Children Partnership advice, and including Prevent and online safety. This will include part-time and voluntary staff. Upper Sixth Form pupils are briefed on child protection and the appropriate action to take should they receive any allegations of abuse. This takes place at the beginning of the school year.
- Training for staff and induction training for new staff is detailed in Section 07.
- The schools have procedures in place to deal with all allegations of abuse against staff, volunteers and the Head. Allegations against staff, Gap students or volunteers should be reported immediately to the Head or to Children's Services, but you must keep the DSL informed; where there is a conflict of interest in reporting the matter to the Head, staff should refer directly to the DSL. If the Head is absent, the allegation should be passed to the Deputy Head Pastoral, or the member of staff acting as Head. If the allegation concerns the Head, the person receiving the allegation should immediately inform the Chair of Governors without notifying the Head first. If the allegation is against the DSL it should be reported to the Head. In the case of serious harm, the police should be informed from the outset. This will always be in accordance with the statutory DfE guidance and Norfolk Safeguarding Children's Partnership's Protocol 27, and in such matters the school will also inform and seek advice from the LADO. The DSLs are:

School	DSL	Deputy Safeguarding Leads
Senior School	Miss Lyndsay Fielding	Mrs Lizzie Alexander, Mr Christopher Cox & Mr Tom Burnett
Prep School	Mrs Jemma Fenn	Mr James Oakden, Mr James Horsley & Mrs Katie Fields
Pre-Prep School	Mrs Jemma Fenn	Mrs Amanda Waters & Mrs Sophie Stephens

- The Safeguarding Leads or a Deputy will always be available to staff for advice or support during term time. In the holiday period at least one DSL or Deputy will always be available to staff; this is arranged by rota which is communicated to all staff, including reception and any staff involved in holiday lets.
- The Governor responsible for Child Protection is Dr Sarah Maxwell and she will review annually the School's Safeguarding and Child Protection policies and procedures and the efficiency with which the related duties have been discharged. The DSL and the Governor responsible, use the Norfolk Safeguarding Children Partnership's Self Review Tool as part of this process. Dr Maxwell can be contacted via the Clerk to the Governors.
- Miss Lyndsay Fielding, DSL for the Senior School will make a full written annual report to the Governing Body, incorporating all three Schools. This is written following detailed reviews of Safeguarding Procedures following Norfolk Safeguarding Children Partnership's guidelines, as above, and requires the active involvement of the Safeguarding Governor at all stages. It is presented in person to the Governing Body, with opportunity for questions and feedback.
- Safeguarding includes Online Safety and is the responsibility of the DSL. Within the Safeguarding Team, Mr Tom Burnett leads on Online Safety and is the Online Safety Officer, reporting to the DSL. The online safety policy can be found [here](#).
- IT staff ensure that internet access and electronic communication is as safe as possible. At Gresham's pupils are taught about safeguarding, including online, through various teaching and learning opportunities, as part of a broad and balanced curriculum.
- The school is a member of EduCare and The National College which provides support and information for teachers, pupils and parents.
- Pupils will be made aware that when they are using 3G, 4G and 5G to access the internet from mobile phones, there will not be the same filtering and monitoring protection in place when they are online.
- Pupils understand and sign for an Acceptable User Policy for online provision, which is reviewed annually.
- The school annually reviews the filtering and monitoring systems on the school network and devices and compares these to the Government standards, this includes using the [plan technology for your school service](#) and the [Generative AI: product safety expectations](#).
- The DSLs and the Deputy Safeguarding Leads are the members of staff nominated to liaise with the Children's Services Department of the Local Authority over welfare matters.
- All young people under the age of 18 are subject to the Children Act 1989 (amendments 2004) and therefore Child Protection procedures apply to them. The commitment to safeguarding and promoting the welfare of children however will extend to all children and young people who study/visit Gresham's. We may seek additional advice or guidance from safeguarding partners, where necessary, relating to matters involving pupils aged 18yrs and above.

2. Aims

The school aims, in compliance with Section 10 of the Children Act 2004, to:

- Improve the physical and mental health and the emotional well-being of the young people in its care; to protect them from harm and neglect and to keep them safe from maltreatment.
- To provide pupils with relevant information, skills and attitudes to help them resist abuse and prepare for the responsibilities of adult life, including home and family.
- To allow staff to be familiar with, and confident of, the appropriate Child Protection procedures and issues. This policy is intended to give clear guidance to all staff, teaching and support staff, on signs that may indicate the possibility of abuse and the procedure to follow if a young person discloses or a member of staff suspects abuse.
- To monitor children who have been identified as 'at risk'.
- To support children who have been abused, in accordance with their agreed Child Protection plans.

3. Objectives

- Skills and information will be delivered through the curriculum and especially through the PSHE programme.
- All Senior School pupils have access to the Pupil Handbook, which includes worries and complaints, online safety, bullying and Safeguarding information. This booklet is introduced and studied in tutor group sessions at the beginning of the school year.
- We have regard for Statutory Relationship, Sex and Health Education - RSHE (2025), the school policy document can be found here: [Relationship and Sex Education Policy](#).
- We try to create an environment and ethos in which young people feel secure and their points of view valued. They are encouraged to talk and they are listened to.
- We provide a range of appropriate adults whom they may approach if they are in difficulties.
- Staff will treat pupils with respect and pupils are expected to treat each other and staff with respect.
- We try to impress upon pupils the importance of rejecting violence as a means of resolving conflict.
- We give pupils opportunities to understand stress and strategies for coping with it.
- Sixth form pupils have access to our Wellbeing/ Enrichment programme.
- We include in the curriculum information on personal safety.
- We operate clear policies on drugs, alcohol, and substance misuse.
- We provide Child Protection training regularly to School staff, and at least annually. All staff undergo online Safeguarding training before commencing employment; in addition to annual training. Information on Staff Code of Conduct is delivered by the HR department. All staff have an induction session with the DSL on the first day of work.
- Each member of staff confirms that they have read and understood the policy, as well as Part One and Annex B of Keeping Children Safe in Education (KCSIE) September 2025, and accept their duty to cooperate with the school management in promoting Child Protection.
- There is a designated teacher (Mr Chart-Boyles, Senior School, and Mr James Horsley, Prep and Pre-Prep School) with particular responsibility for the education of Looked After Children (LAC) and a list of LAC is regularly reviewed and updated.
- The DSL will ensure that the appropriate staff have the information required concerning the Child's legal status, as well as support for previously Looked After Children. The DSL will manage information concerning the child's care arrangement and local authority contact.
- The school will assess the risks and issues in the wider community when considering the well-being and safety of its pupils, recognising the wider importance of environmental factors that may be a threat to their safety and/or welfare. This is known as contextual safeguarding. Safety of our pupils offsite is covered in our Education Trips and Visits Policy which can be found [here](#).
- All pupils are educated about Safeguarding, online safety, radicalisation and Child Protection issue through the School's PSHE /RSE and tutorial programme (also covering topics including relationships, sex education, misinformation, disinformation, conspiracy theories, diversity and inclusion, gender issues, sexting and consent). This is in accordance with the Gov [RSE Guidance \(2025\)](#). At the start of each academic year all pupils are introduced to the Child Protection Team, School Chaplin, Health Centre Manager and Independent Listeners and informed of the various roles they serve within the context of Safeguarding, as well as being made aware of how to contact these individuals. A number of emergency contacts are available to all pupils at all times, including the Child Protection team and the Health Centre.
- The DSL will ensure that any visiting speakers and all staff teaching RSE are fully equipped to handle any disclosures.
- All pupils have access to a handbook that contains information on online safety and child protection concerns. These subjects are also covered in tutorials and within the houses. These concepts are reinforced within the boarding houses and around school where pupils are encouraged to interact with one another, across year groups and between houses and sexes so that mutual respect is developed and appreciated.

- Staff speak with pupils both formally and informally about child-on-child relationships and why unacceptable behaviour between pupils will not be ignored by the school or considered as “banter” or “part of growing up”.
- Staff are clear with all pupils about the school’s policy on sexual relationships (child on child). Pupils are made aware of the communal spaces within houses, which can be used to meet and conduct oneself appropriately. This information is also made clear in the Senior School Pupil Handbook which all pupils have access to. Staff report immediately to the DSL of any concerns where there is an age gap between pupils and any underage relationships.
- As a Co-Educational school we acknowledge that on occasion there may be gender imbalance within academic subjects and activities. Ensuring that all pupils feel comfortable and are happy in the situation is paramount and all staff and activity leaders (when they see this imbalance) address this directly with pupils.

4. Recognising Child Abuse

- Child abuse is when a child or young person is suffering or likely to suffer significant harm. A person may abuse, neglect or exploit a child/young person by inflicting harm or failing to act to prevent harm. There are four categories of child abuse in the Children Act. These are:

Physical Abuse, Neglect, Emotional Abuse and Sexual Abuse.

- It is the duty of all staff to be vigilant and observant when dealing with pupils in their care and have no hesitation in passing on concerns they may have regarding the physical and emotional well-being of any child in the school. 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.
- Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, 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
- All staff must be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to vulnerability, disability and/or sexual orientation or language barriers. This must not prevent staff from having professional curiosity and speaking to the DSL. It is important that staff build trusted relationships with children and young people which will facilitate this communication.
- Safeguarding is the responsibility of all staff, and no member of staff should **assume** that another member of staff will take responsibility for reporting or referral.
- Abuse, neglect, exploitation and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.
- Abuse can take place wholly online or technology may be used to facilitate offline abuse.
- Behaviours linked to issues such as drug taking, alcohol abuse, unexplainable and/or/persistent absences from education, serious violence (including 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.

- Children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Staff must be alert to potential assumptions that indicators of possible abuse such as mood, behaviour and injury, relate to the child's disability without further exploration. Children with SEN can be disproportionately impacted by things like bullying without showing any outward signs. Children with SEN can also be more prone to peer group isolation, and extra pastoral support should be considered. The following information by the Government is useful for reference: [SEND Code of Practice 0 – 25 Yrs](#)

[Supporting Pupils at School with Medical Conditions](#) And the following specialist organisations:

[Mencap](#)

[NSPCC – Safeguarding children with special educational needs and disabilities \(SEND\)](#)

[NSPCC – Safeguarding child protection/deaf and disabled children and young people](#)

- Abuse by one or more pupils against another pupil will usually be dealt with by the school's disciplinary framework in accordance with the School's Anti-Bullying policy. Bullying behaviour is damaging and may lead to abuse; there is also the possibility that relationships between pupils are abusive, and that perpetrator and victim may be at risk. Pupils and staff should be alert to these possibilities and bullying behaviour will be treated as a child protection concern where there is reasonable cause to suspect that a child is suffering or likely to suffer significant harm. This must be reported to the DSL
 - Where a pupil is at risk of significant harm, the DSL will contact Children's Services. The Police will be contacted at the earliest opportunity if the allegation indicates that a potential criminal offence has taken place.
 - Staff should also bear in mind that safeguarding issues can manifest themselves via Child-on-Child abuse. **Child-on-Child abuse** is any form of physical, sexual, emotional or financial abuse, or coercive control, exercised between children and within children's relationships. This is most likely to include, but may not be limited to:
 - Bullying (including cyberbullying, prejudice based and discriminatory bullying)
 - Physical abuse, which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
 - Sexual violence and sexual harassment (to be responded to in accordance with the detailed guidance in Keeping Children Safe in Education, 2025, Part 5. Sexting (also known as youth-produced sexual imagery)
 - Abuse in intimate personal relationships between peers
 - Initiation/hazing-type violence and rituals

There is a detailed section on Child-on-Child abuse further on in this policy. The following lists, whilst not exhaustive, may be indicators that a child is suffering abuse.

Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused including by fabricating the symptoms of, or deliberately inducing illness in a child.

Signs and symptoms of physical abuse could include:

- Unexplained injuries or burns, bruises, finger marks
- Fear of undressing or medical help
- Improbable explanations for injuries
- Refusal to discuss injuries
- Untreated injuries
- Withdrawal from physical contact

- Self-destructive tendencies
- Fear of returning home or parents being contacted
- Unexplained absence from school
- Aggression towards others

Neglect

Neglect is the persistent failure to meet a child's basic and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur in pregnancy for example, as a result of maternal substance abuse. A person may neglect a child by failing to act to prevent harm.

Neglect may involve a parent failing to:

- Provide adequate food, clothing, shelter
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision
- Ensure access to appropriate medical care or treatment
- Respond to a child's basic emotional needs

Signs and symptoms of neglect could include:

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Poor state of clothing
- Emaciation
- Frequent lateness or non-attendance at school
- Untreated medical problems
- Low self-esteem
- Neurotic behaviour
- No social relationships
- Running away
- Compulsive stealing or scavenging

Emotional Abuse

Emotional Abuse is the persistent emotional ill-treatment of a child/young person such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to the child that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children.

These may include interactions that are beyond the child's developmental capability, as well as the overprotection and limitation of exploring and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, 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, though it may occur alone.

Signs and symptoms of emotional abuse could include:

- Physical and emotional development lags
- Admission of punishment which appears excessive
- Over-reaction to mistakes
- Continual self-depreciation
- Sudden speech disorders
- Fear of new situations
- Inappropriate emotional responses to painful situations
- Neurotic behaviour
- Self-mutilation
- Social isolation - few friends
- Fear of parents being contacted
- Extremes of passivity or aggression
- Drug/solvent abuse
- Compulsive stealing or scavenging

Sexual Abuse

Sexual abuse involves forcing or enticing a child/young person to take part in sexual activities, not necessarily involving a violence, whether or not the child/young person is aware of what is happening. These may involve physical contact, including penetrative (for example rape or oral sex) or non- penetrative acts such as assault, kissing, rubbing and touching outside of clothes. It may include involving children or looking at, or being in the production of sexual online images, watching sexual activities, or 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. It should be noted and remembered that abuse may be carried out by men or women, or by young people themselves. The sexual abuse of children by other children is a specific safeguarding issue, please see sections on *Child on Child Abuse*, and *Sexual Violence and Sexual Harassment between Children*. Also included in this category are Grooming, Female Genital Mutilation and Child Sexual Exploitation.

The Centre of Expertise on Child Sexual Abuse may also be useful for further information.

Signs and symptoms of sexual abuse could include:

- Sudden changes in behaviour or performance
- Displays of affection in a sexual way, inappropriate to age
- Sexual awareness inappropriate to age
- Tendency to cling and need reassurance
- Tendency to cry easily
- Regression to younger behavioural traits
- Complaints of genital itching or persistent infections in anal or genital regions
- Distrust of a familiar adult, or anxiety about being left with a relative or babysitter
- Bruises, scratches, bite marks on the body
- Unexplained gifts of money
- Depression and withdrawal
- Apparent secrecy
- Incontinence
- Sleep disturbances or nightmares
- Chronic illnesses, especially throat infections and venereal diseases

- Anorexia or bulimia
- Frequent masturbation
- Unexplained pregnancy
- Fear of undressing for games
- Phobias and panic attacks

Grooming

Grooming is a subtle, gradual, and escalating process of building trust with a young person. It is deliberate and purposeful. It may take place over weeks, months, or even years before any sexual abuse actually takes place. It may happen via the internet or social media, or in person. It usually begins with behaviours that may not even seem to be inappropriate.

Grooming young people may include strategies such as:

- Identifying with the child/young person.
- The abuser may appear to be the only one who understands him/her. Displaying common interests in sports, music, movies, video games, television shows, etc.
- Recognizing and filling the child/young person's need for affection and attention.
- Giving gifts or special privileges to the child/young persons.
- Allowing or encouraging the child/young person to break rules (e.g., smoking, drinking, using drugs, viewing pornography).
- Communicating with the child/young person outside of the person's normal or professional role (e.g., teacher, or coach). This could include, for example, texting or emailing the young person without the parents' knowledge.

Child Sexual Exploitation

Child sexual exploitation involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. It can involve violent, humiliating and degrading sexual assaults. Consent cannot be given, even when a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. It does not always involve physical contact and can happen online. Child Sexual Exploitation can affect any child or young person under the age of 18, who has been coerced into engaging in sexual activities including 16 and 17 year olds who can legally consent to have sex: it can still be abuse even if the sexual activity appears consensual. Child Sexual Exploitation can occur over a period of time or be a one-off occurrence and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

Child Sexual Exploitation is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors, including gender, sexual identity, cognitive ability, physical strength, status, access to economic or other resources.

A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point.

Indicators of Child Sexual Exploitation may include:

- Children who appear with unexplained gifts or new possessions
- Children who associate with other young people involved in exploitation
- Children who have older boyfriends or girlfriends
- Children who suffer from sexually transmitted infections or become pregnant
- Children who suffer from changes in emotional wellbeing
- Children who misuse drugs and alcohol
- Children who go missing for periods of time or regularly come home late.
- Children who regularly miss school or education
- Children who display sexual behaviours beyond expected sexual development

Child-on Child Abuse

The unique nature of a boarding school like Gresham's means that staff are aware of the risks associated with pupils sharing overnight accommodation and in particular the possibility of child-on-child abuse.

- All staff should recognise that children are capable of abusing their peers and should be clear about the reporting procedures with regard to child-on-child abuse.
- Staff should be aware that some children are more vulnerable to child-on-child abuse, this includes children with SEN, children with disabilities and LGBT children.
- Child-on-child abuse must be reported to the DSL the same as any other Safeguarding concern, that is, a written account of any conversation and/or disclosure using reporting procedures. This is either by creating an incident on our pastoral reporting system, CPOMS, including alerting the DSLS, , or by using the form which can be found [here](#) The DSL will keep accurate written records herein, including advice, communication with parents, referrals to external agencies, and any safeguarding/child protection arrangements.
- All staff receive training on child-on-child abuse as part of regular update training and online training via EduCare and The National College.
- In the event of youth-produced sexual imagery, staff should be absolutely clear that they will not view any images but will report immediately to the DSL. In cases where nudes or semi-nudes have been shared, we follow guidance given to schools and colleges by the UK Council for Internet Safety (UKCIS): [Sharing nudes and semi-nudes](#). See also Online Safety Policy [here](#).
- Support for both victim and perpetrator will be required in the event of child-on child abuse; key pastoral staff, DSL, and DDSLs will meet to make arrangements on an individual basis for reintegration to School with due regard to KCSIE (2025) Specialist support, from the mental health nurses, school Dr and Health Centre nurses will also form part of the support given to these identified pupils. External specialist help will be engaged as required. There are a number of websites listed in KCSIE 2025 that can provide further support and advice on harmful sexual behaviour (HSB).
- Staff must promote the systems in place for pupils to confidently report abuse. Pupils must feel confident in reporting to adults in School, and/or using the 'HELP' button on the Pupil homepage.
- Staff have an important role to play in preventing child-on-child abuse and in responding to it where they believe a child may be at risk from it.

Sexual Violence and Sexual Harassment between Children

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

Children who are victims will find the experience stressful and distressing. This will in all likelihood adversely affect their educational attainment.

Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline and are never acceptable. All victims will be taken seriously and offered appropriate support. Intra familial harms may necessitate additional support for siblings following incidents.

We encourage a culture of listening to pupils and taking account of their wishes and feelings. We recognise the difficulties that children may have in approaching staff about these circumstances and work to build trusted relationships which facilitate communication. We educate pupils on positive and healthy relationships throughout the curriculum and in PSHE/RSE

Staff should be aware of:

- Some groups being potentially more at risk: evidence suggests girls, children with SEN and LGBTQ+ children.
- A responsibility to make it clear that sexual violence and sexual harassment is not acceptable and will not be tolerated. It is not an inevitable part of growing up.
- A responsibility not to tolerate or dismiss sexual violence or sexual harassment as 'banter', 'growing up', 'having a laugh' 'boys being boys'.
- A responsibility to challenge and report behaviours such as grabbing bottoms, breasts, and genitalia, lifting up skirts etc.

Failing to document, dismissing, or tolerating such behaviours risks normalising them.

Gresham's School has a zero-tolerance approach to this; it will never be passed off for example as 'banter', as this can lead to unacceptable behaviours and an unsafe environment for children.

We recognise that even if there are no reported cases of child-on-child abuse, sexual harassment, or sexual violence between children, such abuse may still be taking place and is simply not being reported.

Sexual Violence refers to sexual offences under the Sexual Offences Act 2003, and includes rape, assault by penetration and sexual assault, when it is intentional, and when there is no consent, or a person does not reasonably believe there is consent.

Consent is about having the freedom and capacity to choose. It may be given to one sort of sexual activity but not to another. It can be withdrawn at any time during sexual activity and each time activity occurs.

Sexual Harassment in this context refers to child on child sexual harassment; that is unwanted conduct of a sexual nature that can occur online and offline. Sexual harassment is likely to: violate a child's dignity, make them feel intimidated, degraded, humiliated and or create a hostile or sexualised environment.

Sexual Harassment can include:

- Sexual comments such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexual names.
- Sexual jokes or taunting.
- Physical behaviour such as deliberately brushing up against someone, interfering with someone's clothes, displaying photos or drawings of a sexual nature, taking photos of an explicit nature.
- Upskirting – (Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment for the purpose of upskirting. "Operating equipment" includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion- activated camera. This 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.
- Online sexual harassment. This may be standalone, or part of a wider pattern. It may include:
- Non-consensual sharing of sexual images and videos
- Sexualised online bullying
- Unwanted sexual comments and messages, including on social media
- Sexual exploitation, including coercion and threats.

The initial response to a child who tells you about this type of abuse is extremely important. It is essential that all victims are reassured and that they are taken seriously, supported and kept safe so that no victim will be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment and no victim ever made to feel ashamed for making a report. Children should also be reassured that the law on Child-on-Child abuse is there to protect them rather than criminalize them.

The DSL must be contacted immediately, and it must be reported to the DSL the same as any other Safeguarding concern, that is, either by creating an incident on our pastoral reporting system, CPOMS, including alerting the DSLS, and using the form which can be found [here](#). The DSL will follow guidance set out in Keeping Children Safe in Education 2025. The DSL will keep accurate written records herein, including advice, communication with parents, referrals to external agencies, and any safeguarding/child protection arrangements.

It is important also to understand that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. The victim may not make a direct report. If staff have any concerns about a child's welfare, they should act immediately rather than wait to be told.

Child Criminal Exploitation and County Lines

Drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market, and seaside towns. Key to identifying potential involvement in county lines are missing episodes when the victim may have been trafficked for the purpose of transporting drugs.

Indicators will be very similar to other forms of abuse and exploitation.

Children can 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. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, and they are not treated as victims.

Both boys and girls who are criminally exploited may be at higher risk of sexual exploitation. Child Criminal Exploitation does not always involve physical contact; it can also occur through use of technology.

Some of the following can be indicators of Child Criminal Exploitation:

- Children who appear with unexplained gifts or new possessions
- Children who associate with other young people involved in exploitation
- Children who suffer from changes in emotional wellbeing
- Children who misuse drugs and alcohol
- Children who go missing for periods of time or regularly come home late
- Children who regularly miss school or education
- Children who have their bank account used to facilitate drug dealing
- Children who have been the victim or perpetrator of serious violent, e.g. knife crime.

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 (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded.
- Denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network, or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- Making, supplying, or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets, and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the DSL will consider referring into the [Cyber Choices](#) programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Ensuring that the school has the appropriate level of security protection and to further improve our resilience against cyber-attacks we review annually the procedures in place. This review is completed by the DSL and the Head of IT Services. The following governmental standards are used.

[Cyber Security standards for schools and colleges. GOV.UK](#)

The following link [here](#) from the UK Safer Internet Centre provides further information.

Domestic Abuse

In line with the Domestic Abuse Act 2021, domestic abuse can encompass a wide range of behaviours and can be a single incident or a pattern of incidents. The abuse can be, but is not limited to:

- Physical or sexual abuse
- Violent or threatening behaviour
- Controlling or coercive behaviour
- Economic abuse (limiting ability of the victim to acquire, use or maintain money or other property; or obtain goods and services)
- Psychological, emotional, or other abuse

People are 'personally connected' when they are, or have been married to each other or civil partners, or have agreed to marry or become civil partners. If the two people have an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, wellbeing, development and ability to learn.

Anyone can be a victim of Domestic Abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality, or background and can take place inside or outside of the home. We work in partnership with Norfolk Constabulary and Norfolk Children's Services to identify and provide appropriate support to pupils who have experienced domestic violence in their household; this scheme is called Operation Encompass. In order to achieve this, Norfolk Children's Services staff will share police information of all domestic incidents where one of our pupils has been present with the DSL. On receipt of any information the DSL will decide on the appropriate support the child requires, this could be silent or overt. All information sharing and resulting actions will be undertaken in accordance with the Norfolk Joint Agency Protocol for Domestic Abuse – Notifications to Schools. We will record this information and store this information in accordance with the record keeping procedures outlined in this policy. The National Domestic Abuse Hotline is a free confidential service 24 hours per day. Tel: 0808 2000 247

Child Abuse Linked to Faith or Belief (CALFB).

All staff should be aware of Child Abuse Linked to Faith or Belief.

There is a variety of definitions associated with abuse linked to faith or belief. The National Action Plan includes the following when referring to Child Abuse Linked to Faith or Belief (CALFB).

Belief in concepts of:

- witchcraft and spirit possession, demons or the devil acting through children or leading them astray (traditionally seen in some Christian beliefs)
- the evil eye or djinns (traditionally known in some Islamic faith contexts) and dakini (in the Hindu context)
- ritual or muti murders where the killing of children is believed to bring supernatural benefits, or the use of their body parts is believed to produce potent magical remedies
- use of belief in magic or witchcraft to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation. This is not an exhaustive list and there will be other examples where children have been harmed when adults think that their actions have brought bad fortune, such as telephoning a wrong number which is believed by some to allow malevolent spirits to enter the home. Reasons for the child being identified as 'different' may be a disobedient or independent nature, bed wetting, nightmares, or illness. Attempts to exorcise the child may include:
- beating
- burning

- starvation
- cutting or stabbing
- isolation within the household.

Children with a disability may also be viewed as different, and various degrees of disability have previously been interpreted as 'possession', from a stammer to epilepsy, autism or a life limiting illness. Any concerns or potential concerns of abuse or suspected abuse must be reported immediately in exactly the same way as any other category of abuse.

Female genital mutilation (FGM)

This is a form of child abuse which has devastating physical and psychological consequences for girls and women. The World Health Organization describes it as: "procedures that involve partial or total removal of the external female genitalia, or other injury to the female genital organs for non-medical reasons" (WHO, 2013). Since 1985 it has been a serious criminal offence under the Prohibition of Female Circumcision Act to perform FGM or to assist a girl to perform FGM on herself. The Female Genital Mutilation Act 2003 tightened this law to criminalise FGM being carried out on UK citizens overseas. Anyone found guilty of the offence faces a maximum penalty of 14 years in prison. There is now a mandatory reporting duty; all **teachers** are required, by law to report personally to the Police, if there is any evidence FGM has taken place or is about to happen. Norfolk Police can be reached by dialling 101, or in an emergency, 999. This is a statutory duty upon teachers alongside health and social care professionals. Other staff should refer to the DSL for immediate action.

The following link [here](#) takes you to the GOV site and a resource pack with further info.

A girl at immediate risk of FGM may not know what's going to happen, but she might talk about:

- being taken 'home' to visit family
- a special occasion to 'become a woman'
- an older female relative visiting the UK.

She may ask a teacher or another adult for help if she suspects FGM is going to happen or she may run away from home or miss school.

A girl or woman who's had FGM may:

- have difficulty walking, sitting or standing
- spend longer than normal in the bathroom or toilet
- have unusual behaviour after an absence from school or college
- be particularly reluctant to undergo normal medical examinations, or ask for help, and may not be explicit about the problem due to embarrassment or fear

So called 'Honour Based' Abuse

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 FGM and forced/child marriage. All forms of so called HBA are abuse (regardless of the motivation) and should be handled as such. Where staff are concerned that a child may be at risk of HBA, they must contact the DSL as a matter of urgency.

Forced Marriage

Forcing a person into 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. Threats can be physical or emotional and psychological. Concerns must be reported to the DSL to escalate. In addition, it is also 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. This applies to non-binding, unofficial "marriages" as well as legal marriages.

The following link [here](#) takes you to the Gov site and a resource pack with further info.

Vulnerability to Radicalisation and 'PREVENT'

[Further detailed information can be found by reading: Prevent duty guidance: for England and Wales.](#)

As part of the Counter Terrorism and Security Act 2015, schools have a duty to prevent people being drawn into terrorism. This has become known as the Prevent Duty. Where staff are concerned that children or young people are developing signs of being radicalised, they should discuss this with the DSL. The DSL has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have. We use the curriculum to ensure children and young people understand how people with extreme views share these with others, especially online.

Staff should be alert to changes in children's behaviour which would indicate they may need help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately.

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 refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism. The current threat from terrorism in the United Kingdom may include the exploitation of susceptible people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and young people susceptible to future manipulation and exploitation.

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.

Gresham's School is clear that this exploitation and radicalisation should be viewed as a safeguarding concern, and we will seek to protect children and young people against the messages of violent extremism.

There is no such thing as a "typical extremist": those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity. Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that staff are able to recognise those vulnerabilities.

Indicators of vulnerability include:

- Identity Crisis – the student / pupil is distanced from their cultural / religious heritage and experiences discomfort about their place in society
- Personal Crisis – the student / pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
- Personal Circumstances – migration; local community tensions; and events affecting the student / pupil's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
- Unmet Aspirations – the student / pupil may have perceptions of injustice; a feeling of failure; rejection of civic life
- Special Educational Need – students / pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

This list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism. More critical risk factors could include:

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

Action:

- Screening & monitoring of School network by IT staff, in close association with the Director of Pastoral Care/DSL; awareness of the need for vigilance about pupils accessing websites which are connected with radicalised or terrorist activity.
- Vigilance by house staff and other staff for changes in pupil's behaviour (as above).
 - Staff to report any concerns immediately to DSL and Deputy Head Pastoral (SS). DSL to report immediately to Children's Advice and Duty Services (CADS) and contact Preventreferrals-NC@norfolk.police.uk
 - The following guidance document from Norfolk County Council gives further details: Norfolk Practitioners' Quick Guide: Safeguarding Individuals Susceptible to Radicalisation (VTR). In order to access this guide, you will need to click on the following [link](#)
- Engagement with parents/the family will be considered as they are in a key position to spot signs. Families will be helped and supported and guided to support mechanisms.
- DSL to also consider contacting the anti-terrorist hotline 0800 789 321. or reporting via [Gov website](#)
- Deputy Head Pastoral (SS) to have communication with School Prefects in weekly meetings to raise any of their concerns or observations.
- *Guidelines on Teaching Political Issues at Gresham's* included in Teachers' Handbook.
- All staff trained by the DSL to be aware of indicators of vulnerability and susceptibility, in the PREVENT' strategy, and how 'Channel' process works.

Whilst the Counter Terrorism Local Profile (CTLP) identifies that Norfolk in general may experience a low level of risk it is important to note that risk will vary greatly and can change rapidly - no area, institution or

body is risk free and the threat is real and affects all communities

Additional support

The Department has published further advice for schools on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts to other sources of advice and support.

Mental Health

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem, and a DSL, DDSL, and/or a member of the Mental Health Team should always be consulted if there are Mental Health concerns for a child. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, attendance and progress at school.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the procedures in this policy: reporting the concern and contacting the DSL without delay.

Mental Health Support is available in School for pupils; three mental health nurses, Kate Pollicot-Reid, Elliot Robinson and Kelly Langford Lee lead in all matters of mental health, and work with the Safeguarding teams in all three Schools. Pupils are referred for mental health support in a number of ways. The Health Centre and the Mental Health Nurses meet weekly to discuss cases in a Referral and Triage meeting, these pupils are then discussed in the Mental Health Team meeting. Further details are in the Mental Health and Wellbeing Policy which can be found [here..](#)

Children who are absent from education

Children being absent from education for prolonged periods and/or 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. It is important that the DSL (who is the SLT with overview of attendance) responds and flags up attendance concerns for those pupils deemed persistently absent in order to prevent them becoming a child missing education in the future. It may be that the absence can be dealt with as it first starts emerging, but also where the pupil is already known to the local authority Children's social care team. Using the statutory guidance '[Working together to improve school attendance](#)' will help the DSL and pastoral team to recognise the factors which point towards a safeguarding concern.

The school has a duty to report to the LEA if a pupil arrives or departs the school at a nonstandard transition point. Please refer to the school attendance policy (link below).

Knowing where children are during School hours is an extremely important part of Safeguarding. Missing School can be an indicator of abuse or neglect, and may also raise concerns about other safeguarding issues, including exploitation of children.

We monitor attendance carefully and address poor or irregular attendance without delay.

Staff should all be fully conversant with the Attendance Policy and report any concerns to the DSL. Click on the to access the policy [here](#)

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.

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. The government has produced age appropriate guides to support children. [5 – 11yrs](#) and [12 – 17yrs](#).

The guide explains each step of the process, support and special measures that are available. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The charity [Gingerbread](#) has some useful tips for parents in helping their child through the separation process.

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.

Modern Slavery and the National Referral Mechanism

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 - GOV.UK](#)

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL and DDSL's should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family 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, and in accordance with local procedures, 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.

Significant Harm

Some children are in need of protection because they are suffering or likely to suffer significant harm. The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of children. The Local Authority is under a duty to make enquiries, or cause enquiries to be made where it has reasonable cause to suspect a child is suffering, or likely to suffer, significant harm. Decisions about significant harm are complex and should be informed by careful assessment of the child's circumstances, and discussion between the statutory agencies and the child and family.

Definition of Harm and Significant Harm (from Adoption & Children Act 2002)

Ill treatment or the impairment of health or development (impairment suffered from seeing or hearing the ill treatment of another)

'Development' means physical, intellectual, emotional, social or behavioural development

'Health' means physical or mental health

'Ill treatment' includes sexual abuse and forms of ill-treatment which are not physical

Recognition of Significant Harm

Any allegation of a sexual nature, or parents whose behaviour may present risk because of:

- Domestic violence, drug & alcohol abuse and mental health problems
- Any physical injury caused by assault or neglect which requires medical attention
- Repeated incidents of physical harm
- Any contact with a person assessed as presenting a risk to children, or children who live in low warmth, high criticism environments, and children who suffer from persistent neglect
- Children who may be involved in prostitution
- Other circumstances where professional judgement and/or evidence suggest a child's health, development or welfare may be significantly harmed.

Stress and Distress

An abused child will usually show signs of stress and distress. Possible signs of abuse include, but are not limited to, those listed below. Many of these may of course have nothing to do with abuse, but are worth consideration in trying to understand the child's behaviour:

- A fall-off in school performance
- Aggressive or hostile behaviour
- Difficulties in relationships with peers
- Excessively affectionate or sexual behaviour towards adults or other children

- Regression to more immature forms of behaviour
- Self-harming or suicidal behaviour
- No reasonable or consistent explanation for a pupil's injuries, or a pattern of injuries
- Disturbed sleep

Children potentially at greater risk of harm

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and/or complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health. Local authorities should share the fact a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children.

Where children need a social worker, this should inform decisions about safeguarding, such as responding to unauthorised absence, and about promoting welfare, such as mental health support and welfare care plans alongside statutory services.

The child's wishes

Where there is a safeguarding concern the DSL must ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. We will always operate with the best interests of the child at heart.

5. Roles and Responsibilities

It is the duty and responsibility of all involved in the care of young people at Gresham's School to recognise and exercise the trust placed in us, ensuring that the best interests of the child/young person are always paramount, and that Safeguarding is the responsibility of all staff and volunteers working with our pupils.

The DSLs

Senior School	<p>Miss Lyndsay Fielding, Director of Pastoral Care (SLT) is the DSL, Mrs Lizzie Alexander, Deputy Head Pastoral (SLT), Mr Christopher Cox, Housemaster of Tallis and Teacher, and Mr Tom Burnett, Housemaster of Farfield and Teacher, are the Deputy Safeguarding Leads.</p> <p>They have responsibility for contacting the Children's Services to register concern about a child's welfare and implementing measures relating to Child Protection.</p> <p>Miss Lyndsay Fielding is the first point of contact for parents, pupils, all staff and external agencies in matters of Child Protection. She has ultimate lead responsibility for safeguarding. Mrs Lizzie Alexander, Mr Christopher Cox, and Mr Tom Burnett are fully trained to stand in for the DSL at any time.</p>
Prep School	<p>Mrs Jemma Fenn Head of Pastoral Care/SENCo is the DSL. She is the first point of contact for parents, pupils, all staff and external agencies in matters of Child Protection.</p> <p>Mrs Katie Fields, Teacher, Mr James Horsley, Teacher, Mrs Kate Weeks, Head of Boarding and Mr James Oakden, Deputy Head are the Deputy Safeguarding Leads. They have responsibility for contacting Children's Services to register concern about a child's welfare and implementing measures relating to Child Protection.</p>

Pre Prep School	<p>Mrs Jemma Fenn, Head of Pastoral Care/SENCo, is the DSL for the Pre-Prep. Mrs Amanda Waters and Mrs Sophie Stephens, Headmistress, are the Deputy Safeguarding Leads. They have responsibility for contacting Children's Services to register concern about a child's welfare and implementing measures relating to Child Protection. Mrs Amanda Waters is the first point of contact for parents, pupils, all staff and external agencies in matters of Child Protection, and for EYFS. Mrs Jemma Fenn has lead responsibility.</p>
-----------------	--

Their key responsibilities are to:

- Manage referrals from school staff or any others from outside the school.
- Work with external agencies and professionals on matters of safety and safeguarding. Raise awareness of safeguarding and child protection amongst the staff and parents. Ensure child protection information is transferred to the pupil's new school
- Be aware of pupils who have a social worker.
- Be conversant with Local Safeguarding Children Partnership procedures.
- Consult and refer cases under Local Safeguarding Children Partnership procedures.
- Consult the Children's Services department on issues such as informing parents, informing other children or staff, seeking medical help, if an allegation or suspicion occurs.
- Organise training on Child Protection within the School, for staff and senior pupils.
- Attend training every 2 years.
- Keep the Head informed if appropriate.
- Be aware of the role of other agencies.
- Cooperate as fully as possible with Police and Children's Services investigations - and ask to participate in their planning meetings if appropriate.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children are experiencing, or have experienced, with teachers and School Leadership Team.
- Keep appropriate records.
- Support staff.
- Be available for staff in person during School hours, and by mobile at all other times. Advise staff of absence from School and availability of Deputy or alternative DSLs.
- Monitor and evaluate the effectiveness and implementation of the School's Child Protection Policy.
- Assume overall responsibility for online safety with respect to safeguarding.
- Taking lead understanding of the filtering and monitoring systems and the processes in place in regards to safeguarding.
- Meet regularly to discuss Safeguarding and Child Protection matters, and any pupils who may be cause for concern.
- The DSL will inform the initiating member of staff about the action taken.

Further details on the role of the DSL and the DDSLs can be found in Keeping Children Safe in Education 2025, Annex C.

Teaching Staff

- Teachers bring a number of advantages to the recognition of child abuse:
- They have regular and frequent opportunities to observe children and changes in their behaviour.
- They have an ongoing relationship with children who may confide in them about difficulties.
- They have wide knowledge of the wide range of behaviour likely to be seen in children of a particular age. They have opportunities to observe the response of a group of children to particular situations. They will therefore be sensitive to surprising or unusual responses.

All Staff

Every member of staff including volunteers working with children at our school are advised to maintain an attitude of '*it could happen here*' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child and have a responsibility to take action as outlined in this policy.

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

Whilst the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) places duties on organisations and individuals to process information fairly and lawfully, it is not a barrier to sharing information where the failure to do so could result in a child being placed at risk of harm. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

If a member of staff believes or suspects that a crime may have been committed, then the police should be contacted immediately.

If, at any point, there is a risk of immediate serious harm to a child a referral should be made to Children's Services immediately. **Anybody can make a referral.**

If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration by raising concerns again with the DSL and/or the Head. Concerns should always lead to help for the child at some point.

The school does not require parental consent for referral to statutory agencies

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

- The situation is an emergency and the DSL, the DDSL and the Head are all unavailable
- They are convinced that a direct report is the only way to ensure the pupil's safety. Any member of staff who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the Head or the Chair of Governors. If any member of staff does not feel the situation has been addressed appropriately at this point should contact Children's Services directly with their concerns.

A referral to Children's Social Care should be responded to by Children's Social Care with 24 hrs. Staff must follow up a referral if information is not forthcoming.

Staff wishing to raise concerns about safeguarding practices within the school should speak directly to the DSL or the Headmaster, or any other member of the SLT; such concerns will be taken seriously. The [NSPCC](#) whistle blowing advice line is available for any staff who do not feel able to raise such concerns: 0800 028 0285

Helping a child who wants to tell you about his/her abuse

Staff should remember that the priority is to protect the child. The matter should be taken seriously. React calmly, listen carefully, observe but do not judge. Don't stop the child who is freely recalling significant events. Reassure the child that s/he has done the right thing in telling you. Indicate the action you will take and make it clear that you will have to tell the DSL (no secrets). If the child comes back to talk at a later stage s/he should be told that you cannot comment or advise as that might affect his/her security, but you can listen. Bear in mind these 'must nots':

- Do not insist the child speaks directly to the Designated Person
- Do not contact the parents yourself
- Do not cross examine the child or ask leading questions
- Do not speak to anyone about whom allegations are made, including colleagues
- Do not promise confidentiality
- Do not ask a child outright if s/he or others have suffered abuse
- Avoid criticising the alleged perpetrator

6. Safer Recruitment

All appointments to the staff with due regard to statutory guidance Keeping Children Safe in Education Part 3, and key senior staff involved in the recruitment process undergo Safer Recruitment in Education training.

All appointments to the staff are checked in the following ways:

- Written references are obtained for all staff, before interview, and we do not accept testimonials. This is the same for internal candidates. Those references will include specific comments about the suitability of the applicant to work in a residential school. References received electronically will be subject to checks by the HR department, to confirm that they are from a legitimate source. Gaps in CVs are investigated. The identity and qualifications of the applicant are checked, and we require evidence of original academic certificates. As part of due diligence checks all shortlisted candidates will be informed that online searches will be completed. The Heads have completed the online training on Safer Recruitment (along with a number of other staff, including SLT and HR) and the whole application and interview process is underpinned by Safer Recruitment in Education guidance. At least one person on the interview panel will have been trained in Safer Recruitment.
- All members of staff, both academic and non-academic, who will have unsupervised access to the children will be checked at the enhanced level for criminal records via the police and the Disclosure and Barring Service (DBS).
- The DfE's [Check a teacher's record](#) will be used to check for any prohibitions, directions sanctions and restrictions.
- We will maintain a Single Central Register of all Safer Recruitment checks carried out in line with statutory requirements.
- The Single Central register is reviewed termly, by at least two of the following: The Bursar, Governor responsible for Safeguarding and the DSL.
- Staff awaiting DBS clearance, Gap students and volunteers' access to children is only under appropriate supervision at all times. Staff awaiting DBS clearance will have the progress of their application checked every two weeks.
- The School Recruitment Policy sets out this process from beginning to end and can be found [here](#).
- For all persons over 16 (not on the roll of the school) who after April 2002 began to live on the same premises as boarders but are not employed by the school, an enhanced certificate with a barred list information is obtained from the Disclosure and Barring Service (DBS).

- There is a written agreement between the school and any person over 16 not employed by the school but living in the same premises as boarders (for example, members of staff households). This specifies the terms of their accommodation, guidance on contact with boarders, their responsibilities to supervise their visitors, and notice that accommodation may cease to be provided if there is evidence that they are unsuitable to have regular contact with pupils.
- All persons visiting boarding accommodation (e.g. visitors, outside delivery and maintenance personnel) are kept under sufficient staff supervision to prevent them gaining substantial unsupervised access to boarders or their accommodation. See [Access to Boarding Houses](#).
- Care is taken to ensure that when our pupils are off site at particular events or activities, staff of these organisations/facilities are suitable to supervise them. Pupils are accompanied by Gresham's staff in this context [Staff Handbook](#)
- Care is taken to ensure visiting speakers are suitable and supervised at all times. Background research is conducted including internet searches.
- Pupils taking part in exchange visits: it is recognised that DBS cannot access criminal records held overseas, and therefore host families in other countries cannot be checked in the same way by local authorities. We work with partner schools abroad to ensure that similar assurances are undertaken prior to a visit.
- Parents of our own pupils who host pupils visiting our school on a residential basis (such as exchange visits, visiting sports tours) will be DBS checked.

7. Training and Induction

- When new staff, volunteers, governors, temporary staff, or regular visitors join our school, they will be informed of the safeguarding arrangements in place.
- Every new member of staff or volunteer undertakes an online Child Protection training programme, and information on Staff Code of Conduct is delivered by the HR department, before commencing work. There is also an induction session with the DSL on the first day of work. The induction session reinforces online learning and reminds staff and volunteers of their responsibility to safeguard all children at our school and confirms the remit of the role of the DSL.
- The same process is in place for governors. This training equips the governing body with the knowledge to provide strategic challenge to test and assure themselves that safeguarding policies and procedures are effective and support the delivery of a robust whole school approach to safeguarding.

Key elements of induction meeting with DSL for new staff, volunteers, governors, temporary staff, or regular visitors

Explain	Provide
<ul style="list-style-type: none"> • Safeguarding Policy • Staff Code of Conduct • Pupils' Behaviour Policy • Safeguarding response to Children Missing Education • Role of DSL, including identity of DSL and deputies • Online Safety: including use of mobile phones and an understanding of expectations and responsibilities in relation to the schools filtering and monitoring systems. 	<ul style="list-style-type: none"> • Safeguarding Policy • Staff Code of Conduct • Children Missing Education Policy (Part of the Attendance Policy) • Part One of KCSIE and Annex B KCSIE for those working directly with children • Reference to the Online Safety Policy and AUP.

- Every visitor to the school will be given a set of our safeguarding procedures; they will be informed of who the DSL is and the DDSL, and what the recording and reporting system is.
- All members of staff, the Head, governors, and volunteers in regulated activity, will undertake appropriate safeguarding training at least annually. The DSLs and the DDSL will, in addition, attend multi-agency training courses run by Norfolk Safeguarding Children's Partnership at least once every three years, and will attend **DSL Training for Education** provided by the Local Authority every two years. DSL training also includes understanding about the different levels of need as set out by the Norfolk Safeguarding Children Partnership, Guidance to Understanding Continuum of Needs.
- All members of staff, the Head, and volunteers have training from the DSL at least annually, and training reflects new advice and statutory guidance. Updates are also communicated electronically and at staff briefings/INSET
- All members of staff, the Head, and volunteers in regulated activity read Keeping Children Safe in Education Part 1 and Annex B.
- All staff are trained to be aware of indicators of vulnerability to radicalisation, the 'PREVENT' strategy, and how the 'Channel' process works for Pupil School Guides taking prospective parents on a tour of the school, suitable training is delivered and guidelines for personal safety form part of the training.
- Our Governor responsible for Child Protection will also undertake appropriate training to ensure she is able to carry out their duty to safeguard all of the children at our school.
- The DSL will also provide regular safeguarding updates for staff, Head and volunteers.
- Governors and SLT read the whole of KCSIE every year.

8. Monitoring and Recording

It is important that all staff are engaged in active monitoring and are clear about the needs for written records in Safeguarding and promoting the Welfare of Children. Monitoring can help to identify abuse, even when none has been alleged or suspected.

Active monitoring

- A collective eye on a child's safety
- Consideration of what is happening to the family
- Attendance
- Appearance
- Mood and behaviour
- Relationship with peers
- Relationship with staff
- Health
- Play
- Writing or drawing
- Signs of further abuse
- Logging CPOMS notes

Attendance

The DSL works closely with the Attendance Officer and HSM to ensure that any patterns of poor or irregular attendance are addressed. More information on attendance may be found the School's Attendance Policy. Click [here](#). If Gresham's places a pupil with an alternative provision provider, we continue to be responsible for the safeguarding of that pupil. We follow the procedures, as set out in KCSIE (2025).

Early Help and Early Help Assessment and Planning

Early Help is a multi-agency process taking action to support a child, young person or their family early in the life of a problem, as soon as it emerges, and applies to any problem or need that the family cannot deal with or meet on their own. Staff should be particularly alert to the potential need for Early Help for a child who:

- Is disabled
- Has SEN (whether or not they have an EHC plan)
- Is a young carer
- Is showing signs of being drawn into anti-social or criminal behaviour
- Is misusing drugs or alcohol themselves
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is frequently missing/goes missing from care or from home
- Is at risk of modern slavery, trafficking, sexual and/ or criminal exploitation
- Is in a family circumstance presenting challenges for the child
- Has returned home to the family from care
- Is at risk of being radicalised
- Is bereaved
- Is viewing problematic and/or inappropriate online content, or developing inappropriate relationships online
- Is suffering from mental ill health
- Has a parent or carer in custody
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded

Contextual Safeguarding

Safeguarding incidents and behaviours can be associated with factors outside the school and can occur between children outside the school. All staff, but especially the DSL and DDSL should consider the context within which such incidents and behaviours occur, and whether children are at risk of abuse or exploitation in situations outside their families. This is known as Contextual Safeguarding.

Assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety/welfare. It is therefore very important that staff and the school provide as much information as possible as part of any referral process. 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.

All staff have a statutory duty to pass on any Child Protection concerns and to follow these School (and local LSCP) procedures:

- Be alert to signs of abuse.
- Take immediate action in the child's best interest by reporting any evidence of abuse or non-accidental injury to the DSL.
- Know the role of the DSL and School procedures.
- Enquire about the progress of individual cases in which they are/have been involved.
- Thereafter accept their restricted role as the case becomes the province of other agencies.
- Record accurately in writing, information that may be required in Child Protection procedures. This note should record the time, date, place and people who were present as well as what was said. All evidence, for example scribbled notes, mobile phones with text messages, clothing and computers must be

safeguarded and preserved. Also, make a note of what happened next.

Summary of Disclosure

No member of staff may keep a disclosure by a child confidential. The special position of the school Chaplain is recognised but there is a statutory responsibility on all staff to report any allegations immediately, and this includes the school Chaplain.

Alleged victims or perpetrators should not be interviewed by school staff to elicit further information. A detailed written record, which must be signed and dated, must be made by staff, of any allegation, however unpalatable, and presented to the DSL, DDSL, or the Head immediately.

9. Key Points to follow if you suspect, or are told of abuse

The following guidelines may be helpful. They were compiled by Dr Roger Morgan OBE, former Children's Rights Director.

- Adults looking after children or young people in schools (or in residential establishments or youth organisations) should be aware of the risks of abuse (by adults or other young people) and take steps to reduce those risks.
- Adults (staff or volunteers) in charge of children or young people should know what to do if they suspect that someone is being physically or sexually abused, or if someone tells them that this is happening. The following key points give a guide on what to do and not to do:
- Always stop and listen straight away to someone who wants to tell you about incidents or suspicions of abuse.
- If you can, write brief notes of what they are telling you while they are speaking (these may help later if you have to remember exactly what was said) – and keep your original notes, however rough, and even if you wrote on the back of something else (it's what you wrote at the time that may be important later – not a tidier and improved version you wrote up afterwards!). If you don't have the means to write at the time, make notes of what was said as soon as possible afterwards.
- Do not give a guarantee that you will keep what is said confidential or secret – if you are told about abuse, you have the responsibility to tell the right people to get something done about it (see below). If asked, explain that you will only tell people who absolutely have to know.
- Don't ask leading questions that might give your own ideas of what might have happened (e.g. 'did he do X to you?') – just ask "What do you want to tell me?" or "Is there anything else you want to say?".
- Immediately tell the person in charge of the school or group (unless they are themselves accused or suspected of abusing) – don't tell other adults or young people what you have been told.
- Discuss with the person in charge whether any steps need to be taken to protect the person who has told you about the abuse (this may need to be discussed with the person who told you).
- Never attempt to carry out an investigation of suspected or alleged abuse by interviewing people, etc. – the Children's Services Department of the Local Authority and police staff are the people trained to do this – you could cause more damage and spoil possible criminal damage proceedings.

- As soon as possible (and certainly the same day) the person in charge should refer the matter to Children's Services Department telephone number 0344 800 8014. Follow their requests about what to do next. They will set up any necessary investigations and can advise you – that is their statutory job. If someone has made an allegation about the adult in charge of the school or group, YOU should contact the LADO and ask for advice.
- Never think abuse is impossible in your school or group, or that an accusation against someone you know well and trust is bound to be wrong.
- Children and young people often tell other young people, rather than staff or other adults, about abuse – make sure that your senior young people know the points on this sheet as well as the responsible adults (e.g. prefects, cadre NCOs, young people leading activities for others).
- Bullying can develop into physical or sexual abuse – as can idiosyncratic punishments introduced by individuals: we have effective school practices to counter and monitor bullying and misuse of discipline.
- Be vigilant for early warning signs – such as favouritism, development of excessive one-to-one contact, increased involvement with changing or showering.
- Openly discuss within the staff group issues such as acceptable and unacceptable touching.
- Openly discuss with pupils, issues such as times of day or week, and locations in school, that are high risk for bullying or illicit activities.
- Be aware that children can be particularly vulnerable in residential settings and be alert to pupil relationships and the potential for peer abuse.

10. Reporting Procedure

A member of staff needs only reasonable cause for concern in order to act. One sentence from the child indicating abuse or non-accidental injury provides you with reasonable grounds and is sufficient for you to act. This may also apply if clear information comes from a sibling or another adult. However, as many of the signs of child abuse are also commonly associated with other medical, social or psychological problems, a member of staff may naturally wish to discuss some initial concerns with other staff. Concerns should be passed to the DSL without delay.

Staff with access to CPOMS (pastoral monitoring system) should create an incident and alert the DSL using the '*safeguarding referral to DLS*' tab. Alternatively, staff may use the reporting form found [here](#).

Safeguarding Pathways

- Concerns about children who have suffered or who are likely to suffer significant harm are reported to MASH immediately in accordance with procedures outlined in this policy.
- Concerns about children who are in need of additional support from one or more agencies are dealt with via inter-agency assessment using local processes, including use of the Early Help Assessment and Planning (a shared assessment and planning framework for professionals who work with children and families) and Team around the Child (TAC) approaches.

Child Protection Referrals – CADS and MASH

- Where an agency/organisation or worker has concern for the welfare of safety of a child, the initial call should be to the Children's Advice and Duty Service (**CADS**) Tel: 0344 800 8021.
- Norfolk Children's Advice and Duty Service (CADS) is made up of a team of Consultant Social Workers who have had specialist training and use a coaching style to empower partners to be more confident in working with families and meeting needs. The Consultant Social Workers will provide advice, support and signposting, identifying the correct services and support for the child or young person.
- If a child is at risk of immediate harm the information will be shared within the Norfolk Multi-Agency Safeguarding Hub (MASH). The Consultant Social Worker handling the call will maintain oversight of the contact.

11. Working with Parents and Carers

- Gresham's is committed to working in partnership with parents/carers to safeguard and promote the welfare of children and to support them to understand our statutory responsibilities in this area.
- When new pupils join our School, parents and carers will be informed that we have a safeguarding policy. A copy will be provided to parents on request and is referenced in the school prospectus. It is available on the school website
- We are committed to working with parents positively, openly and honestly. We ensure that all parents are treated with respect, dignity and courtesy. We respect parents' right to privacy and confidentiality and will not share sensitive information unless we have permission for it, or it is necessary to do so in order to safeguard a child from harm.
- We will seek to share with parents any concerns we may have about their child **unless** to do so may place a child at increased risk of harm. A lack of parental engagement or agreement regarding concerns the school has about a child will not prevent the DSL making a referral to Children's Services in those circumstances where it is appropriate to do so.

12. Safeguarding concerns and allegations made about staff, including supply teachers, volunteers, and contractors

These relate to: a member of staff who has behaved in a way that has harmed a child, or may have harmed a child; possibly committed a criminal offence against or related to a child, behaved or may have behaved towards a child/children in a way that indicates he/she is unsuitable to work with children, behaved towards a child/children in a way that indicates he or she may pose a risk of harm to children. There is also the consideration of transferable risk; this relates to incidents outside of School which do not involve children but may impact on a member of staff's suitability to work with children.

Our aim is to provide a safe and supportive environment which secures the well-being and very best outcomes for the children at our school. We do recognise that sometimes the behaviour of adults may lead to an allegation of abuse being made. Allegations sometimes arise from a differing understanding of the same event, but when they occur, they are distressing and difficult for all concerned. We also recognise that many allegations are genuine and there are some adults who deliberately seek to harm or abuse children.

Teachers and school staff must protect themselves, and staff should bear in mind that even perfectly innocent actions can sometimes be misconstrued. Children may find being touched uncomfortable or distressing for a variety of reasons. It is also important not to touch pupils, however casually, in ways or on parts of the body that might be considered indecent. See also Staff Handbook.

The Sexual Offences Act, 2003 states that it is a criminal offence for a person aged 18 or over in a position of trust in a school to engage in any sexual activity with a person under the age of 18 (in that school) irrespective of the age of consent, even if the basis of their relationship is consensual. In circumstances which involve an allegation against a member of staff, the responsibility for dealing with the matter lies with the Head.

- Allegations against staff, Gap students, supply teachers or volunteers should be reported immediately to the Head or to Children's Services, but you must keep the DSL informed. If the Head is absent, the allegation should be passed to the member of staff acting as Head. If the allegation concerns the Head, the person receiving the allegation should immediately inform the Chair of Governors without notifying the Head first. The Chair of Governors must then contact the LADO immediately for advice. If the allegation is against the DSL, it should be reported to the Head. In the case of serious harm, the police should be informed from the outset. This will always be in accordance with the statutory DfE guidance and Norfolk Safeguarding Children's Partnership Protocol 27, and in any such matters the school will also inform and seek advice from the LADO.

If a safeguarding allegation is received against any organisation or individual using the school premises for the purpose of running activities for children (for example community groups, sports associations/camps, language schools), we will follow the same procedures and policy as we would with any safeguarding allegation, including informing the LADO. The following guidance should be referred to: [Keeping Children safe in out of school settings](#)

- When hiring or renting the facilities and premises at Gresham's we require assurances that the hirer has appropriate safeguarding and child protection policies and procedures in place (with the ability to inspect these as needed).

Immediate suspension of the member of staff is only one of a number of options, which will be considered. Others include leave of absence or providing a classroom assistant or colleague to be present in contact time. A member of staff in such circumstances will be advised of appropriate support, for example from his/her trades union, or a colleague contact.

- In the event of a member of boarding staff suspended pending investigation of a child protection nature, the school will ensure that satisfactory alternative accommodation arrangements have been made.
- In the event of an allegation being made against a teacher, the Head will immediately take advice from and refer the matter to the Local Authority Designated Officer (LADO). Initial contact should be to the Duty Desk on **01603 307797**. The school will not undertake its own investigations without prior consultation with the LADO.
- The role of the LADO is to give advice and guidance, liaise with the DSL, the Head, the Police and other agencies as necessary, and to oversee, manage and monitor the progress of the case to ensure that it is dealt with as quickly as possible consistent with a thorough and fair process.
- If the Head is wholly satisfied that the child or children is/are not at risk of significant harm and that a reportable criminal offence has not been committed, he will consider the separate need for disciplinary action. In that case, an investigation at School level would be necessary, but not without advice from or referral to the LADO.
- There is a requirement of the school to report to the Disclosure and Barring Service (DBS), within one month of leaving the school any person (whether employed, contracted, a volunteer or student) whose services are no longer used because he or she is considered unsuitable to work with children. Failure to make a report constitutes an offence.
- In the above context, ceasing to use a person's services includes: dismissal, nonrenewal of a fixed-term contract, no longer engaging/refusing to engage a supply teacher provided by an employment agency, terminating the placement of a student teacher or other trainee, no longer using staff employed by

contractors, no longer using volunteers, or resignation and voluntary withdrawal from supply teaching, contract working, a course of initial teacher training or volunteering.

- There are restrictions on the reporting or publishing of allegations against teachers and every effort will be made to maintain confidentiality and guard against unwanted publicity. These restrictions apply up to the point where the accused person is charged with an offence, or the DfE/Teaching Regulation Authority (TRA) publish information about the investigation or decision in a disciplinary case.
- As an independent School, we are also under a duty to consider making a referral to the Teaching Regulation Authority where a teacher has been dismissed (or would have been dismissed had he/she not resigned) and a prohibition order may be appropriate. The reasons such an order would be considered are: "unacceptable professional conduct", "conduct that may bring the profession into disrepute" or a "conviction at any time, for a relevant offence". Further guidance is published on the GOV website by clicking the link [TRA](#). Where a dismissal does not reach the threshold for DBS referral separate consideration will be given to a TRA referral.
- Details of any allegation following an investigation that are found to have been malicious or false will be removed from personnel records unless the individual gives their consent for retention of the information. Gresham's follows the KCSIE 2025 guidance in accordance with this and refers to [The Information Commissioner Employment Practices Code](#).

Occasionally false allegations of abuse are made. To avoid as far as possible such an allegation, and situations which may give rise to misinterpretation, staff should be guided by the following advice:

- Avoid whenever possible unobserved situations of one-to-one contact with a child. If they are unavoidable, always keep a door open and try to ensure you are within the hearing of others. The exception is one-to-one music lessons which take place in sound-proofed rooms, these rooms have a clear glass panel in the door and clear windows, with music lesson timetables with teachers' names clearly displayed in the department.
- Do not offer to transport children alone in your car without seeking advice and telling another colleague that this is what you propose to do.
- Do not engage in or allow any sexually provocative games whether based on talking or touching or engage in 'horseplay' involving children.
- Never make suggestive remarks or discriminatory comments to a child.
- Do not enter a room where a child may be changing his/her clothes or not be fully dressed without first getting his/her clear consent to enter.
- Never engage in inappropriate electronic communication (such as Facebook or Twitter, etc.) with a pupil.
- Avoid 'favouritism' and singling out 'troublemakers'.
- Never trivialise child abuse.

Also see [Policy for Reasonable Force and Restraint of Pupils](#)

Guidance on physical touch in Sport can be found in the staff handbook

Guidance on physical touch in Music can be found in the staff handbook

Low-level Concerns

Concerns may be graded Low-level if the concern does not meet the criteria for an allegation; and the person has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Example behaviours include, but are not limited to:

- being over friendly with children

- having favourites
- taking photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

Low level concerns should be reported to the DSL as set out above in relation to concerns and allegations that meet the harm test. At the Senior School they may also be reported to the Deputy Head Pastoral (DDSL). The Head will be informed of all low-level concerns.

If the concern has been raised via a third party, the DSL will collect as much evidence as possible by speaking: directly to the person who raised the concern, unless it has been raised anonymously; to the individual involved and any witnesses.

Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Staff should be encouraged and feel confident to self-refer, where, for example, 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.

Low-level concerns should be recorded in writing, including:

- name* of individual sharing their concerns
- details of the concern
- context in which the concern arose
- action taken

(* if the individual wishes to remain anonymous then that should be respected as far as reasonably possible)

Records must be kept confidential and comply with the Data Protection Act 2018. The school will retain this information at least until the individual leaves their employment. Records will be reviewed by the DSL and the Head so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO.

The records' review might identify that there are wider cultural issues within the school or college that enabled the behaviour to occur. This might mean that policies or processes could be revised, or extra training delivered to minimise the risk of it happening again.

13. Procedures specific to Safeguarding in EYFS

This Safeguarding Policy details the procedures in place to safeguard all children, including those in the EYFS; additional details, specific to safeguarding in the EYFS, are found in the box below

Personal Mobile phones and other devices that accept calls, messages and video calling

All staff, volunteers and visitors working with children at the Pre-Prep are provided with a secure locker to store their personal mobile devices whilst in the building. Staff are permitted to wear smartwatches or a fitness tracker, on the basis these devices do not have an in-built camera. We advocate health and well-being of our staff and understand that these devices can be used to record daily physical activity etc. Smartwatches and some fitness trackers have the ability to show notifications of calls and texts, but this

feature must be turned off when worn by staff working directly with children. We use mobile phones supplied by the school to provide a means of contact in certain circumstances, such as outings. Photographs are only taken with school cameras and equipment and not with private cameras or devices. The EYFS devices will not have any social media or messaging apps on them, other than the one recognised by Gresham's. Parents/carers or other visitors to the school may not take photographs of children in any part of the school building or grounds school using personal cameras or mobile phones except at performances of plays in the Pre-Prep Hall or on Sports Day in the summer term. Photographs taken on these occasions must not be shared or posted on the internet e.g. on social networking sites etc. Members of staff, parent helpers in school, e.g. members of the Friends of Gresham's (FOGs), or parents/carers or other members of the family assisting on outings or visits must not use their personal cameras or mobile phones to take photographs and must only use their mobiles on a school visit in an emergency.

Reporting to Ofsted

Gresham's Pre-Prep will notify Ofsted of any allegations of serious harm or abuse by any person living, working or looking after children within Gresham's Schools, including if these allegations relate to harm or abuse committed in another location. We will inform Ofsted of the nature of these allegations and the action taken within 14 days of the allegation being made. We will notify Ofsted and our local child protection agency of any serious accident or injury to, or the death of, any child while in our care, and will act on any advice from those agencies. We will report any incident within 14 days.

14. Whistleblowing

We will work for a culture of safety and of raising concerns as they arise. It is particularly important in the context of Child Protection. Staff have a statutory duty to report concerns that a child is at risk of abuse, is being, or has been abused, to the DSL. This is because the interests of the child are paramount. However, fear of reprisal is a real issue for staff in reporting abuse by colleagues. The Public Interest Disclosure Act (PIDA) 1998 provides protection against victimisation for persons who, acting in good faith, raise concerns about a wide variety of malpractices in the public interest. Ofsted offer impartial advice and guide on a special 'Whistleblowing' Helpline 0300 1233155. You may also contact the independent charity '[Protect](#)' for impartial advice and support.

When establishing the validity of any cause for concern care will be taken:

- To protect the whistleblower
- To avoid alerting anyone about whom a concern has been raised
- To avoid alerting other colleagues who may warn the subject of the concern
- To record the information
- To keep all records secure and confidential

Click the link to view the entire [Whistleblowing policy](#)

15. Consultation/Referrals

If the DSL receives allegations or has suspicious of abuse, or needs advice, they will inform the Children's Advice and Duty Service, or the Police directly if it is an allegation or serious criminal offence, within 24 hours of his concerns. If the consultation/referral is by telephone, a written confirmation will be made. If the case meets the criteria for eligibility, the Children's Advice and Duty Service will make background enquiries, including with the police. If the concerns appear well founded, a strategy discussion will follow, normally within two working days. At this point a decision will be taken either to proceed with an S47 enquiry/criminal investigation or not. If the concerns are substantiated and the child is deemed at

continuing risk of significant harm, a Child Protection Conference will be convened.

The school will also:

- Take any necessary steps for the longer-term protection and support of each pupil who has made allegations of abuse, or is alleged to have suffered from abuse, taking his or her wishes fully into account. This may involve the pupil receiving continuing support and protection from a staff member chosen by him/her, or changing boarding accommodation, or returning to his/her parents temporarily.
- Take any necessary steps to protect and support a pupil who is alleged to have abused another. The allegation may not later be substantiated, but even if it is, the school continues to have a statutory welfare responsibility towards this pupil while he/she is at the school. Ensure that any pupil being interviewed by the police has available a supportive member of staff of his/her own choice to accompany him/her if this becomes necessary.
- Take any necessary steps to support a member of staff against whom an allegation has been made, in addition to protecting their anonymity, for example, offers of external counselling and appropriate reasonable support (including medical) could be considered.

Protocol for Searching for a Missing Pupil

In the event of a pupil being unaccountably absent, staff will:

Senior School

- Question close friends as to known destinations/suspicions and contact the Housemaster/mistress
- Check pupil's study for personal items to make an assessment of gravity of a situation.
- Check with all other Houses and School grounds -.
- Try to make phone contact (use the phone of a friend if possible).
- Assemble House if growing concern - to make further enquiries.
- Contact: Headmaster, Deputy Head Pastoral, The DSL, Parents, Police - for information.
- A local area search may be in order, but only if the House is covered.

A boarder unaccounted for at night beyond the normal lockup time or unaccounted for at the weekend should be treated as a serious and reportable incident.

In the event of a pupil not being collected from School, Housemaster/mistress will:

- Contact parents and emergency contacts for further information.
- Make DSL and Deputy Head Pastoral aware of situation.
- Housemaster/mistress will take responsibility for finding a temporary boarding space if necessary.

If the pupil is not collected when School is closing at the end of term the Housemaster/mistress will make suitable arrangements within one of the boarding houses or with emergency contact/local guardians, until the pupil can be collected, or arrangements satisfactorily made to transport pupil home (flights, taxis, trains etc.)

- DSL to refer to Children's Advice and Duty Services if appropriate.

Prep School

If a pupil is missing from roll-call or from class without permission and the teacher has no knowledge of the pupil's whereabouts, the procedures should be as follows.

- Teacher sends a pupil to School Secretary to inform of absence (or phones Office if mobile available)
- School Secretary checks with:
 - Music lesson list and Learning Support timetable in the Office or Common Room
 - Team sheet for away matches and Field Trip sheets in the Common Room
 - Absentee list outside Library
 - Primary First Aider in the Medical Room
- School Secretary contacts Head or Deputy Head (or Deputy Head Academic or Assistant Head if not available) who designates available staff to begin search of:

Prep School Buildings:

Route A: Music School, Practice Rooms, Hall, Sheds, Butterwick Centre

Route B: Library, Rooms 12, 13, 14, 15 and Classroom Block,

Route C: Kenwyn all areas upstairs and down, plus boiler room steps, bike sheds

Route D: Crossways all areas upstairs and down

Playing Fields Including Kenwyn Lawn, Hedges, Colts Field, Cricket Pavilion, Walled Garden.

Pre-Preparatory School and OSH Buildings: All areas outside, around Laundry and Pre-Prep car parks

- Head or Deputy Head consults past history of absent pupil and any previous incidents recorded. Searches appropriate areas. Sends a car or cars out to search surrounding roads. If not found within 30 minutes: Contacts parents, Contacts police.
- Once pupil is found, Head or Deputy Head interviews pupil and any others involved, including relevant house staff and other members of staff, to ascertain reasons for the incident. Deals with the pupil in an appropriate manner and records details on pupils' area of SIMS. If deemed necessary, informs parents.

Procedure for locating absentees from Activities

- Check absentee list
- Check play rehearsal or any other activity that might have caused absence
- Check houses, by phone or in person
- Inform the Head or Deputy Head if they are present
- Ring home if Head or Deputy Head is not able to
- If parents do not know of whereabouts of pupil inform Head (07824996343) or Deputy Head (07881924478).

Procedure for locating absentees after Activities

- If a boarder is discovered to be missing out of school time, the housemaster or housemistress should be informed immediately, and he or she should instigate a search as above. The Head or Deputy Head should be informed as quickly as possible.

Nursery and Pre-Prep School

Children's safety, and welfare are maintained as the highest priority at all times both on and off premises. Every adult who works at the school has been trained to appreciate that he or she has a key responsibility for helping to keep all of the children safe at all times. Our staffing ratios are within the EYFS statutory requirements to ensure that every child is supervised the whole of the time. Every attempt is made through carrying out the *outing's procedure* and the *collection procedure* to ensure the security and safety of children at all times. In the unlikely event of a child going missing our procedures are as follows.

- Once a child is confirmed as missing, a senior member of staff will be informed (Head, Deputy, EYFS Lead)
- Immediate areas will be searched by senior members of staff, who will also inform the school office to alert other staff around the school.
- After conducting an immediate search of the school and grounds, if the child has not been found- the school office will be asked to telephone the police. The senior member of staff in charge will then liaise with the police, providing all requested information.
- If on a trip outside school, the senior staff member present will telephone the school to inform them and all procedures to alert the police will be followed from the school. The senior member of staff in charge will then follow directions from the police.
- Parents concerned will be telephoned by the school office
- Following the incident, a report will be written and Risk Assessments reviewed by Senior staff. If deemed necessary Ofsted/ISI will be informed and provided with incident reports.

Collection after School

- When someone other than one of the main named carers is collecting a child, we ask that we are informed daily when they bring the child to Pre-Prep – or by contacting the school office during the day If there is any cause for concern or clarification, the parent will be contacted before the child is released to anyone's care.
- If a parent has not informed us that someone else is collecting, we will not allow the child to leave without first checking with the parent.

In the event of a child not being collected, the following steps should be taken:

- If it is at the end of the school day, reassure the child and settle them in After School Club.
- Check if a message has been received by the office.
- Ask the office to telephone the child's carers.
- Ask the office to contact the emergency contacts for the child
- If the office is closed, the staff member in charge should gain the child's contact details from the school database, and emergency contacts details from the child's collection form.
- If no contact is made with the child's carers, Inform the Head of Pre-Prep or another member of the Senior Management Team on site, who will assume responsibility for the child if he / she has not been collected by the end of After School Club.
- If necessary, arrange for the child to have supper at the Prep School.
- If the child's carers have not been traced by supper time the Resident senior staff should assume responsibility for the child and the Police informed.

16. Record Keeping and Storage

Child Protection records are kept securely by the DSL, in electronic format, on CPOMs, separately from other pupil records. Safeguarding records may only be viewed by the DSL/DDSLs who may choose to share appropriately with other staff if it is in the best interests of the child.

17. Compliance

The school policy is regularly updated in order that we comply with new legislation and good practice. Currently the School's policy for Child Protection is consistent with, and so reinforces:

- Working Together to Safeguard Children (2023) (WTSC)
- Keeping Children Safe in Education (September 2025) (KCSIE)
- The Children Act 1989 & 2004
- The Education Act 1996 S549 banning corporal punishment
- The Education Act 2002 S157
- Boarding Schools National Minimum Standards Regulations
- Safer Working Practices for Adults who Work with Children and Young People in Education Settings, 2019
- The specific procedure for Child Protection as prescribed by the Norfolk Safeguarding Children's Partnership
- The UN Convention on the Rights of the Child, which contends that all children have an inalienable right to protection from harm.
- Human Rights Act 1998.
- The Prevent Duty 2022
- Freedom of Information Act 2000.
- OFSTED
- Sexual Offences Act 2003
- Education and Inspections Act 2006 (from 1st April 2007) SS88-99 (School Discipline & Pupil Restraint)
- Safeguarding Vulnerable Groups Act 2006 (in force from 2008) Vetting and barring.
- Equality Act 2010
- ISI (Independent School Inspectorate)
- Data Protection Act 2018.

18. Flow Chart for Raising Safeguarding Concerns about a Child



